

Avalon Project

DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

PREPARED BY: CITY OF FORT BRAGG



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CITY OF FORT BRAGG

Incorporated August 5, 1889

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DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

PROJECT TITLE:	Avalon Hotel
APPLICATION NO.:	Coastal Development Permit 1-13 Use Permit 1-13 Design Review Permit 1-13 Parcel Merger 1-13
LEAD AGENCY:	City of Fort Bragg 416 N Franklin Street Fort Bragg, CA 95437
CONTACT:	Sarah McCormick, Assistant Planner Community Development Department (707) 961-2827 x113
PROJECT LOCATION:	1201 and 1211 N Main Street
PROPERTY OWNER:	Robert Hunt
PROJECT APPLICANT:	Hunt InnVestments
PROJECT AGENT:	Wynn Coastal Planning
COASTAL LAND USE AND DEVELOPMENT CODE DESIGNATION; AND COASTAL GENERAL PLAN DESIGNATION:	Highway Visitor Commercial (CH)

CEQA REQUIREMENT

The proposed project is subject to the requirements of the California Environmental Quality Act (CEQA). The Lead Agency is the City of Fort Bragg. The City prepared an Initial Study to provide a basis for determining whether to prepare a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report.

Following the Initial Study, the City drafted mitigation measures and prepared this draft Mitigated Negative Declaration to be circulated to responsible and trustee agencies, the County Clerk, and made available to the public for a 30-day review period, prior to the Fort Bragg Planning Commission conducting a public hearing. At the close of the public hearing, the Mitigated Negative Declaration will be considered for adoption.

PUBLIC AGENCIES CONSULTED

- Sherwood Valley Band of Pomo
- California Coastal Commission
- California State Parks
- California Department of Fish and Wildlife
- Caltrans
- North Coast Regional Water Quality Control Board
- Mendocino County Building and Planning
- Fort Bragg Fire Department

DISCRETIONARY ENTITLEMENTS

The following discretionary approvals are required by the City of Fort Bragg for approval of the proposed project:

- CEQA Document Certification. The outcome of this Initial Study has revealed the project will require a Mitigated Negative Declaration (MND) that will be circulated for review by trustee agencies and the public before consideration to adopt.
- Coastal Development Permit. Coastal development permit review ensures the proposed project compliance with the California Coastal Act, the City's certified Local Coastal Program, and the California Code of regulations Title 14 Division 5.5.
- Use Permit. The use permit approval process ensures the project is compatible with surrounding land uses. The proposed project would need Use Permit approval for land uses "Lodging – Hotel or Motel", and "Meeting Facility, Public or Private", in addition to approval of 35-foot height limit, reduction of six (6) parking spaces and reduction of loading zones.
- Design Review. The design review process would describe the specific design color, materials, parking, and landscaping for the project to ensure that the design of the proposed development would enhance the small town, coastal, historic character of the community.

- Parcel Merger. A Parcel Merger would merge two contiguous parcels in compliance with the Subdivision Map Act. A trail for public access purposes, from MacKerricher State Park Haul Road through the project site to CA Highway 1 would be dedicated as part of the parcel merger process.

In addition, the proposed project would require ministerial approvals, including but not limited to grading, building and encroachment permits.

SURROUNDING LAND USES

WEST:	Open Space (MacKerricher State Park)
SOUTH:	Lodging - Motel (Ocean View Lodge)
NORTH:	Manufacturing Processing (Geo Aggregates)
EAST:	Construction Contractor Base (Caltrans Maintenance Yard)
	Outdoor Storage/Office (Suburban Propane)

The subject parcels are located in the Coastal Zone in the Highway Visitor Commercial zoning district. Highway Visitor Commercial (CH) is designated for areas along CA Highway 1 and adjacent arterials at entryways to the community. Typical uses include lodging, restaurants and retail stores.

The area of Highway 1 south of the site to Pudding Creek is comprised of three existing motels and a public parking lot for MacKerricher State Park. MacKerricher State Park stretches along the Mendocino coastline from Glass Beach to Ten Mile River with a multi-use public trail known as the Haul Road. Land to the east is designated Light Industrial (IL) zoning with a Caltrans Maintenance Station and Suburban Propane office with outdoor storage. Land immediately north is zoned Heavy Industrial (IH), and is the site of Geo Aggregates, a ready-mix concrete and asphalt supplier.

BRIEF PROJECT SUMMARY

The Avalon Hotel Project proposes the merger of two parcels and development of approximately 46,490 SF of commercial use: a 65-unit hotel (comprised of three 3-story buildings, with maximum heights of 35 feet); Restaurant and Cocktail Bar/Lounge (both located in one of hotel buildings); accompanying Event Center (separate, detached single-story building); and associated parking lot and infrastructure.

The project also includes restoration activities in wetlands and wetland buffers to improve functionality and biodiversity. Activities include, but are not limited to the following: targeted removal of invasive plants; installation of appropriate native plants; ripping and amending hard compacted substrate in portion of northern wetland buffer; minor recontouring with hand tools to improve site hydrology.



Image 1: Regional Location Map

Project Background

In June 2007, a fire damaged the 18-room Hi-Seas Inn located at 1201 N Main Street and the Baxman cottage located at 1211 N Main Street. Both structures were subsequently demolished in 2008 with approval of Coastal Development Permit 7-08 (CDP 7-08). Soon thereafter, the applicant and owner of the former Hi-Seas proposed a condo/hotel development (48-rooms that would convert to 24 two bedroom condos), with restaurant, bar, pool, fitness center and other

amenities. The proposed project was larger than City regulations would allow and the developer began the process to amend the Local Coastal Program (LCP) in order to increase floor-area-ratio (FAR) and raise the maximum square footage permitted.

However, this application to amend the LCP was ultimately withdrawn in favor of purchasing the adjacent parcel, thereby increasing the parcel size and allowable envelope for development. In order to accommodate this transaction, Baxman Gravel Co., Inc., applied for a lot line adjustment in 2014, to authorize the transfer of 9,000 square feet from APN 069-241-33 to APN 069-241-04, which was approved by Planning Commission with Coastal Development Permit 8-14 (CDP 8-14) and Lot Line Adjustment 4-14 (LLA 4-14). The newly configured APN 069-241-38 was then purchased by the applicant.

During this process, the development concept was refined, changing from a 48-room condo/hotel with a variety of amenities, to a 65-room hotel with restaurant, bar and event facility. The original concept was submitted in 2013, and the current design was submitted in 2015, and again in 2018; each submission further refining and modifying the project to address concerns/issues raised by reviewing agencies.

The Avalon application was deemed complete on November 14, 2019. The project requires a Coastal Development Permit, Design Review, Use Permit, and Parcel Merger approval by the Planning Commission and is appealable to the City Council and California Coastal Commission.



Image 2: Local Vicinity Aerial Map

Site Overview

The 3.65-acre project site is located north of Pudding Creek on CA Hwy 1 / N Main Street in the Coastal Zone of Fort Bragg. Immediately south of the site, to Pudding Creek, are three existing motels and a public parking lot for MacKerricher State Park. Immediately north of the project site is a ready-mix concrete and asphalt supplier. In the westerly direction, MacKerricher State Park stretches along the Mendocino coastline from Glass Beach to Ten Mile River. Land to the east is designated Light Industrial (IL) zoning with a Caltrans Maintenance Station and Suburban Propane office with outdoor storage.

The project site was previously developed and contains a garage/shed, asphalt driveway and parking lot. The site is generally flat, sloping in a westerly direction toward two wetland areas on the northwest and southwest portion of the property.



Image 3: View of project site from Haul Road, looking southeast

Previous Uses

The project site is currently two parcels that are proposed to be merged into one. The parcel to the south (APN 069-241-27) is 2.40-acres and the location of the former Hi- Seas Motel; the parcel to the north (APN 069-241-38) is 1.25-acres and the former site of the Baxman cottage. The land the cottage was situated on was used by Baxman Gravel Co. for the intermittent storage of gravel, resulting in severely compacted ground. In 2007, both structures were damaged in a fire and subsequently demolished in 2008 with the approval of Coastal Development Permit 7-08.



Image 4: Coastline Aerial with Former Hi-Seas Motel and Baxman Cottage



Image 5: Coastline Aerial with Simulation of Avalon Project

Zoning

The project site is designated Highway Visitor Commercial (CH), which is the zoning designation for areas along CA Highway 1 and at entryways to the community. Land uses of the CH zoning district are intended to serve residents and visitors, and typical uses include lodging, restaurants and retail.

Requested Uses

The applicant is proposing development of approximately 46,490 square feet of commercial use: hotel; restaurant; bar; and event center. The proposed hotel would consist of 65 rooms within three separate, three-story buildings. The proposed restaurant and bar would be located in one of the buildings; the restaurant situated on the first floor with sixty-three (63) seats, and the cocktail bar/lounge would accommodate twenty-eight (28) seats with both indoor and outdoor patio area on the second floor. A 3,064 square foot Event Center would be located in a separate structure.

Use	Square Feet	Occupancy	Characteristics
Hotel	41,952 SF	65 rooms	Located in Building 1, 2, 3 three stories, maximum height 35 feet
Restaurant	660 SF	63 seats	Located in Building 1 ground floor
Cocktail Bar / Lounge	814 SF	28 seats	Located in Building 1 second floor, indoor/outdoor seating
Event Center	3,064 SF		Located in separate single story, detached building

Table 1: Avalon Project Summary

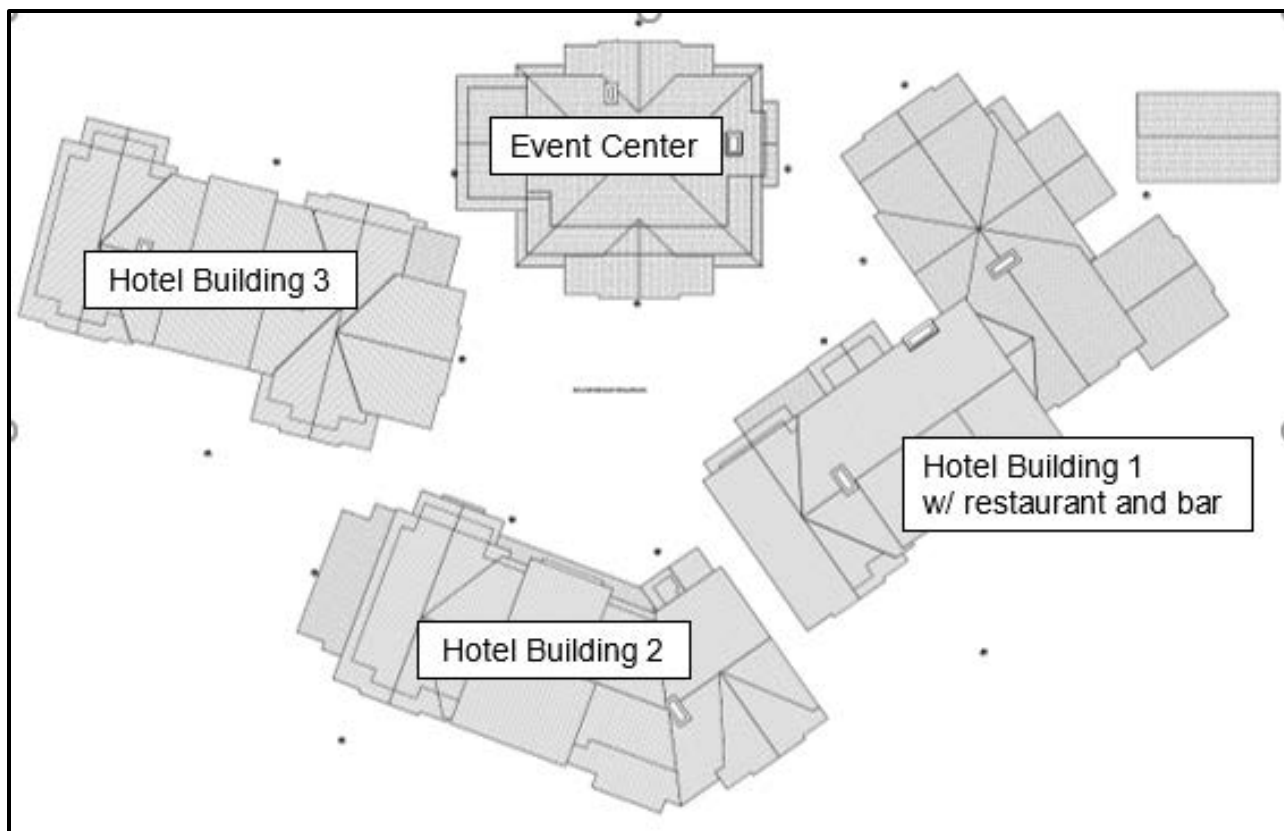


Image 6: Roof Plan – Entitlement Set Sheet A4-1



Image 7: Proposed Project with Haul Road in Foreground



Image 8: Site Layout

Parcel Merger

A parcel merger is proposed in order to merge APN 069-241-27 (2.40 acres) and APN 069-241-38 (1.25 acres) into one parcel totaling approximately 3.65 acres.

Coastal Resources

The project is designed to protect coastal resources as required by the Coastal Act and the City's Local Coastal Program through the following measures:

- **Protect Public Views:** The project maintains 35% of the frontage to protect public views to the ocean;
- **Provide Public Access:** A pathway for the benefit and the enjoyment of the public to pass through the property, connecting CA Hwy 1 / N Main Street to the Haul Road would be provided as part of the deed;
- **Restoration and Enhancement of Habitat:** The project includes restoration of wetland buffers and wetlands;
- **Coastal Resource Education:** The project includes interpretive panels along the public access trail to highlight wetland features and narrate the history of the area

from Native American habitation to the modern day, as well as written materials for hotel guests; and

- Visitor Serving Uses: The proposed hotel would offer overnight lodging to those visiting the area.

Hotel Operational Characteristics

The hotel is expected to be open for business 7 days per week, 24 hours per day. The restaurant and bar would serve hotel guests and visitors; the event center would be available exclusively to hotel guests for events such as conferences and weddings.

Site Access and Parking

- Vehicular Access. The proposed project would be served from two driveways off CA Hwy 1 / N Main Street. Pavement striping would be modified to accommodate a left-hand turn lane for northbound traffic entering the project's southerly driveway;
- Pedestrian Access. The project site is adjacent to the Haul Road, a multi-use trail stretching the coastline of MacKerricher State Park and linking up to Fort Bragg's Noyo Headlands Park coastal trail. A pathway for the benefit and the enjoyment of the public to pass through the property, connecting CA Hwy 1 / N Main Street to the Haul Road would be provided as part of the deed;
- Parking. The proposed development would provide 75 vehicular parking spaces, two (2) motorcycle parking spaces and fifteen (15) bicycle parking spaces for hotel guests. Electric Vehicle (EV) charging would be available for six (6) vehicles. The applicant is requesting a reduction from the required 81 parking spaces, to 75 parking spaces (six (6) parking space reduction); and
- Loading. The proposed development provides one (1) loading zone. The applicant is requesting a reduction of loading areas, based on experience of other lodging establishments.

Utilities

The installation of utilities to include: undergrounding existing electrical lines; placing a 500-gallon underground propane tank; and connections to City services (water, sewer, storm-water systems). City infrastructure does not have adequate pressure for fire suppression system and will only serve domestic water needs. The project would utilize off-site water storage tanks dedicated solely to fire suppression, with 120,000 gallons of capacity and 1,000 gallons per minute.

INTENDED USES OF THIS DOCUMENT

This Initial Study (IS) has been prepared to determine the scope and level of detail required in completing the environmental document analysis for the proposed project. Comments or questions should be sent to:

Sarah Million McCormick
City of Fort Bragg
Community Development Department
416 N Franklin Street
Fort Bragg, CA 96547
Phone: (707) 961-2827 x113
Email: smccormick@fortbragg.com

ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
<input checked="" type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture Resources	<input checked="" type="checkbox"/>	Air Quality
<input checked="" type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input checked="" type="checkbox"/>	Geology/Soils
<input checked="" type="checkbox"/>	Hazards & Hazardous Materials	<input checked="" type="checkbox"/>	Hydrology/Water Quality	<input checked="" type="checkbox"/>	Land Use/Planning
<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population/Housing
<input checked="" type="checkbox"/>	Public Services	<input checked="" type="checkbox"/>	Recreation	<input checked="" type="checkbox"/>	Transportation/Traffic
<input type="checkbox"/>	Utilities/Service Systems	<input checked="" type="checkbox"/>	Mandatory Findings of Significance		

An explanation for all checklist responses is included, and all answers take into account the whole action involved and the following types of impacts: off-site and on-site; cumulative and project-level; indirect and direct; and construction and operational. The explanation of each issue identifies the mitigation measure identified, if any, to reduce the impact to less than significance. All mitigation measures are provided in the Mitigation Monitoring and Reporting Program (MMRP) (Appendix 9 - MMRP).

In the checklist the following definitions are used:

"Potentially Significant Impact" means there is substantial evidence that an effect may be significant.

"Potentially Significant Unless Mitigation Incorporated" means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.

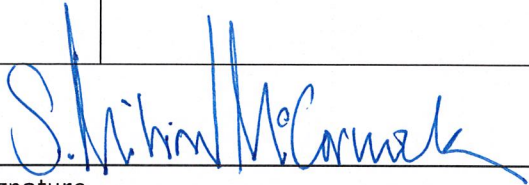
"Less Than Significant Impact" means that the effect is less than significant and no mitigation is necessary to reduce the impact to a lesser level.

"No Impact" means that the effect does not apply to the proposed project, or clearly will not impact nor be impacted by the proposed project.

ENVIRONMENTAL DETERMINATION

On the basis of this evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
		<u>3/25/2020</u>
Signature		Date
Sarah Million McCormick, Assistant Planner Printed Name		City of Fort Bragg For

ENVIRONMENTAL ISSUES

I. Aesthetics

AESTHETICS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

AESTHETICS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. A scenic vista can be defined as a viewpoint that is visually or aesthetically pleasing, which often provides expansive views of a highly valued landscape for the benefit of the public. The proposed site is located on the west side of CA Hwy 1/N Main Street with unobstructed views to the ocean. The two-lane state highway does not have sidewalk facilities nor paved bicycle lanes, however cyclists and occasional pedestrians utilize the shoulder. Generally, pedestrian and cycling traffic opt to use the Haul Road, which provides a safer route with expansive and unobstructed views of the bluffs and ocean.

The proposed development is situated and designed to protect blue water views through the site by retaining at least 30-percent of the street facing façade free of view blocking development.



Image 9: Looking west through proposed parking lot



Image 10: Existing view from N Main Street, looking southwest. See Image 11, below



Image 11: Proposed project (underground electric) from N Main Street, looking southwest



Image 12: Photo simulation traveling from the north



Image 13: Photo simulation traveling from the south



Image 14: Airport Road intersection with (former) Hi Seas Motel



Image 15: Airport Road intersection with no development (current)



Image 16: Airport Road intersection with (proposed) Avalon project

Images 14, 15 and 16 depict the view as one travels in a westerly on Airport Road to CA Hwy 1 / N Main Street intersection prior to the former Hi-Seas Motel fire, the existing view, and a simulation with the proposed project. Airport Road primarily offers views to vehicle passengers. Airport Road is a public road, although it does not connect to any through roads, primarily serving residents. Views would be impacted at this intersection; however, this intersection is not considered a scenic vista.

As the project is situated, approximately 35% of site's frontage would be free of view blocking development, offering views of the ocean for those traveling along CA Hwy 1 / N Main Street. Public views of the ocean from the Haul Road would not be impeded as a result of the proposed project. The proposed project maintains a substantial view corridor through site that provides blue water views to those traveling along CA Hwy 1 / N Main Street and thus, would have a less than significant impact on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to the Caltrans, California Scenic Highway Mapping System, the proposed project is not located within a state scenic highway. Therefore, the project would have no impact on a scenic highway and no further analysis is required.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. Development of the project site would alter the visual character of the site, but would not substantially degrade the visual character or quality of the site. The City's Local Coastal Program includes numerous policies to preserve and enhance views, as well as development standards for site layout and building size. Compliance with the Local Coastal Program ensures that a proposed development would not substantially degrade the existing visual character of the site and its surroundings. Relevant policies are listed below, followed by an analysis:

Policy CD-1.3: Visual Analysis Required. A Visual Analysis shall be required for all development located in areas designated "Potential Scenic Views Toward the Ocean or the Noyo River" on Map CD-1 except development listed in below.

The City's Community Design Element of the Coastal General Plan includes Map CD-1, which identifies potential scenic views toward the ocean or Noyo River. The proposed project location is identified in Map CD-1 and therefore necessitates a "Visual Analysis" as part of the required Coastal Development Permit. The purpose of a Visual Analysis is to consider and protect the scenic and visual qualities of coastal areas, to maintain existing scenic views of the coastline from CA Hwy 1, and to ensure projects are consistent with the character of its surroundings. The

proposed project meets the general findings necessary for approval of a Visual Analysis because: 1) the proposed project would have minimal alteration of natural landforms as the site is relatively flat and the wetlands on-site include restoration activities; 2) the proposed structures would be situated directly across from Caltrans Maintenance Yard, which is a large cinderblock building with a similar scale and massing; 3) over 30% of the street frontage along CA Hwy 1 / N Main Street would be free of view blocking development, offer blue water views of the ocean; and 4) the severely compacted ground that occurred as a result of intermittent stockpiling of materials from operation of Baxman Gravel Co would be ripped and amended.

Restoration activities also include the following, which would enhance the visual quality and functionality of wetlands:

- Invasive plant removal;
- Establish native plants to increase biodiversity;
- Establish native plants to provide screening;
- Rip and amend compacted substrate within the northern wetland buffer;
- Monitoring and project adaptation.

Policy CD-2.1 Design Review: All development that has the potential to affect visual resources shall be subject to Design Review, unless otherwise exempt from Design Review pursuant to Coastal Land Use & Development Code Section 18.71.050. Design Review approval requirements shall not replace, supersede or otherwise modify the independent requirement for a coastal development permit approved pursuant to the applicable policies and standards of the certified LCP. Ensure that development is constructed in a manner consistent with the Citywide Design Guidelines.

The Citywide Design Guidelines, assist the Planning Commission with the evaluation of the design of a proposed development. Although Design Review approval does not replace, supersede or otherwise modify the requirements for a coastal development permit, the guidelines clarify design expectations and promote a clear identity and sense of place for Fort Bragg. As designed, the project is consistent with these guidelines, providing an attractive layout, landscaping and craftsman architecture.

Policy CD-1.12 Maintain Unobstructed Views of the Ocean: Require new development north of Pudding Creek to leave unblocked views to the ocean from Highway One.

Policy CD-1.13: Retain Views North of Pudding Creek. New development north of Pudding Creek and west of Main Street on parcels with total frontage of more than 135 feet, on either the Haul Road or Main Street as determined by the Planning

Commission, shall be required to leave a minimum of 30 percent of the project's total parcel frontage free of view-blocking development. The area free of view-blocking development shall not include narrow passageways between buildings on the site, and shall be concentrated.

The proposed project maintains unobstructed blue-water views and retains approximately 35% of the parcel's frontage free of view blocking development. The parking lot area includes grading activities to lower the elevation, so that parked cars are not view blocking.

Policy LU-4.3 Large-Scale Commercial Development: To maintain scenic views of the coast and to ensure that building sizes at the City's gateways are in scale with the community, no commercial building shall exceed the following limitations on the gross floor area: a) between the Noyo River and Pudding Creek Bridges - maximum 50,000 square feet; b) east of Highway One and north of Pudding Creek Bridge - maximum 30,000 square feet; c) ***west of Highway One and north of Pudding Creek Bridge*** and south of the Noyo River Bridge - ***maximum 15,000 square feet***; and d) east of Highway One and south of Noyo River Bridge – maximum 40,000 square feet.

The project is comprised of three lodging structures – Building 1: 14,533 SF; Building 2: 14,798 SF; Building 3: 14,095 SF; and a 3,064 SF event center. All structures are under 15,000 SF to ensure building size is in scale with the community.

Policy CD-1.14 All new development (including decks and balconies) north of Pudding Creek shall be set back at least 30 feet from the edge of the Old Haul Road and shall be consistent with all other applicable LCP setback requirements.

The proposed project, including all decks and balconies, is setback approximately 75 feet from the Haul Road and complies with all other applicable setback requirements as shown in Table 2.

Setback	Highway and Visitor Commercial Zoning	Avalon Project	Project Compliance
Front Setback	15 feet	15 feet	yes
Side Setback	None	4 feet south; 197 north	yes
Rear Setback	37 feet from Haul Road with 35 foot Height	75 feet	yes
North ESHA	Project specific 50 foot buffer	50 foot buffer +5 foot construction buffer	yes

South ESHA	Project specific 30 foot buffer	30 foot buffer +5 foot construction buffer	yes
Archeological Resource	Project specific	Ranging from 5 feet to 50 feet with 12 inch minimum depth of protective capping material; no digging allowed	yes

Table 2: Project Setbacks

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Construction of the proposed project would increase the amount of light and glare due to new outdoor lighting and interior lighting shining outward from windows. The City's Coastal Land Use and Development Code includes outdoor lighting standards to confine glare and reflections within the boundary of the site to the maximum extent feasible. The project lighting plan complies with City lighting regulations (Sheet A&7-1 and A7-2 of Appendix 1 – Avalon Entitlement Set).

In addition to complying with the City's outdoor lighting regulations, the project incorporates additional measures to ensure light or glare would not adversely affect the environment. These considerations include: 1) shielded "dark sky" lighting along the raised boardwalk trail; 2) the exterior lighting along the western facades would have minimal lumens and be shielded; and 3) native plants (wax myrtle, sword fern and huckleberry) would be established within the southern wetland buffer to screen potential wildlife. These additional lighting considerations were incorporated into the project design as a result of site visits and consultation with California Department of Fish and Wildlife (CDFW) staff. As designed, the project would not create a new light source of substantial light or glare that would have a significant affect day or nighttime views in the area.

II. Agriculture

AGRICULTURE RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public resources Code section 12220(g)), timberland (as defined in Public resources Code section 4526), or timberland zoned Timberland Production (as defined in Public Resources Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The project site is mapped “Nonagricultural or Natural Vegetation” by the California Department of Conservation Farmland Mapping and Monitoring Program, which is a non-agricultural designation. There would not be a conversion of Important Farmland and no further analysis would be required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is zoned, “Highway Visitor Commercial”, which is a non-agricultural zoning designation. Additionally, the project site is not in agricultural use, which precludes the possibility of a Williamson Act contract. Therefore, there is no possibility of conflicts with agricultural zoning or Williamson Act contract. No further analysis is required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined in Public Resources Code section 51104(g))?

No Impact. The project site can be characterized by coastal scrub and does not meet the definitions of forest land, timberland, or zoning for Timberland Production. As such, no impact would occur and no further analysis would be required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated above in c), the project site can be characterized as coastal scrub and does not meet the definitions of forest land, timberland, or zoning for Timberland Production. Under these conditions, no loss or conversion of forest land could occur. No further analysis would be required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact. As stated above in c), the project site does not meet the definitions of the Public Resources Code for forest land, timberland, or zoning for Timberland Production. Nor is not in agricultural use and is mapped as “Nonagricultural or Natural Vegetation” by the California Department of Conservation Farmland Mapping and Monitoring Program. Thus, no loss or conversion of forest land could occur. No impact would occur and no further analysis would be required.

III. Air Quality

AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact with Mitigation Incorporated. The City of Fort Bragg is located in the North Coast Air Basin (NCAB) and is within the jurisdiction of the Mendocino Air Quality Management Basin (MCAQMD). The MCAQMD is responsible for monitoring and enforcing local, state, and federal air quality standards in the County of Mendocino and is one of 35 local Air Districts in California. Air Districts in California must develop regulations based on the measures identified in the Clean Air Act and its Clean Air Plan, as well as state regulations to ensure reduced emissions in compliance with these federal and state regulations. The table below displays MCAQMD adopted air quality CEQA thresholds of significance:

Pollutant	Construction Related	Operational Related	
	Average Daily Emissions (lb/day) (1)	Indirect Average Daily Emissions (lb/day)	Stationary Maximum Annual Emissions (tons/year) (2)
ROG (3)	54	180	40
NOx	54	42	40
PM ₁₀	82	82	15
PM _{2.5}	54	54	10
Fugitive Dust (PM ₁₀ /PM _{2.5})	Best Management Practices	same as above	
Local CO	--	1,100 tons/year	
1. Lb/day: pounds per day 2. Tpy: tons per year 3. ROG: reactive organic gases			

Table 3: Adopted Air Quality CEQA Thresholds of Significance

Air quality impacts anticipated under the proposed development of the site were modeled using the California Emissions Estimator Model (CalEEMod) to quantify potential criteria pollution and greenhouse gas (GHG) emissions associated with both construction and operation of the proposed project. The model quantifies direct emissions from construction and operational activities, as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal. Further, the model identifies mitigation measures to reduce criteria pollutants and GHG emissions along with calculating the benefits achieved from measures chosen by the user (Appendix 6 – Air Quality and GHG Emissions Analysis).

The results of the proposed project's emissions estimations were compared to the MCAQMD thresholds of significance identified in Table 3. Tables 4, 5, 6 and 7 shows the MCAQMD thresholds compared to the proposed project's construction and operational emissions of criteria air pollutants and greenhouse gases (unmitigated). Construction and operational emissions, as well as the GHG emissions from the proposed project are below MCAQMD significance thresholds for criteria air pollutants. Therefore, the proposed project would result in a less than significant impact related to emissions criteria air pollutants and greenhouse gases.

Construction Year	Average Emissions (pounds per day) (1)(2)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
2020	2.5	18.4	16.4	.003	1.7	1.1
2021	12.1	13.6	14.4	0.03	1.05	0.71
Highest Emissions in Any Year	12.1	18.4	16.4	0.03	1.7	1.1
Significance Threshold	54	54	NA	NA	82	54
Exceeds Significance Threshold?	No	No	NA	NA	No	No
<p>1. The MCAQMD recommends that for construction projects that are less than one-year duration, Lead Agencies should annualize impacts over the scope of actual days that peak impacts are to occur, rather than the full year (MCAQMD, 2010).</p> <p>2. Average Daily Emissions calculated using the following equation: Average Daily Emissions = Total Annual Emissions from CalEEMod modeling results in tons per year (tpy) x 2,000 lbs/ton / Estimated Number of Workdays Per Year from Construction Schedule. It is estimated that each year will have the following number of workdays: 2020 = 132 workdays and 2021 = 117 workdays. This is based on an assumed 22 workdays per month.</p> <p>Source: MCAQMD, 2010; CAPCOA, 2017</p>						

Table 4: Average Daily Construction Emissions (Unmitigated)

Stationary Emissions Source	Maximum Annual Emissions (tons per year) (1)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Area Source	0.26	1.0e5	1.3e3	0.000	0.000	0.000
Significance Threshold	40	40	125	NA	15	10
Exceeds Significance Threshold?	No	No	NA	NA	No	No
<p>1. Maximum Annual Emissions in tons per year (tpy) from CalEEMod modeling results</p> <p>Source: MCAQMD, 2010; CAPCOA, 2017</p>						

Table 5: Stationary Source Operational Emissions (Unmitigated)

Indirect Emissions Source	Maximum Annual Emissions (tons per year) (1)(2)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Energy Use	0.03	0.32	0.27	1.9e3	0.24	.024
Mobile Source	1.74	9.91	17.21	0.04	2.44	0.69
Total	1.77	10.23	17.48	0.04	2.68	0.93
Significance Threshold (3)	180	42	125	NA	82	54
Exceeds Significance Threshold?	No	No	No	NA	No	No
<p>1. Average Daily Emissions calculated using the following equation: Average Daily Emissions = Total Annual Emissions from CalEEMod modeling results in tons per year x 2,000 lbs/ton / 365 days per year.</p> <p>2. Table results include scientific notation. The character “e” is used to represent time ten raised to the power of (which would be written as x10b11) and is followed by the value of the component.</p> <p>3. The threshold of significance for CO is 125 tons per year (tpy) for both indirect and stationary emissions sources. As such, the emissions results for CO are shown above in tpy and compared to the 125 tpy threshold.</p> <p style="text-align: right;">Source: MCAQMD, 2010; CAPCOA, 2017</p>						

Table 6: Indirect Operational Emissions (Unmitigated)

Emissions Source	Emission (MT/year) (1)(2)			
	CO2	CH4	N2O	Total CO2e
Construction (3)	306.96	0.05	0.00	308.15
Operation	830.28	0.56	3.92e3	845.43
Significance Threshold	1,100 Metric Tons of CO2e/yr			
Exceeds Significance Threshold?	Construction = No3/Operation = No			
<p>1. Table results include scientific notation. The character “e” is used to represent time ten raised to the power of (which would be written as x10b11) and is followed by the value of the component.</p> <p>2. Totals obtained from CalEEMod modeling results and may not total 100% due to rounding.</p> <p>3. Although the MCAQMD has not adopted a significance threshold for construction GHG emissions, the operational threshold (1,000 MTCO2e/yr) is used for the purpose of this analysis. This is consistent with the methodology used by other air districts in the state including the Sacramento Metropolitan Air Quality Management District (SMAQMD). For the purpose of this analysis, construction emission from 2020 and 2021 are added together and compared to the threshold.</p>				
Source: MCAQMD, 2010; CAPCOA, 2017				

Table 7: GHG Emission (Unmitigated)

The Air Quality and GHG Emissions Analysis included recommended mitigation measures, which are included as mitigation measure AIR-1:

AIR 1: Air Quality and GHG Emissions. The applicant will implement mitigation measures contained in Air Quality and GHG Emissions Analysis prepared by SHN in March 2020. Such measures include, but are not limited to the following: use of low VOC paint; low flow plumbing fixtures; recycling and compost facilities; water efficient landscaping; and dust control BMPs.

Air Quality Management District Regulation 1 Rule 430 requires dust control during construction activities, as well as municipal standards outlined in CLUDC Section 17.30.080.D. To ensure the project does not conflict or obstruct implementation of applicable air quality plans the following mitigation measures are also included:

AIR-2: Dust Control. In order to minimize dust, Dust Prevention and Control Plan measures shall be incorporated into the Final Storm Water Pollution Prevention Plan (SWPPP) and submitted with final grading plan for approval of the Public Works Director per CLUDC 17.62.020. This plan shall include information and provisions:

- The plan shall address site conditions during construction operations, after normal working hours, and during various phases of construction.
- The plan shall include the name and 24-hour contact of responsible person(s) in case of complaints, questions, or an emergency.
- Grading shall be designed and grading activities shall be scheduled to ensure that repeat grading will not be required, and that completion of dust-generating activity will occur in shortest practical timeframe.
- All visibly dry disturbed areas shall be controlled by watering, covering, and/or other dust preventive measures.
- The plan shall include the procedures necessary to keep the adjacent public streets and private properties free of fugitive dirt, dust and other debris resulting from construction activities when importing or exporting of material.
- Graded areas shall be revegetated as soon as possible, but within no longer than 30-days. Disturbed areas that are to remain inactive longer than 30-days shall be seeded (with combination of terminal barley and native seed) and watered until vegetative cover is established.
- All earthmoving activities shall cease when sustained winds exceed 15 miles per hour. Wind speed shall be measured on-site by project manager with a handheld anemometer.

AIR-3: Construction Vehicles and Equipment. To minimize excessive exhaust emissions, at all times, construction vehicles and equipment utilized on-site shall: 1) be maintained in good condition; 2) minimize idling time to less than 5 minutes; 3) minimize the number of vehicles and equipment running at the same time; and 4) use alternatively fueled equipment, such as compressed/liquid natural gas or electric, when feasible.

Construction activities would include the following activities: site preparation; grading and soil stabilization; utility installation; paving; building; and architectural finishing. These activities would be temporary and with the mitigation measures BIO-1, BIO-2, BIO-3, BIO-5, HYDRO-1, HYDRO-2, TRANS-1, AIR-1, AIR-2 and AIR-3 would have a less than significant impact on the environment.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact with Mitigation Incorporated. As with any new development project, the proposed project has the potential to generate pollutant concentrations both during construction activities and during long-term operation. As analyzed in impact a), above, construction and operational emissions from the proposed project are below MCAQMD significance thresholds for criteria air pollutants and GHG emissions. Furthermore, mitigation

measures AIR-1, AIR-2, AIR-3, HYDRO-1 and TRANS-1 are included to ensure the project does not have a significant impact on air quality.

c) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. There are no sensitive receptors that could be exposed to substantial pollutant concentrations from the project. The United States Environmental Protection Agency includes, but does not limit, sensitive receptors to be hospitals, schools, daycare facilities and convalescent facilities, and considers sensitive receptors to be children, elderly, asthmatics and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. No Impact would occur and no further analysis is required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. No residential development exists or planned adjacent to the proposed project; nor are there high density land uses in the vicinity. The surrounding business activities include motels, industrial supplier of aggregate/concrete/asphalt, Caltrans maintenance yard and office and multiuse trail. As a result, it is unlikely a substantial number of people would be affected by other emissions, such as odor as a result of the proposed project.

IV. Biological Resources

BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
California Department of Fish and Game or US Fish and Wildlife Service?				
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. A biological scoping survey was submitted for the project that identified several special status plant communities within and near the two identified wetlands (Appendix 3 – Biological Survey). In order for the project to not have

a substantial adverse effect on these wetland plant communities, several mitigations have been drafted for implementation:

BIO-1: Buffer Area. The proposed development includes 30-foot to 50-foot buffers from wetlands. Buffers shall be demarcated and clearly illustrated on a plat, to be recorded as a deed restriction accompanying the deed for new parcel resulting from the Parcel Merger. Contouring topography within wetland buffer shall occur with hand-tools and disturb minimum of substrate to achieve functionality of the swale and emergency spillway, as conveyed in Wetland Restoration, Buffer Enhancement and Mitigation Monitoring Plan, dated August 7, 2019.

BIO-2: Invasive Plants. Plants listed as moderate or highly invasive by the California Invasive Plant Council (Cal-IPC), shall be removed from site. Prior to the use of heavy equipment, all heavy equipment shall be washed at an off-site location to remove any caked mud or other debris that could harbor invasive plant seed. All erosion control shall be weed free. Landscaping shall utilize native plantings. Plantings within ESHA or ESHA buffers shall adhere to Coastal General Plan Policy OS-1.13.

BIO- 3: Construction Related Impacts to Wetlands. Prior to issuance of a building permit or grading permit, appropriate best management practices (BMPs) shall be identified and submitted as part of the SWPPP subject to review and approval of the Public Works Director. ESHA resources shall be protected from disturbance by construction activities with temporary wire mesh fencing placed around wetland buffers prior to any construction activities. These protected areas shall not be used by workers or for the storage of machinery or materials. Measures shall include the use of a silt fence or other erosion control measures to prevent sediment from entering the wetland. Erosion control devices shall not contain monofilament as this may pose a potential entanglement hazard to sensitive amphibian species that may occur in the area. Construction activities shall not occur during early morning, evening or nighttime hours, to minimize disturbance caused by artificial light and noise.

BIO- 4: Long-Term Impacts to Wetlands. A final Wetland Mitigation Monitoring Plan shall be submitted by the applicant and approved by the Public Works Director, prior to issuance of building permit or commencement of grading.

BIO- 5: Erosion Control. All work involving or associated with soil movement and/or digging shall occur in compliance with the SWPPP. Ground disturbance shall be limited to the minimum necessary and disturbed areas shall be stabilized as soon as feasible.

In addition to an analysis of plants on site, the biological scoping survey submitted for the project also included an analysis of animals on site (invertebrate, amphibian, reptile, bird and mammal species). No candidate, sensitive, or special status animal species were found during survey site visits. However, given that suitable habitat exists on the project site, and to ensure the project would not have a substantial adverse effect to candidate, sensitive or special status animal species, the following mitigation measures have been drafted:

BIO 6: Birds. The breeding season for birds is typically from February to August. Prior to the onset of construction activities during this period, a qualified biologist shall perform breeding bird surveys within 14-days. If active breeding candidate, sensitive or special status bird nests are observed, no ground disturbance shall occur on site until all young are no longer dependent on upon the nest, unless approved by CA Department of Fish and Wildlife. A qualified biologist shall observe the nest weekly to ensure the nest site is protected from disturbance.

BIO- 7: Special Status Frogs. Prior to construction activities, project contractors shall be trained by a qualified biologist in the identification of the northern red-legged frog. Construction crews shall begin each day with a visual search, paying particular attention to stacked materials and silt fencing protecting wetland areas. If a rain event occurs, all construction activities shall cease for 48 hours and the site shall be surveyed for northern red-legged frogs before work resumes. If a northern red-frog is identified, all work shall cease, and a qualified biologist shall be consulted. Prior to initiating work, City staff shall be notified of measures taken.

With mitigation measure BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6 and BIO-7, the proposed project would not have substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. The project site contains 0.9 acres of wetlands in two identified wetlands. US Fish and Wildlife Service identifies the northern wetland, extending westward onto MacKerricher State Park, as a “Freshwater Emergent Wetland” in the National Wetlands Inventory Map: Surface Waters and Wetlands. The western portion of the site is identified as Environmentally Sensitive Habitat Areas (ESHA) in the City’s Coastal General Plan Map OS-1, “Open Space and Environmentally Sensitive Habitat Areas”.

The Coastal General Plan includes policies to preserve and enhance the City’s environmentally sensitive habitat areas (ESHA). As discussed and mitigated, the proposed project would not have a substantial adverse effect on sensitive natural communities on-site as identified in local plans, policies, and regulations. Applicable policies are listed, followed by analysis:

Policy OS-1.3: Development in ESHA Wetlands: Diking, Filling, and Dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following uses: a. New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities. b. Maintaining existing or

restoring previously dredged depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps. c. New or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities. d. Incidental public service purposes, including but not limited to burying cables and pipes or inspection of piers and maintenance of existing intake and outfall pipelines. **e. Restoration purposes.** f. Nature study, aquaculture, or similar resource dependent activities.

The proposed project includes restoration activities within wetlands and wetland buffers, such as, invasive plant removal; establishing native plants to increase biodiversity, improve functionality, and provide screening for wildlife; rip and amend compacted substrate within the northern wetland buffer; and long-term maintenance, monitoring and project adaptation.

Through consultation and site visits with California Department of Fish and Wildlife, California Coastal Commission, California State Parks, and North Coast Regional Water Quality Board, the applicant developed and submitted Wetland Restoration, Buffer Enhancement, and Mitigation and Monitoring Plan, dated August 7, 2019 (Appendix 2 – Wetland Mitigation and Monitoring Plan). This plan identifies activities to improve the quality of the wetlands and their buffer areas through the removal of invasive species and the establishment of native species, using hand tools. The plan also includes measures for monitoring, and as necessary, adaptive management.

Policy OS-1.7 Development in areas adjacent to Environmentally Sensitive Habitat Areas shall be sited and designed to prevent impacts, which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

The proposed project includes a public access easement and trail connection from N Main Street to the Haul Road. The 261- trail would be a 5-foot wide, raised walkway constructed with decking to act as a physical and visual barrier to the wetland communities. The raised platform would allow natural flow of water on site and discourage the development of social trails. Interpretive signage placed along the trail would provide information about the value of the surrounding natural habitat and convey that the area beyond the trail is not intended for visitor use, which would further mitigate degradation of wetlands. As discussed herein and mitigated above in a), development in areas adjacent to ESHA would not significantly degrade ESHA on site.

Policy OS-1.8: Development adjacent to ESHA shall provide buffer areas to serve as transitional habitat and provide distance and physical barriers to human intrusion. The purpose of this buffer area is to provide for a sufficient area to protect environmentally sensitive habitats from significant degradation resulting from future development. Buffers shall be of a sufficient size to ensure the biological integrity and preservation of the ESHA they are designed to protect. The width of the buffer area shall be a minimum of 100 feet, unless an applicant can demonstrate, after consultation with the California Department of Fish and Game, other relevant resource agencies, and the City, that 100

feet is not necessary to protect the resources of that particular habitat area and the adjacent upland transitional habitat function of the buffer from possible significant disruption caused by the proposed development. The buffer area shall be measured from the outside edge of the environmentally sensitive habitat areas and in no event shall be less than 30 feet in width.

The width of proposed buffer areas was determined after consultation with staff from California Department of Fish and Wildlife, California Coastal Commission, California State Parks, and North Coast Regional Water Quality Board. The reduced buffer would allow: 1) a proposed trail connection from CA Hwy 1 / N Main Street to Haul Road, with educational interpretive panels; 2) a system of Low Impact Development swales located south of the existing wetlands; and 3) emergency spillways for the purpose of addressing storms above and beyond the design storm (Appendix 3 – Biological Report and Associated Addendums). Buffers of 30 to 50 feet, as illustrated in Image 16, below. Buffers would be demarcated and clearly illustrated on plat, to be recorded as a deed restriction accompanying the deed for new parcel, as stated in mitigation measure BIO-1.

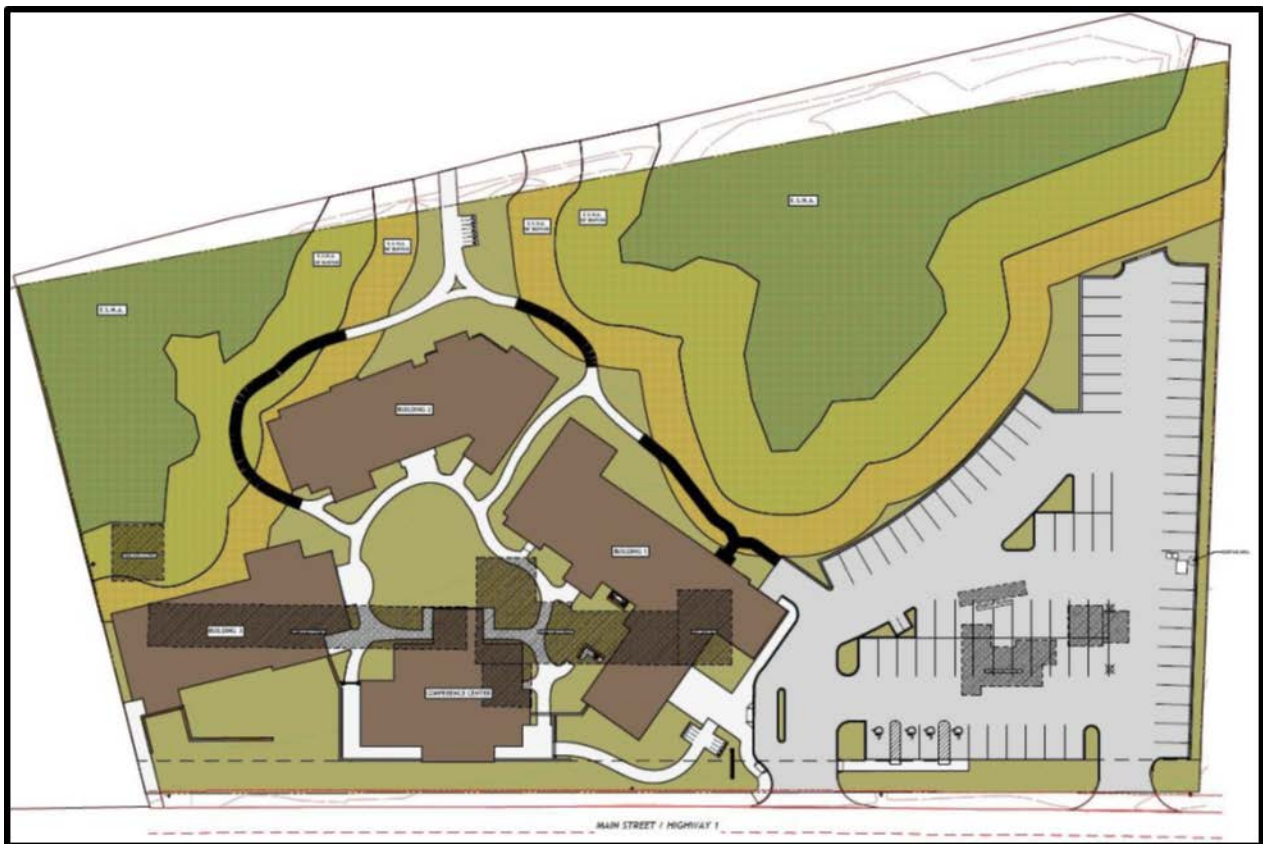


Image 16: Project footprint with trail and buffers

Policy OS-1.9: Utilize the following criteria to establish buffer areas: a. Biological Significance of Adjacent Lands. Lands adjacent to a wetland, stream, or riparian habitat area vary in the degree to which they are functionally related to these habitat areas.

Functional relationships may exist if species associated with such areas spend a significant portion of their life cycle on adjacent lands. The degree of significance depends upon the habitat requirements of the species in the habitat area (e.g., nesting, feeding, breeding, or resting). Where a significant functional relationship exists, the land supporting this relationship shall also be considered to be part of the ESHA, and the buffer zone shall be measured from the edge of these lands and be sufficiently wide to protect these functional relationships. Where no significant functional relationships exist, the buffer shall be measured from the edge of the ESHA that is adjacent to the proposed development.

b. Sensitivity of Species to Disturbance. The width of the buffer zone shall be based, in part, on the distance necessary to ensure that the most sensitive species of plants and animals will not be disturbed significantly by the permitted development. Such a determination shall be based on the following after consultation with the Department of Fish and Game or others with similar expertise: (i) Nesting, feeding, breeding, resting, or other habitat requirements of both resident and migratory fish and wildlife species; (ii) An assessment of the short-term and long-term adaptability of various species to human disturbance; (iii) An assessment of the impact and activity levels of the proposed development on the resource.

c. Erosion susceptibility. The width of the buffer shall be based, in part, on an assessment of the slope, soils, impervious surface coverage, runoff characteristics, erosion potential, and vegetative cover of the parcel proposed for development and adjacent lands. A sufficient buffer to allow for the interception of any additional material eroded as a result of the proposed development shall be provided.

d. Use natural topography. Where feasible, use hills and bluffs adjacent to Environmentally Sensitive Habitat Areas, to buffer these habitat areas. Where otherwise permitted, locate development on the sides of hills away from Environmentally Sensitive Habitat Areas. Include bluff faces in the buffer area.

e. Use existing man-made features. Where feasible, use man-made features such as roads and dikes to buffer environmentally sensitive habitat areas.

f. Lot Configuration and Location of Existing Development. Where an existing subdivision or other development is largely built-out and the buildings are a uniform distance from a habitat area, at least that same distance shall be required as a buffer zone for any new development permitted. However, if that distance is less than one hundred (100) feet, additional mitigation measures (e.g., planting of native vegetation) shall be provided to ensure additional protection.

The width of the buffer areas was determined after consultation with staff from California Department of Fish and Wildlife, California Coastal Commission, California State Parks, and North Coast Regional Water Quality Board, and based on criteria provided in Policy OS-1.9. The applicant demonstrated, and agencies concurred, that 100-feet is not necessary to protect wetland resources on site, and thereby the proposed project is designed with reduced buffers of 30 to 50 feet, as ensured with the implementation of mitigation measure BIO-1. As the distance is less than 100-feet, the project includes mitigations such as removal of invasive species and planting of native species. The project also includes outdoor lighting designed to be low impact, such as short, shielded lighting along trail and lighting fixtures on outdoor balconies to be shielded and pointed into the rooms, rather than outward. Additionally, wax myrtle shrubs shall

be planted along the eastern portion of southern wetland to provide light protection and habitat for wetland animals.

Policy OS-1.10: Permitted Uses within ESHA Buffers. Development within an Environmentally Sensitive Habitat Area buffer shall be limited to the following uses: a. Wetland Buffer. i. Uses allowed within the adjacent Wetland ESHA pursuant to Policy OS-1.3. ii. Nature trails and interpretive signage designed to provide information about the value and protection of the resources iii. Invasive plant eradication projects if they are designed to protect and enhance habitat values.

The proposed project includes a public easement and trail connection from N Main Street / CA Hwy 1 to the Haul Road. The public access trail would be a 5-foot wide, raised walkway constructed with decking to act as a physical and visual barrier to the wetland communities. The raised platform would allow natural flow of water on site and discourage the development of social trails. Interpretive signage placed along the trail would provide information about the value of the surrounding natural habitat and convey that the area beyond the trail is not intended for visitor use. In addition, the project includes invasive plant removal and planting native wetland species to protect and enhance habitat values.

Policy OS-1.12: Drainage and Erosion Control Plan. Permissible development on all properties containing environmentally sensitive habitat, including but not limited to those areas identified as ESHA Habitat Areas on Map OS-1, shall prepare a drainage and erosion control plan for approval by the City. The plan shall include measures to minimize erosion during project construction, and to minimize erosive runoff from the site after the project is completed. Any changes in runoff volume, velocity, or duration that may affect sensitive plant and animal populations, habitats, or buffer areas for those populations or habitats, shall be reviewed by a qualified biologist to ensure that there will not be adverse hydrologic or, erosion, or sedimentation impacts on sensitive species or habitats. Mitigation measures shall be identified and adopted to minimize potential adverse runoff impacts. All projects resulting in new runoff to 4 – Conservation, Open Space, Energy, & Parks Element 4 - 6 July 2008 Fort Bragg Coastal General Plan any streams in the City or to the ocean shall be designed to minimize the transport of pollutants from roads, parking lots, and other impermeable surfaces of the project.

A Drainage and Erosion Control Plan shall be submitted and implemented as part of the SWPPP for the project, as mitigated in HYDRO-1, HYDRO-2 and AIR-2.

Policy OS-1.13: Landscaping Adjacent to ESHA. All development located within or adjacent to environmentally sensitive habitat areas shall be conditioned to: a) Require all proposed plantings be obtained from local genetic stocks within Mendocino County.

If documentation is provided to the review authority that demonstrates that native vegetation from local genetic stock is not available, native vegetation obtained from genetic stock outside the local area, but from within the adjacent region of the floristic province, may be used; and if local genetic stocks within the floristic province are unavailable, the Director may authorize use of a commercial native mix, provided it is clear of invasive seed. Director may also authorize use of a seed mix that is selected for rapid senescence and replacement with native stock; and b) Require an invasive plant monitoring and removal program; and c) Prohibit the planting of any plant species on the property that is (a) listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, and/or by the State of California, or (b) listed as a 'noxious weed' by the State of California or the U.S. Federal Government.

The proposed project includes removal of invasive plants on site, as well as landscaping with native plants. Restoration activities within ESHA or ESHA buffers shall adhere to Policy OS-1.13, as mitigated in BIO-2.

Policy OS-1.14: Vegetation Removal in ESHA. Prohibit vegetation removal in Environmentally Sensitive Habitat Areas and buffer areas except for: a) Vegetation removal authorized through coastal development permit approval to accommodate permissible development, b) Removal of trees for disease control, c) Vegetation removal for public safety purposes to abate a nuisance consistent with Coastal Act Section 30005, or d) Removal of firewood for the personal use of the property owner at his or her residence to the extent that such removal does not constitute development pursuant to Coastal Act Section 30106. Such activities shall be subject to restrictions to protect sensitive habitat values.

The proposed project includes restoration activities, including removal of invasive species within ESHA and ESHA buffer, to be authorized with the approval of a coastal development permit for the proposed project.

Policy OS-1.16: Biological Report Required. a) Permit applications for development within or adjacent to Environmentally Sensitive Habitat Areas including areas identified in Map OS-1 or other sites identified by City staff which have the possibility of containing environmentally sensitive habitat shall include a biological report prepared by a qualified biologist which identifies the resources and provides recommended measures to ensure that the requirements of the Coastal Act and the City of Fort Bragg's Local Coastal Program are fully met. The required content of the biological report is specified in the Coastal Land Use and Development Code. b) Submittal of Biological Reports. These biological reports shall be reviewed by the City and approving agencies. The biological reports described above shall be submitted prior to filing as complete a coastal development permit application and may also be submitted as a part of any environmental documentation required pursuant to CEQA. The selection of the

professional preparing the report shall be made or approved by the City or the agency approving the permit and paid for by the applicant. c) Biological reports shall contain mitigating measures meeting the following minimum standards: i. They are specific, implementable, and, wherever feasible, quantifiable. ii. They result in the maximum feasible protection, habitat restoration and enhancement of sensitive environmental resources. Habitat restoration and enhancement shall be required wherever feasible, in addition to the applicable baseline standard of either avoiding or minimizing significant habitat disruption. iii. They are incorporated into a Mitigation Monitoring Program; and iv. They include substantial information and analysis to support a finding that there is no feasible, less environmentally damaging alternative.

The applicant developed and submitted a biological report for the project, in addition to several supporting documents and/or addendums as consulting agencies, such as California Department of Fish and Wildlife, California Coastal Commission, California State Parks, North Coast Regional Water Quality Board, Sherwood Valley Band of Pomo provided comments and feedback. These documents identify biological resources on site and recommended measures to ensure compliance with the City's Local Coastal Program requirements. Mitigation measures have been included as part of this environmental document, and incorporated into the Mitigation Monitoring and Report Program for the project (Appendix 11 – Mitigation Monitoring and Reporting Program).

Policy OS-5.4: Condition development projects, requiring discretionary approval to prohibit the planting of any species of broom, pampas grass, gorse, or other species of invasive non-native plants deemed undesirable by the City.

Policy OS-5.1: Native Species: Preserve native plant and animal species and their habitat.

The proposed project includes restoration of wetlands on site through the removal of nonnative invasive species and the establishment of native species (Appendix 2 – Wetland Mitigation and Monitoring Plan). The concept landscape plan submitted for the project and included as sheet A2-4 of the Entitlement Set, show native and drought tolerant plantings; no invasive plants would be used in landscaping.

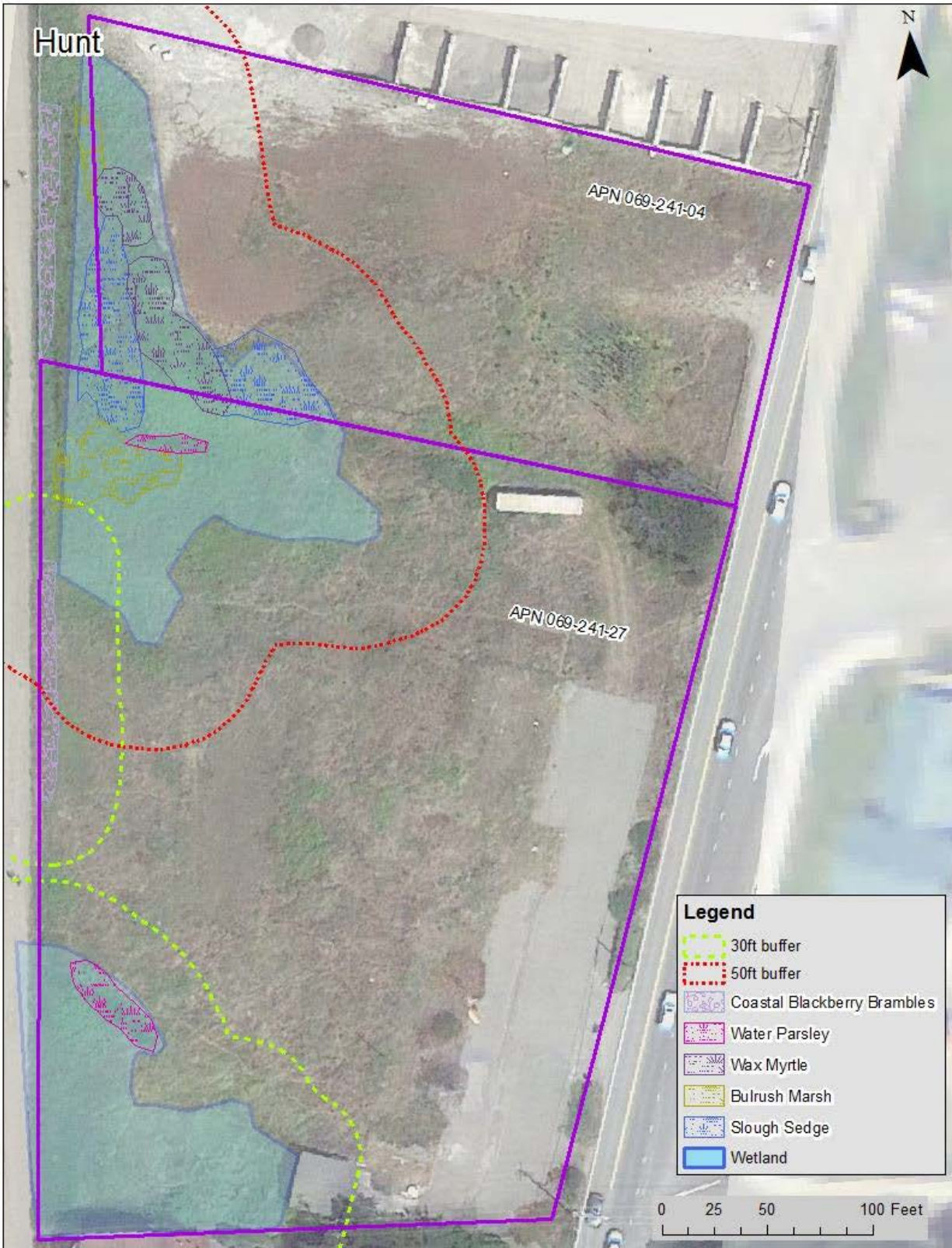
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact with Mitigation Incorporated. The project site contains 0.9 acres of wetlands. Groundwater monitoring wells were installed to determine the boundaries of the two wetlands identified on site and a map was prepared by a professional surveyor (Image 18). Portions of each wetland may be considered three parameter Army Corps wetlands, and some

may be considered two to one parameter Coastal Act wetlands. Additionally, these wetlands may be classified as Waters of the State. The status of wetlands has not been confirmed by the Army Corps of Engineers, however the northern wetland is identified as a “Freshwater Emergent Wetland” by the US Fish and Wildlife Service. The applicant is required to submit a project description to both the United States Army Corps of Engineers and the North Coast Regional Water Quality Board to determine if Clean Water Act Section 401 and/or Section 404 permitting is required (HYDRO-2)

There will be no filling or removal of wetlands. An area within the buffer of the northern wetland would be ripped and amended to restore compacted and stressed soil conditions from the intermittent stockpiling of gravel over the years as part of Baxman Gravel operations. The implementation of this activity is outlined in Wetland Restoration, Buffer Enhancement, and Mitigation and Monitoring Plan (Appendix 2 – Wetland Restoration and Buffer Enhancement). This plan also outlines activities to contour topography within wetland buffer, using hand-tools to achieve functionality of bio-swale and an emergency spillway (BIO-1).

Furthermore, the existing hydrological connection between the wetlands on site and adjacent lands of MacKerricher State Park would not be interrupted, and therefore the project would not substantially alter the existing drainage pattern on site. Water would infiltrate and flow in a westerly direction across the site, filtered by Low Impact Development designs before entering wetlands. Water would continue in a westerly direction to MacKerricher State Park lands by way of: 1) flow underneath the Haul Road, which is constructed on top of large Redwood logs allowing water to seep through; or 2) as sheet flow over the Haul Road.



**Image 17: Wetland boundaries
(including buffers and special status wetland plant communities)**

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Less Than Significant Impact with Mitigation Incorporated. The project site does not contain any waterways, which would preclude migratory fish movement occurring on-site. The wetland habitat on-site could function as a wildlife corridor for birds, and to a lesser extent, amphibians. No special status wildlife was observed during field surveys. The site does contain suitable habitat for potential wildlife and with the inclusion of mitigation measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, and BIO-7, potential wildlife and habitat would not be significantly impacted.

The proposed project is designed to protect and restore wetland ESHA, which could provide migration corridors in perpetuity. These wetlands and associated plant communities are in close proximity to MacKerricher State Park lands, which function as a large migration corridor for the area (Appendix 3 – Biological Survey and Associated Addendums).

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

Less Than Significant Impact. The project site is relatively flat with a westerly slope toward two identified wetlands. The site includes large shrubs in the wetland buffer, such as wax myrtle, which provide valuable habitat and shelter for birds and amphibians. Native plants would be retained to the maximum extent feasible, and the project description includes additional plantings of wax myrtle, sword fern and huckleberry to enhance habitat on site. An analysis of City policies to protect and preserve ESHA resources is provided in detail above in subsection b). As analyzed, the project would not conflict with any local policies or ordinances protecting biological resources on site.

- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No Impact. The City of Fort Bragg does not have an adopted or approved plan that requires a consistency determination under CEQA. No impact would occur.

V. Cultural Resources

CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

Should historical resources, archeological resources or human remains be found on site, mitigation measure CULT-1 has been drafted:

CULT-1: Cultural Resources. If buried human remains, historic or archaeological resources are discovered during construction, operations shall cease immediately and a qualified archaeologist shall be consulted to evaluate the resource in accordance with CEQA Guidelines 15064.5.

a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Less than Significant Impact with Mitigation Incorporated. The project site is not listed in, or determined to be eligible by the State Historical Resources Commission, for the listing in the California Register of Historical Resources, nor listed in a local register or survey as historically significant. Thus, a significant impact is not likely to occur. Should a historical resource be unexpectedly discovered, CULT-1 ensures a less than significant impact would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact with Mitigation Incorporated. The project site has no known archeological resources, which would preclude an archeological resource on-site. Thus, a significant impact is not likely to occur. Should an archeological resource be unexpectedly discovered, CULT-1 ensures a less than significant impact would occur.

c) Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. The project site has no known cemetery or burial grounds on site. Pursuant to Section 7050.5 of the Health and Safety Code and if human remains are discovered, there shall be no further excavation or disturbance of the discovery site or any nearby area. Thus, a significant impact is not likely to occur. Should human remains be unexpectedly discovered, CULT-1 ensures a less than significant impact would occur.

VI. Energy

ENERGY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The proposed development at the site would be subject to Part 5 (California Energy Code) of Title 24 of the California Code of Regulations (CCR), which contains performance and prescriptive compliance approaches for achieving energy efficiency for residential and non-residential buildings throughout California. The objective of California's energy code is to reduce wasteful and unnecessary energy consumption. With this requirement in place, a less than significant impact would occur.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The proposed development at the site would be subject to Part 5 (California Energy Code) of Title 24 of the California Code of Regulations (CCR), which contains performance and prescriptive compliance approaches for achieving energy efficiency for residential and non-residential buildings throughout California. The objective of California's energy code is to reduce wasteful and unnecessary energy consumption. With this requirement in place, a less than significant impact would occur.

VII. Geology and Soils

GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION IMPACTS

Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;**

Less Than Significant Impact. The City of Fort Bragg is located in an area that is known for seismic activity, however, the site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards.

- ii) **Strong seismic ground shaking;**

Less Than Significant Impact with Mitigation Incorporated. Similar to other areas along the California coastline, the subject site could be subject to ground shaking caused by regional fault systems. Potentially active faults in the vicinity include: 1) the North San Andreas Fault system located approximately 6 miles west of the site, which is the most likely source of earth shaking; 2) the Maacama Fault zone located approximately 21 miles to the east of the City; 3) the Mendocino Fault zone located approximately 60 miles to the northwest; and 4) the Pacific Star Fault located between the towns of Fort Bragg and Westport, all of which could potentially cause earth shaking activity. To mitigate potential shaking effects, all structures are designed using sound engineering judgement and standards of the California Building Code (CBC). A geotechnical report was submitted by the applicant, which includes recommendations that are included herein as mitigation measure GEO-1 (Appendix 7 – Geotechnical Investigation and Appendix 11 – Mitigation Monitoring and Reporting Program).

GEO-1: Structural Integrity. Implement recommendations of Geotechnical Investigation, dated December 2015 by Brunsing Associates, Inc. and standards of the California Building Code.

- iii) **Seismic-related ground failure, including liquefaction;**

Less Than Significant Impact with Mitigation Incorporated. In general, lateral spreading is caused by liquefaction adjacent to slopes. In these cases, the saturated soils move toward an unsupported face, such as a bluff, river channel bank or body of water. During an earthquake event, there is indication that a potential for lateral displacement exists; the terrace deposits encountered during the geotechnical investigation were compressible for normal building loads and susceptible to liquefaction. For complete liquefaction analysis refer to Appendix A of Geotechnical Report (Appendix 7 – Geotechnical Investigation).

To mitigate the concern of liquefaction, the planned structures should be supported on drilled piers penetrating the underlying supporting bedrock and a compacted fill pad for lateral resistance and slab-on-grade support. This is included in recommendation of the Geotechnical Report and mitigated as GEO-1.

iv) Landslides?

No Impact. There are no deep-seated or otherwise significant landslides in vicinity of the site, nor is the site in the path of a potential landslide. No further analysis is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact with Mitigation Incorporated. The proposed development would involve grading, building construction, and paving activities that could result in erosion and sedimentation, and would modify the existing ground surface, thereby altering the patterns of surface runoff and infiltration. Grading activities would not occur during high wind events nor rain events and appropriate Best Management Practices would be in place during all phases of construction. With implementation of mitigation measures BIO-3, BIO-5, HYDRO-2 and GEO-1 the project would not result in substantial soil erosion or loss of top soil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact with Mitigation Incorporated. The parcel is within a gently-sloping, Pleistocene marine terrace platform that locally extends from the bluff edge to the east side of the highway. Surface soils at the site generally consist of about one to 2 ½ feet of brown silty sand topsoil that is very loose to medium dense and porous. Beneath the topsoil, the property is typically mantled by poorly-consolidated, Pleistocene Epoch marine terrace deposits. The terrace deposits consist of beach or shallow marine sediments that are typically comprised of sands with some silt, gravel, and clay, along with incorporated rock fragments eroded from the underlying bedrock platform. The terrace materials were deposited in lenses that are generally flat, with local undulations caused by the variable-energy nature of the depositional environment.

In unpaved and undeveloped areas, the upper, approximately one foot to 2.5 feet of surface soils at the site contain roots and have a weak, porous consistency. These soils are susceptible to collapse and consolidation under light to moderate loads and are not suitable for support of foundations or slabs-on-grade in their current condition. In addition, as observed in our borings, the majority of sandy deposits overlying the bedrock at the site are loose, and not suitable for support of shallow foundations. Recommendations for deepening of foundations below the weak soil zones or reinforcing the soils are included in the recommendations of the Geotechnical Report submitted for the project and mitigated by GEO-1.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Less Than Significant Impact with Mitigation Incorporated. The geotechnical report submitted for the project classified soils on-site and did not identify expansive soils. That said, portions of the building and exterior slab areas contain weak soils that should be removed to a depth of at least 5 feet below soil subgrade to minimize differential settlement. The excavated soil can be “cleaned” for reuse as compacted fill or imported fill can be used. These recommendations are part of the Geotechnical Report for the proposed project and mitigated with GEO-1.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

No Impact. All new development is required to connect to City sewer system. No septic systems are proposed within the project area and therefore, no impact would occur.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Less Than Significant with Mitigation Incorporated. No unique paleontological resources or unique geological feature was encountered during field explorations by geologist preparing the geotechnical report for the proposed project. In the event fossil materials are exposed during ground disturbing activities, GEO-2 will ensure a unique paleontological resource is not indirectly destroyed:

GEO-2: Inadvertent Paleontological Discoveries. In the event fossil materials are exposed during ground disturbing activities, work (within 100 feet of the discovery) shall be halted until a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology is retained to assess the find. A report documenting the methods and result of treatment shall be submitted to the Community Development Department.

VIII. Greenhouse Gas Emissions

GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less Than Significant Impact with Mitigation Incorporated. The proposed project would primarily generate increased GHG emissions over the short term related through operation of construction equipment. AIR-3 ensures that equipment is operating in good condition, does not idle for more than five minutes and encourages alternative fuel equipment. TRANS-1 ensures an encroachment permit is obtained from Caltrans, which will include a comprehensive management plan for construction activities.

Project operational activities of the proposed development would emit GHGs from hotel energy demands (lights, heating, and restaurant/bar activities), deliveries and vehicle traffic. As discussed in Section VI Energy, the proposed development at the site would be subject to Part 5 (California Energy Code) of Title 24 of the California Code of Regulations (CCR), which contains performance and prescriptive compliance approaches for achieving energy efficiency for residential and non-residential buildings throughout California. The objective of California's energy code is to reduce wasteful and unnecessary energy consumption.

The project would result in increased traffic and vehicle trips to and from the site, which is discussed in detail in Section XVII Transportation. GHGs would be partially offset by hotel guests having on-site access to restaurant, bar and event center, which could reduce vehicle trips for those seeking food and libations. In addition, guests would have immediate access to MacKerricher State Park, the Haul Road, and onsite bicycle facilities, which could eliminate some

potential increases in vehicular trips (and vehicular emissions) for recreational activities. The parking lot includes four parking spaces for electric vehicle charging.

GHG emissions is also discussed in Section III Air Quality. SHN prepared *Air Quality and GHG Emissions Analysis* for the proposed project (Appendix 6 – Air Quality and GHG Emissions Analysis) and mitigation contained within contained in mitigation measure AIR-1. As indicated in Table 7, the GHG emissions from construction and operation of the proposed project are below Mendocino County Air Quality Management District (MCAQMD) significance thresholds for GHG emissions.

Emissions Source	Emission (MT/year) (1)(2)			
	CO2	CH4	N2O	Total CO2e
Construction (3)	306.96	0.05	0.00	308.15
Operation	830.28	0.56	3.92e3	845.43
Significance Threshold	1,100 Metric Tons of CO2e/yr			
Exceeds Significance Threshold?	Construction = No3/Operation = No			
<p>1. Table results include scientific notation. The character “e” is used to represent time ten raised to the power of (which would be written as x10b11) and is followed by the value of the component.</p> <p>2. Totals obtained from CalEEMod modeling results and may not total 100% due to rounding.</p> <p>3. Although the MCAQMD has not adopted a significance threshold for construction GHG emissions, the operational threshold (1,000 MTCO2e/yr) is used for the purpose of this analysis. This is consistent with the methodology used by other air districts in the state including the Sacramento Metropolitan Air Quality Management District (SMAQMD). For the purpose of this analysis, construction emission from 2020 and 2021 are added together and compared to the threshold.</p>				
Source: MCAQMD, 2010; CAPCOA, 2017				

Table 7: GHG Emission (Unmitigated)

b) Conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact with Mitigation Incorporated. The City endeavors to create a sustainable environment by conserving natural resources, reducing anthropogenic greenhouse gases, and encouraging residents to reduce their carbon footprint. Although the City does not have local greenhouse goals or identified thresholds, the City seeks to comply with County, State

and Federal standards, as stated in General Plan Policies OS-7.1 and OS-7.2. Implementation of mitigation measures AIR-1, AIR-3 and TRANS-1 would keep construction and operational related activities to a less than significant level of GHG emissions, as discussed above in subsection a) and in Section II , Air Quality.

GHGs from hotel energy demands (lights, heating, and restaurant/bar activities), would have a less than significant impact because the proposed development would comply with Part 5 (California Energy Code) of Title 24 of the California Code of Regulations (CCR), which contains performance and prescriptive compliance approaches for achieving energy efficiency for residential and non-residential buildings throughout California. The objective of California's energy code is to reduce wasteful and unnecessary energy consumption.

GHGs resulting from increased traffic and vehicle trips to and from the site is discussed in Section XVII Transportation. These GHGs would be partially offset by hotel guests having on-site access to restaurant, bar and event center, which would reduce vehicle trips for food and entertainment. In addition, guests would have immediate access to MacKerricher State Park, the Haul Road, and onsite bicycle facilities, which could eliminate some potential increases in vehicular trips (and vehicular emissions). The parking lot includes four parking spaces for electric vehicle charging.

IX. Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact. The proposed project would develop approximately 46,490 square feet of new commercial uses on the subject site. These uses would involve the routine transportation, use and disposal of low-level hazardous materials such as cleaning solvents, grease/degreasers, propane, etc. Given the small quantities and characteristics of use, these materials would not be considered a potential risk to human health or the environment. That

said, the use of any hazardous material of any quantity could potentially expose people and the environment to unanticipated harm.

The use of potentially hazardous materials is regulated by health and safety requirements under federal, state, and local regulations. These regulations include provisions for the handling, storage, disposal of, as well as emergency spill response. Following existing protocol, the routine transport, use or disposal of hazardous materials would not create a significant hazard. No further analysis is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The proposed project would develop approximately 46,490 square feet of new commercial uses on the subject site. These uses would involve the routine transportation, use and disposal of low-level hazardous materials such as cleaning solvents, grease/degreasers, propane, etc. Given the small quantities and characteristics of use, these materials would not be considered a potential risk to human health or the environment. That said, the use of any hazardous material of any quantity could potentially expose people and the environment to unanticipated harm.

The use of potentially hazardous materials is regulated by health and safety requirements under federal, state, and local regulations. These regulations include provisions for the handling, storage, disposal of, as well as emergency spill response. Following existing protocol, the routine transport, use or disposal of hazardous materials would not create a significant hazard. No further analysis is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The project site is not located within one-quarter mile of an existing school. The closest school is located three-quarter miles north at the intersection of CA Highway 1 and Church School Lane. Additionally, the proposed project would not emit large quantities of hazardous emissions, nor handle large quantities of hazardous materials. Therefore, these characteristics preclude the possibility of exposing schools located within one-quarter mile of project site to hazardous emissions or materials. No impact would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact with Mitigation Incorporated. The project site is not listed on the Department of Toxic Substance Control hazardous materials site database, Cortese List, nor identified in an Envirostar search. A cleanup program site was identified in the State Water Resources Control Board's Geotracker inventory related to a gasoline spill incident and it was determined that groundwater was not threatened. The contaminated soil was excavated and disposed of per a CDFW directive; soil samples and a water (surface) sample was collected as well as soil stockpiles for disposal. All samples were below the detection limits for the petroleum-related hydrocarbons tested for. Based on this, the site was closed with no further action in relation to the incident documented in the file.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less than Significant Impact. The proposed project is not located within an airport land use plan or within two miles of a public airport. However, a small private airstrip, Fort Bragg Airport (Destination Airport ID 82CL), is within two miles of the project location. This airport host about eight local pilots and thier planes and available only to these pilots and their guests. Due to the small size and low number of flights (about 25 monthly), this airport is not considered a source of excessive noise. A such, the addition of the proposed project would not contribute to a safety hazard or excessive noise for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact with Mitigation Incorporated. The proposed project would be accessible from two entrances off CA Hwy 1 / N. Main Street. The City of Fort Bragg Fire Chief and Fire Marshal reviewed access for emergency response vehicles and deemed access sufficient to serve the proposed project. Furthermore, the proposed development would comply with the California Building Code, including the installation of a fire suppression system, emergency exits and appropriate signage to direct individuals to emergency exits and emergency response equipment, such as fire extinguishers and defibrillators.

Within the City of Fort Bragg, the generally recognized "safe elevation level" with regard to tsunami events is approximately 60 feet above mean sea level. Since the property bluffs are approximately 25 feet in vertical height and the property elevation is approximately 40 feet above mean sea level, the property lies within a designated low-lying area. Therefore, impact or inundation from a severe storm surge or tsunami event must be considered a risk for the site, albeit a relatively low risk.

The City's Tsunami Contingency Plan provides guidelines to alert and evacuate the public from tsunami risk areas within the City. To ensure the project would not impair the evacuation of the

project site in the event of tsunami or coastal flooding, the following mitigation measure has been drafted:

HAZ-1: Tsunami/Coastal Flooding Evacuation Materials and Training. The applicant shall prepare a tsunami/coastal flooding evacuation plan for the project, to be submitted and approved by the Fort Bragg Chief of Police. This plan shall follow the guidelines of the City of Fort Bragg Tsunami Contingency Plan and shall identify alert systems, response actions, evacuation routes and protocol. Relevant materials shall be provided in each guest room. Hotel staff shall be trained in an ongoing basis. The location and maintenance of emergency response supplies, as well and location and proper storage of hazardous materials on-site shall be included.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. According to Calfire Fire Hazard Severity Zones Map, the project site is identified as a “Moderate” risk for wildfire. Impacts would be less than significant and no further analysis is required.

X. Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would: i) Result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollution runoff; iv) impede or redirect flood flows.				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Less Than Significant Impact with Mitigation Incorporated. Site grading (cut and fill) would occur to lower the elevation of the parking lot in order to protect views of the ocean from CA Hwy 1 / N Main Street. Site grading would also occur for utility connections, installation of underground propane tank, and building foundations. Proposed grading during construction could increase the potential of erosion and increase the amount of sediment carried by storm-water runoff, on and off the project site. Therefore, prior to issuance of grading or building permits, the applicant shall submit a Storm-Water Prevention and Pollution Plan (SWPPP).

The SWPPP is a site specific document describing all construction site activities to prevent storm-water contamination, control sedimentation and erosion, and comply with requirements of the

Clean Water Act. Implementation of the SWPPP would ensure onsite wetlands and nearby coastal waters are not substantially degraded. All construction and post-construction activities shall be implemented according to the SWPPP, and monitored by the City's Public Works Department and North Coast Regional Water Quality Board.

In addition, the National Pollution Discharge Elimination Systems (NPDES) Phase II Small Municipal Separate Storm Sewer System (MS4) permit requires that all projects that create and/or replace 5,000 square feet or more of impervious surface be considered Regulated Projects. Regulated Projects are required to implement measures for site design, source control, runoff reduction, storm water treatment and baseline hydro-modification management as defined in the SWRCB Order 2013-0001-DWQ. The requirements established for regulated projects are proposed to be fulfilled for this project with the following LID Design Measures: Vegetated Bio-Swales (5,480 SF); and Treatment Control BMP's: Bio-Retention (2,300 SF) and Permeable Parking areas (6,610 SF).

Furthermore, the North Coast Regional Water Quality Board and the United States Army Corps of Engineers may require permitting for the work within wetlands and wetland buffers to further protect water quality from any discharge and / or threat of discharge of waste. If the project requires a Clean Water Act Section 401 or Section 404 permit, evidence of that permit shall be submitted to the City's Public Works Department, prior to issuance of the grading or building permit.

With these permitting requirements in place for the proposed project, the project would not violate any water quality standards or substantially degrade surface or ground water quality.

HYDRO-1: SWPPP Required. Prior to grading or construction activities, the project applicant shall submit SWPPP for review and approval by City engineer. The approved SWPPP shall be registered with the California State Water Board to obtain General Construction Permit coverage, evidenced by a Waste Discharge Identification (WDID) number.

HYDRO-2: Clean Water Act. Prior to issuance of grading or building permit, the project applicant shall submit a project description to the North Coast Regional Water Quality Board and United States Army Corps of Engineers for review of the pertinent water quality issues to determine if Clean Water Act Section 401 or 404 permitting is required.

The City's Local Coastal Program includes numerous policies regarding water quality and waste discharge requirements. Relevant policies are listed below, followed by an analysis, and the projects compliance:

Policy OS-10.3: Emphasize Site Design and Source Control BMPs. Long-term post-construction Best Management Practices (BMPs) that protect water quality and control runoff flow shall be incorporated in the project design of development that has the potential to adversely impact water quality in the following order of emphasis: A) Site Design BMPs: Any project design feature that reduces the creation or severity of

potential pollutant sources, or reduces the alteration of the project site's natural flow regime. Examples include minimizing impervious surfaces, and minimizing grading. B) Source Control BMPs: Any schedules of activities, prohibitions of practices, maintenance procedures, managerial practices, or operational practices that aim to prevent stormwater pollution by reducing the potential for contamination at the source of pollution. Examples include covering outdoor storage areas, use of efficient irrigation, and minimizing the use of landscaping chemicals. C) Treatment Control BMPs: Any engineered system designed to remove pollutants by simple gravity settling of particulate pollutants, filtration, biological uptake, media adsorption, or any other physical, biological, or chemical process. Examples include vegetated swales, and storm drain inserts. Site Design BMPs may reduce a development's need for Source and/or Treatment Control BMPs, and Source Control BMPs may reduce the need for Treatment Control BMPs. Therefore, all development that has the potential to adversely affect water quality shall incorporate effective post-construction Site Design and Source Control BMPs, where applicable and feasible, to minimize adverse impacts to water quality and coastal waters resulting from the development. Site Design and Source Control BMPs may include, but are not limited to, those outlined in the City's Storm Water Management program.

The proposed project design includes activities for the restoration and enhancement of wetlands and wetland buffers, which include treatment of storm-water to remove pollutants utilizing storm drain inserts and vegetative swales. Storm-Water Treatment and Control Plan: BMP Monitoring and Maintenance Plan, dated January 2019, was submitted for the proposed project. This document includes routine maintenance activities for bio-retention areas and permeable pavement/porous pavement, as well as a maintenance log to be maintained by property owners and available for inspection upon request by the City or Coastal Commission staff. Additionally, a SWPPP will be submitted for the proposed project, describing all construction site operator's activities to prevent storm-water contamination, control sedimentation and erosion, and comply with requirements of the Clean Water Act (HYDRO-1).

Policy OS-11.1: Use Integrated Management Practices in Site Design. The city shall require, where appropriate and feasible, the use of small-scale integrated management practices (e.g., Low Impact Development techniques) designed to maintain the site's natural hydrology by minimizing impervious surfaces and infiltrating stormwater close to its source (e.g., vegetated swales, permeable pavements, and infiltration of rooftop runoff).

In an effort to maintain the site's natural hydrology, the proposed project design includes numerous Low Impact Development techniques, including: 1) the utilization of porous pavement to reduce impervious surface onsite; 2) curb-cuts directing water from parking lot to bio-retention cells to filter storm-water; 3) vegetated bio-swales to filter water before entering wetlands; and 4) planting native and site-appropriate vegetation.

Policy OS-11.2: Preserve Functions of Natural Drainage Systems. Development shall be sited and designed to preserve the infiltration, purification, detention, and retention functions of natural drainage systems that exist on the site, where appropriate and feasible. Drainage shall be conveyed from the developed area of the site in a non-erosive manner.

In order to preserve functions of natural drainage systems on site, the proposed project design includes numerous Low Impact Development techniques, including: 1) the utilization of porous pavement to reduce impervious surface onsite; 2) curb-cuts directing water from parking lot to bio-retention cells to filter storm-water; 3) vegetated bio-swales to filter water before entering wetlands; 4) an emergency spillway; and 5) planting native and site-appropriate vegetation.

Policy OS-11.3: Minimize Impervious Surfaces. Development shall minimize the creation of impervious surfaces (including pavement, sidewalks, driveways, patios, parking areas, streets, and roof-tops), especially directly connected impervious areas, where feasible. Redevelopment shall reduce the impervious surface site coverage, where feasible. Directly connected impervious areas include areas covered by a building, impermeable pavement, and/or other impervious surfaces, which drain directly into the storm drain system without first flowing across permeable land areas (e.g., lawns).

The project is designed to minimize impervious surface with permeable pavement in the parking area, and the proposed trail passing through the site connecting CA Hwy 1 / N Main Street to the Haul Road is constructed of weatherproof decking as a raised platform.

Policy OS-11.4: Infiltrate Storm-Water Runoff. Development shall maximize on-site infiltration of storm-water runoff, where appropriate and feasible, to preserve natural hydrologic conditions, recharge groundwater, attenuate runoff flow, and minimize transport of pollutants. Alternative management practices shall be substituted where the review authority has determined that infiltration BMPs may result in adverse impacts, including but not limited to where saturated soils may lead to geologic instability, where infiltration may contribute to flooding, or where regulations to protect groundwater may be violated.

A preliminary storm-water management plan was submitted for the proposed project that includes the implementation of permeable pavement to infiltrate storm-water and minimize pollutant transport. Other features integrated into the design of project to maximize on-site infiltration include bio-retention facilities and bio-wales, which would filter storm-water runoff prior to entering wetlands or flowing to adjacent land on MacKerricher State Park. (Appendix 4 – Storm-Water).

Policy OS-11.5: Divert Stormwater Runoff into Permeable Areas. Development that creates new impervious surfaces shall divert stormwater runoff flowing from these surfaces into permeable areas, where appropriate and feasible, to enhance on-site stormwater infiltration capacity.

In an effort to divert storm-water runoff into permeable areas, the proposed project design includes numerous Low Impact Development techniques, including: 1) the utilization of porous pavement to reduce impervious surface onsite; 2) curb-cuts directing water from parking lot to bio-retention cells to filter storm-water; 3) vegetated bio-swales to filter water before entering wetlands; and 4) planting native and site-appropriate vegetation.

Policy OS-14.1: Minimize Polluted Runoff and Pollution from Construction. All development shall minimize erosion, sedimentation, and the discharge of other polluted runoff (e.g., chemicals, vehicle fluids, concrete truck wash-out, and litter) from construction activities, to the extent feasible.

The proposed project design implements Low Impact Development designs to filter storm-water runoff onsite. A SWPPP will be submitted for the proposed project, describing all construction site operator's activities to prevent storm-water contamination, control sedimentation and erosion, and comply with requirements of the Clean Water Act (HYDRO-1).

Policy OS-14.2: Minimize Land Disturbance During Construction. Land disturbance activities during construction (e.g., clearing, grading, and cut-and-fill) shall be minimized, to the extent feasible, to avoid increased erosion and sedimentation. Soil compaction due to construction activities shall be minimized, to the extent feasible, to retain the natural stormwater infiltration capacity of the soil.

Proposed grading could increase the potential of erosion and increase the amount of sediment carried by storm-water runoff, on and off the project site. Therefore, prior to issuance of building permit or grading permit: 1) appropriate best management practices (BMPs) shall be identified and submitted as part of the SWPPP (BIO-3); 2) all work involving or associated with soil movement and/or digging shall occur in compliance with SWPPP ;ground disturbance shall be limited to the minimum necessary and disturbed areas shall be stabilized as soon as feasible (BIO-5); and contouring topography within wetland buffers shall occur with hand-tools and disturb minimum of substrate to achieve functionality of the swale and emergency spillway (BIO-1).

Policy OS-14.3: Minimize Disturbance of Natural Vegetation. Construction shall minimize the disturbance of natural vegetation (including significant trees, native vegetation, and root structures), which are important for preventing erosion and sedimentation. Policy OS-14.4: Stabilize Soil Promptly. Development shall implement soil stabilization BMPs (including, but not limited to, re-vegetation) on graded or

disturbed areas as soon as feasible. Policy OS-14.5: Grading During Rainy Season. Grading is prohibited during the rainy season (from November 1 to March 30), except in response to emergencies, unless the review authority determines that soil conditions at the project site are suitable, and adequate erosion and sedimentation control measures will be in place during all grading operations.

Several mitigation measures have been drafted to protect and preserve natural vegetation by implementing BMPs (AIR-2, BIO-3, BIO-5, HYDRO-1) and limiting grading during the rainy season (BIO-5).

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. Water for the proposed site would be supplied by the City of Fort Bragg, so there would be no depletion of groundwater resources used by the development; existing wells on site would be decommissioned as part of the project. The project description incorporates restoring wetlands., bio-retention facilities, porous pavement and bio-swales, to treat storm-water onsite. As storm-water is primarily retained on site, groundwater recharge could occur. As such, the project would have a less than significant impact on groundwater supplies and groundwater recharge. Moreover, the project description includes restoration of wetlands on site, which would improve the quality and functionality of onsite wetlands thereby improving underground water supply.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:

i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact with Mitigation Incorporated. The existing hydrological connection between the wetlands on site and adjacent lands of MacKerricher State Park would not be modified and therefore the project would not substantially alter the existing drainage pattern onsite. Water would continue to flow in a westerly direction across the site, filtered by Low Impact Development designs before entering wetlands and continuing in a westerly direction to MacKerricher State Park lands by: 1) flowing underneath the Haul Road, which is constructed on top of large Redwood logs allowing water to seep through; or 2) as sheet flow over the Haul Road.

The City's Local Coastal Program contains numerous policies to protect and enhance the City's ESHA, which are analyzed and mitigated in Section IV Biological Resources, subsection b), and above in Section IV Hydrology and Water Quality, subsection a). With the following mitigation

measures in place: BIO-1, BIO-3, BIO-4, BIO-5, and HYDRO-1, the project would not result in substantial erosion or siltation on or off site. No further analysis is required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less than Significant Impact. The existing hydrological connection between the wetlands on site and adjacent lands of MacKerricher State Park would not be interrupted and substantially alter the existing drainage pattern onsite. Water would continue to flow in a westerly direction across the site, filtered by Low Impact Development designs before entering wetlands and continuing in a westerly direction to MacKerricher State Park lands by: 1) flowing underneath the Haul Road, which is constructed on top of large Redwood logs allowing water to seep through; or 2) as sheet flow over the Haul Road.

The storm-water management plan for the proposed project includes the implementation of porous pavement to filter and retain storm-water, and alleviate the potential for flooding on or off site. Additionally, measures integrated into the design of project, such as curb cuts, concrete swales, bio-swales and an emergency spillway further alleviate the potential for flooding on or off the site (Appendix 4 – Storm-Water). As designed, the project has a less than significant impact to substantially increase the rate or amount of surface water runoff that would result in flooding on-site. No further analysis is required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm-water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact with Mitigation Incorporated. The existing hydrological connection between the wetlands on site and adjacent lands of MacKerricher State Park would not be interrupted and substantially alter the existing drainage pattern onsite. Water would continue to flow in a westerly direction across the site, filtered by Low Impact Development designs before entering wetlands and continuing in a westerly direction to MacKerricher State Park lands by: 1) flowing underneath the Haul Road, which is constructed on top of large Redwood logs allowing water to seep through; or 2) as sheet flow over the Haul Road.

The storm-water management plan for the proposed project includes the implementation of permeable pavement to infiltrate storm-water, which reduces the potential for flooding on or off site. Additionally, measures integrated into the design of project, such as curb cuts, concrete swales, bio-swales and an emergency spillway further alleviate the potential for flooding on or off the site (Appendix 4 – Storm-Water). Storm-Water LID Calculations were submitted and reviewed by City staff. The project design uses conservative sizing factors based on local design storm conditions. As designed, the project would not create or contribute substantial runoff water in excess of the capacity of existing or planned storm-water drainage systems, nor increase sources of polluted runoff.

Final versions of the Grading Plan and SWPPP shall be reviewed and approved for compliance with local, state and Federal regulations prior to issuance of grading and building permit (HYDRO-1).

iv) Impede or redirect flood flows?

No Impact. The existing hydrological connection between the wetlands on site and adjacent lands of MacKerricher State Park would not be interrupted. Water would continue to flow in a westerly direction across the site, filtered by Low Impact Development designs before entering wetlands and continuing in a westerly direction to adjacent MacKerricher State Park lands by: 1) flowing underneath the Haul Road, which is constructed on top of large Redwood logs allowing water to seep through; or 2) as sheet flow over the Haul Road.

The storm-water management plan for the proposed project includes the implementation of porous pavement to filter and retain storm-water, and alleviate the potential for flooding on or off site. Additionally, measures integrated into the design of project, such as curb cuts, concrete swales, bio-swales and an emergency spillway further alleviate the potential for flooding on or off the site. As designed, the project does not impede or redirect flood flows. No further analysis is required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact with Mitigation Incorporated. Similar to other areas along the California coastline, the subject site could be subject to large storm waves. The California Emergency Management Agency, the California Geologic Survey, and the University of Southern California partnered to create the [California Official Tsunami Inundation Maps](#) and the project site is not within the inundation zone, according to the Fort Bragg quadrant.

The City of Fort Bragg, is in the generally recognized “safe elevation level” with regard to tsunami event, and is approximately 60 feet above mean sea level. However, since the property bluffs are approximately 25 feet in vertical height and the property elevation is approximately 40 feet above mean sea level, the property lies within a designated low-lying area. Therefore, impact or inundation from a severe storm surge or tsunami event must be considered a risk for the site, albeit a relatively low risk.

In Section IX Hazards and Hazardous Materials subsection f) the potential for coastal flooding is discussed and HAZ-1 drafted to create a site specific evacuation plan in the event of tsunami or coastal flooding. This plan would include provisions to routinely monitor storage of hazardous materials. As mitigated, there is a low risk for release of pollutants due to project inundation.

e/f) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact with Mitigation Incorporated. As stated and ensured with mitigation measures, HYDRO-1 and HYDRO-2 a SWPPP shall be submitted and approved by City Engineer, prior to issuance of a grading or building permit, and the project will be referred to North Coast Water Quality Control Board for review and potential permitting.

XI. Land Use and Planning

LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. The proposed project would be situated on a parcel between an existing lodging and an industrial facility supplying washed and unwashed aggregate materials. Parking for the proposed project is on the northern portion of the site, closest to the industrial facility, which will help serve as a buffer between the different zoning designations and land uses.

The two subject parcels APN 069-241-27 and APN 069-241-38 are designated Highway Visitor Commercial zoning and both parcels are currently vacant, with the exception of an asphalt pad and small shed structure on the southeast portion of site. Given the parcels have the same zoning designation and adjacent to an existing motel, no established community would be physically divide and the project would have no impact in this regard.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact with Mitigation Incorporated. As discussed and mitigated below, the proposed project would not have a significant environmental impact due to conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The land use of the proposed project is, “Lodging”, with accompanying restaurant, cocktail lounge and event center. These land uses are a permitted use in Highway Visitor Serving Commercial (CH) zoning and also meet a Coastal Act priority to provide visitor serving uses in the Coastal Zone.

The Land Use Element policies of the City’s Coastal General Plan and Coastal Land Use and Development Code set forth several policies and regulations related to development and operation of project site, for the purpose of avoiding or mitigating potential impacts to the environment. Applicable Land Use policies are listed, followed by an analysis and the proposed project’s compliance:

Policy LU-4.3 Large-Scale Commercial Development: To maintain scenic views of the coast and to ensure that building sizes at the City’s gateways are in scale with the community, no commercial building shall exceed the following limitations on the gross floor area: a) between the Noyo River and Pudding Creek Bridges - maximum 50,000 square feet; b) east of Highway One and north of Pudding Creek Bridge - maximum 30,000 square feet; **c) west of Highway One and north of Pudding Creek Bridge and south of the Noyo River Bridge - maximum 15,000 square feet;** and d) east of Highway One and south of Noyo River Bridge – maximum 40,000 square feet.

The project is comprised of three lodging structures – Building 1: 14,533 SF; Building 2: 14,798 SF; Building 3: 14,095 SF; and a 3,064 SF event center. All structures are under 15,000 SF to ensure building size is in scale with the community.

Policy LU-5.2: Ensure that there are adequate sites for visitor-serving land uses by: a) Maintaining existing areas designated for Highway-Visitor Commercial uses; b) Maintaining the Highway Visitor Commercial land use designation as one allowing primarily recreational and visitor-serving uses; and c) Reserving adequate infrastructure capacity to accommodate existing, authorized, and probable visitor serving uses.

The proposed project is “Lodging” with accompanying restaurant, cocktail lounge and event center, which meets a Coastal Act priority to provide visitor serving uses in the Coastal Zone. Furthermore, lodging and restaurants are considered permitted uses in the Highway Visitor Commercial (CH) zoning district where the proposed project is located. As such, the proposed land use is an appropriate for the subject site.

Policy LU-5.6: The use of private lands suitable for visitor-serving and commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

The proposed project is “Lodging” with accompanying restaurant, cocktail lounge and event center, which meets a Coastal Act priority to provide visitor serving uses in the Coastal one. Furthermore, lodging and restaurants are considered a permitted use in the Highway Visitor Commercial (CH) zoning district where the proposed project is located. As such, the proposed land use is an appropriate for the subject site.

Policy LU-10.2: Locating New Development. New residential, commercial, or industrial development, except as otherwise provided in the LCP, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. Where feasible, new hazardous industrial development shall be located away from existing developed areas.

There are currently three lodgings and a State Park parking lot for use by the general public along the western stretch of highway, north of Pudding Creek. The proposed project would continue the lodging land use of this area, keeping development contiguous and in close proximity to one another. This area of MacKerricher State Park is heavily used and there is evidence of environmental degradation along the bluffs from social trails. State Parks has identified this area for improvements and the agency intends to implement a single trail system for the vicinity north of Pudding Creek Trestle.

The applicant currently provides funds to MacKerricher State Park through the MacKerricher Park Improvement Fund, which is a collaboration between Mendocino Area Parks Association (MendoParks) and participating Fort Bragg Inns and their guests. The applicant’s current lodging establishments, Beachcomber Motel and Surf & Sand Lodge, raised \$104,000 for the MacKerricher State Park Improvement Fund in the past four years. If the proposed project is approved and constructed, the Avalon would also participate in this program and/or contribute support to State Parks for improvements as stated in mitigation measure PUB-3. For further

analysis and mitigation of social trails, refer to Section V Public Services, subsection a); Section XVII Recreation, subsection a); as well as mitigation measure PUB-3.

Policy LU-10.3: The location and amount of new development shall maintain and enhance public access to the coast by: (1) facilitating the extension of transit services where feasible; (2) providing non-automobile circulation within the development that includes circulation connections outside of the development; (3) assuring that the recreational needs of new residents will be supported by onsite recreational facilities and/or off-site local park recreational facilities to ensure that coastal recreation areas are not overloaded; and (4) utilizing smart growth and mixed-use development concepts where feasible to improve circulation and reduce auto use, where such auto use would impact coastal access roads.

The proposed project would provide vehicle parking for hotel guests only. However, the project would enhance public access to the coast by: 1) providing a dedicated public access path between Main Street/CA Hwy 1 and the Haul Road (**BIO-1**); 2) include facilities such as a restaurant, bar and event center facilities for hotel guests to reduce vehicle use; and 3) provide bicycles for guest use, which would provide non-automobile circulation, as well as, a recreational opportunity to explore MacKerricher State Park, Noyo Headlands coastal trail and the surrounding area. For discussion and analysis regarding the cumulative impact of social trails on MacKerricher State Park land in area north of Pudding Creek Trestle refer to Section V Public Services, subsection a); Section XVII Recreation, subsection a); as well as mitigation measure PUB-2.

Policy LU-10.4: Ensure Adequate Services and Infrastructure for New Development. Development shall only be approved when it has been demonstrated that the development will be served with adequate water and wastewater treatment. Lack of adequate services to serve the proposed development shall be grounds for denial of the development.

The City of Fort Bragg Public Works Department has reviewed the proposed development and determined the City has adequate water supply and waste water treatment facilities. It is anticipated that a sewer lift will be necessary to transport solid waste to manhole near N Main and Airport Road. For further analysis of City infrastructure, refer to Section XV Public Services.

Policy LU-10.5: Minimize Impacts on Air Quality and Green House Gasses. New development shall: 1) be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development, and 2) minimize energy consumption and vehicle miles traveled.

Environmental impacts regarding air quality and greenhouse gases are discussed and mitigated in Section III Air Quality, Section VIII Greenhouse Gas Emissions, and Section XVII Transportation. As designed and mitigated, project impacts on air and greenhouse gases are below Mendocino County Air Quality Management District (MCAQMD) thresholds of significance.

Coastal Land use and Development Code

In addition to Land Use Policies of the Coastal General Plan provided above, the City's Coastal Land Use and Development Code (CLUDC) and Fort Bragg Municipal Code of Ordinances (FBMC) includes regulations to avoid or mitigate environmental effects. Relevant provisions are listed with analysis and the projects compliance:

Outdoor Lighting. CLUDC Section 17.30.070 establishes standards for outdoor lighting. The proposed outdoor lighting complies with requirements and goes further to protect and shelter potential wetland wildlife from glare or excessive lighting is discussed in Section I Aesthetics, subsection d) by: 1) installing exterior lighting along the western facades with minimal lumens that are shielded; 2) the exterior balcony lighting along the western elevation would not merely be recessed and downcast, but also directed inward; and 3) native plants (wax myrtle, sword fern and huckleberry) would be established within the southern wetland buffer to further screen potential wildlife living in this area. These additional lighting considerations were incorporated into the project design as a result of site visits and consultation with California Department of Fish and Wildlife (CDFW) staff. As designed, the project would not create a new light source of substantial light or glare that would adversely affect day or nighttime views in the area.

Performance Standards. CLUDC §17.30.080 provides performance standards to minimize various potential environmental impacts and promote compatibility with adjoining land uses. Construction and post-construction operational impacts are discussed and mitigated throughout this environmental document and include:

- Dust: activities that may generate dust emissions are discussed and mitigated in: Section V Biological Resources (BIO-3 and BIO-5), Section X Hydrology and Water Quality (HYDRO-1 and HYDRO-2);
- Noise: activities that may generate ground vibration or excessive noise are discussed in Section XIII Noise and mitigated with BIO-3, and regulated by FBMC Section 9.44 Noise;
- Outdoor lighting: lighting and glare created by the proposed project is discussed in Outdoor Lighting section, directly above, and in Section I Aesthetics, subsection d); and
- Wastewater: storm-water runoff is discussed and mitigated in Section V Biological Resources, subsection a), b), c), and Section X Hydrology and Water Quality, subsection a).

Solid Waste/Recycling. CLUDC §17.30.110 sets forth solid waste and recycling requirements. The project will be served by Waste Management and containers will be fully enclosed with a concrete apron to avoid ground contamination, in compliance with City standards.

Restaurants. CLUDC §17.42.190 regulates the disposal of grease and oils for the protection of the environment and the City's waste water treatment facility. The proposed restaurant and bar

would have the required grease trap and back flow device, inspected and approved prior to finalization of building permit.

Environmentally Sensitive Habitat Areas (ESHA). CLUDC §17.50.050 applies to the review of coastal development permits for sites containing ESHA. In addition, the project must also comply with Chapter 17.58 because the ESHA onsite are Wetland ESHA. As discussed and mitigated in Section IV Biological resources, subsection a), b), c), d), e) and Section X Hydrology and Water Quality, subsection a), b) and c).

Shoreline Development. CLUDC Chapter 17.54 provides requirements to ensure development in the Coastal Zone shall: 1) minimize risk to life and property; 2) ensure structural integrity and stability; and 3) neither create or contribute significantly to erosion, and geologic instability, nor implement coastal armoring devices.

1. The proposed development would adhere to standards of the California Building Code and Fire Code. In addition, HAZ-1 requires applicant to prepare a Tsunami/Coastal Flooding Evacuation materials and staff training;
2. A Geotechnical Report prepared by a qualified, licensed, Certified Engineer was submitted as part of the application. Section VII Geology and Soils includes GEO-1, to ensure the geotechnical report recommendations are followed. In addition, the development would be constructed to standards of the CA Building Code. With these measures in place, the development would have structural integrity and stability; and
3. The project would not create or contribute significantly to: a) erosion as discussed and mitigated in Section V Biological Resources (BIO-3 and BIO-5), Section X Hydrology and Water Quality (HYDRO-1, HYDRO-2); b) geologic instability as discussed in Section V Biological Resources (BIO-3, BIO-5), Section X Hydrology and Water Quality (HYDRO-1), and Section VII Geology and Soils (GEO-1); and c) the project does not include coastal armoring devices.

Shoreline Access. CLUDC Chapter 17.56 provides requirements for the dedication and improvement of public access to and along the coast, in compliance with the California Coastal Act. Public access would be provided through the development, connecting CA Hwy 1 / N Main Street and the Haul Road. This access will be recorded as part of the deed for Parcel Merger.

Wetland Protection and Restoration. CLUDC Chapter 17.58 provides standards for protecting wetland resources, which is discussed and mitigated in Section V Biological Resources (BIO-1, BIO-2, BIO-3, BIO-4, BIO-5), Section X Hydrology and Water Quality (HYDRO-1, HYDRO-2). As designed and mitigated the project complies with wetland protection and restoration.

Historic Resource Protection. CLUDC Chapter 17.74 provides regulation to protect sites and structures identified by the community as culturally and/or historically significant. As discussed in Section V Cultural Resources, the site would not have an impact on historic resources. Should historic resources be discovered on site, CULT-1 ensures resources are evaluated in accordance with CEQA Guidelines 15.064.5.

Coastal Development Permit. CLUDC §17.71.045 establishes the process for review of Coastal Development Permits to ensure a project would be consistent with provisions of the City's Local Coastal Program. Following review of this CEQA document, a coastal development permit, including parcel merger will be presented to Planning Commission at a publically noticed Public Hearing for consideration. Should Planning Commission determine to approve requested coastal development permit, their decision would become final on the 11th day after the decision was rendered, when no appeal is made to the City Council. Following the City appeal period, a Notice of Final Action shall be submitted to the Coastal Commission. Within ten working days of receipt of Notice of Final Action the coastal development is appealable to Coastal Commission.

California Environmental Quality Act (CEQA). CLUDC Chapter 17.72 implements the requirements of CEQA. The proposed project is subject to the requirements of the California Environmental Quality Act (CEQA). The Lead Agency is the City of Fort Bragg. The City prepared an Initial Study to provide a basis for determining whether to prepare a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report.

Following the Initial Study, the City drafted mitigation measures and prepared this draft Mitigated Negative Declaration to be circulated to responsible and trustee agencies and made available to the public for a 30-day review period, prior to the Fort Bragg Planning Commission conducting a public hearing. At the close of the public hearing, the Mitigated Negative Declaration will be considered for adoption.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. No such plan has been adopted with the City's Local Coastal Program. There would therefore be no impact to a habitat conservation plan, nor a natural community conservation plan for the proposed project.

XII. Mineral Resources

MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The proposed project is not located in an area of known rock, aggregate, sand, or other mineral resource deposits of local, regional, or State residents, and does not contain mineral resources that are of value locally, to the region, or to residents. The project area is not identified as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Furthermore, the parcel is not utilized for Surface Mining and Reclamation Act (SMARA) activities. Therefore, the proposed project would not interfere with materials extraction or otherwise cause a short-term or long-term decrease in the availability of mineral resources. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The proposed project is not located in an area of known rock, aggregate, sand, or other mineral resource deposits of local, regional, or State residents, and does not contain mineral resources that are of value locally, to the region, or to residents. The project area is not identified as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Furthermore, the parcel is not utilized for Surface Mining and Reclamation Act (SMARA) activities. Therefore, the proposed project would not interfere with materials extraction or otherwise cause a short-term or long-term decrease in the availability of mineral resources. No impact would occur.

XIII. Noise

NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standard established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standard established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less Than Significant Impact. The Noise Element of the City's Coastal General Plan identifies maximum noise exposure levels by land use type. The City's Code of Ordinances includes Section 9.44 Noise which defines when noise is deemed a misdemeanor and the standards of enforcement. With these plans and policies in place, the project would not substantially increase ambient noise levels in the vicinity.

**TABLE N-4
NOISE AND LAND USE COMPATIBILITY STANDARDS**

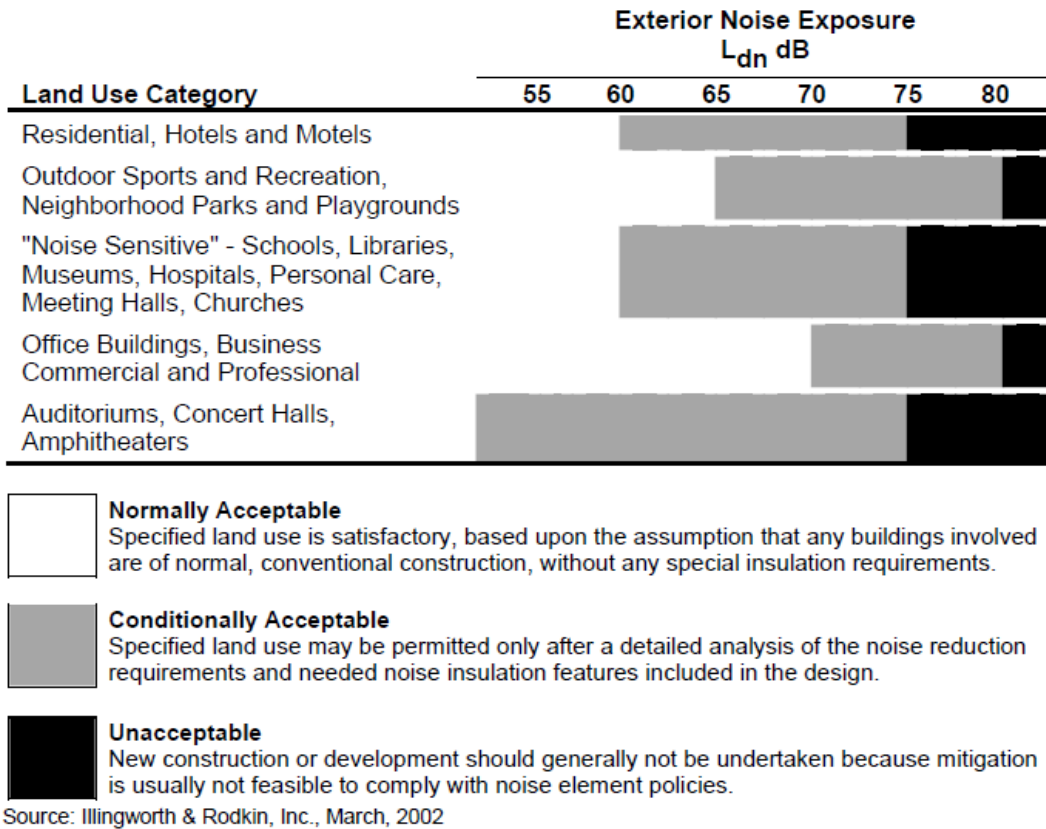


Table 6: Noise and Land Use Compatibility Standards

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact with Mitigation Incorporated. Construction activities have the potential to generate excessive groundborne vibration and noise levels. These activities would include site preparation work, foundation work, and new building framing. Mitigation measure BIO-3 addresses construction related impacts to wetlands and includes a provision that construction activities shall not occur during early morning, evening or nighttime hours, to minimize disturbance caused by artificial light and noise.

Furthermore, AIR-3 addresses operation of construction vehicles and equipment which includes provisions to minimize the number of vehicles and equipment running at the same time and that said vehicles and equipment are in good working order and not left idling. As mitigated, the project would not generate significant vibration or noise levels.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The project site is not located within two miles of a public airport or located within an area covered by an airport land use plan. However, the project would be within two miles of small private airstrip, Fort Bragg Airport (Destination Airport ID 82CL). This airport hosts about eight local pilots and their planes, available only to these pilots and their guests. Due to the small size and low number of flights (about 25 monthly), this airport is not considered a source of excessive noise. As such, the addition of the proposed project would not contribute to a safety hazard or excessive noise for people residing or working in the project area.

XIV. Population and Housing

POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

Less Than Significant Impact. The proposed project does not include the development of any residential units and is not expected to directly or indirectly induce substantial permanent population growth in the area. No new or extended roads or utilities are proposed as part of the project that would induce population growth. Therefore, impacts of the project on population growth would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project includes the construction of lodging, restaurant, bar and event facility on an existing vacant lot with landscaping, wetland restoration, parking lot and associated infrastructure. No housing would be demolished and there would not be a displacement of people. Development of the site would have no impact associated with the displacement of persons or housing.

XV. Public Services

PUBLIC SERVICES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

PUBLIC SERVICES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

1) Fire protection?

Less Than Significant Impact with Mitigation Incorporated. The City is served by the Fort Bragg Fire Protection Authority (FBFPA), referred to as, Fort Bragg Fire Department. It is a volunteer fire department with approximately 36 firefighters and four auxiliary members who actively dedicate themselves to protect life and property. The fire department operates out of three facilities: Main Street Fire Station (141 N. Main Street), Highway 20 Substation (32270 Highway 20), and Little Valley Fire Company (33680 Little Valley Road). Annually, the fire department responds to 500 to 600 calls, which vary from structure fires to public assists. Although the project would result in the addition of a commercial building, the structure would be equipped with automatic fire sprinkler systems.

The City's existing infrastructure has the ability to serve the domestic water needs of the proposed project, however, there is insufficient flow and pressure for required fire suppression needs. The applicant proposes off-site water storage tanks on the east side of N Main Street for fire suppression (Appendix 5 - Fire Suppression Tanks). The proposal for off-site water tank

storage has been preliminarily approved by the Fort Bragg Fire Department and Public Works Director. A condition of approval for the coastal development permit shall be included requiring that the applicant show documentation that required fire pressures can be achieved with offsite water storage tanks, prior to issuance of building permit. This special condition is also included herein as a mitigation measure:

PUB-1: Fire Suppression. Off-site water storage tanks shall be installed for required fire flow. The applicant shall provide documentation that necessary pressure can be achieved from the offsite water storage tanks to serve the required commercial fire suppression flows, prior to issuance of building permit.

PUB-2: Off-Site Water Tanks. Prior to issuance of a grading or building permit, applicant shall submit evidence of a legally binding document from the property owner upon which the Off-Site Water Tank is located to the applicant ensuring uninterrupted access for use, maintenance, etc. of the Off-Site Water Tank for as long as the Tank is used by the applicant. The City will review and concur with the document to ensure that this mitigation is met.

2) Police protection?

Less Than Significant Impact. Police protection services within the City of Fort Bragg are provided by the City of Fort Bragg Police Department (FBPD), located at 250 Cypress Street. The proposed development could result in more calls for service, however it would not result in any increased need for additional staff or stations. The increase of police protection due to the project would be minimal. The project would have onsite staff, 24-hours per day and 7-days per week, which would increase the security of development and reduce potential demand on police.

3) Schools?

Less Than Significant Impact. As mentioned above, it is anticipated that the local populace would occupy most of the jobs resulting in a minimal impact to schools. As the project does not have the potential to generate substantial population growth, it would not result in the need for construction of new school facilities. Furthermore, prior to issuance of building permit, the development would require the payment of local school district fees to be paid, which would mitigate any potential impact.

4) Parks?

Less Than Significant Impact with Mitigation Incorporated. In consideration of the oceanfront location and proximity to the Haul Road and MacKerricher State Park, it is likely there would be an increased use of MacKerricher State Park lands and the coastal trail of Noyo Headlands Park. This area of MacKerricher State Park north of Pudding Creek Trestle is heavily used with evidence

of environmental degradation along the bluffs from social trails. State Parks has identified this area for improvements and the agency intends to implement a single trail system for the vicinity north of Pudding Creek Trestle.

Currently, the applicant provides funds to MacKerricher State Park through the MacKerricher Park Improvement Fund, which is a collaboration between Mendocino Area Parks Association (MendoParks) and participating Fort Bragg Inns and their guests. The applicant's current lodging establishments, Beachcomber Motel and Surf & Sand Lodge, has raised \$104,000 for the MacKerricher State Park Improvement Fund in the past four years. If approved and constructed, the Avalon Hotel would also participate in this program. For further analysis and mitigation of social trails, refer to Section XVII Recreation, subsection a).

PUB-3: MacKerricher State Park. The applicant shall support California State Parks in future improvements to MacKerricher State Park in the area north of Pudding Creek Trestle by the following: 1) financial support via donations to Mendocino Area Parks Association's MacKerricher State Parks Improvement Fund; 2) provide native plantings for creation of a vegetated barrier along the western edge of the Haul Road to discourage creation of social trails; 3) provide educational information for visitors and staff to encourage responsible use of MacKerricher State Park and surrounding habitat; 4) provide educational information to guests with dogs clearly illustrating areas that are "dog friendly" and explicitly stating why dogs are not allowed in many areas; and 5) the removal of invasive plants and restoration of wetlands on-site to enhance natural habitat both on-site and on adjacent State parks land.

5) Other public facilities?

Less Than Significant Impact. The project is not likely to increase the local population and therefore the number of people visiting other public facilities, such as the local library would have a less than significant impact.

XVI. Recreation

RECREATION Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RECREATION Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
substantial physical deterioration of the facility would occur or be accelerated?				
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Less Than Significant Impact with Mitigation Incorporated. The project location is adjacent to the Haul Road, which provides access to the Haul Road, MacKerricher State Park and Noyo Headlands coastal trail. Increased use of these passive recreational facilities would occur as a result of the project. However, the proposed project includes measures to counteract this increased visitation with the following measures, as outlined in PUB-2: 1) financial support via donations to Mendocino Area Parks Association's MacKerricher State Parks Improvement Fund; 2) provide native plantings for creation of a vegetated barrier along the western edge of the Haul Road to discourage creation of social trails; 3) provide educational information for visitors and staff to encourage responsible use of MacKerricher State Park and surrounding habitat; 4) provide educational information to guests with dogs clearly illustrating areas that are "dog friendly" and explicitly stating why dogs are not allowed in many areas; and 5) the removal of invasive plants and restoration of wetlands on-site to enhance natural habitat both on-site and on adjacent State parks land.

These measures have been created in collaboration with California State Parks representatives, City staff and the applicant. As stated above, the applicant's participation in the MacKerricher State Park Improvement Fund has raised \$104,000 in the past four years. The addition of another hotel would increase donations and facilitate State Parks efforts to create a single trail system in the area north of Pudding Creek Trestle. Details of educational outreach materials are included in mitigation measures REC-1 and REC-2:

REC-1: Interpretive Panels. The applicant shall develop a minimum of four (4) interpretive panels to be installed adjacent to the public access trail. Proposed panels shall be submitted to the

Community Development Department and shall be reviewed by CDFW, State Parks, and Sherwood Valley Band of Pomo representatives, prior to installation.

REC-2: Educational Outreach – Guest and Staff Materials. Applicant shall develop written materials for individual guest rooms and available in the lobby for the purpose of educating visitors about coastal resource preservation.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project does not include new park or recreation facilities. This precludes the possibility of physical impacts on the environment from the construction of such facilities. No Impact would occur.

XVII. Transportation/Traffic

TRANSPORTATION/TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

a) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. Project implementation would not conflict with any ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Applicable policies are listed, followed by analysis below:

Policy C-2.2: Improvements to major road intersections for public safety or increased vehicle capacity shall be permitted, as necessary, in existing developed areas and where such improvements are sited and designed to be consistent with all policies of the LCP.

The proposed project does not include improvements to major road intersections. However, there would be highway improvements to CA Hwy 1 / N Main Street. All proposed improvements have been reviewed and preliminarily approved by Caltrans, who holds jurisdiction of this state highway (Appendix 9 – Highway Improvements). Additionally, the project would require an encroachment permit from Caltrans to solidify design and implementation of highway improvements (TRANS-1).

Policy C-2.6: Traffic Studies for High Trip Generating Uses: Traffic studies shall be required for all major development proposals, including but not limited to, drive-through facilities, fast food outlets, convenience markets, major tourist accommodations, shopping centers, commercial development, residential subdivisions, and other generators of high traffic volumes that would affect a Level of Service. Traffic studies shall identify, at a minimum: (a) the amount of traffic to be added to the street system by the proposed development; (b) other known and foreseeable projects and their effects on the street system; (c) the direct, indirect, and cumulative adverse impacts of project traffic on street system operations, safety, and public access to the coast; (d) mitigation measures necessary to provide for project traffic while maintaining City Level of Service standards; (e) the responsibility of the developer to provide improvements; and (f) the timing of all improvements.

The applicant submitted the following documents, prepared by a registered professional traffic engineer, for the evaluation of transportation and traffic of the proposed project:

- Traffic Impact Study for Avalon Hotel, dated October 2015;
- Access Evaluation for the Avalon Project memo, dated January 2018;
- Response to City of Fort Bragg and Caltrans Comments on The Traffic Impact Study for the Avalon memo, dated February 2019
- Parking Demand Analysis memo, February 2019
- Final revisions of Highway Improvements and Turn Lane

The traffic study demonstrates compliance with Policy C-2.6 because: a) the expected trip generation potential for the proposed project is 543 trips per day; b) a left center turn lane

to allow vehicles traveling northbound to enter the project safely would be installed; c) the 1.5 mile study segment had 35 reported collisions over a 5-year period, which was slightly higher than the state average, however, the injury rate of 28.6 is lower than the statewide average of 41.26 and there were no fatalities, so there is no demonstrated safety concern; d) recommendations contained in the Traffic Study were incorporated into the project design and would be implemented as part of the development permit; e) highway improvements, as approved by Caltrans and the City of Fort Bragg shall be the responsibility of the applicant and implemented prior to finalization of building permit; and f) the timing of all improvements (Appendix 8 – Traffic Study).

Policy C-10.2: Require Bikeways. Require new development to provide on-site connections to existing and proposed bikeways, as appropriate.

The proposed development is located adjacent to the Haul Road, which runs parallel to the ocean and is a popular bicycle and pedestrian facility. The project includes a dedicated public access through the site, connecting CA Hwy 1 / N Main Street to the Haul Road. Fifteen bicycle parking spaces for bicycles is included in the project, as well as access to bicycle use by hotel guests.

Policy C-11.2: Handicapped Access. In conformance with State and Federal regulations, continue to review all projects for handicapped access and require the installation of curb cuts, ramps, and other improvements facilitating handicapped access.

The proposed development shall adhere to standards of the CA Building Code, which includes provisions for Americans with Disability Act (ADA) accessibility. Sheet C-3 of the entitlement set (Appendix 1) shows the ADA parking plan, with four spaces that include curb cuts and ramps.

b) For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. Project implementation would attract a greater number of vehicles, pedestrians and cyclists to the vicinity, as the project intends to provide overnight lodging and event space, in addition to food and beverage services. Under existing conditions, all eight study intersections as well as the roadway segment, operate a level C or better overall. Under the anticipated future volume, these study areas would continue to operate acceptably at a level of service of C or better, with the exception of Pine Street and CA Hwy 1 / N Main Street. The Pine Street operation would decrease from D to E during the weekday peak PM period. This however, does not constitute a significant impact overall.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact with Mitigation Incorporated. The project does not include any hazardous design features, such as sharp curves or dangerous intersections. Primary access into the development would be the southern driveway, with right-turn-only, secondary access from the northern driveway.

Temporary traffic impacts could result from construction equipment traveling to and from the construction site and during implementation of proposed highway improvements. In order to ensure the project would not result in significant impacts to transportation/traffic during these activities, a Caltrans Encroachment Permit is required. Caltrans has jurisdiction over CA Hwy1 / Main Street and thereby the appropriate agency to review potential traffic issues and prevent traffic congestion caused by the proposed project. The inclusion of mitigation measure TRANS-1 would ensure approval of a Caltrans Encroachment Permit, which would mitigate and reduce the project's transportation/traffic impacts to a less than significant level.

TRANS-1: Caltrans Encroachment Permit. The applicant shall apply for and be granted an Encroachment Permit from Caltrans. Prior to issuance of building permit, a copy of the approved Caltrans Encroachment Permit shall be submitted to the City.

d) Result in inadequate emergency access?

Less than Significant Impact with Mitigation Incorporated. As discussed above in subsection a), traffic and circulation would continue to operate adequately at a level C or better at the study intersections and along the roadway segment study, with the exception of Pine Street. Implementation of TRANS-1 would prevent construction traffic impacts, so that project construction would not result in substantial traffic conflicts. Additionally, the site is accessible from two driveway access points. Consequently, as designed and mitigated the project would not impede on emergency access and thus, with mitigation, would have a less than significant impact.

XVIII. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DICUSSION OF IMPACT

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i.) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)?**

Less Than Significant Impact with Mitigation Incorporated. Public Resources Code 5020.1(k) defines a local register of historical resource as “a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution”. The City does not have the proposed site listed, designated or recognized on a local register of historical resource. In accordance with Assembly Bill 52, the City of Fort Bragg initiated tribal consultation to request input. Furthermore, Alta Archaeological Consulting performed a confidential archaeological study for the project. Cultural Resource Evaluation of Archaeological

Site CA-MEN-3646 (P-23-5486) located at 1211 N Main Street, City of Fort Bragg, Mendocino County, CA, dated March 2016.

Following Alta's evaluation and consultation with Sherwood Valley and of Pomo, the project was modified and refined to not have an impact on tribal cultural resources through implementation of: 1) established 5-foot to 50-foot buffers; and 2) installation of a protective cap material to a minimum depth of twelve-inches. The inclusion of mitigation measure TRIBAL-1 would ensure that impacts to unknown tribal cultural resources are less than significant.

TRIBAL-1: Tribal Consultation. Sherwood Valley Band of Pomo requested Tribal Monitoring during ground disturbing activities. At least ten days prior to any ground disturbing activities, the applicant shall contact Tina Sutherland, at tsutherland@sherwoodband.com or (707) 459-9690 for scheduling.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less Than Significant with Mitigation Incorporated. Public Resources Code 5024.1(c) states that "a resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria: 1) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; 2) is associated with the lives of persons important in our past; 3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or 4) has yielded, or may be likely to yield, information important in prehistory or history". The City does not consider the project location to be a historical resource.

XIX. Utilities and Service Systems

UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing				

UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project:

- a) **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Less than Significant Impact with Mitigation Incorporated. The proposed project would not result in the construction of new water or wastewater treatment facilities, as the City has determined there is adequate water supply and wastewater capacity to serve the proposed project. There is insufficient water pressure available to attain required fire flows, and as such, the project includes two off-site water storage tanks for this purpose. Mitigation Measure PUB-1 is included to ensure adequate pressure for fire suppression is available. PUB-2 is included to ensure access to the off-site water tanks is available in perpetuity.

Wastewater Capacity. The project would not result in the construction of new wastewater facilities. An 8" gravity sewer main extends to the southerly boundary of the project, which is adequately sized for the proposed development. A wastewater treatment facility upgrade is currently underway to improve the plant's treatment efficiency. The plant will continue to have a capacity of 3.7 MG per day. Influent volumes during 2019 (averaged from monthly rates) varied from 0.63 to 1.81 MG per day, and 0.42 to 1.47 MG per day of effluent.

Water Capacity. The City's existing water infrastructure has the ability to serve the domestic water needs of the proposed project. The water treatment plant has a capacity of 2.2 Million Gallons (MG) per day; treated volumes for 2019 varied from 0.66 to 0.97 MG per day (averaged from monthly rates). Current supply capacity exceeds current usage by approximately 100,000,000 gallons or 48%. A conservative estimate of long-term, future growth of 0.5% in water usage was assumed for this analysis to provide a measure of context. Extra water supply capacity can meet this level of growth for nearly 80 years. This growth assumption applies to the entire City (Appendix 10 – Water Model Presentation to City Council).

Water Flow. The City's existing infrastructure has the ability to serve the domestic water needs of the proposed project, however, there is insufficient flow and pressure for required fire suppression needs. The applicant proposes to place water storage tanks on the east side of N Main Street for fire suppression. The proposal for off-site water tank storage has been discussed and preliminarily approved by the Fort Bragg Fire Chief and Fort Bragg Fire Marshall. A condition of approval for the coastal development permit shall be included requiring that the applicant show documentation that required fire pressures can be achieved with the proposed water storage tanks, prior to issuance of building permit. This special condition is also included herein as a mitigation measure PUB-1 and PUB-2.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. The City has determined there is sufficient water supplies available to serve the proposed development. The Georgia Pacific lumber mill, which used a substantial volume of water, was closed in 2002. During the last few years Georgia Pacific was operating, City water sales averaged about 260 million gallons (MG) per year. After closure, water sales declined. From fiscal years 2010-11 to 2013-14, annual water use averaged about 220 MG. A low of less than 190 MG was achieved during 2015-16, due to highly effective water conservation efforts. Population growth in the City has generally been flat or negative since the closure of the mill, and enrollment in schools has reduced. 2018-19 water sales totaled just over 208 MG, well below historic use.

In 2016-17, the City constructed the Summers Lane Reservoir, adding over 14 MG in raw water storage. It allows the City to supplement low summer flows. In 2018, the City constructed a 1.5 MG water tank, supplementing the treated water supply. These improvements significantly increased the City's ability to provide water during times of shortage.

The City of Fort Bragg has created a Water Supply Model that allows for the input of variable water use scenarios. The model uses historical data from the period January 1, 1977 to December 31, 2015. This data includes two major droughts, and uses historic City demand volumes, source flow volumes, and tidal variations. As part of the modelling effort, multiple development scenarios were evaluated and presented to both the Planning Commission and the City Council. Results indicate there is adequate supply for anticipated growth, including all currently proposed projects, even in a severe drought scenario, such as the 2013-2016 drought (Appendix 10 –Water Model Presentation to City Council).

Current supply capacity exceeds current usage by approximately 100,000,000 gallons or 48%. A conservative estimate of long-term, future growth of 0.5% in water usage was assumed for this analysis to provide a measure of context. Extra water supply capacity can meet this level of growth for nearly 80 years. This growth assumption applies to the entire City.

- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. The City has determined adequate wastewater capacity exists to serve the proposed development demand, in addition to existing commitments. The wastewater treatment facility has a capacity of 3.7 MG per day. Influent volumes during 2019 (averaged from monthly rates) varied from 0.63 to 1.81 MG per day, and 0.42 to 1.47 MG per day of effluent.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

No Impact. CLUDC §17.30.110 sets forth solid waste and recycling requirements. The project will be served by Waste Management and containers will be fully enclosed with a concrete apron to avoid ground contamination, in compliance with City standards. Waste Management services include trash, recycling and compost services.

- e) Comply with federal, state, and local statutes and regulations related to solid waste?**

No Impact. California Green Building Standards requires all new construction project to implement a construction and demolition plan. As part of the building permit process, a Construction & Demolition (C&D) Deposit is required. Implementation of a construction and demolition plan must result in the diversion of at least 65% of waste generated during construction.

XX. Wildfire

WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment?

d) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The proposed project is NOT in or near state responsibility area or lands classified as very high fire hazard severity. As such, no impact would occur and no further analysis is required.

The Fort Bragg Fire Protection Authority (FBFPA), referred to as, Fort Bragg Fire Department, provides the City's fire protection services. The Fort Bragg Fire Department operates as a volunteer organization with approximately 36 firefighters and four auxiliary members who actively dedicate themselves to protect life and property. The project has been reviewed by the Fire Marshall and determined that the proposed off-site water tank storage could serve for fire suppression. The applicant must provide documentation that the water tank system can supply adequate pressure and flow for fire suppression, prior to finalization of building permit (PUB-1).

XXI. Mandatory Findings of Significance

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact with Mitigation. As discussed and mitigated in Section IV Biological Resources, impacts to the environment have been determined to have no impacts, to be less than significant or less than significant with mitigation to biological resources on site.

As discussed and mitigated in Section XVIII Tribal Cultural Resources, the project is designed to not impact tribal cultural resources through implementation of: 1) established 5-foot to 50-foot buffers; 2) installation of a protective cap material to a minimum depth of twelve-inches; and 3) tribal monitoring onsite during all ground disturbing activities.

- b/c) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

Less Than Significant Impact with Mitigation. Based on the analysis of the Initial Study and subsequent Mitigated Negative Declaration, the proposed project would not result in any significant environmental impacts on an individual or cumulative level, nor an adverse effect on human beings. Potentially significant impacts of the proposed project are mitigated to a less than significant level by the following:

AIR 1: Air Quality and GHG Emissions. The applicant will implement mitigation measures contained in Air Quality and GHG Emissions Analysis prepared by SHN in March 2020. Such measures include, but are not limited to the following: use of low VOC paint; low flow plumbing fixtures; recycling and compost facilities; water efficient landscaping; and dust control BMPs.

AIR-2: Dust Control. In order to minimize dust, Dust Prevention and Control Plan measures shall be incorporated into the Final Storm Water Pollution Prevention Plan (SWPPP) and submitted with final grading plan for approval of the Public Works Director per CLUDC 17.62.020. This plan shall include information and provisions:

- The plan shall address site conditions during construction operations, after normal working hours, and during various phases of construction.
- The plan shall include the name and 24-hour contact of responsible person(s) in case of complaints, questions, or an emergency.
- Grading shall be designed and grading activities shall be scheduled to ensure that repeat grading will not be required, and that completion of dust-generating activity will occur in shortest practical timeframe.
- All visibly dry disturbed areas shall be controlled by watering, covering, and/or other dust preventive measures.
- The plan shall include the procedures necessary to keep the adjacent public streets and private properties free of fugitive dirt, dust and other debris resulting from construction activities when importing or exporting of material.
- Graded areas shall be revegetated as soon as possible, but within no longer than 30-days. Disturbed areas that are to remain inactive longer than 30-days shall be seeded (with combination of terminal barley and native seed) and watered until vegetative cover is established.
- All earthmoving activities shall cease when sustained winds exceed 15 miles per hour. Wind speed shall be measured on-site by project manager with a handheld anemometer.

AIR-3: To minimize excessive exhaust emissions, at all times, construction vehicles and equipment utilized on-site shall: 1) be maintained in good condition; 2) minimize idling time to less than 5 minutes; 3) minimize the number of vehicles and equipment running at the same time; and 4) use alternatively fueled equipment, such as compressed/liquid natural gas or electric, when feasible.

BIO-1: Buffer Area. The proposed development includes 30-foot to 50-foot buffers from wetland and special status plant communities. Buffers shall be demarcated and clearly illustrated on a plat, to be recorded as a deed restriction accompanying the deed for new parcel resulting from the Parcel Merger. Contouring topography within wetland buffer shall occur with hand-tools and disturb minimum of substrate to achieve functionality of the swale and emergency spillway, as conveyed in Wetland Restoration, Buffer Enhancement and Mitigation Monitoring Plan, dated August 7, 2019.

BIO-2: Invasive Plants. Plants listed as moderate or highly invasive by the California Invasive Plant Council (Cal-IPC), shall be removed from site. Prior to the use of heavy equipment, all heavy equipment shall be washed at an off-site location to remove any caked mud or other debris that could harbor invasive plant seed. All erosion control shall be weed free. Landscaping shall utilize native plantings. Plantings within ESHA or ESHA buffers shall adhere to Coastal General Plan Policy OS-1.13.

BIO-3: Construction Related Impacts to Wetlands. Prior to issuance of a building permit or grading permit, appropriate best management practices (BMPs) shall be identified and submitted as part of the SWPPP subject to review and approval of the Public Works Director. ESHA resources shall be protected from disturbance by construction activities with temporary wire mesh fencing placed around wetland buffers prior to any construction activities. These protected areas shall not be used by workers or for the storage of machinery or materials. Measures shall include the use of a silt fence or other erosion control measures to prevent sediment from entering the wetland. Erosion control devices shall not contain monofilament as this may pose a potential entanglement hazard to sensitive amphibian species that may occur in the area. Construction activities shall not occur during early morning, evening or nighttime hours, to minimize disturbance caused by artificial light and noise.

BIO-4: Long-Term Impacts to Wetlands. A final Wetland Mitigation Monitoring Plan shall be submitted by the applicant and approved by the Public Works Director, prior to issuance of building permit or commencement of grading.

BIO- 5: Erosion Control. All work involving or associated with soil movement and/or digging shall occur in compliance with the SWPPP. Ground disturbance shall be limited to the minimum necessary and disturbed areas shall be stabilized as soon as feasible.

BIO-6: Birds. The breeding season for birds is typically from February to August. Prior to the onset of construction activities during this period, a qualified biologist shall perform breeding bird surveys within 14-days. If active breeding candidate, sensitive or special status bird nests are observed, no ground disturbance shall occur on site until all young are no longer dependent on upon the nest, unless approved by CA Department of Fish and Wildlife. A qualified biologist shall observe the nest weekly to ensure the nest site is protected from disturbance.

BIO- 7: Special Status Frogs. Prior to construction activities, project contractors shall be trained by a qualified biologist in the identification of the northern red-legged frog. Construction crews shall begin each day with a visual search, paying particular attention to stacked materials and silt fencing protecting wetland areas. If a rain event occurs, all construction activities shall cease for 48 hours and the site shall be surveyed for northern red-legged frogs before work resumes. If a northern red-frog is identified, all work shall cease, and a qualified biologist shall be consulted. Prior to initiating work, City staff shall be notified of measures taken.

CULT-1: Cultural Resources. If buried human remains, historic or archaeological resources are discovered during construction, operations shall cease immediately and a qualified archaeologist shall be consulted to evaluate the resource in accordance with CEQA Guidelines 15064.5.

GEO-1: Structural Integrity. Implement Preliminary Geotechnical Report Recommendations, as outlined in Brunsing Associates, Inc. Geotechnical Investigation, dated December 2015 and the standards of the California Building Code.

HAZ-1: Tsunami/Coastal Flooding Evacuation Materials and Training. The applicant shall prepare a tsunami/coastal flooding evacuation plan for the project, to be submitted and approved by the Fort Bragg Chief of Police. This plan shall follow the guidelines of the City of Fort Bragg Tsunami Contingency Plan and shall identify alert systems, response actions, evacuation routes and protocol. Relevant materials shall be provided in each guest room. Hotel staff shall be trained in an ongoing basis. The location and maintenance of emergency response supplies, as well and location and proper storage of hazardous materials on-site shall be included.

HYDRO-1: SWPPP Required. Prior to grading or construction activities, the project applicant shall submit SWPPP for review and approval by City engineer.

HYDRO-2: Clean Water Act. Prior to grading or construction activities, the project applicant shall submit application to the North Coast Regional Water Quality Control Board for review of the pertinent water quality issues in order to avoid and minimize impacts to wetlands and water of the state on site.

PUB-1: Fire Suppression. The applicant shall provide documentation that necessary pressure can be achieved for required commercial fire suppression flows, prior to issuance of building permit.

PUB-2: Off-Site Water Tank Storage. Prior to issuance of a grading or building permit, applicant shall submit evidence of a legally binding document from the property owner upon which the Off-Site Water Tank is located to the applicant ensuring uninterrupted access for use, maintenance, etc. of the Off-Site Water Tank for as long as the Tank is used by the applicant. The City will review and concur with the document to ensure that this mitigation is met.

PUB-3: MacKerricher State Park. The applicant shall support California State Parks in future improvements to MacKerricher State Park in the area north of Pudding Creek Trestle by the following: 1) financial support via donations to Mendocino Area Parks Association's MacKerricher State Parks Improvement Fund; 2) provide native plantings for creation of a vegetated barrier along the western edge of the Haul Road to discourage creation of social trails; 3) provide educational information for visitors and staff to encourage responsible use of MacKerricher State Park and surrounding habitat; 4) provide educational information to guests with dogs clearly illustrating areas that are "dog friendly" and explicitly stating why dogs are not allowed in many areas; and 5) the removal of invasive plants and restoration of wetlands on-site to enhance natural habitat both on-site and on adjacent State parks land.

REC-1: Interpretive Panels. The applicant shall develop a minimum of four (4) interpretive panels to be installed adjacent to the public access trail. Proposed panels shall be submitted to the Community Development Department and shall be reviewed by CDFW, State Parks, and Sherwood Valley Band of Pomo representatives, prior to installation.

REC-2: Educational Outreach – Guest and Staff Materials. Applicant shall develop written materials for individual guest rooms and available in the lobby for the purpose of educating visitors about coastal resource preservation.

TRIBAL-1: Sherwood Valley Band of Pomo requested Tribal Monitoring during ground disturbing activities. The applicant shall contact Tina Sutherland at (707) 459-9690 or tsutherland@sherwoodband.com to schedule monitors at least ten days prior to any ground disturbing activities.
