

CONFORMANCE WITH COASTAL ACT PRIORITIES & CITY'S LCP

This is a high-level “fly-over” analysis of the conformance of the proposed Land Use Plan with Coastal Act priorities and specific policies of the City’s Coastal General Plan. Both the City and the Coastal Commission will complete a more comprehensive analysis during the LCP Amendment submittal and review process. The purpose of this brief fly-over is to identify where the plan effectively implements Coastal Act priorities and LCP policies and where it may need additional refinement for conformance.

Coastal Act Priorities

- **Coastal Access.** The proposed Land Use Plan includes multiple connections to Noyo Headlands Park.
 - Three connections are illustrated north of Pine Street, one connection is illustrated between Pine Street and Oak Street, and four new connections are illustrated south of the Mill Pond.
 - The process for financing and developing these coastal access routes will be defined in both the LCP amendment and the Development Agreement.
 - The Mill Pond area is the only location without connections to the coast/beach. It is likely that the City and/or the Coastal Commission will require coastal access to the beach at Fort Bragg Landing (west of the mill pond area) as part of the Mill Pond Remediation project and/or this LCP amendment.
- **Open Space & Parks.** The Land Use Plan designates sufficient area (104 acres or 35% of MR’s property) as open space and parks.
 - The draft Land Use Plan includes significant open space (26 acres) north of Redwood Avenue east of the Coastal Trail. This is consistent with previous Land Use Plans prepared through previous community planning processes.
 - Also consistent with previous planning processes the plan designates the Mill Pond area, Ponds 1-4 and the forested areas as open space. This open space area is 72 acres or about 24% of MR’s property.
 - The project illustrates the daylighting of the culvert between Maple Street and Pond 8 which has also been discussed in previous iterations of the Land Use Plan.
 - The Land Use Plan also includes two new public parks (6.6 acres) on the southern portion of the site.
- **Coastal Dependent Uses** (visitor serving, coastal related industries, coastal recreation, etc.)
 - The Land Use plan includes 43 acres (14.6%) of MR’s property designated for Highway Commercial and a hotel conference center, which are coastal dependent uses.
 - Additionally, the Land Use Plan includes the Noyo Center property (11 acres) as a coastal dependent use, however that site is not part of this LCP amendment as it has already been rezoned for the Noyo Center.

- **Protection of Wetlands and Environmentally Sensitive Habitat Area.** The Land Use Plan designates known wetlands in the central open space configuration which is 72 acres or 24% of MR's site. However, the site has not been surveyed for Coastal Act wetlands and based on aerial imagery there are likely other Coastal Act wetlands on the site that will further constrain development within some proposed parcels. Specifically parcels S9, S10, S6, and S1 likely have Coastal Act wetland features over a portion of each parcel. Additionally, the area between Pond 5 and Pond 8 may also contain Coastal Act wetlands which may constrain the north-south road and trolley track or require wetland mitigation/creation somewhere else on the site.
- **Protection of Cultural Resources.** The relocation of the trolley line will protect known cultural resource sites. However, much of the site has not been surveyed for cultural resources and the City will require cultural resource surveys prior to approving development on the site as part of the Coastal Development Permit process. In addition, tribal consultation will be conducted during the LCP amendment process in accordance with State and federal laws.
- **Protection of Public Views to and Along the Ocean.** The site will be analyzed for impacts to ocean views as part of the LCP amendment process. The Coastal Act protects public views from street corridors and public parks. Potential views which could be blocked with future development include views from Alder Street, Madrone Street and Maple Street. Views will also likely be blocked by future development from Main Street between Walnut and South Street. The LCP amendment will include a visual impact analysis to potentially establish some view corridors from these public vantage points.
- **Protection of Water Quality.** All projects will need to comply with the City's LCP which includes multiple protections for water quality.
- **Retention of Infrastructure Capacity (water, sewer, road capacity) for Priority Coastal Uses.** The City's capacity to provide all City services (water, sewer, road capacity, stormwater management, police and fire services) will be analyzed as part of the LCP amendment process. This analysis may require further changes in the Land Use Plan.

Relevant Fort Bragg LCP Policies

The City's Coastal General Plan includes the following policies which are specifically relevant to the evaluation of the draft Land Use Plan:

Policy LU-7.1 Changes in Industrial Land Use. *Require that any Local Coastal Program (LCP) amendments and rezoning of lands which are designated Timber Resources Industrial: 1) be subject to a comprehensive planning process consistent with Policy LU-7.2; and 2) be submitted to, and effectively certified by, the Coastal Commission as an LCP amendment.*

The City is currently engaged with the community and the property owner in the beginning of a comprehensive planning process, which will continue with multiple community workshops for the coming year(s). The consistency of the draft Land Use Plan with Policy LU-7.2 is analyzed below.

Policy LU-7.2: Comprehensive Planning Process Required. *LCP amendments that propose to redesignate lands designated Timber Resources Industrial must be developed*

through a comprehensive community-based planning process that addresses at a minimum an area including one or more of the subareas as shown on Map LU-4. Community participation shall be solicited throughout the planning process in accordance with established City practices and CLUDC requirements. The LCP amendment shall:

- a) Designate new land use classifications, and include development policies and standards that establish the kinds, locations and intensity of land uses;*
- b) Identify adequate connections for existing and future infrastructure such as roads, utilities, and coastal access to surrounding developed and undeveloped areas, including ensuring adequate public vehicular, bicycle, and pedestrian access is provided from Highway One to the coastal trail within each of the subareas shown on Map LU-4;*
- c) Establish orderly phasing for development and future rezoning activities, including ensuring that adequate public services are available for new development;*
- d) Include other measures as needed to protect the health, safety, and well-being of the community;*
- e) Map land uses and transportation facilities, including coastal access; and*
- f) Be consistent with the all policies of the Coastal Act and Fort Bragg's LCP.*

It is too early in the process to evaluate conformity with the entirety of policy LU-7.2, However some progress has been made towards achieving a), b) and e). A development phasing plan c) will be developed as part of the LCP amendment.

Policy C-2.10 Continue Grid System onto Mill Site: *Planning Areas A and B shown on Map LU-4 shall include the extension of the City's street grid and a north/south arterial, as feasible. Transportation facilities within Planning Areas A and B shall serve local traffic, pedestrian, and bicycle circulation and provide public vehicular, bicycle, and pedestrian access from Highway One to the coastal trail at multiple locations. The trail system in Planning Areas A and B shall provide maximum public access to the coast.*

The Land Use Plan does not yet implement this policy. Specifically, the grid onto the Mill Site is not continued at Fir and Bush streets. The grid on the southern portion of the site is discontinuous with the City circulation system due to the strand of trees and wetlands between Maple and Walnut streets. City Council should consider if Oak Street should be continued onto the site.

Policy C-2.7: Consider Impacts to Roads for LCP Amendments. *Direct, indirect, and cumulative adverse impacts to Highway 1 capacity in the rural areas surrounding Fort Bragg shall be considered during the review of proposed LCP amendments that would increase density or change land use classifications to ensure that Highway 1 in rural areas outside the Mendocino County urban/rural boundary remains a scenic two-lane road consistent with Section 30254 of the Coastal Act.*

The level of development intensity and density has not yet been determined for the proposed Land Use Plan and, therefore, compliance with this policy will need to occur once that has been determined and technical studies have been completed for the proposed LCP amendment.

There are many other policies in the City's Coastal General Plan which will further shape the LCP amendment as this process progresses, which are not discussed here as the project is still in its early stages.