



CITY OF FORT BRAGG

Incorporated August 5, 1889
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**INITIAL STUDY AND
MITIGATED NEGATIVE DECLARATION**

PROJECT TITLE: Inland General Plan Amendment - Housing Element Update (2019)

PROJECT NUMBER: General Plan Amendment 1-19 (GPA 1-19)

LEAD AGENCY: City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437

CONTACT: Marie Jones, Community Development Director

LOCATION: Street
Fort Bragg, CA
APNs

PROPERTY OWNERS: NA Governor's Office of Planning & Research

APPLICANT/AGENT: City of Fort Bragg **AUG 09 2019**

ZONING: All Zoning Districts **STATE CLEARINGHOUSE**

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 a draft Mitigated Negative Declaration that was circulated to responsible and trustee agencies and made available to

the public for a 30-day review period on June 20th 2019. The Housing Element was subsequently submitted to the Housing and Community Development Department (HCD) for review. As a consequence of that review six new programs were added to the Housing Element. The new programs are listed below and **bolded** for emphasis in the project description.

- Program H-1.6.3: **Redevelopment of Non-Vacant Sites**
- Program H-1.7.13 **Rezone a Portion of the GP Mill Site for Housing.**
- Program H-2.5.8. **Maximize Housing Density by Right, for projects with 20%+ Affordable Units.**
- Program H-2.5.9. **Encourage and Support Land Divisions to Support Affordable Housing**
- Program H-2.8.9 **Safe Parking Pilot Program.**
- Program H-2.8.10 **Define Group Home**
- Program H-5.3.4. **Replacement Program for Units that are Demolished for new Development.**

Additionally, the City received a comment letter from the Department of Fish and Wildlife which sought additional analysis including a water budget for properties which could potentially be affected by Program H-2.5.8 which requires the City to remove the Use Permit requirement for properties which have been on the City's vacant land inventory. The requested analysis has been added to this Mitigated Negative Declaration and are **Bolded** for ease of identification.

PUBLIC AGENCIES CONSULTED

- California Department of Fish and Wildlife
- California Coastal Commission
- Sherwood Valley Band of Pomo
- Fort Bragg Fire Department
- Mendocino County Planning and Building
- Fort Bragg Public Works Department

PROJECT DESCRIPTION

The City of Fort Bragg proposes to adopt the following goals, policies and programs in its Draft 2019 Housing Element:

Goal H-1 Provide a range of housing, including single-family homes, townhouses, apartments, and other housing types to meet the housing needs of all economic segments of the community.

Policy H-1.1 **Regional Housing Needs**: Ensure that adequate residentially-zoned land is available to accommodate the City's Regional Housing Needs Determination as described in Section II.

Program H-1.1.1 **Inventory of Infill Sites**: Maintain the inventory of vacant and underdeveloped residentially designated land in the City's GIS system. Provide copies of the inventory for public distribution on the City website.

Responsibility: Community Development Department

Financing: City

Scheduling: Ongoing, as vacant sites are developed the GIS system is updated and a map and list of vacant sites is posted on the City's website.

Policy H-1.2 **Mixed-Use Development**: Encourage the development of mixed-use projects that include multi-family residential uses (upstairs and at the rear of properties) in conjunction with

commercial enterprises on the street frontage in commercial zones and use Design Review to minimize conflicts between residential and commercial uses.

Policy H-1.3 Secondary Dwelling Units: Continue to facilitate the construction of secondary dwelling units on residential properties.

Program H-1.3.1 Secondary Dwelling Unit Design: Continue to implement the City's free secondary unit program to provide affordable and aesthetically pleasing second unit designs for the development of secondary units in Fort Bragg.

Responsibility: Community Development Department
Financing: City and Housing Developers
Scheduling: Ongoing

Program H-1.3.2 No Development Impact Fees for Secondary Units: Continue to refrain from charging Capacity Fees for second units.

Responsibility: City Council
Financing: Rate payers
Scheduling: Ongoing

Program H-1.3.3 Develop Amnesty/Legalization Program for Illegal Residential Units: Continue to provide a legalization program for illegal residential units, especially second units, that includes requiring property owners to undertake improvements to meet the requirements of the current building code.

Responsibility: Community Development Department
Financing: City and property owners
Scheduling: 2020-2021
Quantification: 2 units

Program H-1.3.3 Junior Accessory Dwelling Units: Consider revising the zoning ordinance to allow junior accessory dwelling units (units' no more than 500 SF and contained entirely within an existing single-family structure) in single-family residential and multifamily zoning. The Junior Accessory units would be in addition to a second unit, allowing up to 3 units per parcel by right.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2021
Quantification: 5 units

Program H-1.3.5 Allow Tiny Homes as Second Units: Consider revising the zoning ordinance so that people can park mobile residencies (residences built under the vehicle code) as a second unit, so long as the residence looks like a house (e.g. external siding that is compatible with the residential neighborhood, skirted if the wheels would otherwise be visible from the public right of way, etc.).

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2021
Quantification: 5 units

Program H-1.3.6 Alternative Designs for Second Units: Explore options for allowing cutting edge construction techniques for second units including but not limited to: straw bale, rammed earth, prefabricated second units, etc.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2021
Quantification: 5 units

Policy H-1.5 Manufactured Housing: Continue to encourage manufactured homes through the application of established design standards.

Policy H-1.6 Infill Housing: Encourage housing development on existing infill sites in order to efficiently utilize existing infrastructure.

Program H-1.6.1: Continue to update the vacant parcels map and provide information to potential developers about infill development opportunities in Fort Bragg.

Responsibility: Community Development Department
Financing: City and Housing Developers
Scheduling: Ongoing. As vacant sites are developed, the GIS system is updated and a map and list of vacant sites is posted on the City's website.

Program H-1.6.2: Planning Incentives: Consider adopting planning incentives for new residential development on infill sites.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: Consider updating the LUDC to provide a mechanism for market rate housing projects to request up to one planning incentive for development of market rate housing on Infill sites (as defined by CEQA).
Quantification: 20 units

Program H-1.6.3: Redevelopment of Non-Vacant Sites: Require the replacement of housing units subject to the requirements of Government Code, section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or non-residential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to: 1) non-vacant sites and 2) vacant sites with previous residential uses that have been vacated or demolished.

Responsibility: Community Development Department
Financing: General Fund
Scheduling: The replacement requirement will be implemented by 2020/21 and applied as applications on identified sites are received and processed.
Quantification: 5 units

Policy H-1.7 Workforce Housing: Encourage multi-unit housing developments in order to encourage market rate rental housing, affordable housing and lower cost ownership opportunities such as townhomes and condominiums.

Program H-1.7.1: Permit Streamlining. Develop a streamline permitting process for local and out of area developers to permit affordable and market-rate multi-unit housing projects. Project streamlining for larger vacant parcels (2 to 10 acres) could consist of: 1) completion of all resource studies (botanical, traffic, cultural resources, etc.); 2) completion of the CEQA analysis; and/or 3) completion of the site plan, elevations, and all permitting for a vacant parcel.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020-2025
Quantification: 20 units

Program H-1.7.2: Site Improvements. Obtain grant funding for off-site improvements in support of affordable multi-unit housing projects

Responsibility: Community Development Department
Financing: CDBG, HEAP, Home, other grant programs
Scheduling: Ongoing
Quantification: 20 units

Program H-1.7.3: Market Study. Complete a housing market study for market rate multi-family housing development in Fort Bragg and use it to market Fort Bragg to housing developers.

Responsibility: Community Development Department
Financing: General Fund
Scheduling: Ongoing

Program H-1.7.4: Attract Multi-Unit Developers. Work to attract multi-unit housing developers to the Fort Bragg Market place.

Responsibility: Community Development Department
Financing: General Fund
Scheduling: Ongoing
Quantification: 20 units

Program H-1.7.5: Allow Higher Densities by Right. Consider revising the zoning ordinance to allow for one or more of the following: 1) allow multi-family development in Medium Density and High Density zoning districts (by right) without Use Permit approval; 2) allow multi-family development (by right) without use permit approval in all zoning districts if the project includes 20 percent or more of its units affordable to lower income household; and/or 3) allow multi-family projects of 5 units or less without use permit approval in Medium and High density zoning districts.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020-2021
Quantification: 30 units

Program H-1.7.6: Allow Higher Densities in Single Family Residential Districts with Use Permit Approval. Consider revising the zoning ordinance to allow three or four-unit developments on larger parcels within Single Family Residential Zoning districts with a Use Permit. Consider revisions to the Lot Coverage Ratio and Floor Area Ratio to control building size and massing.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020-2021
Quantification: 12 units

Program H-1.7.7: Simplify Design Review for Small Residential Projects. Continue the process of revising the Design Review Guidelines to make them more effective. Consider exempting 3 and/or 4 unit projects from the need to obtain a Design Review permit and/or consider simplifying the Design Review requirements for 3 and 4 unit projects.

Responsibility: Community Development Department

Financing: General Plan Maintenance Fee Fund
Scheduling: 2020
Quantification: 12 units

Program H-1.7.8: Workforce Housing in Mixed-Use Zoning. Continue to allow workforce housing in all zoning districts that allow mixed-use development.

Responsibility: Community Development Department
Financing: Applicants
Scheduling: Ongoing
Quantification: 10 units

Program H-1.7.9: Live-Work Housing in Industrial Zoning Districts. Continue to allow live-work housing in all industrial zoning districts.

Responsibility: Community Development Department
Financing: Applicants
Scheduling: Ongoing
Quantification: 10 units

Program H-1.7.10: Tiny Home Community. Consider adopting new zoning regulations to allow for small home subdivisions, with small individual parcel ownership, in all residential zoning districts. Consider changing the minimum lot size and minimum parcel dimensions of the LUDC to accommodate tiny home communities as part of a planned unit development.

Responsibility: City Council, Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020-2021
Quantification: 10 units

Program H-1.7.11: Public Private Partnership for Major Subdivisions. Consider establishing a partnership between the City and existing property owners to complete subdivisions of 4+ lots for resale of parcels. This program could consist of the City taking the role of agent for the subdivision of underutilized parcels into smaller lots in Fort Bragg in order to facilitate utilization of these parcels for residential development. For example, the City could complete all the studies and the subdivision to divide the main lot into smaller lots, which the property owner could then sell. The City could be repaid by the property owner upon sale of the parcels or receive a dedication of one parcel for affordable housing.

Responsibility: City Council, Community Development Department
Financing: Property Owner and General Plan Maintenance Fee Fund
Scheduling: 2020-2025
Quantification: 10 units

Program H-1.7.12: Mitigation Banks. Consider establishing a habitat and/or wetland mitigation bank with a non-profit Land Trust to establish an offsite mitigation bank for impacts to wetlands and ESHA communities.

Responsibility: Community Development Department, Land Trust, etc.,
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020-2021
Quantification: 10 units

Program H-1.7.13: Rezone a Portion of the GP Mill Site for Housing. Continue the community-based planning process and consider rezoning a portion of the Mill Site for workforce and affordable housing. Consider submitting a Local Coastal

Program to the Coastal Commission for the approval of at least 25 acres of residential zoning on the Mill Site.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020-2025
Quantification: 50 units

Policy H-1.8 Substandard Housing. Work with state agencies and property owners to repair and replace substandard housing.

Program H-1.8.1 Repair and Replace. Give preference to the repair or replacement of residential structures whenever it is economically feasible (repair of less than 75% of structure) over replacement with non-housing structures.

Responsibility: Community Development Department
Financing: General Fund
Scheduling: Ongoing
Quantification: 2 units

Program H-1.8.2 Substandard Housing Program. Participate in the Franchise Tax Board (FTB) Substandard Housing Program, which assists the state and local agencies responsible for addressing unsafe living conditions that violate health and safety codes. Property owners in violation of health and safety code standards are not allowed to make certain deductions on their personal tax returns pursuant to California Revenue & Taxation Code (CR&TC) Sections 17274 and 24436.5. That additional revenue collected by FTB is transferred to the Local Code Enforcement Rehabilitation fund. These funds are then disbursed to the cities and counties that generated the notification of substandard housing to the FTB. The City will use funds collected from Franchise Tax Board (FTB) Substandard Housing Program for code enforcement for residential properties and to address health and safety issues in residential properties that would otherwise be red-tagged.

Responsibility: Community Development Department
Financing: Franchise Tax Board
Scheduling: Ongoing
Quantification: 3 units

Policy H-1.9 Work to Reduce the Cost of Construction and permitting Timeframes

Program H-1.9.1: Building Permits. Consider hiring a contract building inspector to bring building inspection services into the City in order to improve timeliness and inspection certainty.

Responsibility: City Council, Community Development Department
Financing: Building Permit Fees
Scheduling: 2020-25
Quantification: none

Program H-1.9.2: Reduce the Cost of Construction. Explore the feasibility of adopting a modified version of the Uniform Building Code and consider not adopting some of the costly new 2020 UBC requirements.

Responsibility: City Council, Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020
Quantification: none

Goal H-2 **Expand affordable housing opportunities for persons with special housing needs such as the elderly, the disabled, households with very low to moderate incomes, and first time home buyers.**

Policy H-2.1 Available Funding Sources: Utilize County, State and Federal programs and other funding sources that provide housing opportunities for lower-income and special needs households.

Program H-2.1.1 Available Funding: Seek available State and Federal assistance to develop affordable housing for seniors, the disabled, persons with developmental disabilities, lower-income large households, and households with special housing needs. Work with non-profit and for-profit affordable housing developers to apply for State and Federal funding. Seek funding for affordable housing from all sources.

Responsibility: Community Development Department
Financing: State and Federal sources
Scheduling: Apply for funding as funding cycles occur
Quantification: 65

Policy H-2.2 Encourage Senior Housing: Encourage affordable and market rate senior housing projects to be developed with density bonuses and flexible parking standards where consistent with maintaining the character of the surrounding neighborhood.

Program H-2.2.1 Affordable Senior Housing: Maintain an inventory which identifies properties which are potentially well-suited for senior housing. Work with developers to facilitate funding and construction of senior housing.

Responsibility: Community Development Department
Financing: City
Scheduling: Periodically update inventory of properties suitable for senior housing.

Program H-2.2.2 House Sharing: Work with area non-profits to explore the feasibility of establishing house sharing programs for seniors by creating a matching and vetting process.

Responsibility: Community Development Department, Senior Center, MCHC, Project Sanctuary, etc.
Financing: State and Federal sources
Scheduling: 2020-2025
Quantification: 10

Program H-2.2.3 Encourage Housing for Seniors with Pets: Consider methods to encourage developers of senior housing to include pet friendly units and/or accommodations for pets, especially service animals for seniors.

Responsibility: Community Development Department, Senior Center, MCHC, Project Sanctuary, etc.
Financing: General Fund
Scheduling: 2020-2025

Program H-2.2.4 Encourage Housing with Dementia Care and Assisted Living for Seniors: Work to attract a business that provides dementia care and assisted living facilities to Fort Bragg to serve our aging senior population. Identify vacant parcels that would be suitable for an Assisted Living facility. Consider if the zoning ordinance should be revised to make it easier to develop an assisted living facility in Fort Bragg.

Responsibility: Community Development Department

Financing: General Fund
Scheduling: 2020-2025

Policy H-2.3 Encourage Co-Housing: Encourage the development of co-housing for all family and household types, including seniors, families and the disabled.

Policy H-2.4 Increase Affordable Housing Development: Encourage the construction of housing units which are affordable to households with very low to moderate incomes.

Program H-2.4.1 Inclusionary Housing Ordinance: Continue to implement the City's Inclusionary Housing Ordinance. Monitor the Inclusionary Housing Ordinance to determine if it constrains new housing development and if it does, take action to mitigate the constraint on new housing development.

Responsibility: Community Development Department
Financing: City
Scheduling: Monitoring 2020-2023 & take action 2023-2025
Quantification: One inclusionary unit for the Housing Element period.

Program H-2.4.2 Support Self Help Housing: Continue to provide one or two planning incentives for self-help affordable housing.

Responsibility: Community Development Department
Financing: City and developers
Scheduling: Ongoing
Quantification: Six self-help units for the Housing Element period.

Program H-2.4.3 Support SRO Housing: Continue to encourage and facilitate Single-Room Occupancy Units by allowing rooming and boarding with a Minor Use Permit in the RM and RH zones. Consider allowing SRO housing in RVH zones by right (without Use Permit approval).

Responsibility: Community Development Department
Financing: City
Scheduling: Changes to the zoning code have been completed. Implementation is ongoing.
Quantification: 10 SRO units for the Housing Element period.

Program H-2.4.4 Consider Community Land Trust: Complete research regarding Community Land Trust and consider working with community partners to establish a Community Land Trust that serves Fort Bragg.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020-2025

Program H-2.4.5 Prioritize City Services for Housing Developments: Continue to implement procedures to grant priority service for sewer and water services to residential developments.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Program H-2.4.6 Support Effective Use of Housing Vouchers: Work with non-profit partners to develop a program that may include one or more of the following: assist landlords to bring units up to minimum requirements for voucher program; complete a

new study on the cost of living to increase the voucher payment rate; develop an education program for landlords about the benefits of the voucher program; and/or provide case work services for voucher tenants.

Responsibility: Hospitality Center, Project Sanctuary, Community Development Department
Financing: Grants and donations
Scheduling: 2020-2025

Program H-2.4.7 Supportive Housing: Revise the City's zoning ordinance so that it complies with AB 2162, which requires the City to allow supportive housing by right in all multi-family zoning districts and in all mixed-use zoning districts.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020 – 2021
Quantification: 30 units

Program H-2.5.8. Maximize Housing Density by Right for projects with 20%+ Affordable Units. Revise the Land Use and Development Code to allow the maximum density permissible within a zoning district by right (no Use Permit) for all residential projects that include at least 20% of units deed restricted at rents affordable to low income households and that have been listed in the last two Housing Elements as an eligible site in the Vacant Parcel Inventory for the RHNA, these parcels are listed on the Vacant Parcel Inventory and include: 008-172-09, 251 So Franklin St; 018-440-58, 1151 So Main St; 018-150-61, 1190 So Main St; 018-090-02, 700 River Dr.; 018-090-16, 700 River Dr.; 008-010-31, 1020 Glass Beach Dr.; 018-113-03, 970 Chestnut St; 008-010-33, 1080 Glass Beach Dr.; 008-290-73, 1329 Cedar St; 008-302-28, 1328 Cedar St; 008-290-34, 1325 Cedar St; 018-100-42, 485 So Lincoln St; 018-210-29, 860 Hazelwood St; 020-520-22, 1600 Oak St; 018-440-50, 200 We Ocean View Dr.; 018-113-01, 552 S Lincoln St; 018-440-38, 350 Ocean View Dr.; 018-440-49, 250 We Ocean View Dr.; 018-340-04, 441 South St; 018-340-03, 601 Cypress St; 008-350-60, 920 Stewart St; 018-150-58, No Street Address; 018-150-56, No Street Address; 018-150-55, 100 East Ocean View Dr.

Responsibility: Community Development Department
Financing: General Plan Maintenance Fee Fund
Scheduling: 2020-2021
Quantification: 20 units

Program H-2.5.9. Encourage and Support Land Divisions to Support Affordable Housing. The City shall encourage lot line adjustments and land divisions resulting in parcels sizes that facilitate multifamily developments affordable to lower income households on all sites in the Vacant Land Inventory.

Responsibility: Community Development Department
Financing: General Fund
Scheduling: 2019-2027
Quantification: Unknown

Policy H-2.5 Density Bonus Incentives: Continue to provide density bonuses to projects that provide a required percentage of total units affordable to very low and low-income households and for seniors as required by State Density Bonus law. *Any housing development approved pursuant to Government Code Section 65915 shall be consistent with all applicable certified Local Coastal Program (LCP) policies and development standards. In reviewing a proposed density increase, the City shall identify all feasible means of accommodating the density increase*

and consider the effects of such means on coastal resources. The City shall only grant a density increase if the City determines that the means of accommodating the density increase proposed by the applicant does not have an adverse effect on coastal resources. If, however, the City determines that the means for accommodating the density increase proposed by the applicant will have an adverse effect on coastal resources, the City shall not grant the density increase.

Policy H-2.6 Large Families: Encourage housing for large families.

Program H-2.6.1 Seek Funding to Develop or Rehabilitate Housing for Large Low-Income Families: Continue to work with affordable housing developers to identify a potential new construction or rehabilitation project that will serve large lower-income families and obtain and administer a grants specifically to accommodate large families.

Responsibility: Community Development Department
Financing: City, CDBG, HOME, Tax Credit, CoC and other sources
Scheduling: Ongoing
Quantification: Five large family units for the Housing Element period.

Policy H-2.7 Housing for the Disabled and the Developmentally Disabled: Continue to facilitate barrier-free housing in new development. Continue to require that 10% of all units in multi-family projects be developed in conformance with Universal Design to achieve accessibility for the disabled and the developmentally disabled.

Program H-2.7.1 Continue to provide expedited permit processing and reasonable accommodation program to projects targeted for persons with disabilities, including those with developmental disabilities. Encourage developers of supportive housing to develop projects targeted for persons with disabilities, including those with developmental disabilities. Place info about the reasonable accommodation program on the City's website.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing
Quantification: Three units of housing for persons with disabilities.

Policy H-2.8 Emergency and Transitional Housing: Continue to support emergency shelters, transitional housing and supportive housing within the City.

Program H-2.8.1 Ongoing Estimates of the Demand for Emergency Housing: Continue to work with the Fort Bragg Police Department and homeless service providers in the community to maintain ongoing estimates of the demand for emergency housing in Fort Bragg and to develop strategies to meet that demand.

Responsibility: Community Development Department
Financing: City
Scheduling: Annual update

Program H-2.8.2 Inter-Agency Cooperation: Continue to work with private, non-profit, County, and State agencies to provide transitional housing, supportive services and emergency housing for the homeless.

Responsibility: Community Development Department
Financing: City, CDBG
Scheduling: Ongoing
Quantification: 20 transitional units for the Housing Element period.

Program H-2.8.3 Transitional and Supportive Housing: Continue to regulate transitional and supportive housing as a residential use subject to the same restrictions that apply to other residential use types and dwellings of the same type in the same zone.

Responsibility: Community Development Department
Financing: City
Scheduling: Changes to the zoning code have been completed. Implementation is ongoing.

Program H-2.8.4 Transitional and Supportive Housing: Consider working with area non-profits to establish a tiny home (small cottage) community for Transitional Housing.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020-2025
Quantification: 10 transitional units.

Program H-2.8.5 Emergency Shelters: Continue to allow emergency shelters as a permitted use in the General Commercial (CG) zoning district.

Responsibility: Community Development Department
Financing: City
Scheduling: Changes to the zoning code have been completed. Implementation is ongoing.

Program H-2.8.6 Emergency Shelter for Families: Work with area non-profits to establish an emergency shelter for families.

Responsibility: Project Sanctuary, Community Development Department
Financing: Grants
Scheduling: 2020-2225
Quantification: 4 family shelter units.

Program H-2.8.7 Emergency Shelters Regulatory Changes. Consider revising the LUDC to ensure that emergency shelters are subject only to the following requirements (per State law): 1) maximum number of beds; 2) off-street parking based upon demonstrated need; 3) size and location of onsite waiting and intake areas; 4) provision of onsite management; 5) proximity to other shelters; 6) length of stay; 7) lighting; and 8) security during hours when the shelter is open.

Responsibility: Community Development Department
Financing: City
Scheduling: Changes to the zoning code will take place in 2020/21.

Program H-2.8.8 Evidence-Based Homeless Services. Consider the key findings of research and evidence-based approaches when considering funding solutions for homelessness.

Responsibility: Community Development Department
Financing: City
Scheduling: ongoing.

Program H-2.8.9 Safe Parking Pilot Program. Consider developing a safe parking program that may consist of one or more of the following actions: 1) analyze the issue to determine how best to address the issue of homeless people sleeping in their cars; 2) identify and engage local stakeholder; 3) develop and implement a plan of action.

Responsibility: City of Fort Bragg & service providers
Financing: General Fund
Scheduling: 2020-2022
Quantification: NA

Program H-2.8.10 Define Group Home. Revise the ILUDC and CLUDC to define group homes that serve 6 or fewer as a permitted use in all zones in which a single-family home is permitted, and to define group homes with 7 or more residents as an organizational house.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020-2021

Policy H-2.9 First Time Home Buyers: Encourage affordable housing for first time home buyers.

Program H-2.9.1 First Time Home Buyers: Consider whether to require, through the inclusionary housing ordinance, the provision of housing units affordable to first time home buyers who qualify for affordable housing.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020-2025

Program H-2.9.2: Funding Sources for First Time Home Buyers: Continue applying for funding sources for first time home buyers, if the housing market and funding requirements will result in a successful program, and provide referrals to FHA programs offered by local lenders and sweat-equity programs operated by non-profit housing organizations.

Responsibility: Community Development Department
Financing: City, HOME, CDBG
Scheduling: Ongoing
Quantification: NA

Program H-2.9.3: Revise Annexation Regulations: Consider revising the regulations regarding annexations to increase the amount of land zoned for residential development within City limits, especially as water storage and wastewater treatment are less of a limit to the expansion of the City limits, and as some areas adjacent to the City do not have the correct soils for septic systems and/or do not have an onsite water source.

Responsibility: Community Development Department
Financing: Property owners, City
Scheduling: 2019-2025
Quantification: 20 units

Goal H-3 Promote housing opportunities for all persons regardless of race, gender, age, sexual orientation, marital status, or national origin.

Policy H-3.1 Equal Housing Opportunity: Continue to facilitate non-discrimination in housing and ensure compliance with all fair housing laws.

Program H-3.1.1 Housing Discrimination Complaints: Continue to facilitate equal housing opportunity by referring housing discrimination complaints to the Fair Housing

Division of HUD. Continue to distribute information regarding equal housing opportunity laws and the equal housing opportunities for Fair Housing at City Hall.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Program H-3.1.2 Non-discrimination Clauses: Include non-discrimination clauses in rental agreements and deed restrictions for housing constructed with City assistance.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Policy H-3.2 Improve Accessibility to Housing: Make it easier to develop housing for seniors and persons with disabilities.

Program H-3.2.1 Use Housing Funds: Use housing funds as available, to support renovations and improvements to accessibility in affordable housing for qualified seniors, persons with disabilities and persons with developmental disabilities.

Responsibility: Community Development Department
Financing: City, CDBG, HOME
Scheduling: Ongoing
Quantification: Twenty units for seniors, persons with disabilities and persons with developmental disabilities in the Housing Element period.

Program H-3.2.2 Reasonable Accommodation for Persons with Disabilities and Developmental Disabilities: Continue to review the City's land use and building regulations to identify constraints that may exist for the provision of housing for persons with disabilities and developmental disabilities, and continue to implement the City's policy and programs to provide reasonable accommodations for persons with disabilities and developmental disabilities. Publicize revisions to land use regulations and the City's policy and programs for providing reasonable accommodation for persons with disabilities.

Responsibility: Community Development Department
Financing: City
Scheduling: Implemented and ongoing
Quantification: Ten reasonable accommodations for persons with disabilities for the Housing Element period. Five reasonable accommodations will be for people with developmental disabilities.

Program H-3.2.3 Reasonable Accommodation: Ensure all new, multi-family construction meets the accessibility requirements of the federal and State Fair Housing Acts through local permitting and approval processes.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Goal H-4 Improve needed services to expand housing development opportunities.

Program H-4.1.1 Continue to Pursue Strategies to Address Water Pressure Issues: Continue to pursue strategies to address water pressure issues that impact development potentials.

Responsibility: Community Development Department

Financing: City, Infrastructure Bank, Property Owners, Development Impact Fees
Scheduling: Ongoing

Program H-4.1.2 Reduce Capacity Fees for Smaller Units: Consider charging water and sewer capacity fees based on the size of the unit (either square feet or number of bedrooms) in order to ensure that each unit pays its fair share for capacity costs.

Responsibility: Department of Public Works
Financing: Fort Bragg Municipal Improvement District 1
Scheduling: 2020 – 2021
Quantification: 5 units

Goal H-5 Conserve and improve the existing housing supply to provide adequate, safe, and decent housing for all Fort Bragg residents.

Policy H-5.1 Housing Rehabilitation: Continue and expand the City's housing rehabilitation and preservation programs.

Program H-5.1.1 Housing Rehabilitation Projects: Seek funding to assist in the rehabilitation and conservation of multi-family residential projects. Work with non-profit and for-profit affordable housing developers to achieve successful rehabilitation of multi-family housing. Utilize rehabilitation funds to add bedrooms to overcrowded units, as feasible.

Responsibility: Community Development Department
Financing: City, CDBG, HOME
Scheduling: Annually as an ongoing program
Quantification: 30 units

Program H-5.1.2 Target Areas: Continue to identify target areas and specific properties where housing rehabilitation is most needed through a periodic update of the housing conditions survey which identifies the neighborhoods and areas requiring rehabilitation assistance.

Responsibility: Community Development Department
Financing: City or CDBG
Scheduling: Update in 2021

Program H-5.1.3 Housing Rehabilitation/Preservation Program: Continue the City's housing rehabilitation program which provides low interest loans for the rehabilitation of homes owned or occupied by very low to moderate income households. Continue to seek funding for the housing rehabilitation loan program. Facilitate citizen awareness of the City's rehabilitation loan program.

Responsibility: Community Development Department
Financing: City, CDBG, HOME and other State and Federal funds
Scheduling: In place and ongoing
Quantification: 15 units

Program H-5.1.4 Capital Improvement Program: Consider capital improvement projects necessary to maintain the community's older neighborhoods as part of the City Council's annual review of the Capital Improvement Program.

Responsibility: Community Development and Public Works Departments
Financing: City, State and Federal funding sources
Scheduling: Annually as an ongoing program

Policy H-5.2 Discourage Conversion of Residential Units: Discourage the conversion of residential units to other uses.

Program H-5.2.1 Discourage Vacation Rentals: Continue to prohibit vacation rentals in all zoning districts except for the CBD. Undertake proactive undercover code enforcement activity on a regular basis against all illegal vacation rentals in Fort Bragg. Work with the County of Mendocino at all levels to reduce or eliminate further conversions of residential units into vacation rentals as this practice has greatly increased the magnitude of the housing crisis on the Mendocino coast and in the City of Fort Bragg.

Responsibility: City Council, Community Development Department
Financing: City
Scheduling: 2020-21

Program H-5.2.2 Single-Family Homes: Continue to allow the reuse of existing single-family residences, in commercial zones, as single-family residences. Consider allowing second units on commercially zoned parcels with existing single family homes.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020-21
Quantification: 5 units

Program H-5.2.3 Housing Rehabilitation in Non-Residential Areas: Continue to permit substantial rehabilitation of, and additions to, existing housing located in zones where it is a legal nonconforming use.

Responsibility: Community Development Department
Financing: City
Scheduling: Changes to the zoning code have been completed. Implementation is ongoing.

Policy H-5.3 Preserve At-Risk Units: Work with private and non-profit affordable housing developers to preserve at-risk affordable housing projects.

Program H-5.3.1 Develop At-Risk Units Program: Maintain an inventory of at-risk affordable housing units and work with property owners and non-profit affordable housing organizations to preserve these units by identifying and seeking funds from Federal, State and local agencies to preserve the units.

Responsibility: Community Development Department
Financing: HOME Program, Federal Tax Credits, Redevelopment Agency, etc.
Scheduling: Ongoing

Program H-5.3.2 Require At-Risk Education Program: Work with property owners and non-profit affordable housing organizations to ensure that tenants receive required education and notifications regarding at-risk units.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Program H-5.3.3. Monitor Units At-Risk: No units are currently at risk in the City of Fort Bragg. All units are guaranteed to remain affordable through 2031. The City will monitor the units that are at risk in the 2030 decade to ensure that they remain affordable.

Responsibility: Community Development Department
Financing: City
Scheduling: 2025-2030

Program H-5.3.4. Replacement Program for Units that are Demolished for new Development. Consider modification of the Land use and Development Code to require replacement of low and moderate income residential units, when such units are demolished to accommodate new development.

Responsibility: Community Development Department
Financing: City
Scheduling: 2025-2030

Program H-5.3.5 Work with Potential Purchasers of At Risk Units: Establish contact with public and nonprofit agencies interested in purchasing and/or managing units at-risk in the 2030 decade to inform them of the status of these projects. Where feasible, provide technical assistance and support to these organizations with respect to acquisition. Consider reducing or waiving development fees associated with preservation or replacement of at-risk units. Assist property owners with grant applications for funding for mortgage refinancing, acquisition, rehabilitation, and gap funding for affordable development. Access funding resources such as tax-exempt bonds, housing tax credits, Community Development Block Grants, HOME funds for the preservation of affordable housing units.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Program H-5.3.6 Maintain a List of At-Risk Projects: Actively pursue affordable housing opportunities and maintain a list of interested and qualified affordable housing developers.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Program H-5.3.7 Provide Tenant Education & Assistance for Tenants of At Risk Projects: Require property owners to give a 3-year, 12-month and 6-month notice of their intent to opt out of low-income use restrictions. Work with tenants of at-risk units and provide them with education regarding tenant rights and conversion procedures. Assist tenants of existing rent restricted units to obtain priority status on housing choice voucher waiting list.

Responsibility: Community Development Department
Financing: City
Scheduling: Ongoing

Goal H-6 Adopt and Implement a Housing Element that Complies with State Law.

Policy H-6.1 Public Participation: Continue to encourage and facilitate public participation in the formulation and review of the City's housing and development policies.

Program H-6.1.1 Workshops: Continue to hold workshops and public hearings to discuss proposed revisions to the City's Housing Element.

Responsibility: Community Development Dept., Community Development Committee
Financing: City
Scheduling: Annually

Policy H-6.2 Annual Review of Housing Element Implementation: Carry out an annual progress report on implementation of the Housing Element.

Program H-6.2.1 Annual Report: Prepare an annual report that describes the amount and type of housing constructed, the stock of affordable housing units, demolition permits, and conversion of residential units to other uses, and other housing-related activities for review by the EDAC, Planning Commission, and City Council.

Responsibility: Community Development Department
Financing: City
Scheduling: Annually (include with the annual review of the Capital Improvement Program (CIP) by the Planning Commission)

Goal H-7 Increase Housing Opportunities that Provide Environmental Benefits

Policy H-7.1 Encourage environmental practices in all housing.

Program H-7.1.1 Recycling: Consider revising the zoning ordinance so that all multi-family residential developments provide a centralized drop-off location for recyclables and compostable materials.

Responsibility: Community Development Department
Financing: City
Scheduling: Changes to the zoning code will take place in 2020/21.

Program H-7.1.2 Rainwater Capture & Drought Tolerant Landscaping: Consider revising the zoning ordinance to incentivize the installation of cisterns to capture rainwater from roofs for all water needs. Consider revising the zoning ordinance to require drought tolerant landscaping for landscaped areas in commercial and multi-family residential uses.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020/21

Program H-7.1.3 Sustainable Building Techniques: Encourage housing that includes environmental benefits such as energy conservation, green building, water conservation, and recycling.

Responsibility: Community Development Department
Financing: City
Scheduling: 2020/21

Program H-7.1.4 Passive Solar Design Strategies: Consider revising the zoning ordinance to incentivize or require passive solar design strategies for space heating and lighting to reduce energy demand to the extent feasible in all residential and mixed-use buildings and in site design. Alternatively, revise the Citywide Design Guidelines to require passive solar and prefer active solar installations for all projects of more than 5,000 SF.

Responsibility: Community Development Department

Financing: City
Scheduling: 2020/21

Program H-7.1.5 Energy Retrofit Program: Continue to apply for and administer funds to assist residents with energy conservation retrofits and weatherization resources. Continue to partner with community services agencies to provide financial assistance for low-income persons to offset the cost of weatherization and heating and cooling homes.

Responsibility: Community Development Department, REDI
Financing: City
Scheduling: Ongoing

ENVIRONMENTAL SETTING

The City of Fort Bragg is located along the Coastal of Mendocino and about 1/3 of the City is located within the Coastal Zone. The City is approximately 2.92 square miles in size and includes five island areas (non-contiguous land) totaling 0.15 square miles in size and comprised of city-owned property that was annexed on April 7, 1997.

While Fort Bragg is a small community, it is the largest city on the coast between San Francisco and Eureka and is a popular tourist and recreational destination. Commercial land uses in the City are located along the State Highway 1 and Franklin Street corridors. The Central Business District, located between Oak Street and Pine Street, is the historic, civic and cultural core of the community. Industrial lands are located on the Georgia-Pacific mill property located west of State Highway 1 on North Franklin Street, immediately north of the Central Business District, and on State Highway 1 north of Pudding Creek. Residential neighborhoods are located east of the commercial core and in the west Fort Bragg area.

Current Population & Housing. There are approximately 7,287 people residing in the City of Fort Bragg in 3,313 residential units, and the average household size is 2.47 persons (U.S. Census Bureau, 2016b).

Land Uses. The City has a full range of land uses including low to high density residential, retail and service commercial, manufacturing, public facilities, recreation, and open space. The General Plan Land Use Element establishes policies and programs to maintain the existing pattern of land uses within the City while anticipating and providing for future growth and development.

The 2012 Inland General Plan Land Use Element includes the following land use designations for the Inland area of the City:

- o Large Lot Rural Residential (RR5)
- o Medium Lot Rural Residential (RR2)
- o Rural Residential (RR1)
- o Suburban Residential (RS)
- o Low Density Residential (RL)
- o Medium Density Residential (RM)
- o High Density Residential (RH)
- o Very High Density Residential (RVH)
- o Central Business District (CBD)
- o Neighborhood Commercial (CN)
- o General Commercial (CG)
- o Highway Visitor Commercial (CH)
- o Office Commercial (CO)
- o Heavy Industrial (IH)
- o Light Industrial (IL)
- o Parks and Recreation (PR)
- o Agriculture (A)
- o Open Space (OS)
- o Public Facilities and Services (PF)

4

These land use designations are implemented by the City's zoning regulations established by the Inland Land Use and Development Code provided in Chapter 18 of the Fort Bragg Municipal Code and the Coastal Land Use and Development Code (chapter 17 of the Municipal code) for areas located within the Coastal Zone. In addition to the land use designations listed above, the 2008 Coastal General Plan Land Use Element includes Timber.

The vacant Georgia Pacific mill site, comprising 420 acres, is located in the Coastal Zone and is currently zoned for industrial uses. The City is working on rezoning this 320-acre property.

Future Growth. The City will continue to grow at a slow but regular pace. No significant growth is projected for the City within the next five years, barring any unanticipated new businesses or major expansion of existing business. The City is currently engaged in a community based planning process to submit a Local Coastal Program Amendment to the Coastal Commission, for their consideration. If approved the LCP amendment would result in new zoning which could in turn result the eventual development of a mix of open space and residential, commercial, industrial, and visitor-serving development.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

X	Aesthetics		Agriculture and Forestry Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources	X	Energy
X	Geology/Soils	X	Greenhouse Gas Emissions		Hazards & Hazardous Materials
X	Hydrology/Water Quality	X	Land Use/Planning		Mineral Resources
X	Noise	X	Population/Housing	X	Public Services
X	Recreation	X	Transportation	X	Tribal Cultural Resources
X	Utilities/Service Systems		Wildfire		Mandatory Findings of Significance

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a **"Potentially Significant Impact"** or **"Potentially Significant Unless Mitigation Incorporated"** as indicated by the checklists on the following pages.

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.

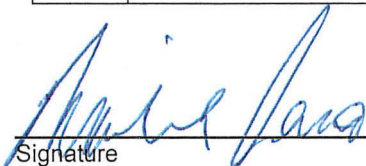
"No Impact" means that the effect does not apply to the proposed project, or clearly will not impact nor be impacted by the proposed project.

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.



 Signature

8/8/2019

 Date

Marie Jones, Community Development Director

City of Fort Bragg

 Printed Name

 Agency

ENVIRONMENTAL ISSUES

I. 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 type="checkbox"/>	<input checked="" 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 public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF AESTHETICS

The proposed 2019 Housing Element amendment would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element does not change programs or policies that provide regulatory guidance for aesthetic issues. These issues are dealt with in the Community Design Element of the General Plan and the Citywide Design Guidelines, neither of which will be revised by the adoption of the 2019 Housing Element.

The following proposed program could have a minor impact on ascetics:

Program H-1.7.6: Simplify Design Review for Small Residential Projects. Continue the process of revising the Design Review Guidelines to make them more effective. Consider exempting 3 and/or 4 unit projects from the need to obtain a Design Review permit and/or consider simplifying the Design review requirements for 3 and 4 unit projects.

However, if this program is implemented the action of revising the ILUDC and CLUDC to exempt small residential projects from design review will require environmental review (CEQA) at which time a thorough review will be completed including the development of mitigation measures if necessary.

Program H-2.5.8 requires the City to allow development of projects with at least 20% of units affordable to low income people without a use permit if the projects are proposed for properties which have been listed on the Vacant Parcel Inventory in two cycle of the City’s Housing Element. However, per guidance from HCD the City is not required to exempt these projects from Design Review. As the City could continue to require Design Review for these projects they will not be ministerial projects and so will subject to CEQA, including an analysis of aesthetic issues.

FINDINGS: As noted in the above analysis, the proposed project would have No Impact on Aesthetics because none of the mandatory programs have the potential to impact aesthetics, and because all potential future changes to the Zoning Ordinance will be analyzed in a CEQA document at the time that the Zoning Ordinance changes are considered.

II. AGRICULTURE AND FORESTRY RESOURCES.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 by PRC section 4526), or timberland zoned Timberland Production (as defined by Government 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 or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF AGRICULTURE AND FORESTRY RESOURCES

The City of Fort Bragg does not have any land zoned for agricultural purposes nor does it have any commercial agricultural activities within or adjacent to the City limits so the 2019 Housing Element update will not impact agricultural resources.

FINDINGS

The proposed project would have No Impact on Agricultural and Forestry Resources because the City does not have any land that is zoned for agricultural purposes.

III. AIR QUALITY.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF AIR QUALITY

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 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element does not change programs or policies that provide regulatory guidance for air quality issues. These issues are dealt with in the City's Inland Land Use and Development Code and Local Coastal Program, which will not be changed through any of the new or revised programs or policies in the 2019 Housing Element.

FINDINGS: As noted in the above analysis, the proposed project would have **No Impact** on Air Quality because none of the mandatory programs have the potential to impact Air Quality and because all potential future changes to the Zoning Ordinance will be analyzed in a CEQA document at the time that the Zoning Ordinance changes are considered.

IV. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 BIOLOGICAL RESOURCES

The proposed 2019 Housing Element amendment would not result in any direct or indirect physical changes to the environment. The Housing Element Update does not change programs or policies that provide regulatory guidance for biological issues. These issues are dealt with in the Conservation, Open Space and Park Element of the General Plan and in the following articles of the Land Use and Development Code: Article 5 – Resource Management and Article 6- Site Development Regulations. The 2019 Housing Element Update does not recommend any changes to the ILUDC or the CLUDC that would impact biological resources.

Furthermore, as noted previously Program H-2.5.8 requires the City to revise the zoning ordinance to allow development of projects with at least 20% of units affordable to low income

people without a use permit in some cases. However, per guidance from HCD the City is not required to exempt these projects from Design Review or the requirement to obtain a Coastal Development Permit. As the City could continue to require Design Review and would have to require a Coastal Development Permit for these projects, the projects would be subject to CEQA and a biological analysis would be required if warranted by the project location. Implementation of this program will not have impacts on biological resources.

FINDINGS

As noted in the above analysis, the proposed project would have No Impact on Biological Resources as none of the mandatory programs have the potential to impact them, and as all potential future changes to the Zoning Ordinance will be analyzed in a CEQA document at the time that the Zoning Ordinance changes are considered. The proposed project would have

V. 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 pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF CULTURAL RESOURCES

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The Housing Element Update does not change programs or policies that provide regulatory guidance for cultural resources. These issues are dealt with in the Conservation, Open Space, Energy and Parks Element of the General Plan and in Chapter 18.74 Cultural Resource Protection of the Inland Land Use and Development Code and Chapter 17.74 Cultural Resource Protection of the Coastal Land Use and Development Code. The 2019 Housing Element does not recommend any changes to either Land Use and Development Code that would impact cultural resources.

Program H-2.5.8 requires the City to allow development of projects with at least 20% of units affordable to low income people without a use permit if the projects are proposed for properties which have been listed on the Vacant Parcel Inventory in two cycle of the City’s Housing Element. However, per guidance from HCD the City is not required to exempt these projects from Design Review or the requirement to obtain a Coastal Development Permit. As the City could continue to require Design Review and would have to require a Coastal Development Permit for some of these projects, the projects would be subject to CEQA and a cultural resources analysis would be required if warranted by the project location. Implementation of this program will not have impacts on cultural resources.

FINDINGS

As noted in the above analysis, the proposed project would have No Impact on Cultural Resources as none of the mandatory programs have the potential to impact Cultural Resources, and as all potential future changes to the Zoning Ordinance will be analyzed in a CEQA document at the time that the Zoning Ordinance changes are considered.

VI. ENERGY

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

DISCUSSION OF ENERGY

All future development in Fort Bragg 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 following proposed programs could have a minor impact on energy use:

Program H-7.1.1 Recycling: Consider revising the zoning ordinance so that all multi-family residential developments provide a centralized drop-off location for recyclables and compostable materials.

Program H-7.1.2 Rainwater Capture & Drought Tolerant Landscaping: Consider revising the zoning ordinance to incentivize the installation of cisterns to capture rainwater from roofs for all water needs. Consider revising the zoning ordinance to require drought tolerant landscaping for landscaped areas in commercial and multi-family residential uses.

Program H-7.1.3 Sustainable Building Techniques: Encourage housing that includes environmental benefits such as energy conservation, green building, water conservation, and recycling.

Program H-7.1.4 Passive Solar Design Strategies: Consider revising the zoning ordinance to incentivize or require passive solar design strategies for space heating and lighting to reduce energy demand to the extent feasible in all residential and mixed-use buildings and in site design. Alternatively, revise the Citywide Design Guidelines to require passive solar and prefer active solar installations for all projects of more than 5,000 SF.

Program H-7.1.5 Energy Retrofit Program: Continue to apply for and administer funds to assist residents with energy conservation retrofits and weatherization resources. Continue to partner with community services agencies to provide financial assistance for low-income persons to offset the cost of weatherization and heating and cooling homes.

However, if these programs are implemented the action of revising the ILUDC and CLUDC will require environmental review (CEQA) at which time a thorough review will be completed. If implemented these programs would reduce energy use and would not require mitigation measures. Additionally, any projects which are required by right through mandatory programs of the Housing Element will have to comply with state building code standards including Title 24.

FINDINGS

As noted in the above analysis, the proposed project would have a No Impact on Energy, because all housing development projects will be subject to Title 24 standards and because the Housing Element includes a number of programs to potentially reduce energy use.

VII. 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 type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF GEOLOGY AND SOILS

The City of Fort Bragg is located in an area that is known for seismic activity, however, the City is not within a currently established State of California Earthquake Fault Zone for surface fault rupture hazards and there are no known active fault traces in the immediate project vicinity. The nearest Alquist-Priolo Earthquake Fault Zone to the project site is associated with the North San Andreas Fault system and located approximately 6.5 miles west of the site, which is the most likely source of earth shaking. The Maacama Fault zone is approximately 21 miles to the east of the City; the Mendocino Fault zone is approximately 60 miles to the northwest; and the Pacific Star Fault is located between the towns of Fort Bragg and Westport, all of which could potentially cause earth shaking activity.

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element Update does not change programs or policies that provide regulatory guidance for regulating development based on geology and soils. These issues are dealt with in the Public Safety Element of the General Plan and in Article 6 – Site Development

Regulations of the Inland and Coastal Land Use and Development Codes. All potential projects that request a building permit must comply with the requirements of Article 6. Thus, these issues are addressed at the ministerial level of approval for projects in Fort Bragg.

FINDINGS

The proposed project would have a No Impact on Geology and Soils, because the Housing Element does not change programs or policies that provide regulatory guidance for regulating development based on geology and soils.

VIII. 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 (GHG), 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 an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF GREENHOUSE GAS EMISSIONS

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element Update does not change programs or policies that provide regulatory guidance for regulating development based Greenhouse Gas emissions. These issues are dealt with in the Sustainability Element of the General Plan.

The City is located within the North Coast Air Basin (NCAB) and is subject to the Mendocino County Air Quality Management District (MCAQMD) requirements. The MCAQMD is responsible for monitoring and enforcing federal, State, and local air quality standards in the County of Mendocino. MCAQMD has issued a recommendation that agencies use adopted Bay Area Air Quality Management District (BAAQMD) CEQA thresholds for projects in Mendocino County. BAAQMD does not have an adopted Threshold of Significance for construction-related GHG emissions. Therefore, the Lead Agency is encouraged to incorporate best management practices to reduce GHG emissions during construction, as feasible and applicable, in accordance with Assembly Bill (AB) 32, also known as The Global Warming Solutions Act of 2006. The City of Fort Bragg prepared a Climate Action Plan in 2012. The plan sets greenhouse gas reduction goals including a 30% reduction in greenhouse gasses for the municipality by 2020, and a 7% reduction goal for the community by 2020, however the plan was not adopted by City Council.

Program H-2.5.8 requires the City to allow development of projects with at least 20% of units affordable to low income people without a use permit if the projects are proposed for properties which have been listed on the Vacant Parcel Inventory in two cycle of the City’s Housing Element. However, per guidance from HCD the City is not required to exempt these projects from Design Review or the requirement to obtain a Coastal Development Permit. As the City could continue to require Design Review and would have to require a Coastal Development Permit for some of these projects, the projects would be subject to CEQA and a GHG analysis would be required if warranted by the project size.

If implemented, some of the Housing Element policies could reduce greenhouse gas emissions and climate change by increasing residential density in a small compact city which would reduce vehicle miles travels and GHG emissions. Additionally, if the programs are implemented the

action of revising the ILUDC and CLUDC will require environmental review (CEQA) at which time a thorough review will be completed.

FINDINGS

The proposed project would have No Impact on Greenhouse Gas Emissions because the Housing Element does not change programs or policies that regulate GHGs and because the implementation of the Housing Element will necessitate a subsequent CEQA review wherein all potential impacts will be analyzed once the City has defined the project (Zoning Amendment) sufficiently to prepare a CEQA analysis.

IX. 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF HAZARDS AND HAZARDOUS MATERIALS

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or has characteristics defined as hazardous by a federal, State, or local agency. Chemical and physical properties such as toxicity, ignitability, corrosiveness, and reactivity cause a substance to be considered hazardous. These properties are defined in the California Code of Regulations (CCR), Title 22, §66261.20-66261.24. A “hazardous waste” includes any hazardous material that is discarded, abandoned, or will be recycled. Therefore, the criteria that render a material hazardous also cause a waste to be classified as hazardous (California Health and Safety Code, §25117).

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element Update does not change programs or policies that provide regulatory guidance for regulating development based on hazards or hazardous materials. These issues are dealt with in the Public Safety Element of the General Plan and in

Article 6 – Site Development Regulations of the Land Use and Development Code. Additionally, the City is not located within an airport land use plan nor does it have an active air strip within City Limits.

FINDINGS

The proposed project would have No Impact on Hazards or Hazardous Materials because the Housing Element does not change programs or policies that regulate Hazardous Materials and because the implementation of the Housing Element will necessitate a subsequent CEQA review wherein all potential impacts will be analyzed once the City has defined the project (Zoning Amendment) sufficiently to prepare a CEQA analysis.

X. 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 ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 or through the addition of impervious surfaces, in a manner, which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF HYDROLOGY AND WATER QUALITY

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element Update does not change programs or policies that provide regulatory guidance for regulating development based on hydrology or water quality. These issues are dealt with in the Public Safety and Conservation, Open Space, Energy and Parks Elements of the Inland General Plan and the Coastal General Plan and in Article 6 – Site Development Regulations and Article 5- Resource Management of the Inland and Coastal Land Use and Development Codes.

FINDINGS

The proposed project would have No Impact on Hydrology and Water Quality because the Housing Element does not change programs or policies that regulate Hydrology and Water

Quality and because the implementation of the Housing Element will necessitate a subsequent CEQA review wherein all potential impacts will be analyzed once the City has defined the project (Zoning Amendment) sufficiently to prepare a CEQA analysis.

XI. 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 type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF LAND USE AND PLANNING

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element will not divide an established community.

The 2019 Housing Element is consistent with and does not conflict with the City’s General Plans. This analysis explores potential future consistency issues between proposed optional Housing Element programs, if implemented, and the General Plans. Please note that these consistency issues may arise only in the future, if the City Council implements the program through a Land Use and Development Code amendment. The implementation of the programs may necessitate a future General Plan Amendment to insure that no inconsistency occurs. Additionally, some of the programs may be implemented without any future inconsistency, depending on how they are implemented. For example, additional units could be allowed on larger parcels that would still comply with the maximum density requirements of the zoning district.

A. Potential Future Density Inconsistency

If the following four optional programs are implemented in the future, they could necessitate a General Plan Amendment prior to adoption of the zoning amendment to the LUDC to increase the maximum development density levels for: Suburban Residential (1-3 units per acre); Low Density Residential (3-6 units per acre) and Medium Density Residential (6 -12 units per acre).

Program H-1.3.3 Junior Accessory Dwelling Units: Consider revising the zoning ordinance to allow junior accessory dwelling units (units no more than 500 SF and contained entirely within an existing single-family structure) in single-family residential and multifamily zoning. The Junior Accessory units would be in addition to a second unit, allowing up to 3 units per parcel by right

Program H-1.3.5 Allow Tiny Homes as Second Units: Consider revising the zoning ordinance so that people can park mobile residencies (residences built under the vehicle code) as a second unit, so long at the residence looks like a house (e.g. external siding that is compatible with the residential neighborhood, skirted if the wheels would otherwise be visible from the public right of way, etc.).

Program H-1.7.4: Allow Higher Densities by Right. Consider revising the zoning ordinance to allow for one or more of the following: 1) allow multi-family development in Medium Density and High Density zoning districts (by right) without Use Permit approval; 2) allow multi-family development (by right) without use permit approval in all zoning districts if the project includes 20 percent or more of its units affordable to lower income household; and/or 3) allow multi-family projects of 5 units or less without use permit approval in Medium and High density zoning districts.

Program H-1.7.5: Allow Higher Densities in Single Family Residential Districts with Use Permit Approval. Consider revising the zoning ordinance to allow three or four-unit developments on larger parcels within Single Family Residential Zoning districts with a Use Permit. Consider revisions to the Lot coverage Ratio and Floor Area Ratio to control building size and massing.

Program H-1.7.8: Tiny Home Community. Consider adopting new zoning regulations to allow for small home subdivisions, with small individual parcel ownership, in all residential zoning districts. Consider changing the minimum lot size and minimum parcel dimensions of the LUDC to accommodate tiny home communities as part of a planned unit development.

If these programs are implemented through a future zoning amendment the minimum units per acre may need to be revised for these zoning districts. This may necessitate a future General Plan Amendment to revise the Residential Land Use Designation descriptions of the Land Use Element prior to adoption of the zoning ordinance. Mitigation Measure 1 has been added to address this potential **future** inconsistency.

Mitigation Measure 1: Undertake a General Plan Amendment to revise the Residential Land Use Designation descriptions of the Land Use Element, prior to adoption of an LUDC amendment if the implementation of programs H-1.3.3, H1.3.5, H-1.74, H-1.7.5 and H-1.7.8 result in a conflict with the maximum density permissible in residential zoning districts in the General Plan.

B. Potential Future Annexation Inconsistency

Optional program H-2.9.3 (below), if implemented in a future Zoning Amendment, would require an amendment to Land Use Element **Policy LU-2.4 Annexation Standards** as a revenue neutral single family residential zoning is unlikely to be feasible.

Program H-2.9.3: Revise Annexation Regulations: Consider revising the regulations regarding annexations to increase the amount of land zoned for single family residential within City limits, especially as water storage and wastewater treatment are less of a limit to the expansion of the City limits, and as some areas adjacent to the City do not have sufficient soil conditions for septic systems and/or do not have an onsite water source.

This potential future General Plan conflict could be addresses through an amendment to General Plan Policy LU-2.4 prior to adoption of the zoning amendment. Mitigation Measure 2 has been added to address this potential future inconsistency.

Mitigation Measure 2: Complete a General Plan Amendment to revise Policy LU-2.4, prior to adoption of a zoning amendment to implement optional program H-2.9.3 if the zoning amendment results in a conflict with the annexation standards of the Land Use Element.

C. Potential Design Review Inconsistency

The following optional program, if implemented, could conflict with Community Design Element policies: **Policy CD-2.1 Design Review** and **Policy CD-2.3 Second Unit Design Review**.

Program H-1.7.6: Simplify Design Review for Small Residential Projects. Continue the process of revising the Design Review Guidelines to make them more effective. Consider exempting 3 and/or 4 unit projects from the need to obtain a Design Review permit and/or consider simplifying the Design review requirements for 3 and 4 unit projects.

Mitigation Measure 3 has been added to address this potential future General Plan inconsistency.

Mitigation Measure 3: Complete a General Plan Amendment to revise Policies CD-2.1 and CD-2.3 prior to implementing program H-1.7.6 through a zoning amendment, if the implementation of program H-1.7.6 could result in a conflict with the design review requirements of these policies of the Community Design Element.

D. Remaining Programs and Policies of the Housing Element

Staff has reviewed the remaining programs and policies of the Housing Element and determined that there is no evidence of any conflicts between the program and policies of the Housing Element and the remainder of the General Plan and Coastal General Plan.

The 2019 Housing Element Update does not change policies that provide regulatory guidance for regulating housing development. The 2019 Housing Element Update does change programs that may result in regulatory changes to the Land Use and Development Code which if adopted could result in a change in the intensity and density of development within the City of Fort Bragg. However, the 2019 Housing Element would not result in any direct or indirect physical changes to the environment. Only subsequent amendments to the LCUDC or ILUDC could result in regulatory changes which would result in indirect changes to the environment. However, these amendments to the C/ILUDC would need to be reviewed under CEQA as a separate project and any impacts could be identified at that time with appropriate mitigation measures.

Ultimately the 2019 Housing Element will also be Certified by the Coastal Commission and become a component of the City's Certified Local Coastal Program. The Coastal Commission's actions are CEQA equivalent.

FINDINGS

The proposed project would have a Less than Significant Impact with Mitigation on Land Use and Planning because the Housing Element will not physically divide a community and because any potential future conflict with the above policies of the General Plan, will be addressed as part of the implementation of the Housing Element, which will necessitate a subsequent CEQA review wherein all potential impacts will be analyzed once the City has defined the project (Zoning Amendment and General Plan Amendment) sufficiently to prepare a CEQA analysis.

XII. 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"/>
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 MINERAL RESOURCES

The City does not contain any known mineral resources. The 2019 Housing Element would not result in any direct or indirect physical changes to the environment that would affect mineral resources. The City does not have any identified locally important mineral resource recovery sites delineated on a local general plan, specific plan, or other land use plan. Furthermore, the City has not been 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.

FINDINGS

The proposed project would have No Impact on Mineral Resources, because the City has not identified any mineral resources sites in Fort Bragg.

XIII. 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF NOISE

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The 2019 Housing Element Update does not change programs or policies that provide regulatory guidance for regulating development based on noise. These issues are dealt with in the Noise Element of the Inland and Coastal General Plans and in Article 4 – Standards for Specific and Uses of the Inland and Coastal Land Use and Development Code.

FINDINGS

The proposed project would have No Impact on Noise, because the Housing Element Update does not change programs or policies that provide regulatory guidance for regulating development based on noise.

XIV. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<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 POPULATION AND HOUSING

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. Most of the proposed programs in the Housing Element could increase population growth as the Housing Element includes many programs to increase housing development. However, if these programs are implemented (e.g. the City Council chooses to revise the ILUDC & CLUDC) the action of revising the ILUDC and CLUDC will require environmental review (CEQA) at which time a thorough review will be completed. If implemented many of the proposed programs would increase both the number of new homes and the population of Fort Bragg.

HCD requires that the City implement the following required new program in the Housing Element. Thus unlike other programs in the housing element, this program is not discretionary.

Program H-2.5.8. Maximize Housing Density by Right for projects with 20%+ Affordable Units. Revise the Land Use and Development Code to allow the maximum density permissible within a zoning district by right (no Use Permit) for all residential projects that include at least 20% of units deed restricted at rents affordable to low income households and that have been listed in the last two Housing Elements as an eligible site in the Vacant Parcel Inventory for the RHNA, these parcels are listed on the Vacant Parcel Inventory and include: 008-172-09, 251 So Franklin St; 018-440-58, 1151 So Main St; 018-150-61, 1190 So Main St; 018-090-02, 700 River Dr.; 018-090-16, 700 River Dr.; 008-010-31, 1020 Glass Beach Dr.; 018-113-03, 970 Chestnut St; 008-010-33, 1080 Glass Beach Dr.; 008-290-73, 1329Cedar St; 008-302-28, 1328 Cedar St; 008-290-34, 1325 Cedar St; 018-100-42, 485 So Lincoln St; 018-210-29, 860 Hazelwood St; 020-520-22, 1600 Oak St; 018-440-50, 200 We Ocean View Dr.; 018-113-01, 552 S Lincoln St; 018-440-38, 350 Ocean View Dr.; 018-440-49, 250 We Ocean View Dr.; 018-450-41, 441South St; 018-340-03, 601 Cypress St; 018-220-02, 440 South St; 008-350-60, 920 Stewart St; 018-150-58, No Street Address; 018-150-56, No Street Address; 018-150-55, 100 East Ocean View Dr.

Removal of the discretionary Use Permit requirement would result in only a Design Review Permit and Zoning Clearance for projects in the Inland Area and a Coastal Development Permit, Design Review and Zoning Clearance for projects in the Coastal Zone. The findings for each permit type are described below.

Use Permit Findings	Coastal Development Permit Findings	Design Review Permit Findings, Zoning Clearance & Building Permit Review
The proposed use is consistent with the General Plan, any applicable specific plan, and the Local Coastal Program;	The proposed development is in conformance with the City of Fort Bragg's Coastal General Plan.	Is consistent with the General Plan, any applicable specific plan, and the certified Local Coastal Program ; and
The design, location, size, and operating characteristics of the proposed activity are compatible with the existing and future land uses in the vicinity; The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of this Development Code and the Municipal Code;	The proposed use is consistent with the purposes of the zone in which the site is located.	The proposed land use or structure complies with the list of activities allowed in the applicable zoning district, and the development standards applicable to the use.
The site is physically suitable in terms of design, location, shape, size, operating characteristics, and the provision of public and emergency vehicle (e.g., fire and medical) access and public services and utilities (e.g., fire protection, police protection, potable water, schools, solid waste collection and disposal, storm drainage, wastewater collection, treatment, and disposal, etc.), to ensure that the type, density, and intensity of use being proposed would not endanger, jeopardize, or otherwise constitute a hazard to the public interest, health, safety, convenience, or welfare, or be materially injurious to the improvements, persons, property, or uses in the vicinity and zoning district in which the property is located.	The proposed location of the use and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity; and Services, including but not limited to, water supply, sewage disposal, solid waste, and public roadway capacity have been considered and are adequate to serve the proposed development;	The review on the site for access to public services and facilities (water, sewer, roads, sidewalk, drainage, etc.) is completed during the Building Permit stage

This side-by-side comparison of the Use Permit findings and the required findings for Design Review, Coastal Development Permit, Zoning Clearance and the Building Permit process, indicate that most of the required findings for the Use Permit would be made as part of the CDP, DR or Zoning Clearance review for any proposed project, with the exception of the use's compatibility with existing and future land uses in the area. The required revision to the Zoning Ordinance would only have the effect of not allowing the City to look at compatibility between uses when considering a new multifamily housing project with at least 20% affordable units. This change would be a less than significant impact on housing because it would NOT induce substantial unplanned housing development nor would it displace existing housing units. The implementation of this program could have a less than significant in impact on population and housing.

The 2019 Housing Element Update includes no policies or programs that would displace existing housing or people. Instead it includes a number of programs that specifically require that destroyed units be rebuilt and that low income residents that are displaced by any future project receive fair notification. For example, implementation of Program H-1.6.3 and H-5.3.4. would result in changes to the LUDC such that any existing affordable units would be replaced for any new development approved. Program H-5.3.6 requires the City to monitor at risk affordable units and work to keep them affordable, while Program H-5.3.7 requires extensive noticing and education of tenants for any at risk units when the owner intends to opt out of providing affordable housing.

FINDINGS

The proposed project would have a less than significant impact on Population and Housing, because: 1) the 2019 Housing Element Update includes no policies or programs that would displace existing housing or people; and 2) it would not induce substantial unplanned housing development nor would it displace existing housing units.

XV. PUBLIC SERVICES.

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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF PUBLIC SERVICES

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. Most of the proposed programs in the Housing Element could increase population growth and demand for public services as the Housing Element includes many programs to increase housing development. However, if the City Council chooses to implement programs that

require an amendment to the ILUDC and CLUDC this will trigger environmental review (CEQA) at which time a thorough review of the impact on public services will be completed. However, the analysis below is included as background as it indicates that the City does has sufficient existing public facilities to serve potential development that may result from the implementation of the Housing Element programs.

Program H-2.5.8 requires the City to allow development of projects with at least 20% of units affordable to low income people without a use permit if the projects are proposed for properties which have been listed on the Vacant Parcel Inventory in two cycle of the City's Housing Element. However, per guidance from HCD the City is not required to exempt these projects from Design Review or the requirement to obtain a Coastal Development Permit. As the City could continue to require Design Review and would have to require a Coastal Development Permit for some of these projects, the projects would be subject to CEQA and a discussion of public services would be required if warranted by the project.

a. 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. The Fire Station may need to be reconstructed to the higher State earthquake standards for emergency response facilities, however the proposed project will not necessitate this reconstruction.

b. 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 project will not necessitate any physical changes to the Police Department buildings.

c. Thirteen schools are located within the City of Fort Bragg. The City's schools have experienced declining enrollment and have excess capacity to serve additional students. The proposed project will not necessitate any physical changes to area schools.

d. The City has 209 acres of local passive and active recreational parks which is significantly higher than the minimum required by the Quimby Act (1 acre/3,000 residents). The proposed project will not necessitate any physical changes to area parks.

FINDINGS

The proposed project would have No Impact on Public Services because the project would not result in new development that would necessitate the construction of new or physically altered governmental facilities.

XVI. 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 substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 RECREATION

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment, as a result the 2019 Housing Element Update would not cause any significant effect on recreational facilities. In addition, these issues are dealt with at the policy level in the Open Space Element of the Inland and Coastal General Plan, which is not being modified at this time.

a & b. New parks are required under the Quimby Act when the ratio of parks is less than one acre per 3,000 residents. The City has 209 acres of local passive and active recreational parks which is significantly higher than the minimum required by the Quimby Act. Thus the implementation of mandatory Program H-2.5.8 will not necessitate any physical changes to area parks.

FINDINGS

The proposed project would have No Impact on Recreation because even mandatory program H-2.5.8 does not necessitate any physical changes to parks nor any additional parks.

XVII. TRANSPORTATION.

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, roadways, bicycle lanes and pedestrian paths?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF TRANSPORTATION

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment, as a result the 2019 Housing Element Update would not cause any significant effect on transportation. Most of the proposed programs in the Housing Element could increase population growth and use of transportation services. However, if the City Council chooses to implement programs that require an amendment to the ILUDC and CLUDC this will trigger environmental review (CEQA) at which time a thorough review of the impact on transportation

infrastructure and services will be completed. In addition, transportation issues are dealt with at the policy level in the Circulation Element of the Inland and Coastal General Plan, which is not being modified at this time.

a) Staff has reviewed the Housing Element for consistency with the Transportation Element and has determined that the two elements are consistent with each other.

b & c) CEQA section 15064.3 requires Vehicle Miles Traveled analysis for development projects and transportation projects however the adoption of the Housing Element is neither a development project nor a transportation project. Therefore, the project does not conflict with this section of the CEQA guidelines.

d & e) the adoption of the Housing Element will not result in physical development including the development of streets. Even housing projects that are approved as a consequence of the implementation of mandatory programs in the Housing Element will be subject to CEQA.

FINDINGS

The proposed project would have **No Impact** on transportation because: 1) the proposed project does not conflict with a plan, ordinance or policy addressing the circulation system; 2) the project is consistent with CEQA section 15064.3; and 3) the project will not result in development.

XVIII. TRIBAL CULTURAL RESOURCES.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF TRIBAL CULTURAL RESOURCES

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The Housing Element Update does not change programs or policies that provide regulatory guidance for cultural resources. These issues are dealt with in the Conservation, Open Space, Energy and Parks Element of the General Plan and in Chapter 18.74 Cultural Resource Protection of the Inland Land Use and Development Code and Chapter 17.74 Cultural Resource Protection of the Coastal Land Use and Development Code. The 2019 Housing Element does not

recommend any changes to either the Coastal or the Inland Land Use and Development Code that would impact cultural resources.

Program H-2.5.8 requires the City to allow development of projects with at least 20% of units affordable to low income people without a use permit if the projects are proposed for properties which have been listed on the Vacant Parcel Inventory in two cycle of the City’s Housing Element. However, per guidance from HCD the City is not required to exempt these projects from Design Review or the requirement to obtain a Coastal Development Permit. As the City could continue to require Design Review and would have to require a Coastal Development Permit for some of these projects, the projects would be subject to CEQA and a cultural resources analysis would be required if warranted by the project location. Therefore, implementation of this program will not have impacts on cultural resources.

FINDINGS

As noted in the above analysis, the proposed project would have No Impact on Cultural Resources as none of the mandatory programs have the potential to impact Cultural Resources, and as all potential future changes to the Zoning Ordinance will be analyzed in a CEQA document at the time that the Zoning Ordinance changes are considered.

XVIX. 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 relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF UTILITIES AND SERVICE SYSTEMS

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. Most of the proposed programs in the Housing Element could increase population growth and demand for utilities as the Housing Element includes many programs to increase housing development. However, if the City Council chooses to implement programs that require an amendment to the ILUDC and CLUDC this will trigger environmental review (CEQA) at which time a thorough review of the impact on utilities will be completed.

The analysis below is included as background and in response to a comment from the California Department of Fish and Wildlife on the initial MND.

The City of Fort Bragg Public Works Department Water Enterprise Division is responsible for raw water collection, treatment, and distribution of treated water to customers within and outside of the city limits. Additionally, the City owns and operates a water treatment plant (WTP), located at 31301 Cedar Street in Fort Bragg.

Water. The Public Works Department has developed a comprehensive water model to determine how much new development can be accommodated within the City given the additional water storage which has been added to the City's water system in the past four years. Two large new water storage features have been added, namely Summers Lane Reservoir (15 million gallons) and the new treated water tank (1.5 million gallons). The City diverts water from three water sources, and in extreme drought conditions (50-year drought) there may not be enough surface water in these surface water sources to serve demand. The new water storage facilities supplement water supply in drought conditions when the City's surface water sources have less supply. The analysis by Public Works has determined that even in a 50-year drought, the new water storage facilities would allow the City to serve an additional 65 to 75% increase in water demand over 2015 water demand (water demand during drought conditions with water conservation measures) and 47% over current (2018 non drought conditions) water demand. In other words, the City can accommodate an additional 40 to 65% increase in new development through the use of the Summer's Lane Reservoir under drought conditions. In a comment letter to the City of Fort Bragg the Department of Fish and Wildlife made the following request with regard to the adoption of the Housing Element:

"The MND should include a water budget that compares current and anticipates demands and provides adequate bypass flows during low-flow and drought periods for species including State-listed endangered and federally-listed Coho Salmon, Chinook Salmon and Stealhead Trout."

The following analysis responds to this request.

There are two mandatory state-required programs could potentially impact water demand in Fort Bragg, noted in blue text below.

Program H-1.6.3: Redevelopment of Non-Vacant Sites: Require the replacement of housing units subject to the requirements of Government Code, section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or non-residential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to: 1) non-vacant sites and 2) vacant sites with previous residential uses that have been vacated or demolished.

The City's Housing Element does not list any sites in the Vacant and Underutilized Site Inventory that are occupied by or restricted for the use of lower-income households. However, in the future one of the sites in the site inventory may be developed with low income housing. It is however very unlikely that such a site would both be developed for low income housing and then be redeveloped within the eight-year timeframe of this Housing Element. However, if this remote eventuality did come to pass, the water impact would be very small as it would consist of the requirement to replace existing housing units.

Program H-2.5.8. Maximize Housing Density by Right for projects with 20%+ Affordable Units. Revise the Land Use and Development Code to allow the maximum density permissible within a zoning district by right (no Use Permit) for all residential projects that include at least 20% of units deed restricted at rents affordable to low income households and that have been listed in the last two Housing Elements as an eligible site in the Vacant Parcel Inventory for the RHNA, these parcels are listed on the Vacant Parcel Inventory and include: 008-172-09, 251 So Franklin St; 018-440-58, 1151 So Main St; 018-150-61, 1190 So Main St; 018-090-02, 700 River Dr.; 018-090-16, 700 River Dr.; 008-010-31, 1020 Glass Beach Dr.; 018-113-03, 970 Chestnut St; 008-010-33, 1080 Glass Beach Dr.; 008-290-73, 1329 Cedar St; 008-302-28, 1328 Cedar St; 008-290-34, 1325 Cedar St; 018-100-42, 485 So Lincoln St; 018-210-29, 860 Hazelwood St; 020-520-22, 1600 Oak St; 018-440-50, 200 We Ocean View Dr.; 018-113-01, 552 S Lincoln St; 018-440-38, 350 Ocean View Dr.; 018-440-49, 250 We Ocean View Dr.; 018-340-04, 441 South St; 018-340-03, 601 Cypress St; 008-350-60, 920 Stewart St; 018-150-58, No Street Address; 018-150-59, No Street Address; 018-150-55, 100 East Ocean View Dr.

This mandatory state program (Program H-2.5.8) has the potential to increase water use in Fort Bragg as it would require the City to approve by right (without a use permit) a multi-family housing project with at least 20% of the units deed restricted for low income households. However, many of the above parcels are located within the Coastal Zone (noted in underline) and would require a Coastal Development Permit. All multifamily projects currently require Design Review (if the project includes three or more units), and Design Review is not a ministerial process. As approval of any development for these parcels would not be ministerial, a CEQA analysis would be required. Furthermore, a CDP analysis in compliance with Policy PF-1.2 of the Coastal General Plan would also be required in most cases which states:

Coastal General Plan Policy PF-1.2: Ensure Adequate Services and Infrastructure for New Development. No permit for development shall be approved unless it can be demonstrated that such development will be served upon completion with adequate services, including but not limited to potable water; wastewater collection, treatment and disposal; storm drainage; fire and emergency medical response; police protection; transportation; schools; and solid waste collection and disposal; as applicable to the proposed development.

The Table below illustrates the water budget for these potential projects, even though any future project would require a CEQA review, which includes an analysis of water availability.

Vacant Parcel Inventory - Permitting & CEQA Requirements							
		Deisgn Review	Coastal Development Permit	CEQA	Maximum Housing Units	Water Budget: Gallons/ Unit /Day	Total Annual Water Use
008-172-09	251 SO FRANKLIN ST	DR		Yes	25	74.5	679,401
018-150-61	1190 SO MAIN ST	DR	CDP	Yes	47	74.5	1,255,807
018-090-02	700 RIVER DR	DR	CDP	Yes	59	74.5	1,579,610
018-090-16	700 RIVER DR	DR	CDP	Yes	67	74.5	1,785,180
008-010-31	1020 GLASS BEACH DR	DR	CDP	Yes	44	74.5	1,182,327
018-113-03	970 CHESTNUT ST	DR		Yes	31	74.5	823,667
008-010-33	1080 GLASS BEACH DR	DR	CDP	Yes	54	74.5	1,434,651
008-290-73	1329 CEDAR ST	DR		Yes	29	74.5	771,102
008-302-28	1328 CEDAR ST	DR		Yes	7	74.5	182,831
008-290-34	1325 CEDAR ST	DR		Yes	7	74.5	182,067
018-100-42	485 SO LINCOLN ST	DR		Yes	11	74.5	296,533
018-210-29	860 HAZELWOOD ST	DR		Yes	36	74.5	960,007
020-520-22	1600 OAK ST	DR		Yes	61	74.5	1,640,811
018-440-50	200 WE OCEAN VIEW DR	DR	CDP	Yes	12	74.5	325,976
018-113-01	552 S Lincoln St	DR		Yes	38	74.5	1,029,529
018-440-38	350 OCEAN VIEW DR	DR	CDP	Yes	11	74.5	298,311
018-440-49	250 WE OCEAN VIEW DR	DR	CDP	Yes	9	74.5	238,615
018-340-03	601 CYPRESS ST	DR	CDP	Yes	218	74.5	5,843,846
008-350-60	920 STEWART ST	DR	CDP	Yes	86	74.5	2,307,184
018-150-58	No Street Address	DR	CDP	Yes	32	74.5	849,258
018-150-56	No Street Address	DR	CDP	Yes	18	74.5	484,831
018-150-55	100 EA OCEAN VIEW DR	DR	CDP	Yes	21	74.5	565,853
				Total	922		24,717,399

If all of these parcels were developed to the maximum amount (units/acre) with multi-family projects that included at least 20% affordable housing, it would increase the water demand in Fort Bragg by 24 million gallons annually, which would amount to a 13% annual increase over current water use, which is 194,799,396 gallons per year. This is within the water budget that is currently available to the City given the construction of the Summer's Lane Reservoir and current pumping requirements of the Water Board for the Noyo and Fish and Wildlife for Waterfall Gulch (through our LSA).

The new reservoir allows the City to serve all potential new development, that would be potentially facilitated by the implementation of Program H-2.5.8, without increasing the City's water diversion from the City's sources to meet that increased demand during low-flow drought conditions. The reservoir would serve the potential increase in demand from the implementation of Program H-2.5.8. and thus the project would not have an impact on State-listed endangered and federally-listed Coho Salmon, Chinook Salmon and Stealhead Trout.

Fish and Wildlife also requested an analysis of Sea Level Rise on the City's water sources. The City is cognizant of the potential for sea level rise to impact the City's water diversion on the Noyo River and the City has completed a draft sea level rise analysis to begin to understand potential impacts on the City's point of diversion on the Noyo. The City will need to apply for a new Lake and Streambed Alteration Agreement (LSA), if and when sea level rise necessitates the relocation of the City's Noyo River point of diversion. However, this potential eventuality will not be impacted

or result from the adoption of the Housing Element and no mitigation measures are warranted based on the adoption of the Housing Element.

Wastewater. The Public Works Department is undertaking a major wastewater treatment facility upgrade which, when completed, will be capable of treating foreseeable Waste Water treatment discharges from existing and future development.

Solid Waste. The City contracts solid waste services to Waste Management. The City's C&D recycling ordinance has reduced C&D waste sufficiently to comply with the requirements of state law. New development will be required to comply with the City's C&D ordinance.

FINDINGS

The proposed project would have **No Impact** on Utilities and Service Systems, as the City has sufficient service capacity in the water, wastewater and solid waste areas to serve potential development that may result from the adoption of mandatory Housing Element programs.

XX. 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) 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 temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF WILDFIRE

The 2019 Housing Element would not result in any direct or indirect physical changes to the environment. The proposed programs in the Housing Element will not impair an adopted emergency response plan or emergency evacuation plan. If the City Council chooses to implement programs that require an amendment to the ILUDC and CLUDC this will trigger environmental review (CEQA) at which time a thorough review of the impact of the specific programs to be implemented on wildfire safety will be completed.

FINDINGS

As noted in the above analysis, the proposed project would have No Impact on Wildlife as none of the mandatory programs have the potential to impact wildfire, and as all potential future changes to the Zoning Ordinance will be analyzed in a CEQA document at the time that the Zoning Ordinance changes are considered.

XXI. 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 substantially 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, substantially 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF MANDATORY FINDINGS OF SIGNIFICANCE

The project does not 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. No impacts were identified that are individually limited but cumulatively considerable.

With the incorporation of the following mitigation measures, all potential impacts would be reduced to a level of less than significant:

Mitigation Measure 1: Complete a General Plan Amendment to revise the Residential Land Use Designation descriptions of the Land Use Element, prior to adoption of an LUDC amendment if the implementation of programs H-1.3.3, H1.3.5, H-1.74, H-1.7.5 and H-1.7.8 result in a conflict with the maximum density permissible in residential zoning districts in the General Plan.

Mitigation Measure 2: Complete a General Plan Amendment to revise Policy LU-2.4, prior to adoption of a zoning amendment to implement optional program H-2.9.3 if the zoning amendment results in a conflict with the annexation standards of the Land Use Element.

Mitigation Measure 3: Complete a General Plan Amendment to revise Policies CD-2.1 and CD-2.3 prior to implementing program H-1.7.6 through a zoning amendment, if the implementation or program H-1.7.6 could result in a conflict with the design review requirements of these policies of the Community Design Element.