

**Date:** February 15, 2022  
**To:** City of Fort Bragg Planning Commission  
**From:** Kevin Locke, Assistant Planner  
**Subject:** 701 South Franklin Class 32 In-Fill Exemption

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The City of Fort Bragg has received a development application for Design Review and Coastal Development Permit of a proposed additional auto repair shop building at 701 South Franklin Street. As documented herein, the proposed project meets the conditions for the In-Fill exemption pursuant to Section 15332 of the State California Environmental Quality Act (CEQA) Guidelines. Specifically, the project qualifies for a CEQA exemption for the following reasons:

- The project is consistent with the City of Fort Bragg Coastal General Plan land use designation, complies with the established zoning regulations, and is a permitted use;
- The project is located within City limits on a site that is less than 5 acres and is substantially surrounded by established urban uses;
- The site is void of natural vegetation and there is no habitat that would support endangered, rare or threatened species;
- The project would not result in any significant effects relating to traffic, noise, air quality, or water quality;
- The project is adequately served by all required utilities and public services; and
- There are no exceptions that would preclude application of the exemption.

***a. The project is consistent with the applicable General Plan Designation, applicable policies and applicable zoning designation and regulations.***

The project site is designated as “General Commercial” (GC) per Map LU-1 of the Coastal General Plan. The General Commercial designation is intended for a less compact and intensive type of development than found in the Central Business District. Typical land uses in this designation depend more on vehicular than pedestrian access and include automotive and service-related outlets, retail sales, home improvement, paint or carpeting sales, offices, apparel stores, and food stores. As vehicle services are an expected use in a General Commercial zone, the project would be consistent with the General Plan.

***b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by Urban Uses.***

The project site is roughly ~17,000 square feet and located in a commercial area characterized with a large range of uses. The site is surrounded by established roadways, retail/commercial, industrial, and municipal uses such as a police station. The project site is currently fully paved and developed with an approximately 2,000

square foot building. Thus, the project site is located on no more than 5 acres and substantially surrounded by established urban uses.

***c. The project has no value as habitat for endangered, rare or threatened species.***

The project site is currently developed with existing urban uses and consist of a 2000 square foot building and a paved parking area with a narrow strip of landscaping along the site frontage to Franklin and Cypress Street. The paved area is void of value for habitat and the minimal landscaping along the site frontage is heavily disturbed due to the urban environment. A biological survey was also conducted for the site in December 8, 2021 and found no rare plant species or Environmentally Sensitive Habitat Areas. Therefore, the site is not suitable or valuable habitat for sensitive species.

***d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.***

The following discussion describes the project as it relates to traffic, noise, air quality and water quality:

**Traffic**

Senate Bill 743 changed the guidelines related to transportation impacts as part of CEQA compliance. Vehicle Miles Traveled (VMT) is the new metric projects should use when identifying transportation impacts for new development. The City of Fort Bragg has not established significance thresholds, therefore the *California's Office of Planning & Research's (OPR) Technical Advisory* recommendations will be used to analyze this project.

In its recommended thresholds for retail project types, the Technical Advisory indicates that, unlike regional retail, local-serving retail development typically redistributes shopping trips rather than creating new trips, noting that *"lead agencies generally may presume such development creates a less-than-significant transportation impact"*. OPR's threshold for what would be considered a "local-serving" is a project size of 50,000 square feet. The proposed project is less than 50,000 square feet, therefore screening out of VMT requirements and has a less than significant impact.

**Noise**

The proposed project is located adjacent to Cypress and Franklin Street, which carries vehicular traffic and is surrounded by urban development in the vicinity. Development adjacent to the site includes restaurants, other auto service shops, a police station, and general commercial buildings. The uses and existing traffic in the area contribute to the existing ambient noise environment. As a high traffic area, ambient noise levels are typically higher than those in more residential areas of town.

Typical equipment used in an auto service shop could include air grinders, air compressors, and floor lifts, which could generate noise levels above 100 decibels. Typical operating cycles for the equipment would include one to two minutes of use with three to five minutes of quiet in between. However, no repair work would occur outside the building, similar to the existing shop. The existing City of Fort Bragg Coastal

General Plan states that the maximum exterior acceptable noise level for “office buildings, commercial, and professional” is roughly 70 decibels. With the enclosure and distance attenuation, it is expected that the proposed addition would mitigate noise to acceptable levels, similar to the existing auto shop.

### **Water Quality**

The site is currently occupied by an approximately 2,000 square foot building and the entire site is improved with hardscape and minor landscaping. The project is proposing to provide LID features in compliance with City and State Codes.

Additionally, application of uniformly applied development standards requires erosion and sediment control to be implemented during all stages of construction. Typical Best Management Practices (BMP) that are generally applied during construction activities include use of fiber filter rolls, sand bags or interceptors at storm drain inlets, track pads at access points, and spill prevention, amongst others.

The overall ground disturbance is limited to less than one acre and run-off will be controlled through the application of best management practices as identified on the project plans. Therefore, there is no expectation that construction activities would significantly impact water quality.

### **Air Quality**

The site is located within the North Coast Air Basin (NCAB) and is subject to the requirements of the Mendocino County Air Quality Management District (MCAQMD). The MCAQMD is responsible for monitoring and enforcing the state and federal Clean Air Acts as well as local air quality protection regulations in the County of Mendocino. The entire NCAB is currently designated as “non-attainment,” or more than allowable limits, for the state 24-hour allowable limits for breathable particulate matter of 10 microns or less (PM10), and as “attainment,” or within allowable limits, concerning the balance of the criteria pollutants. Criteria pollutants include: ozone (O3), carbon monoxide (CO), oxides of nitrogen (NOx), lead (Pb), sulfur dioxide (SO2), particulate matter less than 10 microns in size (PM10), and particulate matter less than 2.5 microns in size (PM2.5).

The MCAQMD has been determined to be in “attainment”, or within allowable limits, for all federal and state ambient air quality standards, except for the state annual average PM10 standard and the 24-hour PM10 standard. The project and its emission sources are subject to the rules and regulations contained in the most recent version of the Rules and Regulations of the MCAQMD. The MCAQMD has identified significance thresholds for use in evaluating project impacts under CEQA. Projects with emissions under the significance thresholds are deemed to have less than significant air quality impacts.

Air quality impacts anticipated under the proposed development of the site were modeled using the California Emissions Estimator Model (CalEEMod) to quantify potential criteria pollution and greenhouse gas (GHG) emissions associated with both

construction and operation of the proposed project. The model quantifies direct emissions from construction and operational activities, as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal. The table below presents the modeled project emissions with respect to the MCAQMD identified significance thresholds.

Pollutant	Construction Related		Operations Related		
	Average Daily Emissions (lb/day)		Indirect Average Daily emissions (lb/day)	Stationary Maximum Annual Emissions (tons/year)	Project Combined Indirect and Stationary (tons/year)
	Significance Threshold	Project			
ROG	54	0.06	180	40	
NOx	54	0.23	42	40	0.18
PM <sub>10</sub>	82	0.01	82	15	0.025
PM <sub>2.5</sub>	54	1.6e-004	54	10	8.75e-003
Fugitive Dust (PM <sub>10</sub> /PM <sub>2.5</sub> )	See PM <sub>10</sub> / PM <sub>2.5</sub>		See PM <sub>10</sub> / PM <sub>2.5</sub>		.026
Local CO	---	---	125	125	0.48

***e. The project is adequately served by all required utilities and public services.***

City staff reviewed the site and the proposed project would be able to be served by utilities and public services. The site has existing uses that are already served by utilities and public services. The applicant is not proposing any expansion of those services.

***f. There are no exceptions that would preclude application of the exemption.***

It has been further considered whether the project is subject to any of the exceptions outlined in CEQA Guidelines Section 15300.2. An exemption would be prohibited pursuant to Section 15300.2 if any of the following circumstances are found to exist:

***1. For certain classes of projects (Classes 3, 4, 5, 6 and 11) due to location where the project may impact an environmental resource or hazardous or critical concern;***

Section 15300.2(a) does not apply to the infill exemption.

**2. When the cumulative impact of successive projects of the same type in the same place, over time, is significant.**

Since the project is located in an urban area with commercial and industrial uses it is expected to be complimentary to the existing land use and there is no expectation that the project will contribute to cumulative impacts.

**3. Where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.**

There is no expectation that the project would have a significant effect on the environment resulting from unusual circumstances. The proposed project involves the introduction of an additional auto repair building on a lot used for auto repair within an area consisting of like uses. Therefore, no significant effects generated by the presence of unusual circumstances would result from the proposed project.

**4. Where the project may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway;**

Section 15300.2(d) is not applicable; the project is not located in the vicinity of a State Designated Highway, nor is it located in the vicinity of a locally recognized or designated Scenic Corridor.

**5. Where the project is located on a state designated hazardous waste site;**

The Envirostor and Geotracker databases were reviewed for potential as a hazardous waste site. The site is not identified as a contaminated or spill site, nor is it near an active contaminated or spill site. A closed LUST Cleanup Site was identified north of the project site at a private residence, however since the case is closed in 2005 and the project site is not located on a State designated hazardous waste site, there would be no potential for exposure due to contamination.

**6. Where the project may cause a substantial adverse change in the significance of a historical resource;**

The site currently consists of an approximately 2,000 square foot building and a paved parking area. The existing building based on available records indicate it was constructed around 1981 and was originally used as an auto repair shop.

An evaluation of historical significance concluded that the subject building is not associated with a significant trend or event, does not provide significant architectural or artistic value, is not associated with any significant persons, and does not hold the potential to yield information important to the past. In the absence of any strong associations with these criterion, the proposed building is not eligible for listing on the California Register of Historic Resources and does not meet the definition of a historic resource.