



## COMMUNITY DEVELOPMENT COMMITTEE STAFF REPORT

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**TO:** Community Development      **DATE:** March 2, 2026  
**DEPARTMENT:** Community Development  
**PREPARED BY:** Marie Jones Consulting  
**PRESENTER:** Marie Jones

**AGENDA TITLE:** Receive Report Regarding Visual Analysis Requirements in the Coastal Zone

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### RECOMMENDED ACTION

Receive Report and Provide Direction Regarding Visual Analysis Requirements in the Coastal Zone

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### BACKGROUND

In 2024 and 2025, the City Council and Planning Commission held a total of five public hearings to consider approval of an 83-unit multifamily project with 1,000 sf of retail space and 2,450 sf of visitor serving accommodations at 1151 south main street. The project was appealed twice to the Coastal Commission by neighbors and Paul Clark, who proposed an Autozone store project for this same site was denied by the City Council in January of 2020. As a consequence of the first appeal to the Coastal Commission, Coastal Commission staff recommended some modifications to the proposed project to include more visitor-serving uses and a public access route through the site. The project was modified to include additional visitor serving uses and the public access route through the site. Subsequently the Planning Commission recommended approval and City Council approved the project again. On the second appeal by the neighbors, the Coastal Commission denied the appeal and affirmed the approvals of all permits for the project. Some project neighbors and Paul Clark have filed a lawsuit again the project on CEQA grounds which is being adjudicated.

A visual analysis was not required for the 83-unit mixed use project because it is not required by either the Coastal General Plan or the CLUDC as illustrated in this report. However, prior staff did require a visual analysis and story poles for the Autozone, even though a visual analysis should not have been required. It should be noted that the Autozone project was not denied on the basis of the project's visual impacts, so while staff incorrectly required a visual analysis for the project, it had no bearing on the City Council's ultimate denial of that project.

AGENDA ITEM NO.

## ANALYSIS

A Coastal Development Permit requires that the City exam potential impacts of a development project on the following coastal resources: visual resources, archaeological and cultural resources, biological and wetland resources, coastal dependent uses and public access.

The project site is located west of Highway 1 and visual resources have been identified in the Coastal General Plan in some areas west of Highway 1, but not in all areas.

The specific General Plan includes the following key visual analysis policies:

*Policy CD-1.1: Visual Resources: Permitted development shall be designed and sited to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance scenic views in visually degraded areas.*

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

Map CD-1 of the Coastal General Plan is the key determinant of whether or not a visual analysis is only required by the Coastal General Plan. If a parcel is identified in Map CD-1 as having "potential scenic views to the ocean" a visual analysis is required.

Additionally, under the CDP application requirements (17.71.045 D) of the CLUDC, Visual Analysis are only required if a parcel is designated as potentially scenic in Map CD-1 as follows:

*9. Visual Analysis. For applications for development located in areas designated "Potential Scenic Views Toward the Ocean or the Noyo River" on Map CD-1 of the Coastal General Plan (except development listed in subsection (B) of Policy CD-1.3 of the Coastal General Plan), a visual analysis as required by Chapter 17.50.070 of this Development Code.*

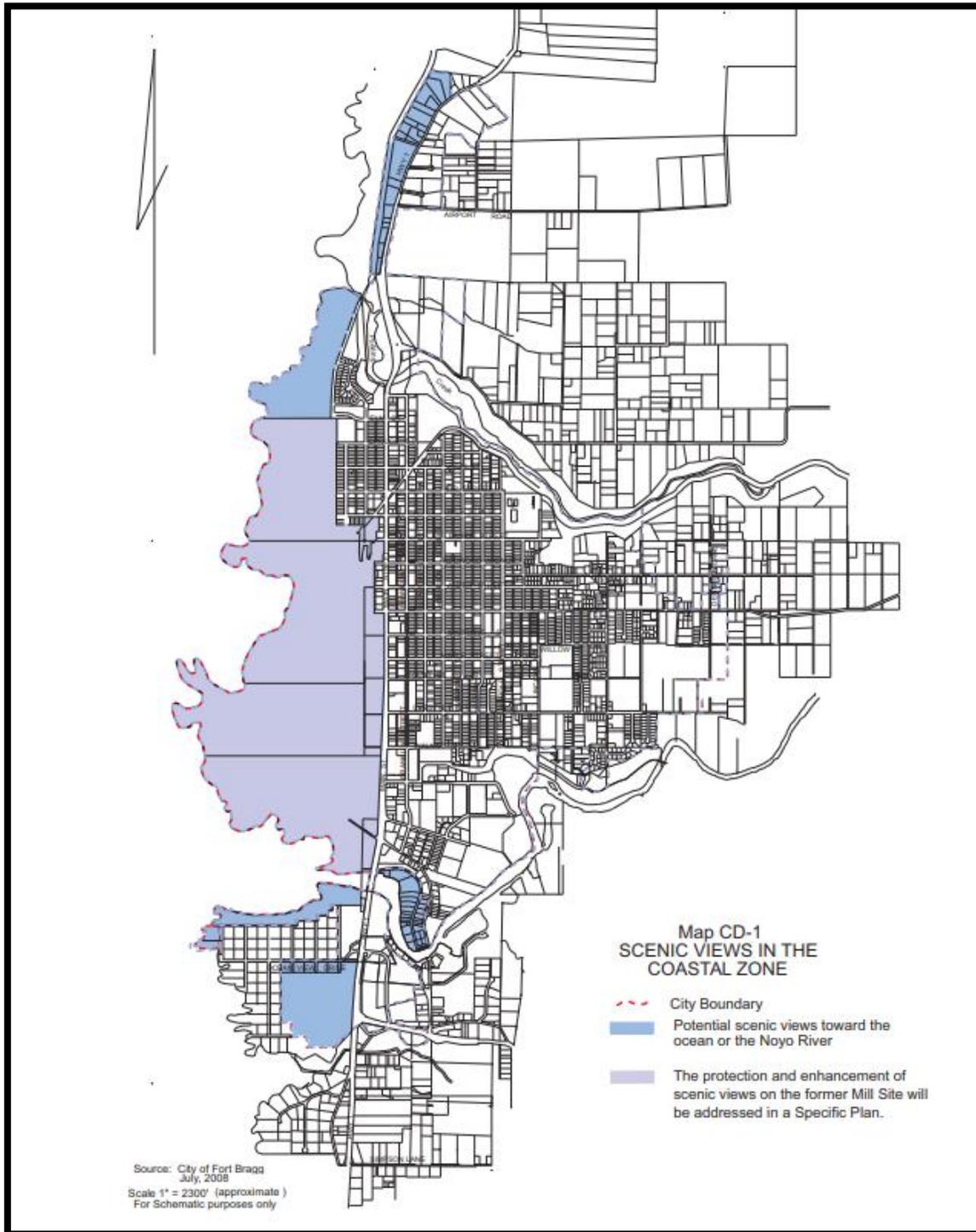
The parcel located at 1151 south main street is not identified as a highly scenic area on Map CD-1, therefore a visual analysis was not required.

As illustrated in Map CD-1 below, Visual Resource Analysis and story poles are required for development on parcels:

- On the Noyo River flats (although weirdly most of the indicated parcels are not within City limits),
- South of Ocean Drive, west of highway 1, and
- North of Pudding Creek, west of highway 1.

The following locations, which are similar to 1151 South Main Street, are also not included on Map CD-1:

- Parcels located east of Highway 1 and between the Noyo River and highway 1,
- Parcels located to the west of Highway 1, south of the Noyo River Bridge and north of Ocean Drive, and
- All parcels west of highway 1 between the Noyo Bridge and Glass Beach Drive.



If City Council wants to provide direction to expand the number of parcels which require a visual resource analysis, adding some of the above locations to Map CD-1 would be one place to start.

The Coastal General Plan includes the following additional visual resource policy:

*Policy CD-1.4: New development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads or public viewing areas to the maximum feasible extent.*

Highway 1 is not defined as a scenic road within City limits for purposes of CEQA nor by the Coastal General Plan.

A “Public Viewing Area” is defined in the City’s Coastal General Plan as follows:

*Public Viewing Area. A location along existing scenic public roads and trails or within public parklands or beaches where there are scenic views of the beach and ocean, coastline, mountains, ridgelines, canyons and other unique natural features or areas.*

The City Council, Planning Commission and Coastal Commission determined that 1151 south main street site does not qualify as a public viewing area per this definition, and they also determined that the limited views from Highway 1 through this property do not qualify as scenic views when the agencies approved the permits for this project.

*Policy CD-2.5 Scenic Views and Resource Areas: Ensure that development does not adversely impact scenic views and resources as seen from a road and other public rights-of-way.*

The City’s Coastal General Plan does not include a definition of a scenic resource. The California Coastal Act defines scenic resources as “the visual and scenic qualities of the coast, including beaches, headlands, bluffs and more.” The Act also considers cultural features, historic sites and natural points of interest as scenic resources.

The site is an undeveloped field with a few trees and therefore does not constitute a scenic resource per the definition of the Coastal Act as it does not include views of beaches, headlands or bluffs.

A final Visual Resource policy is noted below.

*Policy CD-1.5: All new development shall be sited and designed to minimize alteration of natural landforms by:*

- 1. Conforming to the natural topography.*
- 2. Preventing substantial grading or reconfiguration of the project site.*
- 3. Minimizing flat building pads on slopes. Building pads on sloping sites shall utilize split level or stepped-pad designs.*
- 4. Requiring that man-made contours mimic the natural contours.*
- 5. Ensuring that graded slopes blend with the existing terrain of the site and surrounding area.*
- 6. Minimizing grading permitted outside of the building footprint.*
- 7. Clustering structures to minimize site disturbance and to minimize development area.*
- 8. Minimizing height and length of cut and fill slopes.*
- 9. Minimizing the height and length of retaining walls.*

The project site at 1151 South Main St is flat and does not require alterations of the natural landform of the site to accommodate development.

The following visual resource policies apply to development north of Pudding Creek.

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

*Policy CD-1.13: Retain Views North of Pudding Creek. New development north of Pudding Creek and west of Main Street on parcels with total frontage of more than 135 feet, on either the Haul Road or Main Street as determined by the Planning Commission, shall be required to leave a minimum of 30 percent of the project's total parcel frontage free of view-blocking development. The area free of view-blocking development shall not include narrow passageways between buildings on the site, and shall be concentrated.*

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

It is noteworthy that City Council did not chose to apply this level of visual resource protection to other areas of town.

#### **ENVIRONMENTAL ANALYSIS:**

The City would need to prepare a visual resource study to inform an LCP amendment to cover new visual resource requirements. An LCP amendment is exempt from CEQA per State law.

#### **STRATEGIC PLAN/COUNCIL PRIORITIES/GENERAL PLAN CONSISTENCY**

Not applicable.

#### **COMMUNITY OUTREACH**

These items is being brought forward to City Council at the request of community members.

#### **ALTERNATIVES:**

If City Council wants to revisit the visual resources policies and/or Map CD-1 of the Coastal General Plan, staff can prepare an LCP amendment to establish new policies or a new map which would impact development potential in the Coastal Zone for parcels that are newly designated with a requirement for a visual resource analysis. However, this policy change would have to be accompanied by a visual resource study that clearly identifies new visual resources that are in need of protection by the City through the CDP process.

Alternatively, the City could require story poles for larger projects (for example projects that are greater than 5,000 SF regardless of location (coastal or inland) as part of the design review process. This policy change would be applicable only to commercial and industrial projects, as per State Law, design review of multifamily projects must be quantitative and

cannot be qualitative. The purpose of a story pole for a multifamily project would be to define if the project is “too big” or “too dense” which is a qualitative determination.

**ATTACHMENTS:**

None

**NOTIFICATION:**

The following “Notify Me” lists:

- Economic Development Planning
- Fort Bragg Downtown Businesses
- Tourism and Marketing