

Paoli, Diana

From: Paul Clark <pclark@fortbraggrealty.co>
Sent: Thursday, July 10, 2025 8:13 AM
To: City Clerk
Cc: CMAR (CMAR@MCN.ORG); Paul Clark
Subject: City Council 07/14/2025 Item 7B
Attachments: 1151SMainHousingStudy.pdf

1151 S Main and City goals for 200 units

Think all the Council should see this.

This is the response I got from the city on my formal request for any studies done for the city council to have declared the need for 200 residential units by 2026.

I was surprised to see any study, but as you will see this is not Fort Bragg specific.

I wanted this in the record and would ask the city to rethink this strategy. Being the owner of a property management company here in Fort Bragg, I would think that any study would include reaching out to rental providers in the area, also as it is called for in the City's Economic Development Strategy, another grant funded plan that is not often followed.

Thank you

Paul Clark

[Contact Us \(/contact-us\)](/contact-us)[-Translate](#)[\(/hcd-search\)](/hcd-search)[\(https://www.ca.gov/\)](https://www.ca.gov/)

California Department of Housing and Community Development (/)

[Grants & Funding \(/grants-and-funding\)](/grants-and-funding)[Manufactured & Mobilehomes \(/manufactured-and-mobilehomes\)](/manufactured-and-mobilehomes)[Building Standards \(/building-standards-hcd\)](/building-standards-hcd)[Planning & Community Development \(/planning-and-community-development\)](/planning-and-community-development)[Policy & Research \(/policy-and-research\)](/policy-and-research)[About HCD \(/about-hcd\)](/about-hcd)[Home \(/\)](#) > [Planning & Community Development \(/planning-and-community-development\)](/planning-and-community-development)> [Accountability and Enforcement](#)

Accountability and Enforcement

The Department of Housing and Community Development (HCD) enforces state housing laws to meaningfully and positively impact the provision of housing in all communities across the state.

California's housing crisis has reached historic proportions despite the passage of numerous laws intended to increase the supply of housing affordable to Californians at all income levels. As part of the 2021-2022 state budget, HCD received additional staff to grow its accountability efforts and formed the Housing Accountability Unit (HAU). While education and technical assistance is always the first step in HCD's accountability efforts, the HAU holds jurisdictions accountable for meeting their housing element commitments and complying with state housing laws. Violations of these state laws may lead to consequences including revocation of housing element certification and/or referral to the California Office of the Attorney General.

Actions and Results

The Housing Accountability Dashboard reflects the actions the Housing Accountability Unit (HAU) has taken to date (updated weekly) and includes HCD's accountability and enforcement work starting on January 1, 2020.

[View Housing Accountability Dashboard \(/planning-and-community-development/housing-open-data-tools/housing-accountability-dashboard\)](/planning-and-community-development/housing-open-data-tools/housing-accountability-dashboard)

Technical Assistance and Enforcement Letters



Legal Action



Submit Technical Assistance Requests and Potential Violations to HCD for Review



Enforcement Process



Enforcement Authority

In 2017, several bills were signed to strengthen and clarify existing laws, and to increase accountability and enforcement to better address the housing needs of Californians. Assembly Bill (AB) 72 was one of those bills. In 2021, AB 215 provided additional authority. In 2023, AB 434 further expanded HCD's authority. As a result, enforcement authority is now codified in Government Code section 65585 includes:

Housing Element Law



Housing Accountability Act (HAA)



No Net Loss Law



Density Bonus Law



Anti-Discrimination in Land Use Law



Portions of the Permit Streamlining Act (PSA)



Housing Crisis Act (HCA) of 2019



Affirmatively Furthering Fair Housing (AFFH)



Streamlined Ministerial Approval Process (SB 35 of 2017)



By-Right Supportive Housing Provisions



By-Right Low Barrier Navigation Centers



Affordable Housing Preservation Noticing Law



Surplus Land Act



Rental Inclusionary Housing



Limitations on Development Standards



Minimum Parking Requirements (AB 2097 of 2022)



Affordable Housing and High Road Jobs Act (AB 2011 of 2022)



Five Hearing Rule



Duplexes and Lot Splits (SB 9 of 2021)



Accessory Dwelling Unit Law



Middle Class Housing Act (SB 6 of 2022)



Affordable Housing on Faith and Higher Education Lands Act (SB 4 of 2023)



Demolition of Housing Units (AB 1218 of 2023)



The Starter Home Revitalization Act (SB 684 of 2023)



Need Help?

Visit our Housing Accountability Unit Portal (https://calhcd.service-now.com/csp?id=sc_cat_item&sys_id=91e19b8ac31955109a97251ce0013105) to submit a request for technical assistance.

Related Links

[Accessory Dwelling Units \(/policy-and-research/accessory-dwelling-units\)](/policy-and-research/accessory-dwelling-units)

[San Francisco Policy and Practice Review \(/policy-and-research/plans-and-reports\)](/policy-and-research/plans-and-reports)

[Public Lands for Affordable Housing Development \(/planning-and-community-development/public-lands-affordable-housing-development\)](/planning-and-community-development/public-lands-affordable-housing-development)

[Affirmatively Furthering Fair Housing \(/planning-and-community-development/affirmatively-](/planning-and-community-development/affirmatively-)

[furthering-fair-housing](#))

[Housing Elements \(/planning-and-community-development/housing-elements\)](#)

[Building Blocks \(/planning-and-community-development/housing-elements/building-blocks\)](#)

[Annual Progress Reports \(/planning-and-community-development/annual-progress-reports\)](#)

Resources

[Group Home Technical Advisory 2022 \(PDF\) \(/sites/default/files/docs/planning-and-community/group-home-technical-advisory-2022.pdf\)](#)

Contact

California Department of Housing & Community Development
651 Bannon Street
Sacramento, CA 95811

Directions (<https://www.google.com/maps/dir//651+Bannon+Street,+Sacramento,+CA/@38.5952691,-121.4950853,17z/data=!4m9!4m8!1m0!1m5!1m1!1s0x809ad7c9f66658c9:0x51fe757f44d50a6b!2m2!1d-121.4925104!2d38.5952649!3e0>)

Division of Codes and Standards
9342 Tech Center Drive, Suite 500
Sacramento, CA 95826
(800) 952-8356

Regional Offices ([/manufactured-and-mobilehomes/registration-and-titling#collapse-4](#))

Statewide Campaigns

[Register to Vote \(https://registertovote.ca.gov/\)](#)

[Mental Health For All \(https://mentalhealth.ca.gov/\)](#)

[Save Our Water \(https://saveourwater.com/\)](#)

[Flex Alert \(http://www.flexalert.org/\)](#)

[Real ID \(https://www.dmv.ca.gov/portal/dmv/detail/realid\)](#)

[Housing Is Key \(https://landlordtenant.dre.ca.gov/\)](#)

[Covid19 Updates \(https://covid19.ca.gov/\)](https://covid19.ca.gov/)

[Vaccinate ALL 58 \(https://covid19.ca.gov/vaccines/\)](https://covid19.ca.gov/vaccines/)

[Rent Relief \(https://urldefense.com/v3/__https://www.bcsb.ca.gov/ab3088/__;!!KlquKgc!MkdD66JlqHAnQp6NTLPcjensK9w0NCXU_tvyS_H_FAJ_vlrjUAzEptQy0LHW4i2p2tQcwK%24\)](https://urldefense.com/v3/__https://www.bcsb.ca.gov/ab3088/__;!!KlquKgc!MkdD66JlqHAnQp6NTLPcjensK9w0NCXU_tvyS_H_FAJ_vlrjUAzEptQy0LHW4i2p2tQcwK%24)

[Conditions of Use \(/condition-of-use\)](#) | [Privacy Policy \(/privacy-policy\)](#) | [Accessibility Policy \(/accessibility\)](#) | [Contact Us \(/contact-us\)](#) | [Site Map \(/sitemap\)](#) | [Language Access \(/language-access\)](#)

Copyright © 2025 State of California

City of Fort Bragg, California



Request Visibility: Unpublished

Request 25-109 Open**Dates**

Received

June 19, 2025 via email

Requester

Paul Clark

pclark@fortbraggrealty.co

 809 North Main Street, Fort Bragg, CA,
95437

707-964-0811

Century 21 Fort Bragg Realty

Invoices

No invoices due

Staff assigned**Request**

Hi there, how do I make formal request for copies of any studies the city has relied upon to declare the housing "crisis" that lead to the city's goal of 200 residential units by 2026? I have asked at several PC and CC meetings but have not received any response. My guess is there is none but am making this formal request.

Please advise.**Thank you**

Paul Clark

Century 21 Fort Bragg Realty

809 North Main Street

Fort Bragg, CA 95437

707-964-0811

DRE 00640014

pclark@fortbraggrealty.co

Timeline**Documents**

CityMtg 20250714b Request for Information

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332 - Class 32 Infill Development Projects and 15195 Infill Housing Development

We are requesting the location of each bore hole / exploratory well (Bh/Ew) bored on the property at 1151 South Main Street, Fort Bragg CA 95437.

This information request should include:

City of Fort Bragg
Received

Date of boring

JUL 10 2025

Location of boring, plotted on this project's site plan

Diameter of boring

Geologic log, with all strata encountered

Total depth of boring

Depth when water was encountered

If a completed well report is NOT available, then include these:

Thickness of silty soil

Thickness of terrace deposit

Thickness of Franciscan bedrock

Copies of invoices, and description of sealing material for each Bh/Ew

Labor invoice for sealing each Bh/Ew

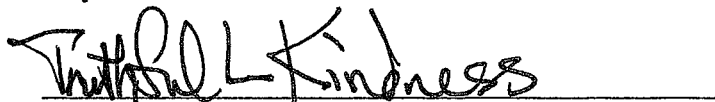
Name and signature of person confirming each Bh/Ew has been sealed according to California Department of Water Resources, Part III. Destruction of Monitoring Wells Sections 18 & 19.

Respectfully submitted by Guy Burnett & Truthful Kindness on 10July2025

Guy Burnett



Truthful Kindness



City Council Mtg 14July2025c **BOIL Water Notice**

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332 - Class 32 Infill Development Projects and 15195 Infill Housing Development

Received

JUL 10 2025

The City Council has been presented with documentation that calls into question the legitimacy of proceeding with this project on site of 1151 South Main Street.

Here is MORE documentation of the misuse of this property for the project, which calls for a "NO" vote is needed on this project:

On 29Apr2025, Mendocino County Public Health issued a public advisory Water Quality Alert – Mendocino, CA; "The State Water Resources Control Board, Division of Drinking Water, has issued citations and compliance orders to three businesses west of Highway 1 in the town of Mendocino. These actions have resulted in boil water notices being issued for those businesses." ((see attached)).

One of the three wells had a finished depth of over 150', a properly installed sanitary seal, and still was "under the influence of surface water" contamination. The contaminated stormwater from this project will inundate and overwhelm specific confined areas of a filtration/percolation basin. The soil bedrock constitution is not capable of adequately allowing a slow percolation process. **In all likelihood wells along Harbor Avenue and further west will be destroyed because of this project.**

City council does not have the right or jurisdiction to take and/or allow the destruction of personal property without imminent domain.

Respectfully submitted by Guy Burnett & Truthful Kindness on 10July2025

Guy Burnett

Guy R Burnett July 10 2025

Truthful Kindness

Truthful Kindness 10 July 2025

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332.1 Class 1 Fort Bragg Development Projects and 15195 Infill Housing Development

Received

JUL 10 2025

Excerpts from notes by Dick LaVen 27Aug2003 regarding the 23Aug1995 Nolan Report on Todds Point; area groundwater recharge & water balance report by Nolan Associates. These excerpts show that a “NO” vote is needed on this project.

Highest priority from Summary and Conclusions is page 3 excerpt:

“... BETTER THAN A CHOLERA EPIDEMIC.” – Dick LaVen

Page 3

There is no thought about potential health problems when the report proposes to recharge the aquifer from septic systems. The report says the terrace soils give “poor filtration for septic disposal” and that the SCS soils report recommends community sewage systems because of the potential for failure of septic tank absorption fields. But the report includes 150 gallons per day per household contributed to groundwater from each septic system as if it were a good thing. How about a dye study? It’s better than a cholera epidemic.

So what should we do? My recommendation is a detailed inventory of surface topography, bedrock surfaces & fractures and wells & septic systems & interviews of residents & water use on the site. This will identify sub-basins. Then let some good groundwater modeler build a picture of what happens under 3 drought years in a row for each of the sub-basins, all the while separating septic leachfield contributions from rainfall contributions.

Editorial comments:

At least septic systems have an inflow/outflow period of 7-15 days for its digestive process. Septic systems generally do not include runoff from parking lot consisting

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332 - Class 32 Infill Development Projects and 15195 Infill Housing Development

of petroleum products, antifreeze, pesticides, herbicides, and random “forever chemicals”.

Please allow me to point out that this project intends to introduce polluted surface drainage containing petroleum products from parked vehicles, coolant drippings, pesticides, herbicides, animal waste, household waste drippings, etc, into the 0’ to 10’ soil layer overlaying the fractured Franciscan bedrock. This slurry of chemical and biological soup will have 0 minutes of treatment time prior to its introduction to the chain of poor filtration leading to the water supply on Todd’s Point. ((end editorial comment.))

Page 1

1. *This level of analysis is no longer adequate. The information readily available will allow us to do a better job.*
2. *The information provided in the report does not support the report’s conclusions about the adequacy of the Todd Point aquifer. ...*

Adequacy of the Todd Point groundwater recharge and water balance evaluation:

The NOLAN Associates report references reporty by Scott (1982) and the USDA Soil Conservation Service (1987) describing the marine terrace fill material and underlying bedrock on Todd Point as:

1. *An excessively drained sandy loam soil formed from and on marine terrace material. This soil has depths of 0 to 4 feet.*

H

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332 - Class 32 Infill Development Projects and 15195 Infill Housing Development

2. *Marine terrace deposits, sand and gravel. The deposits range from 0 to 24 feet in thickness.*
3. *Very irregular surfaced Coastal Belt Franciscan sandstone. The sandstone bedrock itself is widely recognized as non-water bearing.*

Page 2

Pg 2, paragraph 2: The bedrock itself is does not produce groundwater. The bedrock is fractured and most of the fracture zones are readily observed on airphotos.. Wells have been successfully drilled into the bedrock, but if those producing wells are plotted on a map, they will be found to be located near bedrock fracture zones.

Editorial comment: Unfortunately, the 20' of sanitary seal provides a very weak level of protection for a well drilled through fractured Franciscan bedrock. This presents poor filtration. ((end editorial comment)).

Page 3

There is no thought about potential health problems when the report proposes to recharge the aquifer from septic systems. The report says the terrace soils give "poor filtration for septic disposal" and that the SCS soils report recommends community sewage systems because of the potential for failure of

G

5

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332 - Class 32 Infill Development Projects and 15195 Infill Housing Development

***.

septic tank absorption fields. But the report includes 150 gallons per day per household contributed to groundwater from each septic system as if it were a good thing. How about a dye study? It's better than a cholera epidemic.

So what should we do? My recommendation is a detailed inventory of surface topography, bedrock surfaces & fractures and wells & septic systems & interviews of residents & water use on the site. This will identify sub-basins. Then let some good groundwater modeler build a picture of what happens under 3 drought years in a row for each of the sub-basins, all the while separating septic leachfield contributions from rainfall contributions.

Respectfully submitted by Guy Burnett & Truthful Kindness on 10July2025

Guy Burnett

Guy R Burnett July 10, 2025

Truthful Kindness

Truthful Kindness 10 July 2025

JUL 10 2025

To: Dave Goble

From: Dick LaVen

Date: August 27, 2003

Subject: Notes on 1995 Todd Point area groundwater recharge & water balance report by Nolan Associates:

Summary and conclusions:

1. This level of analysis is no longer adequate. The information readily available will allow us to do a better job.
2. The information provided in the report does not support the report's conclusions about the adequacy of the Todd Point aquifer.
3. The information provided in the report supports the assumption that the area east of Hwy 1 does not contribute to the recharge of the Todd Point aquifer.

Contributions to the Todd Point aquifer from the area east of Hwy. 1:

The Nolan Associates report cites work by Krazan & Associates on the proposed K-Mart site. Krazan & Associates put down 24 borings in the winter of 1994-95 and came up with mostly dry holes. Krazan & Associates only hit water in one hole.

The author reports sandstone bedrock outcrops and shows the outcrops on the map. The outcrops are in the T intersection of Hwy 1 and Hwy 20. These outcrops are shown on the Nolan Associates Figure 1.

The geologic cross-section shown on the Nolan Associates Figure 2 shows a slice through a bedrock ridge trending in a northerly direction. The prism of Hwy 1 is built on this sandstone outcrop and on the shallow terrace soils to the north. Construction of the highway prism and continued traffic has compacted the prism into a de-facto dam.

Based on these observations, it is reasonable to conclude that it is unlikely that groundwater moves from east to west across bedrock and Hwy. 1 prism barrier.

Adequacy of the Todd Point groundwater recharge and water balance evaluation:

The Nolan Associates report references reports by Scott (1982) and the USDA Soil Conservation Service (1987) describing the marine terrace fill material and underlying bedrock on Todd Point as:

1. An excessively drained sandy loam soil formed from and on marine terrace material. This soil has depths of 0 to 4 feet
2. Marine terrace deposits, sand and gravel. The deposits range from 0 to 24 feet in thickness.
3. Very irregular surfaced Coastal Belt Franciscan sandstone. The sandstone bedrock itself is widely recognized as non-water bearing.

The Nolan Associates report states that "south of the bedrock outcrop, the terrace surfaces (and presumably the underlying bedrock surfaces slope)

←

→

⑦

southward towards Hare Creek. North and west of the bedrock outcrop, slopes drain to the north and west. This divides the Todd Point "aquifer" into at least three separate units; east of the bedrock ridge (which may be ignored), south of the ridge, and north and west of the ridge. The Nolan Associates report started off on that idea, but conveniently forgot about it when the water balance was developed.

The bedrock itself does not produce groundwater. The bedrock is fractured and most of the fracture zones are readily observed on airphotos.. Wells have been successfully drilled into the bedrock, but if those producing wells are plotted on a map, they will be found to be located near bedrock fracture zones.

It is wrong to imply that the sandstone is producing 8.7 gpm. The water produced by the wells is water draining from the marine terrace material and accumulating in the fracture zones, and the volume stored in the cracks is less than what Nolan Associates imply. The cracks simply accumulate what runs through the terrace soils. In addition, the bottom of some of the Todd Point wells might be below sea level and might be tapping fresh groundwater held in a lens on top of salt water. The study quotes Scott (1982), who drew the right conclusions. There is no water in the sandstone.

The Nolan Associates report indicates that there are 36 residences on Todd Point, plus the College of the Redwoods campus. The Nolan Associates report provided data from 12 well driller's reports. Presumably, since very few buildings are served with City of Fort Bragg water, there are many other wells drilled into the Todd Point aquifers.

In theory, there are well driller's reports for most of the wells drilled into the Todd Point aquifers. It is recognized that the well driller's reports are less than precise, and yes, we need to take the information provided with several grains of salt, but the reports will provide data that will be useful in further characterizing the aquifers.

It is rumored that peoples' wells run dry now and they have to import water. Where are those wells? We need to see them, to identify their locations on a map and to have the well owners explain their problems. There will be a pattern.

Also Nolan Associates report does not tell us where wells were drilled & came up with dry holes. Nor does the report tell us about CR's water source and use. (City water)
That was conveniently overlooked in the water balance.

The water balance itself is based on the assumption that all 174 acres delineated by Nolan Associates contribute water to a single Todd Point aquifer. But the eastern section covers about 51 acres and the southern section covers about 19 acres. That leaves 104 acres to supply water to the largest northern and western aquifer, not 174 acres as assumed in the water balance model.

There is no thought to cones of depression set up by wells and how they react when the cones intersect. The interference between wells is magnified when they are drawing from the same bedrock fracture zone. It's like two people slurping from straws in a single old-fashioned ice cream soda glass.

D

8

There is no thought about potential health problems when the report proposes to recharge the aquifer from septic systems. The report says the terrace soils give "poor filtration for septic disposal" and that the SCS soils report recommends community sewage systems because of the potential for failure of septic tank absorption fields. But the report includes 150 gallons per day per household contributed to groundwater from each septic system as if it were a good thing. How about a dye study? It's better than a cholera epidemic.

So what should we do? My recommendation is a detailed inventory of surface topography, bedrock surfaces & fractures and wells & septic systems & interviews of residents & water use on the site. This will identify sub-basins. Then let some good groundwater modeler build a picture of what happens under 3 drought years in a row for each of the sub-basins, all the while separating septic leachfield contributions from rainfall contributions.

Submitted by

Guy R Burnett July 10, 2025

Truthful L Kindness 10 July 2025

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332 - Class 32 Infill Development Projects and 15195 Infill Housing Development

City of Fort Bragg
Received

JUL 10 2025

The City of Fort Bragg has not proceeded impartially in this project.

Fort Bragg's Community Development Department, Planning Commission, and City Council are (or should be) aware of the dangers presented by this current project since historical soil and water data submitted to these entities date back 30 years, leaving no room for lack of awareness of the issues or changing course and ignoring the information now. The ONLY justification for setting aside all of this previously embraced documentation would be new hydrological-geological-ecological study(s?) that refute past data. This information has been instrumental in denying four prior development projects on Todd's Point. All four of these projects share the same soil characteristics with the current project.

This shows that a "NO" vote on this project has merit (ie defensible).

The following information requests and documents supporting failure to properly process safeguards to water sources were submitted to the above entities in writing and/or verbally on dates indicated.

- Identify locations of existing and abandoned bore holes and wells on Hare Creek project. Documentation was requested on 16Dec2003, 24Mar2015, 12Nov2018, 11Jun2025, 18Jun2025 and 25Jun2025. City of Fort Bragg has done nothing to comply with these requests.
- Excerpts from California Department of Water Resources, Part III. Destruction of Monitoring Wells were submitted 16Dec2003, 24Mar2015, 12Nov2018, 11Jun2025, 18Jun2025 and 25Jun2025. These excerpts notified the above entities for actions that must be taken to insure bore holes are sealed properly, and proof that these safety actions have occurred. City of Fort Bragg has done nothing to comply with these requests.

B

10

Coastal Development Permit Amendment (8-24/A), Use Permit Amendment (UP 9-24/A), Design Review Amendment (DR 11-24/A), for 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 (APN 018-440-58) CEQA Exempt per Section 15332 - Class 32 Infill Development Projects and 15195 Infill Housing Development

- On 16Dec2003, 24Mar2015, 12Nov2018, 11Jun2025, 18Jun2025 and 25Jun2025, the following excerpts notified the above entities of the soil characteristics on Todd Point; "The U.S. Soil Conservation Service (SCS, 1987) performed a soil survey that includes the Todd Point area. ... Because of its rapid permeability, the Heezer sandy loam is considered to have poor filtration ability ..."
- The city has failed to confirm that bore holes have been properly sealed on this property. Multiple requests have been ignored, both oral and written presentations to these entities, which generates sustainable grounds for denial of this project. The harm that would be inflicted upon the aquifer would most likely be impossible to remedy/correct.

The City of Fort Bragg has not proceeded impartially in this project. Clearly, Fort Bragg's Community Development Department, Planning Commission, and City Council are (or should be) aware of the dangers presented by this current project. They have historically turned a blind eye to the above issues until they had no choice but to finally disapprove prior development projects.

The damage done to this property by the bore holes and inappropriate backfill may have rendered it unable to be developed.

Respectfully submitted by Guy Burnett & Truthful Kindness on 10July2025

Guy Burnett

Guy R Burnett July 10, 2025

Truthful Kindness

Truthful L Kindness 10 July 2025

A

(11)