



CITY OF FORT BRAGG

Incorporated August 5, 1889
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City of Fort Bragg LCP Amendment 3-17



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1. Application Submittal Details

1.1 Application Details

APPLICATION NO: LCP 3-17

APPLICANT: City of Fort Bragg

AGENT: Marie Jones, Community Development Director

PROJECT: Local Coastal Program Amendment to revise Coastal General Plan policies LU-7.1 and LU-7.2, which require a Specific Plan for rezoning of Timber Resources Industrial properties. The proposed revision would require a community-based planning process and an LCP Amendment to rezone Timber Resources Industrial zoned property.

LOCATION: 90 W Redwood Ave, 215 S Main St, 100 Cypress St, 955 S Main St, 654 W Cypress St, 331 Jere Melo St, 300 W Elm St, 281 Jere Melo St, 321 Jere Melo St.

APNs: 008-151-22-00, 008-161-08-00, 008-171-07-00, 018-020-01-00, 018-030-45-00, 018-430-11-00, 018-430-10-00, 018-430-04-00, 018-430-15-00, 018-430-17-00, 008-010-35-00, 008-010-38-00, 008-020-15-00, 018-010-67-00, 018-120-50-00, 008-020-11-00, 018-430-18-00, 018-040-61-00, 018-430-07-00, 018-120-44-00, 018-430-22-00, 008-020-07-00, 018-430-21-00, 008-020-14-00, 008-020-10-00, 018-430-19-00, 018-430-20-00

LOT SIZE: 415 acres

1.2 Background

The City Council and Planning Commission are seeking an LCP Amendment to revise Coastal General Plan policies LU-7.1 and LU-7.2, which require a Specific Plan for rezoning of Timber Resources Industrial properties. The proposed revision would require a community-based comprehensive planning process for the rezoning of the Mill Site and the development of comprehensive LCP amendment. Specifically City Council and the Planning Commission identified the following benefits of the community-based comprehensive planning approach:

1. The costs of community-based comprehensive planning approach are lower than the Specific Plan/LCP approach. This will enable the City to proceed with an LCP Amendment now to rezone the site without the financial participation of a developer or the property-owner. The time, cost, and staff resources required to prepare a Specific Plan, resources studies and the requisite EIR are excessive: the Specific Plan adoption process and subsequent LCP amendment process would likely take 4+ years and cost around \$500,000.
2. The Comprehensive Plan approach will include preparation of a detailed set of policies and regulations to ensure that new development conforms with the community's vision and "sense of place" and detailed planning of infrastructure requirements and studies that ensure that the City has sufficient capacity to serve new development;
3. The Comprehensive Planning/LCP Amendment process would allow for future rezoning flexibility as the City Council would not have to complete both a Specific Plan update and an LCP Amendment to revise the zoning, policies and regulations. Instead it could proceed with

a local planning process and an LCP Amendment. Additionally, a Specific Plan will eventually become obsolete and/or limit flexibility to respond to unforeseen development opportunities, and will thereby necessitate costly future Specific Plan updates.

4. Over the past 15 years, since the Mill Site closed, no single developer has approached the City or GP to redevelop the entire site. Instead, a number of local business owners have expressed interest in developing smaller projects on small parcels on the site. It is unlikely that the property will be acquired by a developer who will want to complete a Specific Plan to rezone the property and it is unlikely that the City will be able to anticipate the specific infrastructure needs (as required by a Specific Plan) with sufficient clarity for a Specific Plan to be beneficial.

The City Council and the Planning Commission have determined that the City should proceed with an LCP Amendment to revise Policy LU-7.1 and LU-7.2 so that a Specific Plan would not be required to rezone Timber Resources Industrial zoned property on the Mill Site. Instead, a comprehensive local planning process and a Major LCP Amendment would be required.

1.3 City of Fort Bragg LCP Amendment Submittal Requirements

The Coastal Land Use and Development Code requires that all LCP Amendments include the following analysis per Section 17.94.030A - Processing, Notice, and Hearing

- A. Contents of Amendment Applications. The amendment application shall include:
 1. A summary of the measures taken to provide the public and affected agencies and districts maximum opportunity to participate in the LCP amendment process, except for amendments initiated under Section 17.94.020 (C) or (D); a listing of members of the public, organizations, and agencies appearing at any hearing or contacted for comment on the LCP; and copies or summaries of significant comments received and of the City's response to the comments.
 2. All policies, plans, standards, objectives, diagrams, drawings, maps, photographs, and supplementary data related to the amendment in sufficient detail to allow review for conformity with the requirements of the Coastal Act. Written documents should be readily reproducible. An amendment to a land use plan shall include, where applicable, a readily identifiable public access component as set forth in California Code of Regulations Section 13512.
 3. The application shall be accompanied by a map drawn to scale showing the location of the property concerned and the location of all highways, streets and alleys, public easements or Offers to Dedicate Public Easements and all lots and parcels of land within a distance of five hundred feet from the exterior boundaries of the property involved. The accuracy of such map shall be the responsibility of the applicant.
 4. A discussion of the amendment's relationship to and effect on the other sections of the certified LCP.
 5. An analysis that meets the requirements of California Code of Regulations Section 13511 that demonstrates conformity with the requirements of Chapter 6 of the Coastal Act.
 6. Any environmental review documents, pursuant to CEQA, required for all or any portion of the amendment to the LCP.
 7. An indication of the zoning measures or implementation that will be used to carry out the amendment to the Coastal General Plan (unless submitted at the same time as the amendment to the Coastal General Plan).

Each of these requirements is addressed in this document.

2. Public Process Summary

Per Section 17.94.030A, the Coastal Land Use and Development Code requires that all LCP Amendments include the following analysis

A. Contents of Amendment Applications. The amendment application shall include:

1. A summary of the measures taken to provide the public and affected agencies and districts maximum opportunity to participate in the LCP amendment process, except for amendments initiated under Section 17.94.020 (C) or (D); a listing of members of the public, organizations, and agencies appearing at any hearing or contacted for comment on the LCP; and copies or summaries of significant comments received and of the City's response to the comments.

This document summarizes the measures taken to provide the public and affected agencies with the maximum opportunity to participate in the LCP amendment process.

2.1. Public Process & Comments

February 6, 2017 – Joint City Council & Planning Commission Workshop

City Council and the Planning Commission held a joint workshop to discuss how to move forward with rezoning and planning for the reuse of the Mill Site. The City Council and the Planning Commission supported proceeding with a Local Coastal Program (LCP) amendment to revise two policies in the Coastal General Plan (specifically, Policies LU-7.1 and LU-7.2) that require a Specific Plan prior to rezoning the Mill Site. The following people participated in the Joint Planning Commission and Planning Commission Workshop:

- Andy Wellspring inquired as to whether or not the City could buy the property from GP and suggested building an adventure playground on the land, similar to the one that exists in the Berkeley Marina.
- Rex Gressett said the property cannot be developed without water and that there needs to be a change in mechanism to grapple with issues publicly.
- Mary Rose Kaczarowski expressed concern about the zoning, traffic, waste and resources, stating that children and young people need to be involved in the discussion because decisions made now will affect their future.
- Christy Cox said GP is hanging onto their water rights because they do not want people to know that it is contaminated and recommends that the Council look into that matter.
- Doug Hammerstrom spoke in favor of the LCP amendment process rather than the Specific Plan, as the time frame is shorter and it will cost less.
- Carrie Durkee approves of the LCP amendment, but noted that extending the City's street grid out onto the Mill Site may cause problems in relation to daylighting creeks.
- George Mansfield asked why the City cannot get an engineer to look at the property to try to save water.
- Lisa Norman is in favor of the Berkeley adventure playground idea for the Mill Site.
- Mike Thomas supports reduced intensity of development on the site and believes that knowing what the water situation will be is an important question that should be answered before money is spent developing new plans.
- Sue Boecker stated that water is a huge concern, along with mill pond cleanup and potential pipe leaks.
- Ann Cole is in favor of amending the LCP instead of redoing the Specific Plan, as it would allow more flexibility and lower the purchase price.
- Teri Jo Barber spoke in favor of an LCP Amendment and suggested that on top of water rights, the City should apply for appropriative rights to the Noyo River.
- Ann Rennacker supports doing zoning in small pieces and wants new community meetings to discuss this matter.

- Tim Bosma noted that a lack of affordable housing is affecting Fort Bragg's ability to bring new businesses to the area and that the Mill Site should be considered for new housing development.
- John Gallo suggested making a contest where people could provide ideas for the process of developing the Mill Site, and suggested keeping options open for the long-term instead of doing smaller piecemeal zoning projects.
- Gabriel Quinn Maroney said this important project, if done right, can start a legitimate renaissance in Fort Bragg and suggested partnering with or creating a green university.
- Jinx Bridges spoke about water issues.

March 13, 2017 – City Council meeting

This topic was again considered by the City Council on March 13, 2017 and the Council directed staff to bring the LCP Amendment forward after the City initiated the community-based planning process for the Mill Site rezoning and LCP Amendment. At this meeting City Council also provided direction regarding the proposed strategy for Mill Site planning workshops and a community survey. Public comments included the following:

- Rex Gressett expressed his concerns about expediting development.
- Ann Rennacker recommended including a plan for water, environmental space, and creek restoration. Rennacker spoke in opposition to the mill pond remaining onsite.
- George Reinhardt emphasized the need to think about the environmental space at the beginning of the planning phase.
- Sue Boecker spoke in favor of this planning process and creek daylighting. Boecker spoke in opposition to the mill pond remaining onsite and expressed concerns about infrastructure.
- John Gallo stated the importance of infrastructure and long term planning, the ability to provide certainty to local businesses, and the inclusion of a natural space priority. Gallo recommended including a mapping function in the web survey component.
- David Gurney recommended a more comprehensive planning process and complete cleanup of the mill pond prior to development.
- Gabriel Maroney advocated for cleanup before development and the need to have a larger picture or plan.
- Eric Dwyer spoke in favor of expediting the development process.

September 16 and 21, 2017 - Community Workshops

On September 16 and 21, 2017, the City re-started the community planning process with two all-day open houses which included six mini-workshops. The City held an all-day open house with three mini-workshops at the CV Starr Center on September 16, 2017 which was attended by about 60+ participants. An all-day open house with three mini-workshops was held at Town Hall on September 21, 2017 and was attended by 80+ participants. During the open houses, participants reviewed a number of large poster boards to visualize, understand and discuss the Mill Site reuse. Workshop participants asked many questions and many interesting discussions ensued. Participants also provided feedback and preferences on a wide range of topics for the reuse of the Mill Site. During the mini-workshops, some participants developed their own preferred land use maps. Additionally, City staff presented a shortened form of the workshop at a Fort Bragg Rotary Club meeting, a Chamber of Commerce mixer and at a Coastal Mendocino Association of Realtors meeting. Approximately 220 people in all attended the Fall 2017 Mill Site Reuse workshops. Attachment 1 provides a summary and analysis of all workshop input.

September 20 – October 10, 2017 - Community Survey

The City also conducted a Mill Site reuse survey on Survey Monkey (in both English and Spanish). The survey was started on September 20, 2017 and ran through October 10, 2017. The survey has been completed by 975 persons to date. A comprehensive analysis and summary of survey results is presented in Attachment 2.

November 8, 2017 - Planning Commission Workshop & Public Hearing

On November 8, 2017 the Planning Commission held a public hearing and adopted a *Resolution of the Planning Commission of the City of Fort Bragg Recommending that the City Council Submit a Local Coastal Program Amendment (LCP 3-17) to Revise Policies Requiring Specific Plan(s) For Zoning Changes to Properties Located in the Timber Resources Industrial Zone*. Public comments included the following:

- Rex Gressett expressed opposition to the LCP amendment.
- Gabriel Quinn Maroney talked about upholding a vision and having a big plan.

November 27, 2017 – City Council Workshop & Public Hearing

At the November 27th public hearing, City Council discussed the cleanup of the mill site, the history of Coastal Commission involvement, the process for making LCP changes, and how to encourage development while remaining cognizant of the high quality of life enjoyed on the coast. All agreed that adoption of the resolution to submit an LCP Amendment to revise Policy LU-7.1 and LU-7.2 would move the mill site zoning process forward. Public comments included the following:

- Rex Gressett is opposed to Georgia-Pacific selling off the mill site in pieces before all the toxicity problems have been addressed.
- Ann Rennacker referred to a Department of Toxic Substances Control (DTSC) letter; would like to keep the area zoned Timber Industrial; and wants a small lumber mill on the site for historical purposes.
- Eric Dwyer urged the Council to get moving on the LCP amendment and to get it done.
- Scott Deitz spoke about the loss of jobs and the resulting loss of people on the coast. He said the mill site property needs to be available to bring in good paying jobs and make Fort Bragg a real town again.
- Gabriel Quinn Maroney talked about embracing opposites, upholding a vision, developing infrastructure, moving forward, and having a big plan.
- John Fletcher said the most successful communities are made with people in mind, and he recommends keeping the small town character.
- Thais Mazur is concerned about sustainability and local economy. She advised patience and taking a good look at things before acting so that Fort Bragg can be a global representative to show what can happen to a former mill town.
- Sheila Dawn Tracey is concerned that Georgia Pacific does not want to fully clean up the land. She would like to see Fort Bragg be a real college town, but thinks there should be more public input.

2.2. Agency Comments

The City sent out a “request for comments” letter for LCP Amendment 3-17 to the following agencies:

- California Coastal Commission
- Sherwood Valley Band of Pomo
- Fort Bragg Fire Department
- County Building Department
- Mendocino County Solid Waste Authority
- Caltrans
- California Department of Fish and Wildlife
- California State Parks

The City received comments back from Caltrans and Coastal Commission Staff. This City also initiated the consultation process with the Sherwood Valley Band of Pomo.

The Coastal Commission staff provided the following comments

From: Kenyon, Cristin@Coastal <Cristin.Kenyon@coastal.ca.gov>
Sent: Thursday, November 16, 2017 8:58 AM
To: Jones, Marie
Cc: Merrill, Bob@Coastal
Subject: Changes to policies 7.1 and 7.2

Hi Marie,

I got your phone message and I understand that you are already took this amendment to the Planning Commission and you are planning on taking it to City Council on November 27th. I did receive your request for comments on October 23rd, and I apologize for not getting back to you sooner. My management and legal haven't had a chance to review the language so these comments are just my thoughts on the amendment. After Thanksgiving week I will get a chance to run this by everyone.

- The changes to Policy LU-7.1 look fine.
- Proposed Policy LU-7.2 includes the language “the LCP amendment should” – please change this to “shall” to make it enforceable.
- The certified LU-7.2 includes mention of public access (“the specific plan shall make provisions for...coastal access to surrounding developed and undeveloped areas”). Since I will need to make public access findings in my staff report, removing mention of public access requirements may make my findings tricky and I would therefore recommend adding public access provisions into the new language, possibly under (b) “Identify...public improvements *including coastal access*.”
- The certified LU-7.2 has a requirement for “orderly phasing of development.” The current comprehensive process is going to leave “urban reserve” that will be developed later on. When those areas get developed in the future, we want to make sure that that development is not piecemeal and isolated, but a logical and orderly expansion of the current planning process. 30250 of the Coastal Act touches on this need to locate new development relative to existing development. Can you add back in that requirement for orderly phasing of development or different language that clarifies what a “comprehensive planning process” entails?

Cristin Kenyon
Coastal Program Analyst
California Coastal Commission

The City revised Policy LU 7.2 in the proposed LCP Amendment to address the comments from the Coastal Commission.

Additionally, the City received the following comments from Caltrans. The letter did not ask for any changes to the proposed minor amendment. It does request that the City engage with Caltrans as it moves forward with the larger rezoning process for the Mill Site.

STATE OF CALIFORNIA—BUSINESS, TRAI

STATION AND HOUSING AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 1, P. O. BOX 3700
EUREKA, CA 95502-3700
PHONE (707) 441-4540
FAX (707) 441-5869
TTY 711



REC'D NOV 03 2017

Serious drought.
Help Save Water!

October 31, 2017

Marie Jones
Community Development Director
City of Fort Bragg
416 N. Franklin Street
Fort Bragg, CA

1-MEN-SR1
Local Coastal Program Amendment
DB # 01-MEN-2017-00105

Dear Ms. Jones,

Thank you for the opportunity to comment on the Local Coastal Program Amendment (LCP-3-2017) for the Georgia Pacific Mill Site property in the City of Fort Bragg. The LCP requires a community-based planning process and will rezone Timber Resource Industrial zoned property. Depending on the use of the property, we recognize the potential significance it can have to the city and the surrounding area. Considering a comprehensive community planning process is part of the process, we would like to work closely with the city, especially as it pertains to State Route 1.

We look forward to working with you as this project develops. If you have questions regarding the comments outlined in this letter, please contact me at tatiana.ahlstrand@dot.ca.gov or (707) 441-4540.

Sincerely,

Tatiana Ahlstrand
Associate Transportation Planner
District 1 Office of Community Planning

The City also consulted with the Sherwood Valley Band of Pomo on the proposed Mill Site rezoning process. At that meeting the Tribal Council indicated that they did not want to see any development on the Mill Site. The City clarified only about 30 acres of the site qualifies as an archaeological site and another 35 acres of the site qualifies as a Traditional Cultural Property. The majority of both of these areas are located within the City's coastal trail property. City Staff will meet again with the Tribal Council of the Sherwood Band of Pomo on December 13th for another consultation meeting on the larger LCP amendment to rezone the site.

3. Proposed Policy Revisions of Coastal General Plan

Per Section 17.94.030A2, the Coastal Land Use and Development Code requires that all LCP Amendments include the following:

2. All policies, plans, standards, objectives, diagrams, drawings, maps, photographs, and supplementary data related to the amendment in sufficient detail to allow review for conformity with the requirements of the Coastal Act. Written documents should be readily reproducible. An amendment to a land use plan shall include, where applicable, a readily identifiable public access component as set forth in California Code of Regulations Section 13512.

Proposed changes are illustrated below.

3.1 Proposed Changes to the Land Use Element

Attachment A

LCP Amendment 3-17

Existing Policies & Proposed Policy Amendments

Industrial

Existing: The Coastal General Plan is intended to support the growth and vitality of existing industries while ensuring that the community is prepared to actively participate in the decision-making process as new industries develop in Fort Bragg and as current industrial lands transition to other uses. This Coastal General Plan requires that specific plans be prepared when different land uses are proposed for large areas of industrial land. This offers the community the opportunity to: plan for its future, engage in consensus building, and develop comprehensive land use and economic development strategies.

Ammended: The Coastal General Plan is intended to support the growth and vitality of existing industries while ensuring that the community is prepared to actively participate in the decision-making process as new industries develop in Fort Bragg and as current industrial lands transition to other uses. This Coastal General Plan requires that a comprehensive planning process be completed when different land uses are proposed in the lands designated Timber Resources Industrial than those currently allowed. This offers the community the opportunity to: plan for its future, engage in consensus building, and develop comprehensive land use and economic development strategies.

Policy LU-7.1

Existing: Policy LU-7.1 Changes in Industrial Land Use: Require that any Local Coastal Program (LCP) amendments and rezoning of lands which are designated Timber Resources Industrial be subject to a specific plan process. The portions of a Specific Plan that meet the definition of “Land Use Plan” as defined by Coastal Act Section 30108.5 and “Implementing Actions” as defined by Coastal Act Section 30108.4 shall be submitted to, and effectively certified by, the Coastal Commission as an LCP amendment before those portions of the Specific Plan become effective.

Amended: Policy LU-7.1 Changes in Industrial Land Use. Require that any Local Coastal

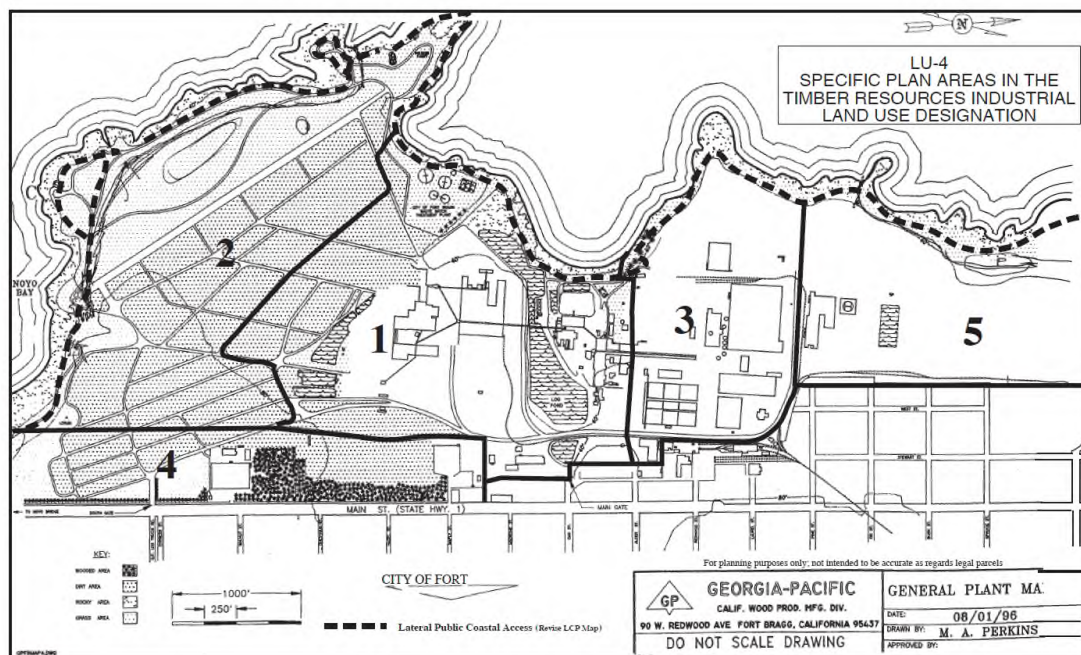
Program (LCP) amendments and rezoning of lands which are designated Timber Resources Industrial: 1) be subject to a comprehensive planning process consistent with Policy LU-7.2; and 2) be submitted to, and effectively certified by, the Coastal Commission as an LCP amendment.

Policy LU-7.2

Existing: Policy LU-7.2: In order for LCP amendments and rezoning of lands designated Timber Resources Industrial to be considered, a specific plan shall be prepared which addresses, at a minimum, an area approximating one or more of the subareas as shown on Map LU-4: Specific Plan Areas in the Timber Resources Industrial Land Use Designation. Specific plans shall meet the following minimum criteria:

- a. The specific plan shall make provisions for existing and future infrastructure connections such as roads, utilities, and coastal access to surrounding developed and undeveloped areas.
- b. The specific plan shall contain financing methods to provide infrastructure and public amenities based on a nexus between development exactions being imposed and the development-induced needs being met by those exactions, establish an orderly phasing of development, and include other measures as needed to protect the health, safety, and well-being of the community.
- c. The specific plan, and environmental studies required for that plan, shall be paid for by the applicant who may be repaid by future developers of other portions of the specific plan area on a pro rata basis.
- d. The specific plan shall be consistent with the Chapter 3 policies of the Coastal Act.

Map LU-4



Amended: Policy LU-7.2: Comprehensive Planning Process Required. LCP amendments that propose to redesignate lands designated Timber Resources Industrial must be developed through a comprehensive community-based planning process that addresses at a minimum an

area including one or more of the subareas as shown on Map LU-4. Community participation shall be solicited throughout the planning process in accordance with established City practices and CLUDC requirements. The LCP amendment shall:

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

Amended Map LU-4



3.2 Proposed Changes to the Circulation Element

Existing: Policy C-2.10 Continue Grid System onto Mill Site: Ensure that the grid street system and a north/south arterial on the Mill Site be designed to ensure the maximum benefit to local

traffic, pedestrian, and bicycle circulation and to provide maximum public access to the coast.

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

3.3 Proposed Changes to the Coastal Land Use and Development Code

The following change will be required to the CLUDC to ensure consistency with the proposed LCP amendment:

Existing

17.94.030 - Processing, Notice, and Hearing

C. Specific plan requirement. Prior to the filing of a proposed LCP amendment for a site designated Timber Resources Industrial, a specific plan shall first be prepared in compliance with Chapter 17.78 (Specific Plans).

Amended

17.94.030 - Processing, Notice, and Hearing

C. Comprehensive plan requirement. Prior to the filing of a proposed LCP amendment for a site designated Timber Resources Industrial, a comprehensive planning process shall first be completed in compliance with Coastal General Plan Land Use Policies LU 7.1 and LU 7.2.

LCP Amendment 3-17 Maps

Per Section 17.94.030A3, the Coastal Land Use and Development Code requires that all LCP Amendments include the following:

3. The application shall be accompanied by a map drawn to scale showing the location of the property concerned and the location of all highways, streets and alleys, public easements or Offers to Dedicate Public Easements and all lots and parcels of land within a distance of five hundred feet from the exterior boundaries of the property involved. The accuracy of such map shall be the responsibility of the applicant.

Figure 1, below, shows the location of the property concerned in a map drawn to scale.

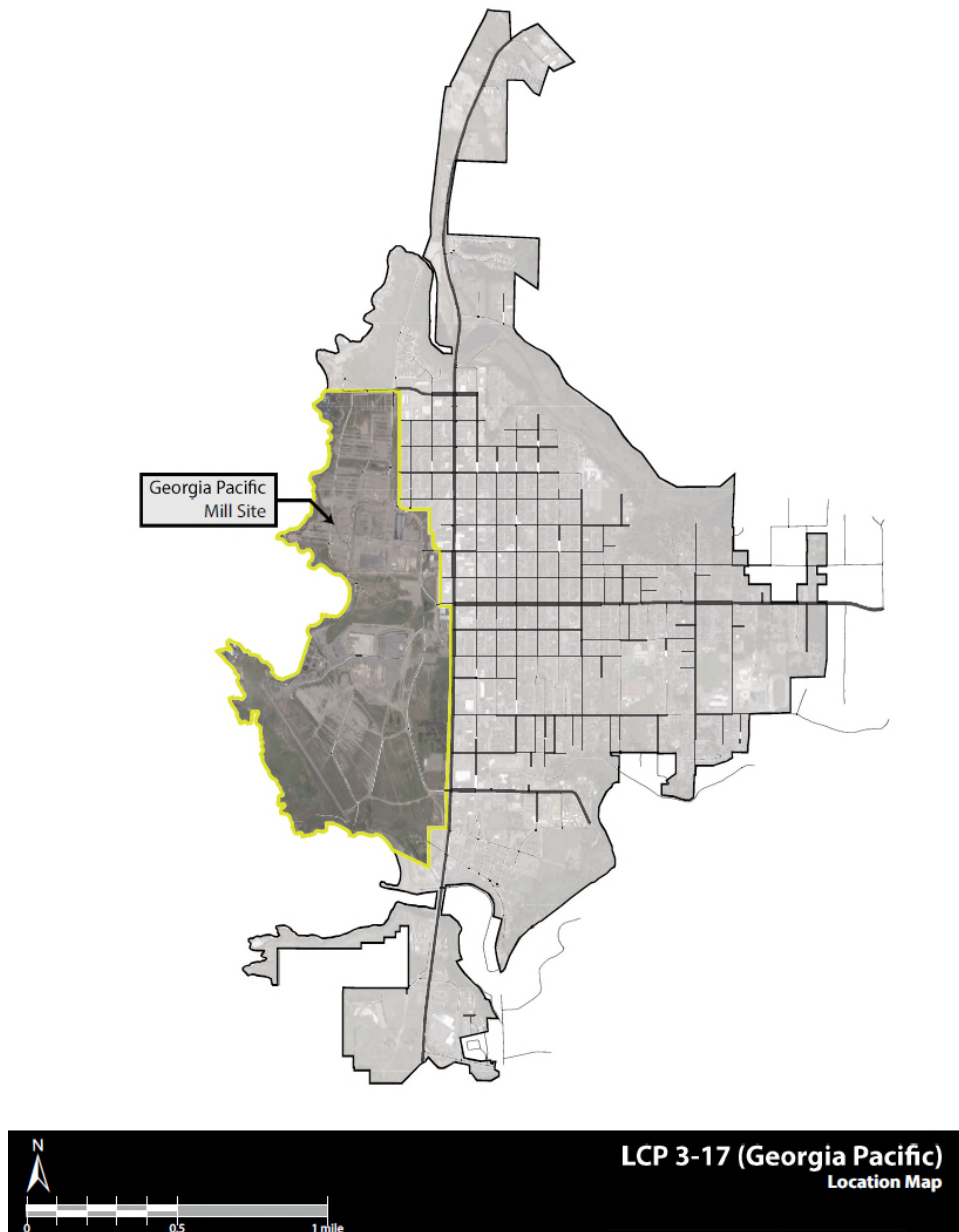


Figure 1: Scale Map of Area Affected by the LCP Amendment

Figure 2, below, illustrates all parcels that would be affected by the proposed LCP Amendment as well as the location of all adjacent roads and highways.

The property is not encumbered by easement or irrevocable offers to dedicate for public access. All easements on the property were removed through a property exchange between the City of Fort Bragg and the property owner.



In 2009 the City acquired 82 acres of coastal property from GP for the Fort Bragg Coastal Trail. In 2017, the City acquired an additional ten acres of property to connect the north and south trail alignments. The continuous coastal trail, completed in March 2018, will provide coastal access for 90% of the Mill Site property. The coastal trail is illustrated in the Figure 3 below:



Figure 3: Fort Bragg Coastal Trail.

Figure 4, below, illustrates the parcels with Timber Resources Industrial Zoning.

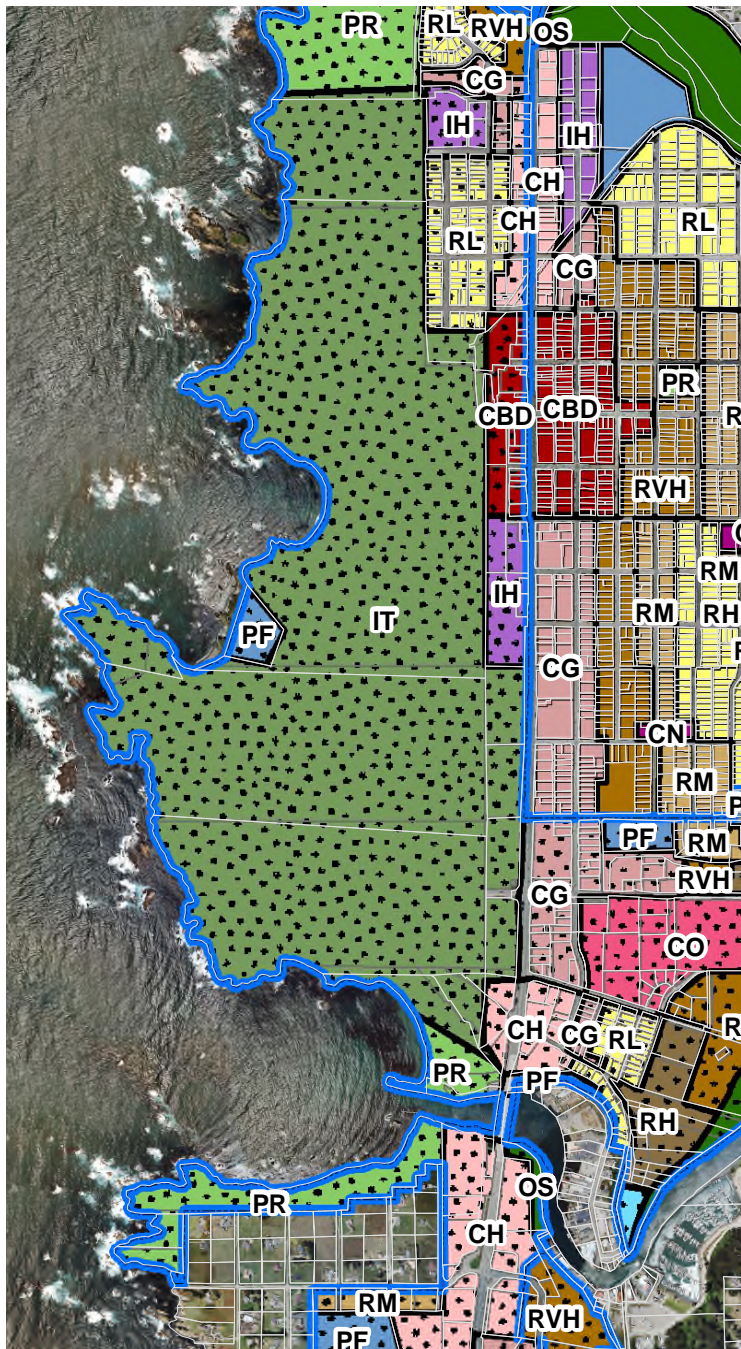


Figure 1: Current Zoning – Timber Resources Industrial (IT) for LCP Amendment 3-17

4. Amendment Relationship to the Certified LCP

Per Section 17.94.030A4, the Coastal Land Use and Development Code requires that all LCP Amendments include the following:

4. A discussion of the amendment's relationship to and effect on the other sections of the certified LCP.

The City has reviewed the Certified LCP and determined that the proposed amendment will not conflict with other sections of the Certified LCP. Further the City has described the relationship to and effect of the LCP amendment on all relevant Elements of the General Plan and all relevant Sections of the Coastal Land Use and Development Code below.

5.1. Coastal General Plan

Land Use Element

The Land Use Chapter of the Coastal General Plan 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 Land Use Element of the Coastal General Plan, certified in 2008, established the newly created Timber Resources Industrial land use to support the continued use of the area for timber processing activities and to establish a clear planning process for transitioning this land to other uses. Staff reviewed the Land Use Element and determined that the proposed policy changes do not conflict with any of the other policies or programs of the Land Use Element. The purpose section of the Land Use Plan includes the following language regarding properties zoned Timber Resources Industrial:

The most significant policy change in the Land Use Element is the reclassification of the Industrial Lands which lie west of Highway One between Noyo River and Elm Street. The newly-created Timber Resource Industrial land use designation is intended to support the continued use of this area for timber processing activities and to establish a clear planning process for the transition of this land to other uses, as initiated by the property owners.

The proposed changes to Policy LU 7.1 and LU 7.2 will not conflict with this “purpose” language, rather it provides a different mechanism to achieve the same goals.

The proposed changes to Policy LU 7.1 and 7.2 has the potential to conflict with some descriptive language on page 2-16, as noted below.

Industrial Land

The lumber and fishing industries have played an important role in the formation and growth of Fort Bragg. Both of these industries are in transition, and the local economy is evolving from a natural resource-based economy to a more service-oriented economy. Fort Bragg is the commercial, educational, medical, and professional service center for a large portion of the Mendocino coast. Future growth in the local economy is projected to occur in the retail, tourism, and service sectors.

The Coastal General Plan is intended to support the growth and vitality of existing industries while ensuring that the community is prepared to actively participate in the decision-making process as new industries develop in Fort Bragg and as current industrial lands transition to other uses. This Coastal General Plan

requires that ~~specific plans~~ comprehensive planning process be completed ~~prepared~~ when different land uses are proposed ~~in the lands designated Timber Resources Industrial than those currently allowed for large areas of industrial land~~. This offers the community the opportunity to: plan for its future, engage in consensus building, and develop comprehensive land use and economic development strategies.

This language will need to be revised, as shown above, as part of the LCP Amendment to eliminate this potential conflict.

Chapter 2 also includes policies regulating the establishment of aquaculture facilities in Timber Resources Industrial zoning districts and various requirements for Timber Resources Industrial Zoning, as the proposed policy changes do not change Mill Site zoning; these policies will be retained and will have the force of law until an LCP Amendment is certified to rezone the Mill Site.

The proposed changes to Policy LU 7.1 and 7.2 will not result in new development or new zoning for the site. Additionally when and if new zoning is proposed for the site under the revised Policy LU 7.1 and 7.2, the new zoning and associated regulations and policies will have to comply with the Certified LCP and the Coastal Act. The proposed changes to Policy LU 7.2 require that the comprehensive planning process and mill site rezoning be “consistent with the all policies of the Coastal Act and Fort Bragg’s LCP.”

All policies of the Land Use Element will continue to apply to use of the Mill Site.

Public Facilities Element

There are no policies in the Public Facilities Element that conflict with the proposed changes to Policy LU 7.1 and 7.2. However, a number of policies will guide the future reuse of the Mill Site such that many of the requirements that are part of a Specific Plan process will be required instead as part of the permitting process for future development. Key policies from the Public Facilities Element that will heavily influence the design and financing of infrastructure on the site include the following:

Policy PF-1.1: All new development proposals shall be reviewed and conditioned to ensure that adequate public services and infrastructure can be provided to the development without substantially reducing the services provided to existing residents and businesses.

Program PF-1.1.1: New development shall be responsible for any improvements or extensions of infrastructure or the service capacity necessary to serve the development.

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.

- a. Demonstration of adequate water and sewer facilities shall include evidence that adequate capacity will be available within the system to serve the development and all other known and foreseeable development the system is committed to serving, and that the municipal system will provide such service for the development;

- b. Demonstration of adequate road facilities shall include information demonstrating that (i) access roads connecting to a public street can be developed in locations and in a manner consistent with LCP policies; and (ii) that the traffic generated by the proposed development, and all other known and foreseeable development, will not cause Levels of Service (LOS) of roads, streets, and intersections within the City to reduce below LOS standards contained in Policy C-1.1 of the Circulation Element of the Coastal General Plan.

Policy PF-2.1 Development Pays Its Share: Require that new development pay its share of capital improvements and the cost of public services to maintain adequate levels of service.

Program PF-2.1.1: Maintain development impact and mitigation fees at a level adequate to finance infrastructure costs. Periodically review the City's fee structure to ensure that it accurately reflects the actual cost of providing services.

Program PF-2.1.2: Consider revising the Coastal LUDC to require property owners seeking annexation approval to enter into a pre-annexation agreement stating that they will not oppose assessment districts, including lighting and street maintenance districts.

Policy PF-2.2: Potable Water Capacity: Develop long-term solutions regarding the supply, storage, and distribution of potable water and develop additional supplies. In addition to providing capacity for potential build-out under the City General Plan outside the coastal zone, any expansion of capacity of water facilities shall be designed to serve no more than the maximum level of development in the coastal zone allowed by the certified LCP that is consistent with all other policies of the LCP and Coastal General Plan. The City shall identify and implement water system improvements or changes in service areas that are designed to ensure adequate service capacity to accommodate existing, authorized, and projected probable future coastal dependent priority uses. Such uses include, but are not limited to, industrial (including commercial fishing facilities), visitor serving, and recreational priority uses in commercial, industrial, parks and recreation, and public facilities districts.

All policies of the Public Utilities Element will apply to future use of the Mill Site.

Conservation, Open Space, Energy, And Parks Element

There are no policies in the Conservation Element that conflict with the proposed changes to Policy LU 7.1 and 7.2. All policies of the Conservation Element will apply to future use of the Mill Site.

Circulation Element

The proposed changes to Policy LU 7.1 and 7.2 will not conflict with any policies of the Circulation Element. Only Policy C-2.10 of the Circulation Element specifically addresses the reuse of the Mill Site.

Policy C-2.10 Continue Grid System onto Mill Site: Ensure that the grid street system and a north/south arterial on the Mill Site be designed to ensure the maximum benefit to local traffic, pedestrian, and bicycle circulation and to provide maximum public access to the coast.

As currently written policy C-2.10 may be difficult to implement given locations of existing wetlands and required wetland buffers. It may be difficult to accommodate a north south arterial through the area between Oak Street, Pond 5 and Pond 8 on the Mill Site. Staff recommends revising this policy as portions of a north and south arterial may be feasible north of Alder Street and South of Maple Street but the entire north-south route may not be feasible.

Thus the City proposes to revise Policy C-2.10 as follows:

Policy C-2.10 Continue Grid System onto Mill Site: ~~Ensure that the grid street system and a north/south arterial on the Mill Site be designed~~ The Mill Site shall include the extension of the City's street grid and a north/south arterial, as feasible, ~~to ensure the maximum benefit to~~. Mill Site transportation facilities shall serve local traffic, pedestrian, and bicycle circulation. The Mill Site shall include at least three public street connections to the coastal trail and a trail systems that shall ~~and to~~ provide maximum public access to the coast, including new vertical public accessways through the Mill Site to the coastal trail.

A number of Circulation Element policies will guide the future reuse of the Mill Site such that many of the requirements that are part of a Specific Plan process will be met as part of the permitting process for future development. Key Circulation Element policies include the following:

Policy C-1.2 Coordinate Land Use and Transportation: Ensure that the amount and phasing of development can be adequately served by transportation facilities.

Program C-1.2.1: Review development proposals for their direct and cumulative effects on roadway Level of Service standards. During the development review process, City staff will determine whether traffic studies need to be carried out and the scope of such studies.

Policy C-1.3: Do not permit new development that would result in the exceedance of roadway and intersection Levels of Service standards unless one of the following conditions is met:

- a) Revisions are incorporated in the proposed development project which prevent the Level of Service from deteriorating below the adopted Level of Service standards; or
- b) Funding of prorata share of the cost of circulation improvements and/or the construction of roadway improvements needed to maintain the established Level of Service is included as a condition or development standard of project approval.

Policy C-1.4: Include specific time frames for the funding and completion of roadway improvements for projects which cause adopted roadway and intersection Level of Service standards to be exceeded. Require security, bonding or other means acceptable to the City to ensure the timely implementation of roadway mitigations.

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

Policy C-9.1: Provide Continuous Sidewalks: Provide a continuous system of sidewalks throughout the City.

Policy C-9.2: Require Sidewalks. Require a sidewalk on both sides of all collector and arterial streets and on at least one side of local streets as a condition of approval for new development.

Policy C-10.2: Require Bikeways. Require new development to provide on-site connections to existing and proposed bikeways, as appropriate.

All policies of the Circulation Element will apply to future use of the Mill Site.

Community Design Element

The proposed changes to Policy LU 7.1 and 7.2 will not conflict with any policies of the Community Design Element. All policies of the Community Design Element will apply to future use of the Mill Site.

Safety Element

The proposed changes to Policy LU 7.1 and 7.2 will not conflict with any policies of the Safety Element. All policies of the Safety Element will apply to future use of the Mill Site.

Noise Element

The proposed changes to Policy LU 7.1 and 7.2 will not conflict with any policies of the Noise Element. All policies of the Noise Element will apply to future use of the Mill Site.

Housing Element

The proposed changes to Policy LU 7.1 and 7.2 will not conflict with any policies of the Housing Element. All policies of the Housing Element will apply to future use of the Mill Site.

Glossary

The proposed changes to Policy LU 7.1 and 7.2 will not conflict with any definitions in the glossary.

5.2. Coastal Land Use and Development Code

Staff completed a comprehensive review of the Coastal land Use and Development Code and determined that the proposed revisions to Policy 7.1 and 7.2 will not conflict with any section of the Coastal land Use and Development Code.

Generally for all development permits (Use Permit, Design review, and Coastal Development Permit), all subdivisions (Lot Split, Minor and Major) and all Local Coastal Program Amendments, the following findings must be made by the Planning Commission, and the City Council upon appeal prior, to an approval of an individual permit, subdivision or LCP amendment.

“The [use, design, subdivision, project, LCP Amendment etc.] will be consistent with the Coastal General Plan, Local Coastal Program, and any applicable specific plan.”

If the Mill Site is rezoned without a specific plan, any development or subdivision approval would have to make the consistency finding with the Coastal General Plan and Local Coastal Program, which would be amended through the rezoning process for the LCP. The lack of preparation of a Specific Plan for the Mill Site rezoning will not relieve a project from complying with the amended Local Coastal Program. Likewise the LCP Amendment to rezone the Mill Site will also have to be consistent with the City’s Certified LCP and the Coastal Act.

Further the Coastal Land Use and Development Code includes the following definition for Timber Resources Industrial uses and this definition and the land use regulations regarding allowable uses in the IT zone will continue to stand until such time as the City Council submits and the Coastal Commission approves an LCP amendment to rezone the site. At that time the LCP amendment will need to be found compatible with the LCP and the Coastal Act.

17.24.020 - Purposes of Industrial Zoning Districts

IT (Timber Resources Industrial) zoning district. The IT zoning district is applied to areas appropriate for timber resource and forest products related manufacturing, including a variety of related industrial uses, as well as related support activities including railroad lines, truck shipping facilities, power generation, and related uses; and aquaculture. The maximum floor area ratio (FAR) is 0.40. The IT zoning district implements and is consistent with the IT land use designation of the Coastal General Plan.

The CLUDC includes Chapter 17.78 geared entirely towards the adoption, preparation and processing of a Specific Plan. This chapter will continue to apply to any property for which a Specific Plan is prepared for redevelopment of a parcel that is 5 acres or more anywhere within the Coastal Zone of the City of Fort Bragg. The proposed amendment will not conflict with this chapter as it does not foreclose any property owner or the City of Fort Bragg from initiating and completing a Specific Plan for any development project of more than 5 acres either on or off the Mill Site. Staff has reviewed Chapter 17.78 and the City Council may decide to include some of the required components of a Specific Plan into an LCP Amendment to rezone the Mill Site. Per the revised policy 7.1 and 7.2 the City would have to implement many of the components of a Specific Plan, including: A1, A3, A5 and A6 described below. The Council can require most of A2 under various policies of the Coastal General Plan including: Policy PF 1.1, Policy PF 1.2, Policy PF 2.1, Policy PF 2.2, Policy C-2.10, Policy C-1.2, Policy C-1.3, Policy C-1.4, Policy C-2.7, Policy C-9.1, Policy C-9.2, Policy C-10.2. The City can accomplish many of the items listed in A.4 through development agreement(s) with developers of the site.

17.78.050 - Preparation and Content

The draft specific plan shall include detailed information in the form of text and diagram(s), organized in compliance with State law (Government Code Section 65451).

- A. Required information.** At a minimum, the following information shall be provided:
- 1. Proposed land uses.** The distribution, location, and extent of land uses proposed within the area covered by the specific plan, including open space areas;
 - 2. Infrastructure.** The proposed distribution, extent, intensity, and location of major components of public and private circulation/transportation, drainage, energy, potable water, sewers, solid waste disposal, utilities, coastal access to surrounding developed and undeveloped areas, and other essential facilities proposed to be located within the specific plan area and needed to support the proposed land uses;
 - 3. Land use and development standards.** Standards, criteria, and design guidelines by which development would proceed, and standards for the conservation, development, and utilization of natural resources, where applicable;
 - 4. Implementation measures.** A program of implementation measures, including financing, methods, programs, regulations, and public works projects, necessary to carry out and provide:
 - a. Development and conservation standards and criteria, infrastructure, and land uses;
 - b. Public services, facilities and utilities, based on a nexus between development exactions being imposed and the development-induced needs being met by those exactions;
 - c. Orderly phasing of the development; and
 - d. Other measures needed to protect the health, safety, and well-being of the community.
 - 5. Relationship to General Plan.** A discussion of the relationship of the specific plan to the goals, policies, and objectives of the General Plan;

6. **Conformance to the Local Coastal Program.** A discussion of the conformance of the specific plan to the policies of the certified Local Coastal Program, including but not limited to policies regarding the protection of environmentally sensitive habitat areas, public access, geologic hazards, and visual resources; and
 7. **Additional information.** The specific plan shall contain additional information deemed to be necessary by the Director based on the characteristics of the area to be covered by the plan, applicable goals, policies, and objectives of the General Plan and Local Coastal Program, or any other issue(s) determined by the Director to be relevant.
- B. **Costs to be borne by the applicant.** The specific plan, and all environmental studies required as a result of the specific plan, shall be paid for by the applicant who may be repaid by future developers of other portions of the specific plan area on a pro rata basis.

CLUDC Chapter 9

Section 17.94.030 includes the following language which would conflict with the proposed changes to Policy 7.1 and 7.2,

17.94.030 - Processing, Notice, and Hearing

- C. **Specific plan requirement.** Prior to the filing of a proposed LCP amendment for a site designated Timber Resources Industrial, a specific plan shall first be prepared in compliance with Chapter 17.78 (Specific Plans).

The City recommends that the wording for this section be revised as follows in order to eliminate the conflict:

17.94.030 - Processing, Notice, and Hearing

- C. **Comprehensive Planning Process Required.** Prior to the filing of a proposed LCP amendment for a site designated Timber Resources Industrial, a comprehensive planning process shall first be completed in compliance with Coastal General Plan Land Use Policies LU 7.1 and LU 7.2.

5. Environmental Review Documents

Per Section 17.94.030A6, the Coastal Land Use and Development Code requires that all LCP Amendments include the following:

6. Any environmental review documents, pursuant to CEQA, required for all or any portion of the amendment to the LCP.

The City's action to submit an LCP Amendment is exempt from CEQA review by the City. In accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21080.9, CEQA does not apply to activities and approvals by the City as necessary for the preparation and adoption of an LCP amendment. This application is for an amendment to the LCP, which must be certified by the Coastal Commission before it takes effect. As noted in Public Resources Code Section 21080.9, the "activities and approvals by a local government necessary for the preparation and adoption of a local coastal program or long range development plan" pursuant to the California Coastal Act are statutorily exempt from compliance with CEQA, and this statutory exemption "shifts the burden of CEQA compliance from the local agency to the California Coastal Commission (CEQA Guidelines § 15265 (c)). As discussed above, a number of technical studies will be prepared and submitted with the LCP Amendment application to assist the Coastal

Commission with its preparation of an environmental document which will serve as the functional equivalent of a CEQA document.

6. Zoning Measures Required to Implement the Amendment

7. An indication of the zoning measures or implementation that will be used to carry out the amendment to the Coastal General Plan (unless submitted at the same time as the amendment to the Coastal General Plan).

The Coastal LUDC will require one amendment as follows:

17.94.030 - Processing, Notice, and Hearing

- C. ~~Specific plan requirement~~ Comprehensive Planning Process required.** Prior to the filing of a proposed LCP amendment for a site designated Timber Resources Industrial, a comprehensive planning process shall first be completed in compliance with Coastal General Plan Land Use Policies LU 7.1 and LU 7.2. ~~specific plan shall first be prepared in compliance with Chapter 17.78 (Specific Plans).~~

7. Relationship of Comprehensive Plan to LCP

The Fort Bragg Coastal General Plan (Coastal General Plan) and Coastal Land Use and Development Code (Coastal LUDC) designate the majority of the Plan Area as Timber Resources Industrial (IT). Coastal General Plan Policies LU-7.1 and LU-7.2 specifically require the preparation of a Comprehensive Plan prior to rezoning of lands that are designated Timber Resources Industrial. The Mill Site Reuse Plan will fulfill this requirement.

The Mill Site Reuse Plan policies will be added to the Coastal General Plan and the Mill Site Reuse development standards will be added to the development standards in the Coastal LUDC as part of an amendment to the Fort Bragg Local Coastal Program (see below). The Mill Site Reuse Plan provisions will be identified in those documents with the Mill Site logo.

All development in the Mill Site Plan Area must also comply with the Citywide Design Guidelines. The Citywide Design Guidelines will include certain guidelines that only apply within the Plan Area.

All subsequent development projects and related activities in the Plan Area must be consistent with the Major LCP Amendment, which will include policy changes to the Coastal General Plan, and regulation changes to the Coastal LUDC. All future development projects will need to comply with the policies and standards contained in the Coastal General Plan and Coastal LUDC.

Local Coastal Program

The Fort Bragg Local Coastal Program (LCP) — comprised of the Coastal General Plan, Land Use and Development Code and Zoning Map — outlines the policies, standards and regulations with which all development in the City's Coastal Zone must conform. The Coastal General Plan sets policies on a wide range of topics including land use, resources protection, storm water management, transportation, community design, safety, energy, and sustainability.

The Plan Area lies entirely within the Coastal Zone. The Mill Site Reuse Plan will establish land use categories, zoning districts, general plan policies, and coastal LUDC regulations that will be incorporated into the LCP through an amendment to the LCP.

Coastal General Plan

The Coastal General Plan constitutes the Land Use Plan of the City's LCP and sets forth specific land use designations for all properties within the City that are within the Coastal Zone. These designations are classified into major land use categories, including Residential, Commercial, Industrial, and Other (e.g., harbors, open space, agriculture, etc.). The Coastal General Plan also describes the specific types of uses intended for each category, and depicts them on the City's Land Use Designations Map.

The Coastal General Plan currently designates most of the Plan Area as Timber Resources Industrial (IT). A few smaller portions of the Plan Area have designations other than IT. These include two small rectangular tracts of land along the Plan Area's eastern boundary designated Central Business District (CBD) and Heavy Industrial (IH). These designations are similar to the land use designations of adjacent parcels outside the Plan Area boundary.

The Mill Site Reuse Plan and associated LCP Amendment must be consistent with the City's

certified Coastal General Plan. An amendment to the Coastal General Plan to change the land use designations and incorporate applicable policies from the Mill Site Reuse Plan, will be required.

Coastal Land Use and Development Code

The Fort Bragg Coastal LUDC constitutes the Implementation Program of the City's LCP. The Coastal LUDC clarifies the policies of the Coastal General Plan by classifying and regulating land uses and development occurring on properties within the City's Coastal Zone boundary.

Consistent with the Coastal General Plan land use designation, the majority of the Plan Area is currently zoned for IT uses. Similarly, a few small tracts of land within the Plan Area have other zoning classifications. For example, two small tracts of land along the eastern boundary of the Plan Area are zoned CBD and IH, matching the zoning of adjacent parcels not within the project boundary. A triangular tract at the Plan Area's southeastern-most tip is zoned Highway Visitor Commercial (CH).

An amendment to the Coastal LUDC to incorporate the new zoning districts and development standards from the Mill Site Reuse Plan will be required as part of the Coastal Commission's consideration of the LCP Amendment.

Citywide Design Guidelines

The Fort Bragg Citywide Design Guidelines are intended to (1) promote a desired level of future development quality; (2) clarify expectations for high-quality design; (3) serve as a source for evaluation criteria for project review; (4) provide a method to help ensure objectivity, consistency, and predictability in the design review process; and (5) promote a clear identity and sense of place for the entire community of Fort Bragg. These guidelines, which are in addition to but not part of the LCP, acknowledge the valued architectural characteristics and development patterns within Fort Bragg today. The guidelines, therefore, do not seek to impose an overriding style or an artificial theme. They do seek to assist in promoting the positive design characteristics existing throughout Fort Bragg that make it a unique place.

The Citywide Design Guidelines apply to both the Coastal and Inland Areas of Fort Bragg and will be applied to all development within the Plan Area during review of proposed projects (new construction, additions, remodeling, and relocation). The design elements of each project (including site design, architecture, landscaping, signs, and parking design) will be reviewed through the City's Design Review process. Certain design guidelines will be identified in the Citywide Design Guidelines as only applying within Mill Site Plan Area.

Responses to Coastal Commission Letter Dated December 20, 2017

A. Revised Resolutions

B Public Notice Documents

C1 Conformity for the Requirements of the Coastal Act

Per Section 17.94.030A5, the Coastal Land Use and Development Code requires that all LCP Amendments include the following:

5. An analysis that meets the requirements of California Code of Regulations Section 13511 that demonstrates conformity with the requirements of Chapter 6 of the Coastal Act.

This proposed LCP Amendment would be a minor amendment that would change two policies of the LCP. The City adopted and the Coastal Commissions' certified LCP Amendment in 2008 and it meets all the requirements of California Code of Regulations, Section 13511 and the LCP is in conformity with all requirements of Chapter 6 of the Coastal Act. The proposed amendment is minor and would not impact the City's LCP or its conformance with Chapter 6 of the Coastal Act.

The City has analyzed compliance with Chapter 3 of the Coastal Act below. In order to provide a comprehensive analysis of the potential impact on the minor amendment to replace the requirement for a Specific Plan with a comprehensive planning process, this analysis also explores the potential impact of the subsequent Major LCP Amendment which would eventually occur if this minor amendment is approved. The Major amendment would use a comprehensive planning process to: 1) rezone the Mill Site; 2) modify the Coastal General Plan (Land Use Plan - LUP), and; 3) modify the Coastal Land Use and Development Code (Implementation Plan-IP). As the comprehensive planning process has not been completed this analysis is necessarily preliminary in scope and based on the community workshops, survey and meetings with City Council and the Planning Commission which have taken place over the past year.

Compliance with Chapter 3 of the Coastal Act

Coastal Act Section	Key policy requirements	Compliance Analysis
Section 30200	"policies of this chapter shall constitute the standards by which the adequacy of local coastal programs, ...are determined"	Please see compliance with policies below.
Section 30210	Access; recreational opportunities; posting	The proposed Comprehensive Planning Process (CPP) will rezone the 92 acre property acquired by the City of Fort Bragg as Open Space, this is a 92 acre linear park stretched along the entire coastal edge of the Mill Site. This linear park currently provides direct coastal access to 80% of the site. The remaining 20% of the coastline will be rezoned as open space through CPP and the Major LCP Amendment.
Section	Development not to	The CPP will result in a Land Use Plan that

30211	interfere with access	provides for public access to Soldiers Bay and the associated beach. All other beaches are currently accessible via the Coastal Trail.
Section 30212	New development projects	The proposed LCP Amendment (3-17) will not result in any new development. The CPP will result in a subsequent LCP Amendment that will include policies to ensure that public access will be provided in compliance with Section 30212.
Section 30212.5	Public Facilities	The proposed LCP Amendment (3-17) will not result in any new development. The CPP will result in a subsequent LCP Amendment that will include a Land Use Plan and Circulation Plan and parking facilities policies and requirements which will be provided in compliance with Section 30212.5.
Section 30213	Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals	<p>The proposed LCP Amendment 3-17 will not result in any new development. The CPP will result in a subsequent LCP Amendment that will include a significant area rezoned for visitor serving facilities that is adjacent to the Coastal Trail which provides opportunities for public recreation. The City currently provides a significant amount of low cost visitor serving facilities. The area proposed for new visitor serving facilities is envisioned as a higher end facility by the City Council and the community. Lower cost facilities, such as a hostel or camping areas may be allowed in other locations at the site. This concept has not yet been reviewed through the community planning process.</p> <p>Visitor serving zoning, policies and requirements of the City LCP will result in compliance with Section 30213.</p>
Section 30214	Implementation of public access policies; legislative intent	The proposed Comprehensive Planning Process (CPP) will rezone the property acquired by the City of Fort Bragg as Open Space, which includes a 92 acre linear park along the entire coastal edge of the Mill Site. This linear park currently provides direct coastal access to 80% of the site. The remaining 20% of the coastline will be rezoned as open space through CPP. The new Land Use Plan zoning, policies and requirements of the City's LCP Amendment will result in compliance with Section 30214.
Section 30220	Protection of certain water-oriented activities	The Mill Site only provides suitable access for water oriented recreational activities which do not require water going vehicles. Thus the site is suitable for diving, shoreline fishing, and abalone diving. The City has identified and developed areas suitable for this access on the new Coastal Trail park, while protecting areas with rare plants

		<p>and wetland from access of this type.</p> <p>The new Land Use Plan zoning, policies and requirements of the City's LCP Amendment will result in compliance with Section 30222.</p>
Section 30221	Oceanfront land; protection for recreational use and development	<p>The proposed Comprehensive Planning Process (CPP) will rezone the property acquired by the City of Fort Bragg as Open Space, which includes a 92 acre linear park along the entire coastal edge of the Mill Site. This linear park currently provides direct coastal access to 80% of the site. The remaining 20% of the coastline will be rezoned as open space through CPP.</p> <p>The new Land Use Plan zoning, policies and requirements of the City's LCP Amendment will result in compliance with Section 30221.</p>
Section 30222	Private lands; priority of development purposes	<p>Fort Bragg's LCP currently includes a number of policies to address the primacy of visitor serving uses over other uses. The proposed amendment would not result in revisions to those policies.</p> <p>The new zoning, policies and requirements of the City's LCP Amendment will result in compliance with Section 30222.</p>
Section 30222.5	Oceanfront lands; aquaculture facilities; priority	<p>The proposed Comprehensive Planning Process (CPP) will rezone property acquired by the City of Fort Bragg as Marine Dependent uses for the Noyo Center for Science and Education. This facility provides marine science education and citizen science opportunities to the public. The CPP will also allow aquaculture facilities on this parcel as a permitted use. The Noyo Center parcel adjoins the Fort Bragg Coastal Trail property. The remainder of the ocean fronting lands include a 92 acre linear park along the entire coastal edge of the Mill Site, which will be rezoned as Parks through the Major LCP Amendment. This linear park currently provides direct coastal access to 80% of the site. The remaining 20% of the coastline will be rezoned as open space through CPP.</p> <p>The new Land Use Plan zoning, policies and requirements of the City's Major LCP Amendment will result in compliance with Section 30222.5.</p>
Section 30223	Upland areas	<p>The proposed Comprehensive Planning Process (CPP) will rezone the property acquired by the City of Fort Bragg as Open Space, which includes a 92 acre linear park along the entire coastal edge of the Mill Site. This linear park currently provides direct</p>

		coastal access to 80% of the site. The remaining 20% of the coastline will be rezoned as open space through CPP. The new Land Use Plan zoning, policies and requirements of the City's LCP Amendment will result in compliance with Section 30223.
Section 30224	Recreational boating use; encouragement; facilities	<p>The City of Fort Bragg is immediately adjacent to the Noyo Harbor. The Noyo Harbor is the largest sea port between San Francisco and Eureka and includes a number of vacant parcels that are sufficient to serve needs for dry storage. This facility also includes boat launching facilities, berthing space, and a harbor of refuge.</p> <p>The Mill Site does not include an area that is suitable for recreational boating facilities as the wave action along the shore is too intense to allow for such facilities.</p> <p>The City's LCP Amendment will not increase compliance with Section 30230, because compliance is not feasible within the geographical limits of the City's boundary.</p>
Section 30230	Marine resources; maintenance	<p>The proposed LCP Amendment will not have a direct impact on marine resources, as the entire project is located on a coastal headland.</p> <p>The existing 92 acre coastal trail provides protections to the near shore environment. The proposed Comprehensive Planning Process (CPP) will rezone property acquired by the City of Fort Bragg as Marine Dependent uses for the Noyo Center for Science and Education. This facility provides marine science education and citizen science opportunities to the public.</p> <p>The City's LCP Amendment will increase the City's compliance with Section 30230.</p>
Section 30231	Biological productivity; water quality	<p>The City of Fort Bragg is in compliance with its MS4 permit. Additionally the City's certified LCP includes many policies and regulations protective of water quality and storm water management, these policies will be retained and enhanced through the LCP Amendment.</p> <p>The new coastal trail includes wetland bioswales to assist with the infiltration of stormwater. The remainder of the Mill Site is largely paved and redevelopment of the site will result in improved stormwater infiltration and management.</p>

		<p>The proposed Land Use Plan includes the preservation of significant open space between Alder Street and Maple Streets in order to allow for the eventual daylighting and restoration of Maple and Alder Creeks (currently culverted), which would result in improved riparian and wetland habitat. The draft Land Use Plan also includes a wildlife corridor that would connect “ponds 1-4” and “pond 8” to improve habitat connections and values in this area.</p> <p>The draft Major LCP Amendment (policies and regulation) will facilitate cutting edge stormwater management techniques in both public infrastructure on the site and private development. The City’s LCP Amendment will retain and enhance the City’s compliance with Section 30231.</p>
Section 30232	Oil and hazardous substance spills	The City’s certified LCP includes many policies and regulations protective of environmental health. All proposed projects that may eventually occur on the site will require CDPs which will include special conditions addressing handling transportation and storage of hazardous substances. The City’s LCP Amendment will retain the City’s compliance with Section 30232.
Section 30233	Diking, filling or dredging; continued movement of sediment and nutrients	The City’s certified LCP includes policies and regulations that specifically address this requirement of the Coastal Act. These policies will not be changed through the Major LCP Amendment. The City’s LCP Amendment will retain the City’s compliance with Section 30233.
Section 30234	Commercial fishing and recreational boating facilities	<p>The City of Fort Bragg is immediately adjacent to the Noyo Harbor. The Noyo Harbor is the largest sea port between San Francisco and Eureka and includes a number of vacant parcels that are sufficient to serve needs for dry storage. This facility also includes boat launching facilities, berthing space, a harbor of refuge.</p> <p>The Mill Site does not include an area that is suitable for recreational boating facilities as the wave action along the shore is too intense to allow for such facilities.</p> <p>The City’s LCP Amendment will not increase compliance with Section 30234, because compliance is not relevant to the geographical constraints of the City.</p>
Section 30234.5	Economic, commercial, and recreational	Please see comment for Section 30234 above. The City’s LCP Amendment will not increase

	importance of fishing	compliance with Section 30234.5, because compliance is not relevant to the geographical constraints of the City.
Section 30235	Construction altering natural shoreline	<p>The Mill Site includes two existing significant structures that alter the natural shoreline:</p> <p>1) Pond 8 is retained by a 35 foot dam and spillway which releases freshwater directly into the Ocean. This existing structure may be retained and improved. Georgia-Pacific (the property owner) is currently going through a multiple agency permitting process with the following agencies: City of Fort Bragg, Coastal Commission, Department of Toxics Substances Control (DTSC), Army Corp of Engineers, Division of Safety of Dams (DSOD) and Fish and Wildlife in order to strengthen the dam so that it can withstand a maximum credible earthquake. This structure is a freshwater impoundment structure not a marine structure.</p> <p>2) Beach berm is a 20 foot high structure the runs the length of the beach at Fort Bragg Landing (500+ feet). The berm is lined on the shoreward side (west) with discarded concrete rip rap. The eastern side of the berm is flush with fill soil. This approximately 8 acre area includes about 4 acres of Coastal Act wetlands. No changes are proposed to the beach berm at this time by the property owner.</p> <p>The proposed Land Use Plan includes the preservation of both areas as Open Space.</p>
Section 30236	Water supply and flood control	Please see response to Section 30231.
Section 30240	Environmentally sensitive habitat areas; adjacent developments	<p>The City's certified LCP includes policies and regulations that specifically address these requirements of the Coastal Act. These policies will not be changed through the Major LCP Amendment.</p> <p>The City's LCP Amendment will retain the City's compliance with Section 30240.</p>
Section 30241	Prime agricultural land; maintenance in agricultural production	<p>The City of Fort Bragg does not include any prime agricultural land.</p> <p>The City's LCP Amendment will retain the City's compliance with Section 30241.</p>

Section 30241.5	Agricultural land; determination of viability of uses; economic feasibility evaluation	Please see response to Section 30241.
Section 30242	Lands suitable for agricultural use; conversion	Please see response to Section 30241.
Section 30243	Productivity of soils and timberlands; conversions	The proposed Major LCP Amendment would change the zoning for timber resources industrial zoning, which allows manufacturing and processing of wood product. There is a small, two acre, third growth redwood stand on the site that will be protected with open space zoning. There are no timberlands on the site.
Section 30244	Archaeological or paleontological resources	<p>The site has known archaeological sites, which are listed on the National Register. These sites will be rezoned at Open Space, Parks or Urban Reserve. Additionally any development on the site will be required to comply with CEQA and the City's existing archaeological resource policies and regulations in the City's certified LCP.</p> <p>There are not known paleontological sites in Fort Bragg. The City's LCP Amendment will retain the City's compliance with Section 30244.</p>
Section 30250	Location; existing developed area	<p>The CPP has resulted in the development of a new zoning map which changes the zoning primarily on the eastern third of the site to ensure that new development is as close as possible to existing development and infrastructure.</p> <p>The proposed visitor serving zoning would be located at the western terminus of the extension of Redwood road onto the site, the most westerly new zoning. Other than coastal dependent uses (parks and marine sciences) this is the only portion of the site where development would not be surrounded on at least two sides by other development.</p> <p>The City's LCP Amendment will retain and enhance the City's compliance with Section 30250.</p>
Section 30251	Scenic and visual qualities	<p>The comprehensive planning process has not yet directly addressed the scenic and visual impacts of the Major LCP Amendment.</p> <p>The site is currently a vacant former industrial property. Most of the former buildings have been removed. Approximately 60% of the site is covered with asphalt and concrete paving, and the foundations of demolished buildings, which has low</p>

		<p>visual quality.</p> <p>Additionally, the visual resources of the westernmost 92 acres of the site are protected as a park and the Fort Bragg Coastal Trail.</p> <p>The draft zoning map includes the retention of key visual resources on the site through:</p> <ol style="list-style-type: none"> The extension of the City's street grid onto the site to ensure the retention of public views from public right of ways. Two significant portions of the site are slated for Urban Reserve zoning which would not permit new development for many years and would therefore preserve views across these properties. The proposed Land Use Map includes preservation of the forested area and wetland area located between Maple Street and Walnut Street as open space as well as all wetland areas. The site is largely flat with very slight slope to the ocean and thus development of the site will not require the alteration of natural land forms. Any development that occurs on the site will have to be consistent with the Citywide Design Guidelines which require compatibility with the visual character of surrounding areas. The LCP amendment will include policies requiring the removal of existing concrete and asphalt as part of any subdivision approval. This area is not currently designated as a highly scenic area in the City's LCP, thus buildings do not have to be subordinate to the character of the setting. <p>The City's certified LCP includes policies and regulations that specifically address the preservation of scenic resources and visual quality. These policies will not be changed through the Major LCP Amendment. The City's LCP Amendment will retain the City's compliance with Section 30251.</p>
Section 30252	Maintenance and enhancement of public access	<p>The Major LCP Amendment will include transit, circulation and parking policies to ensure that the property when developed includes:</p> <ol style="list-style-type: none"> 1. Bus service will be provided on the site; 2. Zoning for a small extension of CBD, Highway Commercial zoning, light industrial zoning, heavy industrial zoning and Mill Site Employment zoning are slated for locations adjacent to existing development and

		<p>highway 1. The interior streets for the site will largely serve recreation, visitor serving residential uses and some light industrial.</p> <p>3. The City's Fort Bragg coastal trail project provides 5.5 miles of multiuse trail that traverses the site from North to South. The multi-use trail will also connect to downtown. The LCP Amendment will also include requirements for complete streets and pedestrian-friendly streetscapes.</p> <p>4. The LCP amendment will include policies and regulations that encourage the development of smart growth shared parking facilities. Additionally, the Coastal Trail includes significant parking to serve the Coastal Trail facility.</p> <p>5. The LCP Amendment will not allow high intensity uses.</p> <p>6. The draft land use map for the LCP Amendment includes 99 acres of passive and active recreational zoning. The Site will provide for the recreational needs of those who live and visit the site as well as the recreation needs of the larger community. Additionally, the LCP Amendment will include policies that require the dedication of lands for some of these parks during subdivision. Funds to support the development and maintenance of the parks will be secured through development impact fees, a Community Development District, and/or a Melo-roos district.</p>
Section 30253	Minimization of adverse impacts	<p>The City's certified LCP includes policies and regulations that specifically address: 1) minimization of risk to life and property; 2) geotechnical stability and bluff stability; 3) air resources control board requirements; 4) energy use; protection of special communities and neighborhoods. These policies will not be changed through the Major LCP Amendment. Additionally the LCP Amendment will address the need to reduce vehicle miles traveled in the circulation element of the Certified LCP.</p> <p>The City's LCP Amendment will retain the City's compliance with Section 30253.</p>
Section 30254	Public works facilities	<p>The Mill Site is located within the City's Municipal Service district boundaries. The City is currently replacing our existing sewer and treatment plant as it has aged past its reasonable useful life. The new plant will not increase capacity. There is sufficient</p>

		<p>existing capacity to serve the Mill Site upon buildout per the LCP Amendment.</p> <p>State Route 1 is not a rural highway within the City of Fort Bragg. A traffic study will be prepared to ensure that the rural qualities of Scenic Route 1 will not be impacted by the buildout of the area zoned through the LCP Amendment.</p> <p>The City's LCP currently includes a number of policies that place a preference for visitor serving uses when there are capacity constraints with public facilities, and these policies will be retained.</p> <p>The City's LCP Amendment will retain the City's compliance with Section 30254.</p>
Section 30254.5	Terms or conditions on sewage treatment plant development; prohibition	The City is currently replacing our existing sewer and treatment plant as it has aged past its reasonable useful life. The new plant will not increase capacity. There is sufficient existing capacity to serve the Mill Site upon buildout per the LCP Amendment.
Section 30255	Priority of coastal-dependent developments	The LCP amendment would allow the following priority uses adjacent to the shoreline: parks and open space, visitor accommodations, and marine dependent research and education. The site wetlands will all be located in areas that are zoned as open space or public parks. Coastal-related zoning for residential and commercial uses is proposed within reasonable proximity to the coastal dependent uses.
ARTICLE 7: INDUSTRIAL DEVELOPMENT		
Section 30260	Location or expansion	The LCP amendment would allow a variety of light industrial, heavy industrial and timber resources industrial. The amendment would not specifically designate a zoning district for coastal dependent industrial uses, however such uses would be permitted in the light and heavy industrial zones.
Section 30261	Tanker facilities; use and design	The site does not include a location that would be compatible with tanker facilities. The headlands are too high and the rocky offshore and intertidal areas would make tanker approaches infeasible and dangerous.
Section 30262	Oil and gas development	The LCP amendment would not specifically designate a zoning district for coastal dependent industrial uses such as onshore facilities that support off-shore oil and gas development, however such uses would be permitted in the heavy industrial zone per the requirements of the Coastal Act.

Section 30263	Refineries or petrochemical facilities	Coastal dependent industrial uses such as refineries and petrochemical facilities are undesired by the community and the City Council. The LCP Amendment would not establish a zoning district that would allow this use type on the site.
Section 30264	Thermal electric generating plants	Coastal dependent industrial uses such as thermal electric generation plants are undesired by the community and the City Council. The LCP Amendment would not establish a zoning district that would allow this use type on the site.

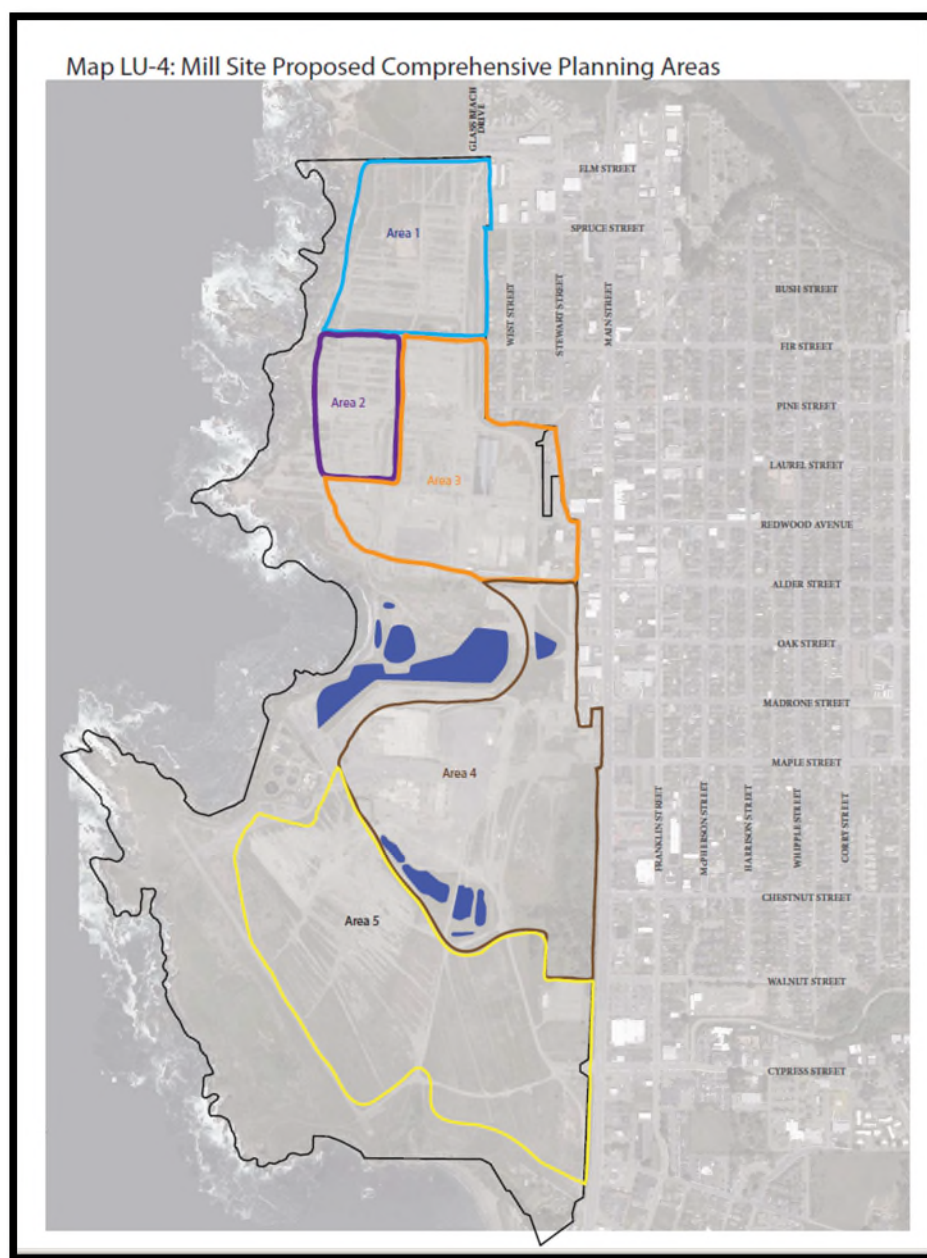
D1 & D2. Definition of a Comprehensive Plan

The City proposes that the following definition be included in the LCP Amendment to clarify the requirements of a Comprehensive Planning process in terms of community involvement, plan requirements, and geographical area for the planning process.

Comprehensive Planning Process. A Comprehensive Planning Process shall include maximum opportunities for community participation through public workshops, surveys, open houses, and City Council and Planning Commissions meetings and hearing. A Comprehensive Plan shall include the following:

- a. Establish new land use classifications, development policies and standards;
- b. Identify potential connections for existing and future infrastructure connections such as roads, utilities, and coastal access to surrounding developed and undeveloped areas;
- c. Establish orderly phasing for development and future rezoning activities;
- d. Include other measures as needed to protect the health, safety, and well-being of the community;
- e. Map new zoning and transportation facilities, including coastal access; and
- f. Be consistent with the all policies of the Coastal Act and Fort Bragg's LCP.

A Comprehensive Plan for rezoning of the Mill Site will at a minimum entail an area approximating one or more of the subareas as shown on Map LU-4 as illustrated.



D3 Requirements for a Comprehensive Planning Process

The Coastal Commission letter dated 12-20-2017 states:

“(3) The proposed revisions to Policies LU-7.1 and 7.2 only require a comprehensive planning process at the rezoning phase and not at the LUP phase. If comprehensive planning does not occur at the LUP phase, please explain how adequate protection of coastal resources will be assured.”

The City does not understand the expressed concern or the underlying assumption that an LUP amendment would not be required. This is a misunderstanding of the City’s intent and the proposed LCP Amendment. As noted in proposed Policy LU-7.2 the comprehensive planning process would require:

The LCP amendment shall:

a. Establish new land use classifications, development policies and standards

As policies are located in the Coastal General Plan (LUP) and standards are located in the Coastal Land Use and Development Code (IP), clearly any change to zoning would require a comprehensive LCP amendment, including changes to the LUP and the IP. Furthermore the policy itself requires that any Amendment be consistent with all the policies of the Coastal Act as follows:

The LCP amendment shall...

f. Be consistent with the all policies of the Coastal Act and Fort Bragg’s LCP.

If the Coastal Commission wants to clearly state that a comprehensive planning process includes changes to the IP and LUP in language that is totally and unambiguously clear, the City recommends the following clarification:

Proposed: Policy LU-7.2: Comprehensive Planning Process Required. LCP amendments that propose to rezone lands designated Timber Resources Industrial must be developed through a comprehensive community-based planning process. Community participation shall be solicited throughout the planning process in accordance with established City practices and CLUDC requirements. The LCP amendment shall:

- g. Establish new land use classifications, development policies and standards *through amendments to the IP and the LUP*;**
- h. Identify potential connections for existing and future infrastructure connections such as roads, utilities, and coastal access to surrounding developed and undeveloped areas;**
- i. Establish orderly phasing for development and future rezoning activities;**
- j. Include other measures as needed to protect the health, safety, and well-being of the community;**
- k. Map new zoning and transportation facilities, including coastal access; and**
- l. Be consistent with the all policies of the Coastal Act and Fort Bragg’s LCP.**

D4 Infrastructure Requirements

The Coastal Commission letter dated 12-20-2017 states:

“(4) Thank you for the discussion of the similarities and differences between a Specific Plan and a comprehensive planning process. The discussion seems to indicate that a major difference is that the Specific Plan would include a comprehensive infrastructure plan and a financing plan for infrastructure and other public services. Please clarify the level of infrastructure planning that would occur under the proposed comprehensive planning process. For instance, would the location of major components of public infrastructure facilities be specifically identified (e.g. the actual layout of streets) or would policies be included that guide future siting (e.g. policies to maintain views of the ocean and continue the street grid)? Please also clarify how infrastructure would be financed and developed, including larger pieces of infrastructure beyond parcel-specific extensions.”

The City has not completed the comprehensive planning process yet so these items have not been completely determined. However, from a review of Policy LU-7.2 it is clear that the City proposes to provide general guidance about where infrastructure will be placed, as follows:

Proposed: Policy LU-7.2: Comprehensive Planning Process Required. LCP amendments that propose to rezone lands designated Timber Resources Industrial must be developed through a comprehensive community-based planning process. Community participation shall be solicited throughout the planning process in accordance with established City practices and CLUDC requirements. The LCP amendment shall:

b. Identify potential connections for existing and future infrastructure connections such as roads, utilities, and coastal access to surrounding developed and undeveloped areas;

e. Map new zoning and transportation facilities, including coastal access;

The City proposes to map all transportation facilities, as stated in the policy above. This will include all roads, sidewalks, coastal access, bike lanes, bus stops, etc.

As the City is currently engaged in the comprehensive planning process the City has not yet defined all zoning, policies nor identified all funding mechanisms for infrastructure. The funding mechanisms for financing of infrastructure will be identified in a generic sense in policies of Certified LCP, however the details will be worked out either in the formation of Development Impact Fees, and Community Financing District, Mello Roos District, infrastructure reimbursement agreements, development agreement or other funding mechanisms under the City's authorization not under the Coastal Commissions. This would have been the identical process if a Specific Plan were pursued, as financing and funding mechanisms are outside of the purview of the Coastal Act.

D5 Consistency with CLUDC 17.78.050

The Coastal Commission letter dated 12-20-2017 states:

“(5) By eliminating the Specific Plan requirement, the proposed amendment would no longer require consistency with CLUD 17.78.050. Please explain how the proposed amendment will provide protections equivalent to Section 17.78.050 including how the

comprehensive planning process will be sufficiently detailed to: (1) indicate the kinds, location, and intensity of land uses at the Mill Site, and (2) include adequate land use and development standard by which development would proceed. For example, what limitations on subdivision will ensure that the distribution location and size of land uses adequately protect coastal resources including the protection of view corridors, wildlife corridors, open space corridors and public access corridors?”

The comprehensive planning process will include changes to the IP that indicate the “kinds, location, and intensity of land uses at the Mill Site.” As previously noted the LCP amendment will include: “Establish new land use classifications, development policies and standards.” The new land use classifications and development standards will necessarily include the permitted use types and the intensity of land uses (FAR, Lot Coverage Ratio, Height Limits, Set Back Requirements, Parking Requirements, etc.).

The Comprehensive Planning process will also “include adequate land use and development standard by which development would proceed.” See comment above. Also all existing development standards related to subdivisions, stormwater protections, view corridors, protection of ESHAs, open space and public access corridors of the City’s Certified LCP will continue to apply to any new land uses on the Mill Site. Additionally, the City is developing new policies to further protect and rehabilitate and restore the open space and wildlife corridors on the Mill Site.

D6 Maximum Public Access

The Coastal Commission letter dated 12-20-2017 states:

(6) The proposed, revision to Policy C-2.10 changes the policy in a manner that would only require that maximum public access be provided if feasible. Please explain what feasibility limitations may affect the ability to provide maximum public access.

The actual policy is worded as follows:

Policy C-2.10. Ensure that the grid street system and a north/south arterial on the Mill Site be designed, as feasible, to ensure the maximum benefit to local traffic, pedestrian, and bicycle circulation and to provide maximum public access to the coast.

Some open space areas may not allow for public access because wetland ESHA requires protections under the Coastal Act. For example Pond 5 may interfere in the ability to extend Oak Street and Alder street onto the Mill Site as the 100 foot wetland buffer around this pond would preclude the extension of this street onto the site. Likewise the wetland and forests located between Maple Street and Cypress Street may preclude the extension of these streets onto the site as the extensions would have to traverse these ESHA areas. Additionally, Laurel Street and Pine Street cannot be extended onto the Mill Site because the Skunk Train depot and tracks effectively block the extensions of these streets onto the Mill Site. Finally the North South arterial through the Mill Site will likely be precluded by Pond 5 and Pond 8 and their respective buffers which would physically constrain the location of a road through this area. “As feasible” has been added to this policy to recognize these limitations.