

Table 2: Coastal General Plan Policies Relevant to the Mill Pond Remediation Project Sept 25, 2018

Coastal General Plan Policy	5. Vegetative sediment cover (wet) over contaminated sediment and institutional controls & Dam Repair	6. In-Situ Soil Mixing without Dam Stabilization.	7. Mill Pond “Hot Spot” Removal without Dam Stabilization.
Brief Project description	For purposes of this analysis this project alternative is assumed to include: <ul style="list-style-type: none">Retention of the dam structuresAdd 2 feet of fill over the existing sediment and retention of a wetland cap within the existing mill pond.	For purposes of this analysis this project alternative is assumed to include: <ul style="list-style-type: none">ISM technology would be used to immobilize organic and inorganic compounds in saturated sediments, using reagents to produce an inert, geotechnically strong, and relatively less permeable material, such as Portland cement.The dam stabilization project would not be required.The Mill Pond Dam and beach berm would continue to provide sediment containment.	For purposes of this analysis this project alternative is assumed to include: <ul style="list-style-type: none">Minimal dredging of a small portion of Pond 8 for removal of “hot spots” in Pond 8. Upon removal of the “hot spots” this analysis assumes that the pond would be cleaned to a residential standard and no containment of the pond would be required.This analysis assumes retention of Pond 8 without geotechnical stabilization. (See alternative 1 to view policy implications for geotechnical stabilization.)Under this analysis the dam would be retained under DSOD authority and beach access may not be feasible. To determine the feasibility of Hot Spot Removal with dam repairs, please see Option 2a.
Open Space Element			
Policy OS-1.3: <u>Development in ESHA Wetlands:</u> Diking, <u>Filling</u> , and Dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following uses: <ul style="list-style-type: none">a. New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.b. Maintaining existing or restoring previously dredged depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.c. New or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.d. <u>Incidental public service purposes</u>, including but not limited to burying cables and pipes or inspection of piers and maintenance of existing intake and outfall pipelines.e. <u>Restoration purposes.</u>f. Nature study, aquaculture, or similar resource dependent activities.	Project may comply with this policy. This option might be approvable as filling and dredging for an incidental public service purpose if it can be demonstrated that the work in Pond 8 actually does benefit or improve the stormwater runoff treatment use of Pond 8. <ul style="list-style-type: none">If the continued use of Pond 8 as a stormwater detention basin poses the risk of mobilizing some of the contaminated sediments, then arguably partially filling the pond under could be for an incidental public service purpose of stormwater runoff managementIf not, and if there is no other legitimate basis to state that dredging and filling for the option is for an incidental public service purpose, then the project would not comply with Policy OS-1.3.	Project would not comply with this policy. This alternative would not be able to secure a Coastal Development Permit. This project would be considered a combination of dredging and fill as sediment would be treated and retained in place in a solid form. The incidental public service would be stormwater quality benefits and conveyance, however do to the scale of disturbance to the Pond 8 ESHA this project would not be considered the least environmentally damaging alternative.	Project may comply with this policy. If this project includes minimal dredging of Pond 8 to remove “hot spots” and if this dredging is part of a larger more extensive restoration strategy for the pond and a larger strategy that would result in improved stormwater treatment outcomes (incidental public service purpose) for the pond. This project would require significant in pond wetland restoration that improves wetland function, vegetation and water quality outcomes for stormwater treatment.
Policy OS-1.5: <u>Development in Rivers and Streams with ESHA.</u> Channelizations, dams, or other	Project may comply with this policy Compliance with policy OS-1.5 is feasible if this	Project may comply with this policy Compliance with policy OS-1.5 is feasible if this	Project may comply with this policy with special conditions.

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<p>substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to:</p> <ul style="list-style-type: none"> a. Necessary water supply projects, b. Flood control projects where no other method for protecting existing structures in the floodplain is feasible and where such protection is necessary for public safety or to protect existing development, or c. Developments where the primary function is the improvement of fish and wildlife habitat. 	<p>project is considered a flood control project through the dam stabilization project. This project would not be able to improve sufficient habitat, given its large scope to qualify as a habitat improvement project.</p>	<p>project is considered a flood control project, which it could be as it contributes to dam stabilization.</p>	<p>This project could possibly be permitted as a habitat improvement project (Policy OS1.5b) if the project includes significant habitat restoration activities within the Mill Pond.</p>
<p>Policy OS-1.6: Development within Other Types of ESHA shall protect ESHA against any significant disruption of habitat values and shall be limited to the following uses:</p> <ul style="list-style-type: none"> a. Resource Dependent Uses. Public nature trails within riparian ESHA are considered a resource dependent use provided that: (1) the length of the trail within the riparian corridor shall be minimized; (2) the trail crosses the stream at right angles to the maximum extent feasible; (3) the trail is kept as far up slope from the stream as possible; (4) trail development involves a minimum of slope disturbance and vegetation clearing; and (5) the trail is the minimum width necessary. Interpretive signage may be used along permissible nature trails accessible to the public to provide information about the value and need to protect sensitive resources. b. Restoration projects where the primary purpose is restoration of the habitat. c. Invasive plant eradication projects if they are designed to protect and enhance habitat values. d. Pipelines and utility lines installed underneath the ESHA using directional drilling techniques designed to avoid significant disruption of habitat values. 	<p>Project could comply with this policy.</p> <p>This policy is for upland ESHA and its application will depend on the results of a botanical report for the proposed work area.</p> <p>If there are upland rare plants in the project area the project would have to be redesigned so that it does not impact the ESHA.</p>	<p>Project complies with this policy.</p> <p>If no development is proposed within other ESHA, the project complies with policy. A complete botanical survey will be required.</p>	<p>Project complies with this policy.</p> <p>No development proposed within other ESHA, project complies with policy. A complete botanical survey will be required.</p>
<p>Policy OS-1.7 Development in areas adjacent to Environmentally Sensitive Habitat Areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.</p>	<p>See answer for option 2b</p>	<p>Project complies with this policy. No development in areas adjacent to ESHA, project complies with policy.</p>	<p>Project complies with this policy. No development in areas adjacent to ESHA, project complies with policy.</p>

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<p>Policy OS-1.10: Permitted Uses within ESHA Buffers. Development within an Environmentally Sensitive Habitat Area buffer shall be limited to the following uses:</p> <p>a. Wetland Buffer.</p> <p>i. Uses allowed within the adjacent Wetland ESHA pursuant to Policy OS-1.3.</p> <p>ii. Nature trails and interpretive signage designed to provide information about the value and protection of the resources</p> <p>iii. Invasive plant eradication projects if they are designed to protect and enhance habitat values.</p> <p>b. Riparian Buffer.</p> <p>i. Uses allowed within the adjacent River and Stream ESHA pursuant to Policy OS-1.5.</p> <p>ii. Uses allowed within the adjacent ESHA pursuant to Policy OS-1.6.</p> <p>iii. Buried pipelines and utility lines.</p> <p>iv. Bridges.</p> <p>v. Drainage and flood control facilities.</p> <p>c. Other types of ESHA Buffer.</p> <p>i. Uses allowed within the adjacent ESHA pursuant to Policy OS-1.6.</p> <p>ii. Buried pipelines and utility lines.</p> <p>iii. Bridges.</p> <p>iv. Drainage and flood control facilities.</p>	<p>See answer for option 2b</p>	<p>Project complies with this policy.</p> <p>No development proposed within ESHA buffers, project complies with policy.</p>	<p>Project complies with this policy.</p> <p>No development proposed within ESHA buffers, project complies with policy.</p>
<p>Policy OS-1.14: Vegetation Removal in ESHA. Prohibit vegetation removal in Environmentally Sensitive Habitat Areas and buffer areas except for:</p> <p>a) Vegetation removal authorized through coastal development permit approval to accommodate permissible development,</p> <p>b) Removal of trees for disease control,</p> <p>c) Vegetation removal for public safety purposes to abate a nuisance consistent with Coastal Act Section 30005, or</p> <p>d) Removal of firewood for the personal use of the property owner at his or her residence to the extent that such removal does not constitute development pursuant to Coastal Act Section 30106.</p> <p>Such activities shall be subject to restrictions to protect sensitive habitat values.</p>	<p>Depending on the project scope the project may not comply with this policy.</p> <p>The project will require significant wetland vegetation removal from ESHAs, due to the impact of placing fill into the wetland. This work would only be permissible if the project as a whole complies with OS-1.3 above, which is unlikely.</p> <p>Mitigation measures will include extensive restoration of pond 8 wetlands and other wetlands on site for impacts to wetlands.</p>	<p>Project will probably not comply with this policy.</p> <p>The project will require 8 acres of wetland vegetation removal from ESHAs, due to the impact of in-situ soil mixing on wetlands. This work would only be permissible if the project as a whole complies with OS-1.3 above, which is unlikely.</p> <p>Mitigation measures will include extensive restoration of pond 8 wetlands and other wetlands on site for impacts to wetlands.</p>	<p>Project may comply with this policy.</p> <p>The project will require vegetation removal from ESHAs, due to the impact of hot spot removal on wetlands. This work will only be permissible if the project as a whole complies with OS-1.3 above.</p> <p>Wetland mitigation will require extensive restoration of pond 8 wetlands.</p>

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<p>Policy OS-2.1 Riparian Habitat: Prevent development from destroying riparian habitat to the maximum feasible extent. Preserve, enhance, and restore existing riparian habitat in new development unless the preservation will prevent the establishment of all permitted uses on the property.</p> <p>Program OS-2.1.1: To the maximum extent feasible, preserve, protect, and restore streams and creeks to their natural state.</p> <p>Program OS-2.1.2: Work with organizations and private property owners to enhance the City’s watercourses for habitat preservation and recreation.</p> <p>Program OS-2.1.3: Develop additional guidelines for the maintenance of watercourses to further assure that native vegetation is not unnecessarily removed and that maintenance minimizes disruption of wildlife breeding activities and wildlife movement. Incorporate these guidelines, where appropriate, into the City’s maintenance procedures.</p> <p>Program OS-2.1.4: Seek Federal and State funding for the repair of streambank erosion, planting of riparian vegetation to stabilize creek banks, and removal of debris obstructing waterflow.</p>	<p>Depending on the project scope the project may not comply with this policy.</p> <p>This project appears to conflict with Policy OS-2.1 as it would require the temporary destruction of riparian habitat, and there are project alternatives which would not require habitat destruction, thus it would not comply with the “maximum extent feasible” caveat.</p>	<p>Project will probably not comply with this policy.</p> <p>This project appears to conflict with Policy OS-2.1 as it would require the temporary destruction of riparian habitat, and there are project alternatives which would not require habitat destruction, thus it would not comply with the “maximum extent feasible” caveat.</p>	<p>Project may comply with this policy.</p> <p>The proposed project may be fairly limited in the scope of impacts on riparian areas, depending on the size of the “hot spot” removal projects.</p> <p>The City will require the applicant to “restore riparian habitat” due to the policy language. Restoration of riparian habitat, in the case of this project, would apply to restoration of the mill pond vegetation.</p> <p>While Program OS-2.1.1 calls for “restore streams and creeks to their natural state”, program language is not used to govern the approval of Coastal Development Permits. Please note that the Coastal General Plan defines notes that City’s “Programs” shall not govern the review and approval of coastal development permits.</p>
<p>Policy OS-9.5. <u>Maintain and Restore Biological Productivity and Water Quality</u>. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.</p>	<p>Depending on the project scope the project may comply with this policy.</p> <p>A case would need to be made that the layer of fill would increase the biological productivity of Pond 8 and that the layer of fill is necessary to protect human health.</p>	<p>Project will probably not comply with this policy.</p> <p>The project would likely reduce the biological productivity and quality of Pond 8 as it would take organically active sediment and turn it into concrete.</p>	<p>Project would likely comply with this policy.</p> <p>This policy may be interpreted to apply to “hot spot” removal. The removal of “hot spots” could improve the biological productivity and quality of Pond 8 and would be more protective of human health.</p> <p>The list of techniques to restore biological productivity is primarily focused on pollution control. This policy might require the applicant to install new storm water pollution control devices for stormwater going into the Mill Pond from the Mill Site (which is largely paved) and the City’s storm water culverts.</p>
<p>Policy OS-16.1 <u>Coastal Access</u>: Maximum access and recreational opportunities shall be provided consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.</p>	<p>Project would likely comply with this policy.</p> <p>The City would require the dedication of a shoreline lateral access from the California Coastal Trail (Fort Bragg Coastal Trail) to the beach as part of the</p>	<p>Project would likely comply with this policy.</p> <p>The City would require the dedication of a shoreline lateral access from the California Coastal Trail (Fort Bragg Coastal Trail) to the beach as part</p>	<p>Project will probably not comply with this policy.</p> <p>The project would conflict with this policy as it would make shoreline access infeasible, unless</p>

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Provide public open space and shoreline access in the Coastal Zone. Acquisitions for coastal access shall not preclude the potential development of necessary infrastructure to support coastal-dependent uses.	approval for this project.	of the approval for this project.	the DSOD decides that retaining the pond within its jurisdiction and the associated required O&M would result is safe access by the public to a portion of the beach.
Policy OS-16.2 Right of Public Access: Development in the Coastal Zone shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation. Public prescriptive rights must be protected wherever they exist.	See above	See above	See above
Policy OS-16.17 Coastal Trails: Develop a continuous trail system throughout the City which connects to the California Coastal Trail system.	See above	See above	See Above
Policy OS-16.18 General Standards: Require that all public access easements offered for dedication to public use be a minimum of 25 feet wide. The area where public access is allowed within the easement may be reduced to the minimum necessary to avoid: a) adverse impacts on sensitive environmental areas; b) encroachment closer than 20 feet from an existing residence; and/or c) hazardous topographic conditions. Policy OS-16.19 Standards for Lateral Shoreline Access Easements: Lateral shoreline access easements shall extend landward 25 feet from mean high tide to the toe of the bluff or the first line of terrestrial vegetation if the width of the beach is greater than 25 feet. Lateral blufftop easements shall be at least 25 feet in width. The area where public access is allowed within the easement may be reduced consistent with Policy OS-16.18 above. The average annual bluff retreat (erosion) shall be taken into account when planning lateral accesses. Shoreline and blufftop trail segments that may not be passable at all times shall provide inland alternative routes.	See above	See above	See above
Safety Element			
Policy SF-1.1 Minimize Hazards: New development shall: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard; and (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding	Project could comply with this policy with special conditions. See Policy SF 1-10 which is an override policy and provides property owners with the right to protect development that was built prior to adoption of the	This project may comply with this policy as the concretization could stabilize soils sufficiently so that the existing dam would withstand a maximum credible earthquake.	The project might conflict with this policy as structural stability of the dam would be suspect in a maximum credible earthquake. Need to confirm with DSOD if the dam stays in DSOD’s jurisdiction and if it is not stabilized, would the dam provide sufficient structural stability.

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area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.	<p>Coastal Act.</p> <ul style="list-style-type: none"> The policy requires structural stability and the project will need to comply with DSOD requirements. The proposed project would include construction of South Dam Improvements to the existing crib wall, which is not a natural land form. Rebuilding it would not be considered substantial. <p>The applicant will need to look at implication of sea level rise as a potential hazard to the dam, e.g. the erosional impacts or waves and sea level rise.</p>		
Policy SF-1.2: All ocean-front and blufftop development shall be sized, sited and designed to minimize risk from wave run-up, flooding, and beach and bluff erosion hazards, and avoid the need for a shoreline protective structure at any time during the life of the development.	<p>Project could comply with this policy with special conditions.</p> <p>See Policy SF 1-10 which is an override policy and provides property owners with the right to protect development that was built prior to adoption of the Coastal Act.</p> <p>The new dam stabilization project must be designed to minimize risk of flooding, beach and bluff erosion.</p>	<p>This project may comply with this policy</p> <p>The in-situ soil mixing would be bluff top development. Applicant will need to provide evidence that the existing dam provides sufficient protection of the development during the life of the development.</p>	<p>This project may comply with this policy</p> <p>If hot spot removal would result in a project that requires a structurally improved dam, please see the analysis for Option 1.</p> <p>If hot sport removal does not require a structurally improved dam, Policy SF 1-10 is an override policy and provides property owners with the right to protect development that was built prior to adoption of the Coastal Act. The dam was built prior to the Coastal Act so it could be retained.</p>
Policy SF-1.5: Siting and design of new blufftop development and shoreline protective devices shall take into account anticipated future changes in sea level. In particular, an acceleration of the historic rate of sea level rise shall be considered. Development shall be set back a sufficient distance landward and elevated to a sufficient foundation height to eliminate or minimize to the maximum extent feasible hazards associated with anticipated sea level rise over the expected 100-year economic life of the structure.	<p>It is uncertain if this project will comply with Policy SF 1.5</p> <p>The applicant will need to include an analysis that considers the impact of sea level rise on storm surge forces on the dam and ensure that the existing structure will have a 100 year life.</p>	<p>It is uncertain if this project will comply with Policy SF 1.5</p> <p>The applicant will need to include an analysis that considers the impact of sea level rise on storm surge forces on the existing dam and ensure that the new soil mixed sediment will have a 100 year life.</p>	<p>It is uncertain if this project will comply with Policy SF 1.5</p> <p>Project does not include bluff top development. The applicant will need to include an analysis that considers the impact of sea level rise on storm surge forces on the existing dam and ensure that the dam will have a 100 year life.</p>
Policy SF-1.7 Alterations to Landforms: Minimize, to the maximum feasible extent, alterations to cliffs, bluff tops, faces or bases, and other natural land forms in the Coastal Zone. Permit alteration in landforms only if erosion/runoff is controlled and either there exists no other feasible environmentally superior alternative or where such alterations re-establish natural landforms and drainage patterns that have been eliminated by previous development activities.	<p>Project may comply with this policy with special conditions.</p> <p>This option includes changes to manmade landforms, namely the Crib Wall and the North embankment. As these are not natural landforms they are exempt from this policy.</p> <p>This option also includes some changes to natural landforms below the mean high tide, and these changes will need to be analyzed relative to the Coastal Act not the City’s LCP.</p> <p>A through exploration of other environmentally alternatives is required.</p>	<p>This project would comply with this policy</p> <p>Project does not include alterations to landforms.</p>	<p>This project would comply with this policy</p> <p>Project does not include alterations to landforms.</p>

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<p>Policy SF-1.9 Bluff Face and Bluff Retreat Setback: Prohibit development on the bluff face and within the bluff retreat setback because of the fragility of this environment and the potential for resultant increase in bluff and beach erosion due to poorly-sited development—except that the following uses may be allowed with a conditional use permit:</p> <p>(1) engineered accessways or staircases to beaches, boardwalks, viewing platforms, and trail alignments for public access purposes;</p> <p>(2) pipelines to serve coastal dependent industry;</p> <p>(3) habitat restoration;</p> <p>(4) hazardous materials remediation; and</p> <p>(5) landform alterations where such alterations re-establish natural landforms and drainage patterns that have been eliminated by previous development activities.</p> <p>Findings shall be made that no feasible, less environmentally damaging, alternative is available and that feasible mitigation measures have been provided to minimize all adverse environmental impacts. Require as a part of the conditional use permit, a full environmental, geological, and engineering study as specified in Policy LC-6.1. Such structures shall be constructed and designed so as to neither create nor contribute to erosion of the bluff face and to be visually compatible with the surrounding area to the maximum extent feasible.</p>	<p>Project could comply with this policy with special conditions.</p> <p>Development within the bluff face is permitted with a Condition Use Permit for hazardous materials remediation.</p> <p>Feasible environmentally less damaging alternatives will need to be explored.</p> <p>The final design will need to be supported with evidence from a geological and engineering study.</p> <p>The final design will need to be visually compatible with the surrounding area. The City will require renderings of the proposed design in full color and in relationship to the existing cliff face.</p>	<p>This project would comply with this policy</p> <p>The in site soil mixing concretization appears to conform with this policy because it is allowed with a Condition Use Permit for hazardous materials remediation.</p>	<p>This project would comply with this policy</p> <p>The hot spot removal appears to conform with this policy because it is allowed with a Condition Use Permit for hazardous materials remediation.</p>
<p>Policy SF-1.10 Seawalls, Breakwaters and Other Shoreline Structures: Prohibit construction of seawalls, breakwaters, revetments, groins, harbor channels, retaining walls, and other structures altering the natural shoreline processes unless a finding is made that such structures are required: (1) to serve coastal-dependent uses; or (2) to protect public beaches in danger from erosion; or (3) to protect existing structures that were legally constructed prior to the effective date of the Coastal Act; or (4) that were legally permitted prior to the effective date of this Coastal General Plan provided that the CDP did not contain a waiver of the right to a future shoreline or bluff protection structure; or (5) for a development consistent with Section 30233(a) of the Coastal Act and only when it can be demonstrated that said existing structures are at risk from identified hazards if no feasible or less environmentally damaging alternative is available</p>	<p>Project would likely comply with this policy.</p> <p>The finding for construction of “retaining walls” for the South Dam and North Wall as required by Policy SF 1.1 can be made: (3) the proposed project would protect a structure (dam and Mill Pond) that was legally constructed prior to the effective date of the Coastal Act.</p> <p>In order for the structure to “respect natural landforms” the final design should blend into the existing bluff face as much as possible.</p> <p>Need to determine if no feasible or less environmentally damaging alternative is available and if the structure has been designed to eliminate or mitigate adverse environmental impacts, including impacts upon local shoreline sand supply.</p>	<p>This project would comply with this policy</p> <p>The finding for construction of other structures (in-situ soil mixing) as required by Policy SF 1.1 can be made: (3) the proposed soil mixing may help protect a structure that was legally constructed prior to the effective date of the Coastal Act.</p>	<p>This project would comply with this policy</p> <p>The proposed project does not include modifications to structures that alter shoreline processes.</p>

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and the structure has been designed to eliminate or mitigate adverse environmental impacts, including impacts upon local shoreline sand supply. The design and construction of allowed protective structures shall respect natural landforms and provide for lateral beach access.			
Policy SF-2.1 <u>Seismic Hazards</u> : Reduce the risk of loss of life, personal injury, and damage to property resulting from seismic hazards.	Project complies with this policy. The project would implement this policy.	The project would implement this policy.	The project may comply with this policy. Additional information is needed from DSOD. If the dam stays within DSOD jurisdiction is the O&M requirements sufficient to ensure seismic safety?
Policy SF-2.4 <u>Tsunami</u> : Minimize development in areas subject to tsunami.	Project could comply with this policy with special conditions. The project would include development around the crib wall that would be subject to Tsunami. The development and hazards would need to be minimized by ensuring a public evacuation route and signage from the beach and lowland area to safe ground.	The project would implement this policy.	The project would implement this policy.
Policy SF-2.5: Review development proposals to ensure that new development is not in an area subject to tsunami damage and if such development is otherwise allowable that it is designed to withstand tsunami damage.	Project complies with this policy. See above. The project will need to be designed to withstand tsunami damage.	The project may comply with this policy. Project with need to withstand maximum credible tsunami.	The project complies with policy. No new development proposed in a tsunami run up area.
Community Design Element			
Policy CD-1.1: Visual Resources: Permitted development shall be designed and sited to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance scenic views in visually degraded areas.	Project could comply with this policy with special conditions. The final design should blend into the existing bluff face as much as possible.	Project complies with policy. The project would not have impacts on visual resources.	Project complies with policy. The project would not have impacts on visual resources.
Policy CD-1.3: Visual Analysis Required. A Visual Analysis shall be required for all development located in areas designated "Potential Scenic Views Toward the Ocean or the Noyo River" on Map CD-1 except development listed in below.	Project could comply with this policy with special conditions. A visual analysis will be required and special conditions may be required to reduce visual impacts.	See above	See above
Policy CD-1.4: New development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads or public viewing areas to the maximum feasible extent.	See above	See above	See above
Policy CD-1.5: All new development shall be sited and designed to minimize alteration of natural landforms by: 1. Conforming to the natural topography.	Project could comply with this policy with special conditions. The final design will need to conform with all the	See above	See above

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<div>2. Preventing substantial grading or reconfiguration of the project site.</div> <div>3. Minimizing flat building pads on slopes. Building pads on sloping sites shall utilize split level or stepped-pad designs.</div> <div>4. Requiring that man-made contours mimic the natural contours.</div> <div>5. Ensuring that graded slopes blend with the existing terrain of the site and surrounding area.</div> <div>6. Minimizing grading permitted outside of the building footprint.</div> <div>7. Clustering structures to minimize site disturbance and to minimize development area.</div> <div>8. Minimizing height and length of cut and fill slopes.</div> <div>9. Minimizing the height and length of retaining walls.</div> <div>10. Cut and fill operations may be balanced on-site, where the grading does not substantially alter the existing topography and blends with the surrounding area. Export of cut material may be required to preserve the natural topography.</div>	requirements of the policy.		
Policy CD-2.5 Scenic Views and Resource Areas: Ensure that development does not adversely impact scenic views and resources as seen from a road and other public rights-of-way.	See above	See above	See above