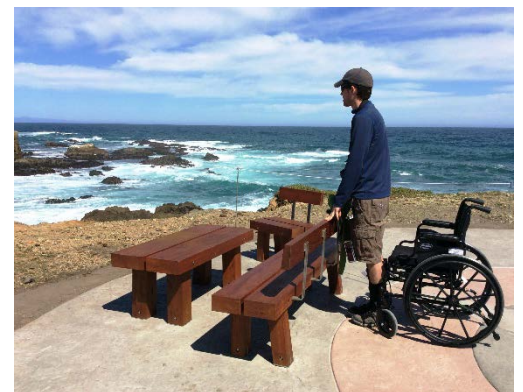


# Fort Bragg Mill Site Reuse LCP Amendment Recreational & Visitor Serving Facilities Lower-Cost Visitor-Serving Accommodations And Policy Recommendations



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MARIE JONES

DIRECTOR COMMUNITY DEVELOPMENT

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## PURPOSE

The Coastal Act places a high priority on protecting and maximizing recreational and visitor serving land uses, including lower cost visitor serving facilities. The City of Fort Bragg's LCP was updated in 2008 and thus reserves adequate area and infrastructure capacity to meet current visitor serving facility needs. However, the City of Fort Bragg's Mill Site Reuse/LCP update provides an opportunity to identify additional visitor-serving land uses and policies.

The purpose of this report is to:

- Describe the Coastal Act requirements and Commission guidance on overnight accommodations;
- Provide an overview of shoreline and near shoreline recreational facilities including, location, type, usage numbers (as available) for beaches, harbors, parking lots/spaces, visitor serving commercial. This section also includes demand projections for visitor serving facilities.
- Provide an overview of the overnight accommodation market conditions in Fort Bragg, including the location, number, type, rates and usage for hotel, bed and breakfast, vacation rentals, camping and RV parks located in and nearby Fort Bragg. This section also includes demand projections for overnight accommodations.
- Review of existing Coastal General Plan policies that: 1) impart priority to visitor serving commercial uses; and 2) require deed restrictions and other measures to ensure that visitor serving uses retain their primary functions.
- Review existing and proposed designations and zoning of suitable land for recreation, visitor serving facilities and accommodations and determine if they are suitably located and sufficient to meet projected demand.
- Identification of potential public agency acquisitions, development or redevelopment to meet anticipated demand.
- Identification of measures to provide for sufficient parking for alternative transportation to recreational and visitor serving facilities.

This report analyzes all of these measure to determine if the City's proposed LCP Amendment will ensure ongoing compliance with Coastal Act provisions for coastal access.

## SUMMARY OF FINDINGS

### HOTELS AND MOTELS

Fort Bragg has many lower- cost hotels and motels. In total, ten hotels and motels and 53 percent of Fort Bragg's available hotel room inventory (489 total units) are lower-cost, which significantly exceeds the Coastal Commission goal of 25% of units being lower cost.

Fort Bragg has more lower-cost hotel/motel accommodations than other coastal Mendocino areas in the County. Furthermore, many of the hotel and motel accommodations in Fort Bragg are older accommodations, with 57% of rooms located in hotels that were built prior to 1980.

#### CAMPGROUNDS & RV PARKS

As an urbanized area Fort Bragg offers 73 RV spaces in two RV parks but no camping facilities. However there are 999 RV and camping sites within 3 miles of Fort Bragg. All of these accommodations are well below the lower-cost threshold.

#### OVERALL AFFORDABILITY IN FORT BRAGG.

<b>Summary: Low Cost Visitor Serving Facilities, Fort Bragg CA</b>			
	Total Stock	Total Low Cost	Percent
Campgrounds/RV Parks	73	73	100%
Hotels and Motels	909	489	54%
Short-Term Vacation Rentals	3	0	0%
<b>Total All Accommodations</b>	<b>985</b>	<b>562</b>	<b>57%</b>

#### FORT BRAGG RECREATION FACILITIES

Fort Bragg offers a range of coastal recreational destinations for walking, cycling, fishing, picnicking, beach combing, boating, kayaking, off shore water sports and nature education. Demand for these facilities is variable and is anticipated to increase as the mill site is developed and as the City's tourism attraction efforts expand.

#### CONCLUSION

Fort Bragg is one of the most affordable and accessible destinations on the Northern Coast of California. Approximately 57 percent of all accommodations, including hotels, motels, short-term vacation rentals, and RV campgrounds, are lower-cost. The City will continue to be a low cost accommodation destination, in part because the redevelopment of the Mill Site provides an opportunity for additional land for visitor serving accommodations which will help the community meet future development pressures. Additionally Fort Bragg's LCP already includes policies to protect low cost accommodation affordability into the future.

## CALIFORNIA COASTAL ACT REQUIREMENTS

The Coastal Act and subsequent bills give priority to recreational and visitor-serving uses in the Coastal Zone. The goals established by the State for the Coastal Zone include:

- Reserving upland areas for recreational uses, protecting an adequate amount of oceanfront land for recreational use, and focusing recreational facilities in selected areas, rather than spreading them out along the entire coastline.
- Requiring that all members of the public have “equal access to the coast” including accommodations, parking, and recreational facilities that are available and affordable to the general public.
- The provision of LCVSAs is a primary goal when protecting and maximizing recreation and visitor-serving land uses (Coastal Act Sections 30212.5, 30213, 30220 through 30224, 30250, 30252, 30253, and 30254). While Senate Bill 1581 (Ch. 1087 Statutes of 1980) precludes the Commission from setting room rates or using any method to identify low- or moderate-income persons, the language of Section 30213 requires coastal communities to protect and encourage lower-cost facilities and accommodations for visitors (California Coastal Commission 2016).
- Assembly Bill 2616 (Burke) (January 2017) amended the Coastal Act to add Section 30604(h) to the Public Resources Code. Section 30604(h) states: “When acting on a coastal development permit, the issuing agency, or the commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state.” This was added to ensure coastal accessibility and adequate provision of lower-cost accommodations.

Due to rising costs in coastal communities, the Commission has developed guidance on how coastal cities should manage these issues. Coastal Commission staff recommendations pursuant to Section 30213 of the Coastal Act, include:

- a) Introduce an official definition of “lower cost” that is calculated individually for each community.
- b) Prohibit loss of LCVSAs in coastal communities.
- c) Require that new high-cost accommodations provide lower-cost accommodations where possible.
- d) When on-site provision is not possible, require in-lieu fees that are adequate for the full range of development costs.
- e) Ensure efficient use of in-lieu fees through partnerships with other organizations (i.e., environmental education, outreach programs).
- f) Support appropriately regulated STVRs.

## 1. FORT BRAGG'S LOWER-COST VISITOR-SERVING ACCOMMODATIONS

This section analyzes hotel, campground and RV Park data to determine the extent, location and quantity of lower cost visitor serving accommodations.

### METHODOLOGY

The City utilized the following data sources to complete an analysis of the existing accommodation market in Fort Bragg:

- Transient Occupancy Tax receipts and occupancy information submitted by hotels to identify lower cost visitor serving accommodations, analyze average overnight rates by season, and occupancy rates by season;
- Available data from Smith Travel Research (STR), which is limited; and
- Internet Surveys. Staff completed price surveys for different accommodation types for September of 2018, part of our peak travel season. Hotel, motel, vacation rental camping and RV Park pricing were obtained using internet searches of advance prices available on each accommodation's website and on aggregator websites, such as google, Bing, Travelosity, using a randomly selected date in September of 2018.

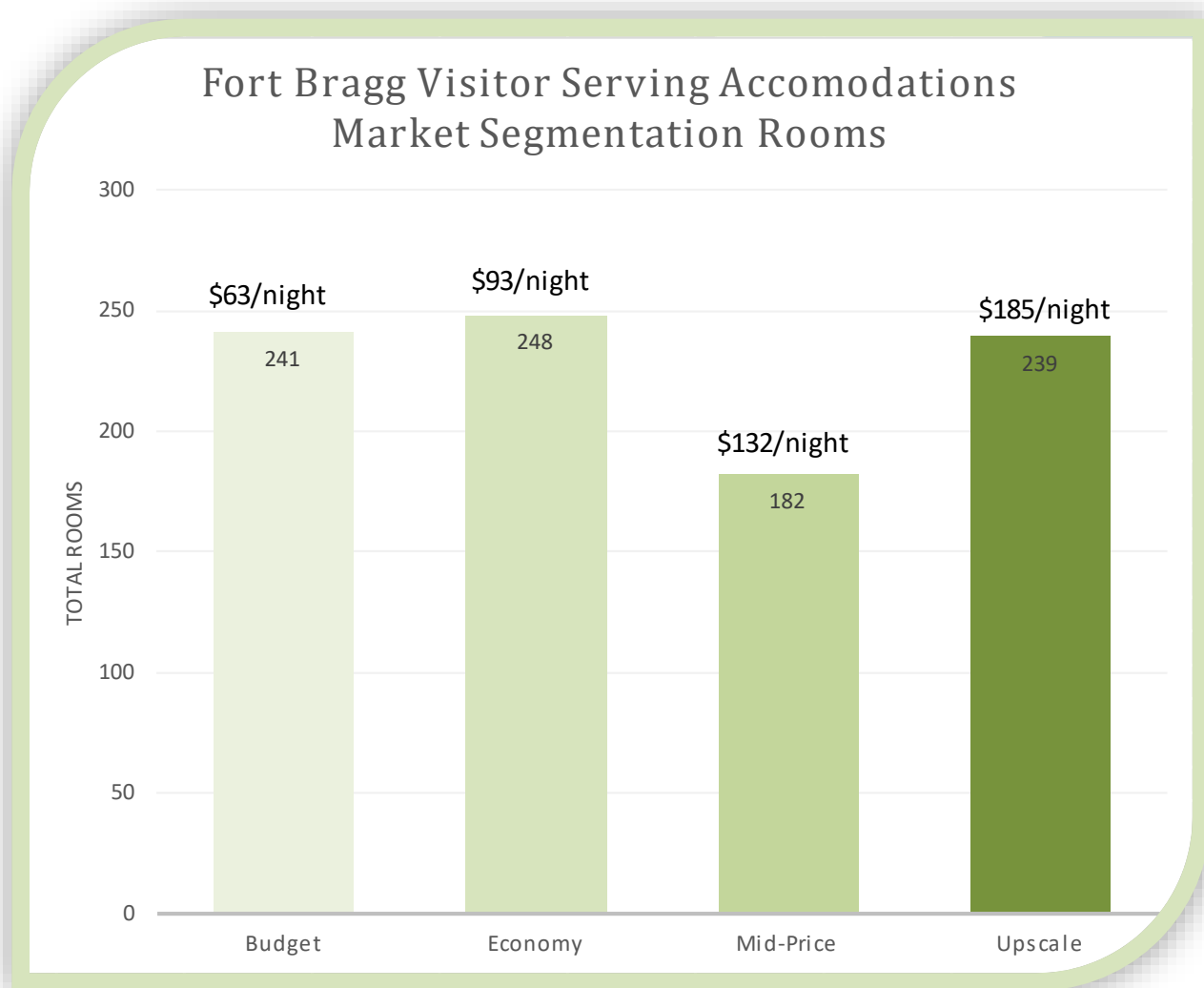
### HOTEL MARKET

Hotels and motels may or may not be defined as lower cost, depending on factors such as room rates, types of amenities, and overall quality (California Coastal Commission 2015). The Commission has adopted the Smith Travel Research based on thresholds to categorize hotel prices. These thresholds are developed by organizing all hotel prices from low to high and dividing the dataset into four tiered classes of affordability based on where each hotel's price falls in the overall range of prices. These thresholds are as follows:

- Budget: Lowest 20% of average room rates
- Economy: Next 20% of average room rates
- Mid-Price: Next 30% of average room rates
- Upscale: Top 30% of average room rates

Using this methodology, the Fort Bragg accommodation market is composed of 241 budget rooms, 248 economy rooms, 255 mid-price rooms and 239 upscale rooms. In total, lower cost accommodations include 53% of the rooms in Fort Bragg or 589 rooms out of a total of 909 rooms within City Limits. Fort Bragg is known as a relatively affordable beach vacation spot in Northern California. It offers a unique opportunity to the residents of northern California to have an affordable nature-based coastal experience. Lower cost accommodations attract visitors to Fort Bragg: Fort Bragg is a three to four hour drive from population centers of the Bay Area and Sacramento valley. Thus it is relatively low cost relative to coastal destinations closer to population centers.

Figure 1 below illustrates the number of hotel rooms and the price range for Fort Bragg lodging for peak season (August and September, 2018) by hotel category.



Fort Bragg has 5 budget motels, 65economy motels, 7 mid-price hotels and 7 upscale hotels.<sup>1</sup> Smith Travel Research has limited data on the Fort Bragg market and the 6 hotels for which it has data are aligned with this categorization. Table 1 below inventories all visitor serving accommodations by type, room capacity, occupancy and price range.

<sup>1</sup> Please note that two of the hotels have less than 3 rooms and these were excluded from the categories, as they are too small and skew the results. However they have been included in the table below for completeness.

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#### HOTEL LOCATION DATA

Fort Bragg's tourist accommodations are located throughout Fort Bragg, primarily along Highway 1.

- Lower cost visitor serving accommodations are concentrated in the center of town, east of the Mill Site, where coastal access and views are least accessible.
- Higher costs accommodations are clustered around Noyo Harbor to the south and MacKerricher Park and Pudding Creek on the northern side of town, which offer direct beach and ocean access and views.

This locational distribution pattern is illustrated in Figures 1 and 2 below.

Figure 1: North Fort Bragg Hotel Names, Locations & Rates

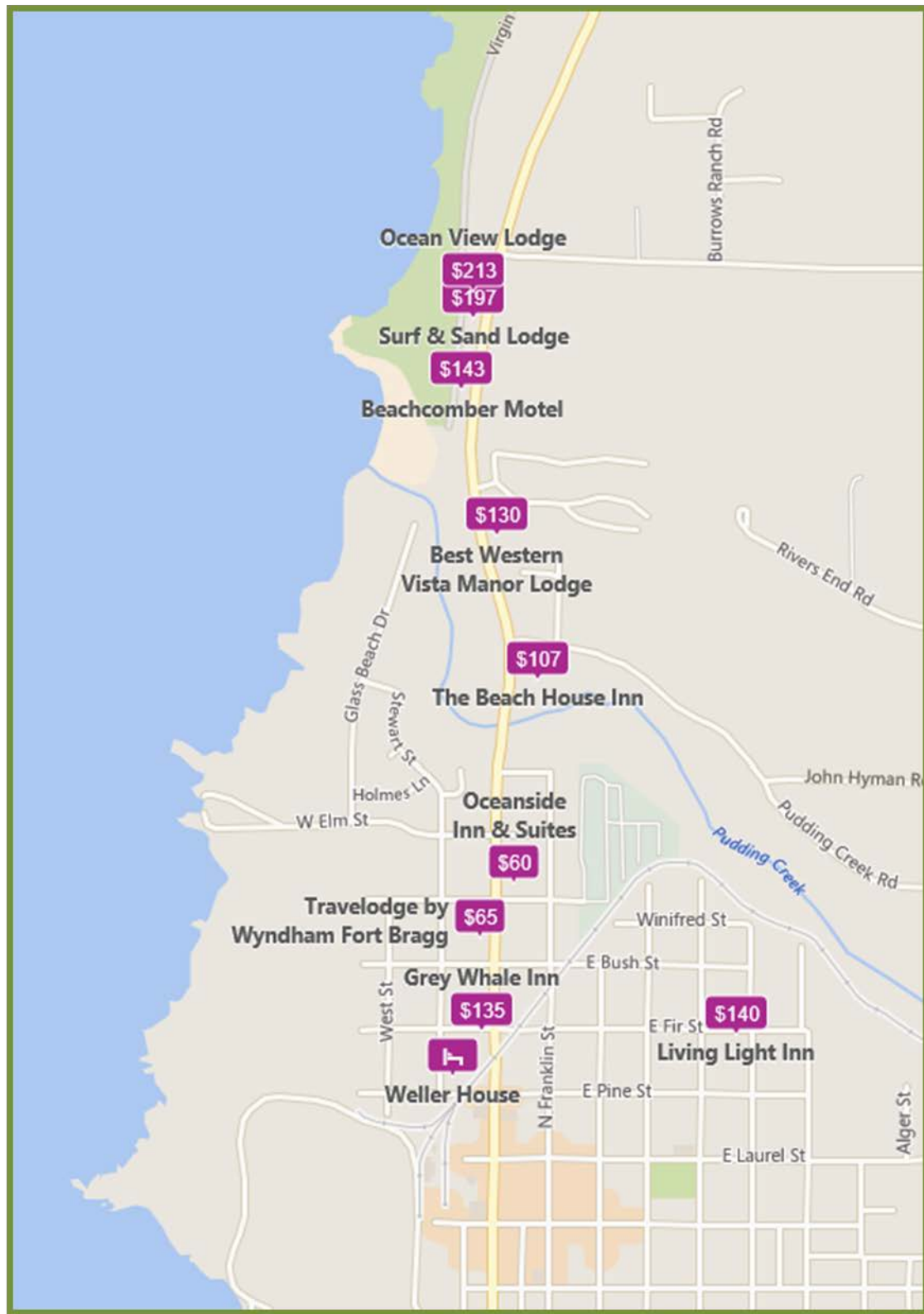
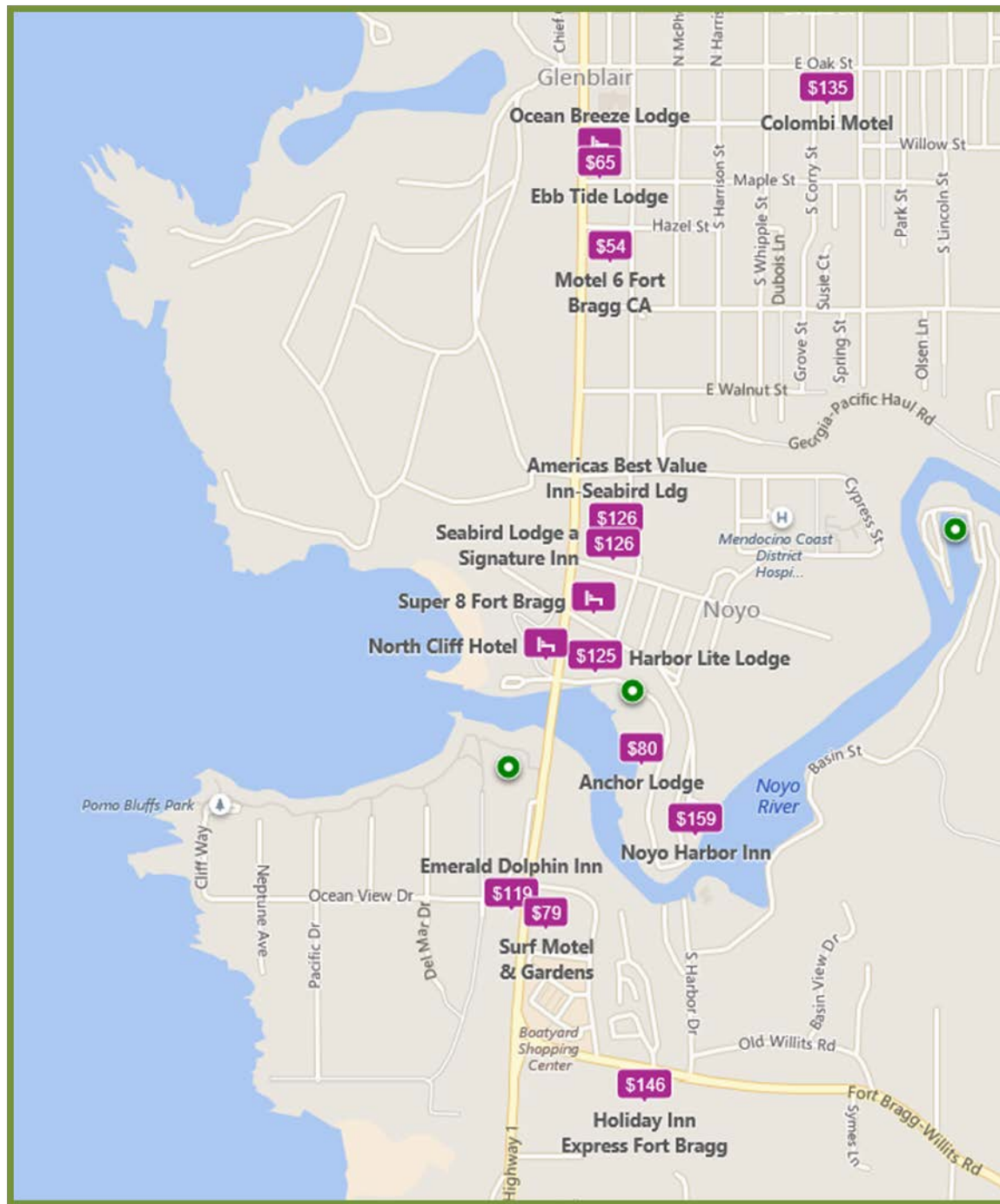
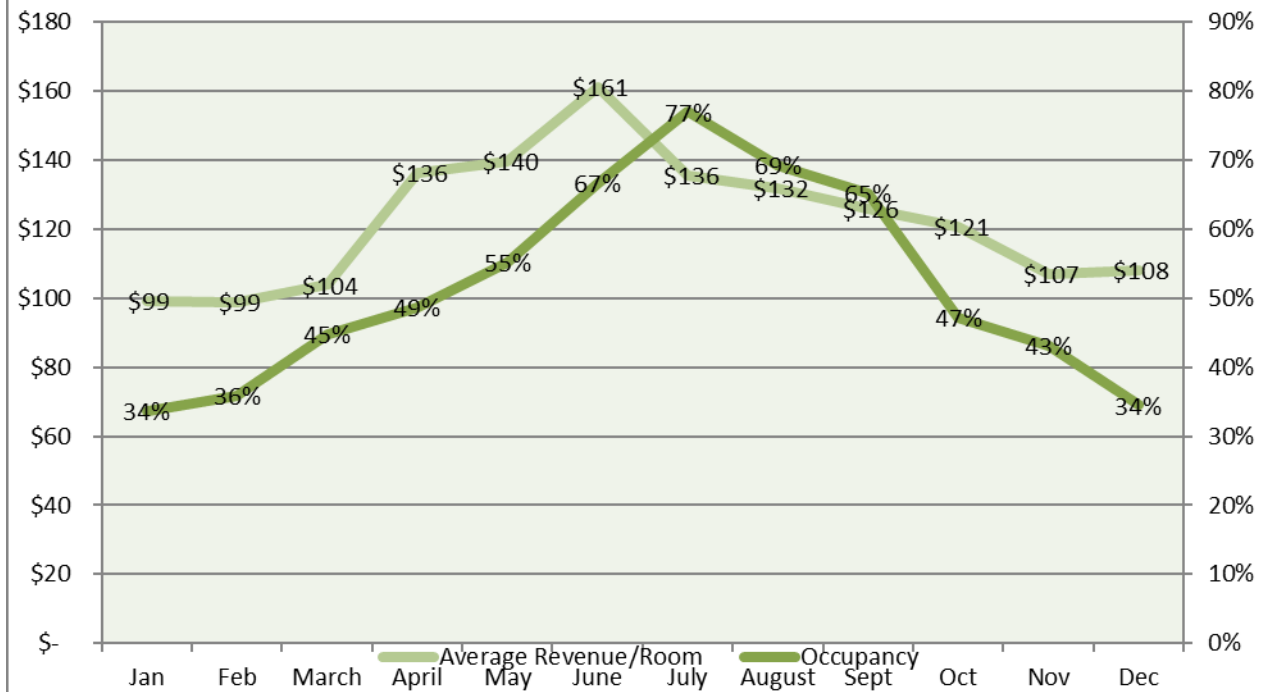


Figure 2: South Fort Bragg Hotels & Rates



Only six hotels located within Fort Bragg provide data to Smith Travel Research: three are listed as economy, two are midscale and one is upper midscale.

**Table 3: Hotel Occupancy and Average Revenue Per Room, Fort Bragg July 2016-June 2017**



## HOTEL OCCUPANCY

The City's Transient Occupancy Tax survey data was used to determine occupancy rates and Average Daily Revenue.<sup>2</sup> As illustrated in the Table 3 below, occupancy rates and average revenue per available room are highly seasonal in Fort Bragg, with relatively high occupancy rates in the upper 60 to 70% in June, July and August and very low occupancy rates of 30% to 40% in November through February. Average Revenue per Available Room also fluctuates accordingly with lower average room rates in the winter months \$99 to \$107 and higher rates in the summer from \$140 to \$160.

## CAMPGROUNDS & RV PARKS

There are no campgrounds located within Fort Bragg's City Limits. There are two recreational vehicle (RV) parks within City Limits, namely:

- Harbor RV Park with 33 spaces at \$35/night; and
- Trailer Cove RV Park with 40 spaces at \$35/night.

<sup>2</sup> Smith travel Research data is very limited for Fort Bragg as only six hotels participate in the service. Thus it does not provide useable occupancy rates or other usage statistics for Fort Bragg.

As illustrated in the Table 4 below and on the following map there are 15 Campgrounds and RV parks within 3 miles of Fort Bragg offering, 274 tent spaces and 725 RV spaces for a total of 999 spaces. These low cost accommodations charge between \$25/night to \$59/night with an average rate of \$35/night.

<b>Camp Grounds &amp; RV Parks located between Cleone and Caspar (within 3 miles of Fort Bragg)</b>						
<b>Campground RV Park Name</b>	<b>Tent Spaces</b>	<b>RV Spaces</b>	<b>Total Spaces</b>	<b>Low Rate</b>	<b>High Rate</b>	<b>Address</b>
<b>Fort Bragg Camp Grounds &amp; RV Parks</b>						
Harbor RV Park	0	33	33	\$ 33	\$ 39	1021 S Main
Fern Creek Farm	23	0	23	\$ 35	\$ 35	
Sportsman's RV Park	0	24	24	\$ 35	\$ 35	32094 N Harbor Dr
Dolphin Isle Marina	2	83	85	\$ 35	\$ 45	32399 Basin St
Trailer Cove Trailer Park	0	40	40	\$ 35	\$ 40	180 Boatyard Drive
Fort Bragg Leisure Time RV Park	15	45	60	\$ 25	\$ 35	30801 Hwy 20
Wildwood Campground	7	60	67	\$ 25	\$ 35	29700 Highway 20
Pomo RV Park & Campground	20	96	116	\$ 30	\$ 47	17999 Tregoning Ln
Woodside RV Park and Camp	18	86	104	\$ 25	\$ 35	17900 North Hwy 1
Hidden Pines RV Park Campground	16	18	34	\$ 35	\$ 45	18701 North Highway 1
<b>Fort Bragg Subtotal</b>	<b>101</b>	<b>485</b>	<b>586</b>	<b>\$ 31</b>	<b>\$ 39</b>	
<b>Cleone Campgrounds and RV Parks</b>						
Cleone Campground	15	20	35	\$ 33	\$ 37	24400 CA-1
Vagabond Village	0	9	9	\$ 25	\$ 25	32850 Mill Creek Drive
Mackerricher State Park	118	118	236	\$ 35	\$ 35	24100 Mackerricher Park Rd
<b>Caspar Campgrounds and RV Parks</b>						
Caspar Beach RV Park & Campground	33	93	126	\$ 38	\$ 59	14441 Point Cabrillo Dr
Jug Handle Creek Farm & Nature Center	7		7	\$ 37	\$ 37	15501 CA-1
<b>Total Spaces</b>	<b>274</b>	<b>725</b>	<b>999</b>	<b>\$ 32</b>	<b>\$ 39</b>	
Source: Internet Search on Bing and Google, City of Fort Bragg, September 2018						

## CAMPGROUND AND RV/TRAILER PARK USAGE

### *RV/Trailer Parks*

The City of Fort Bragg does not collect TOT revenue from RV parks and it is not possible to determine occupancy levels with this data. However the RV parks appear to follow the same occupancy trends as the hotels, with very high occupancy in the summer and fall and very low occupancy rates in the winter.

### *State Park Campgrounds*

According to a California State Parks Statistical Report from 2015–2016, Mackerricher State Park had 80,821 visits to camping facilities in the fiscal year 2015-16 Mackerricher park has 236 space which provides for 85,904 unique camping nights. As many visitors may camp together, actual occupancy is difficult to gauge, however according to State Parks the campground is 100% booked between May and September.

## SHORT-TERM VACATION RENTALS

The City has not allowed vacation homes for many year. Just last year the City Council revised the Inland zoning ordinance to allow up to ten STVR in the Central Business District only. Three STVR have been approved in downtown Fort Bragg as of September 2018. The average nightly rental rate for a mid-week September date is \$135/night. These units would be mid-price, not low cost visitor serving units.

Legal Vacation Rentals, Fort Bragg Ca	
	Sept Rate
The Cordelia - In the heart of downtown	\$ 115.00
Casa Maya Queen	\$ 130.00
Casa Maya King	\$ 160.00
The Virginia	\$ 137.00
Average	\$ 135.50

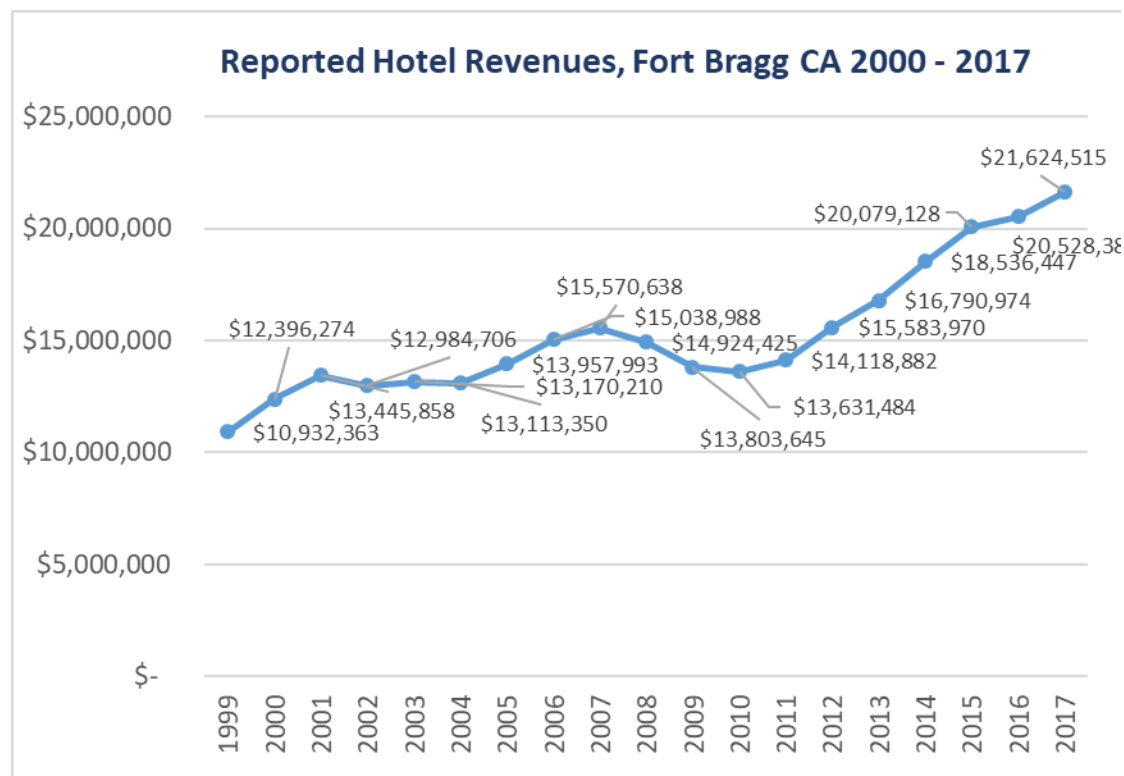
## DEMAND PROJECTIONS FOR VISITOR SERVING ACCOMMODATIONS

As noted in the analysis above, demand is highly seasonal in Fort Bragg, which creates a financial challenge for new hotel development projects as the revenue from summer and shoulder seasons must be sufficient to finance a new project. There does not appear to be sufficient year round demand and room rates for hotel chains to build new hotels. Thus new hotel development in Fort Bragg is most likely to be undertaken by independent owners/operator, who have a connection to the Fort Bragg community and or are willing to achieve a lower rate of return.

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### CURRENT HOTEL DEVELOPMENT TRENDS

In general the hotel market in Fort Bragg has improved along with the economy and the construction of the 104 acre Noyo Headland Park (Fort Bragg Coastal Trail) which provides an exceptional nature experience and has helped attract visitors to Fort Bragg. As illustrated in the chart below, hotel revenues have increased steadily from a low of \$13 million per year in 2010 to a high of \$21 million in 2017, with an average post recession increase of 7% a year .



## HOTEL DEVELOPMENT PROJECTS

Since 2000, the City has approved two Coastal Development Permits for hotel properties, including:

- North Cliff Hotel – new construction of a 39-room hotel on a 0.82 acre site;
- Noyo Harbor Inn – significant remodel of a 16 room inn and restaurant.

Additionally an application was submitting in September of 2018 for a proposed 60 unit Avalon hotel and restaurant, located on the site of the Hi Seas Hotel, which burned to the ground in 2009.

## FUTURE HOTEL DEMAND

The demand for hotel rooms in Fort Bragg will continue to grow at a modest pace. The market will continue to be more attractive to independent operators than to chains. Fort Bragg's hotel market will continue to be geared primarily to the budget and economy minded traveler, however the Mill Site provides an opportunity for some upscale visitor serving properties adjacent to the ocean.

## DEVELOPMENT PRESSURES

Due to the aging stock of some of the hotels and motels in Fort Bragg, some lower-cost accommodations may be subject to pressure from developers who wish to buy properties, demolish them and build higher-end accommodations. This could result in loss of affordable accommodation stock and an overall increase in hotel prices. The City's LCP includes a number of policies to protect against this. Additionally the rezoning of the Mill Site to allow Visitor Serving Accommodations would provide an opportunity to provide higher end accommodations as well as low cost accommodations and would increase the acreage with the appropriate zoning and thereby eliminate develop pressures to redevelop low cost aging accommodations into higher cost accommodations.

## 2. EXISTING SHORELINE & NEAR SHORELINE RECREATIONAL AREAS AND FACILITIES

### INVENTORY OF RECREATIONAL AREAS AND FACILITIES

Fort Bragg offers 220 acres of publically owned recreational facilities on or near the shorelines. These recreational facilities include: walking trails, beach access, picnic areas, interpretive and educational center, ocean access and 656 parking spaces. Fort Bragg also offers easy access to the Noyo Harbor, which totals 40 acres and provides a Marina, boat launch facilities, ocean tours, fish shops, dinning, accommodations, RV Park, and more. Additionally there are nine hotels on the shore line providing 403 hotel rooms. These data are noted in the table below and on the following maps.

Fort Bragg : Near Shore Recreation Facilities			
	Acres	Features	Parking Spaces
<b>Public Recreational Facilities</b>			
Noyo Headlands Park	104	5.6 miles of Multi Use Trails, four restrooms, picnic tables, artist benches, interpretive panels, murals, dog park, passive recreational playing field	392
Glass Beach Headlands	30	Glass beach, nature trails, Pudding Creek Trestle	20
Pomo Bluffs Park 13 acres	13	Walking trails, picnic tables, interpretive panels, benches	46
Pudding Creek Beach	12	Beach access, creek access	100
Noyo Beach	6	Beach access, jetty access for fishing	53
Mackerricker State Park - Silvergate	55	Coastal access, multi-use trails, beach access	35
Noyo Center For Marine Research	12	Open space and Ocean Interpretive Center	10
<b>Total</b>	<b>232</b>		<b>656</b>
<b>Recreational Business Areas</b>			
North Noto Harbor	15	Boat launch, ocean tours, fish shops, dinning, accommodations, etc.	200
South Noyo Harbor	25	Marina, boat launch, ocean tours, fish shops, dinning, accommodations, RV Park, etc.	300
<b>Total</b>	<b>40</b>		<b>500</b>
<b>Near Shore Commercial</b>			
	Rooms		
Beachcomber	72	Hotel	
Holiday Inn Express-Fort Bragg	54	Hotel	
Surf & Sand Lodge	31	Hotel	
Noyo Harbor Inn	14	Hotel & restaurant	
North Cliff Hotel	39	Hotel	
Ocean View Lodging	29	Hotel	
Beach House Inn	30	Hotel	
Harborlite Lodge	79	Hotel	
Vista Manor - Best Western	55	Hotel	
Cliff House & Crows Nest		Restaurant	
Denny's		Restaurant	
<b>Total</b>	<b>403</b>		
Source; City of Fort Bragg, 2018			

## DEMAND PROJECTIONS FOR VISITOR SERVING FACILITIES

Demand for visitor serving facilities is uneven. Some visitor serving facilities experience heavy use, such as Glass Beach, the Noyo Headlands Park, and Pudding Creek Beach. Other facilities are much less heavily accessed including: Pomo Bluffs Park, Noyo Beach and the Noyo Center for Marine Research.

The City just increased its TOT from 10\$ to 12% and is using the proceeds for a more effective visitor attraction marketing campaign. Additionally the reuse of the Mill Site as a visitor serving center will make Fort Bragg a more attractive destination to visitors as more of the coast line will become accessible for accommodations, restaurants, attractions and other visitor serving uses.

These efforts are likely to increase the use of and demand for visitor serving parking, coastal access and beach access in the future. Luckily the redevelopment of the Mill Site will provide opportunities to provide additional parking and trails to and at the Noyo Headland Park project, it will also provide for access to the Fort Bragg Harbor beach, which is centrally located on the Mill Site.

### 3. CURRENT ISSUES AND POLICIES IN FORT BRAGG

The City adopted a certified LCP amendment in 2008 that addresses many LCVSA issues on a long-term basis. Current Coastal General Plan, LCP, and Municipal Code regulations that relate to or impact LCVSAs are outlined in this section.

#### COASTAL GENERAL PLAN

The Coastal General Plan includes many policy and programs that encourage and require Low Cost Visitor Serving Accommodations and recreation opportunities in Fort Bragg as detailed below:

The Coastal General Plan notes that:

- Fort Bragg serves as the regional service center for the Mendocino coast and many support services needed for recreation and tourist-oriented businesses on the coast are located here.
- No shortage of visitor-serving land use exists in the City.
- All commercial land use designations in the City allow visitor-commercial uses, and there are many vacant parcels available for this use.

##### Highway Visitor Commercial (CH)

This land use designation applies to land uses serving residents and visitors on sites which are located along Highway One and arterials at the entry points to the community. Typical uses allowed in this designation include motels and other lodging enterprises, restaurants, and retail outlets. Residential uses are permitted above the ground floor or on the ground floor at the rear of buildings at a maximum density of up to 24 units per acre with a conditional use permit.

##### Recreation and Visitor-Serving Facilities

Goal LU-5 Maximize public recreational opportunities in the Coastal Zone consistent with sound resource conservation principles and the constitutionally protected rights of property owners.

Policy LU-5.1 Additional Sites for Visitor-Serving Commercial: Continue to provide for and encourage additional visitor-serving commercial facilities.

Policy LU-5.2: Ensure that there are adequate sites for visitor-serving land uses by:

- a) Maintaining existing areas designated for Highway-Visitor Commercial uses;
- b) Maintaining the Highway Visitor Commercial land use designation as one allowing primarily recreational and visitor-serving uses; and
- c) Reserving adequate infrastructure capacity to accommodate existing, authorized, and probable visitor serving uses.

Policy LU-5.3: Lower Cost Facilities: Protect, encourage, and, where feasible, provide lower-cost visitor and recreational facilities for persons and families of low and moderate income. If and when average annual occupancy rates at Fort Bragg visitor facilities exceed 70%, removal or conversion of existing lower cost facilities

shall be prohibited unless the use will be replaced with another facility offering comparable visitor serving or recreational facilities.

Program LU-5.3.1: Create an inventory and monitor lower-cost visitor recreational facilities in the City.

Program LU-5.3.2: Encourage lower-cost visitor and recreational facilities during the project review process with private developers and work with State Parks to expand such facilities on State land.

Policy LU-5.4: Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Policy LU-5.5: Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Policy LU-5.6: The use of private lands suitable for visitor-serving and commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

Policy LU-5.7: Adequate parking should be provided to serve coastal access and recreation uses to the extent feasible. Existing parking areas serving recreational uses shall not be displaced unless a comparable replacement area is provided.

Policy LU-5.8: Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

## COASTAL COMMISSION GOALS FOR LCVSA

The Commission requires coastal communities to implement policies to encourage the development of new LCVSAs and prevent the loss of existing LCVSAs. The Commission has typically interpreted this expectation to mean that 25 percent of new accommodations should be designated as LCVSAs. The City's LCVSA stock exceeds the Commission's expectations. The existing LCVSA stock in Fort Bragg is 54% and thus sufficient to ensure equal access to the coast, pursuant to Section 30213 of the California Coastal Act.

## LCVSA POLICY RECOMMENDATIONS FOR THE COASTAL GENERAL PLAN

Since Fort Bragg currently has a sufficient proportion of total lower-cost hotels and motels (54%), it is not necessary to implement policies that will increase the number of lower-cost hotels and motels on privately owned land at this time. However a number of programs and policies should come into play when and if this threshold is breached. These are detailed below:

### **1. Track the inventory of lower-cost hotels and motels**

The City's current LCP includes program LU-5.3.1 to achieve this task.

Program LU-5.3.1: Create an inventory and monitor lower-cost visitor recreational facilities in the City.

## **2. Protect existing inventory of lower-cost accommodations**

The City's current LCP includes Policy LU-5.3 to achieve this task.

Policy LU-5.3: Lower Cost Facilities: Protect, encourage, and, where feasible, provide lower-cost visitor and recreational facilities for persons and families of low and moderate income. If and when average annual occupancy rates at Fort Bragg visitor facilities exceed 70%, removal or conversion of existing lower cost facilities shall be prohibited unless the use will be replaced with another facility offering comparable visitor serving or recreational facilities.

## **3. Develop New LCVSAs**

While the Commission is still developing specific policy language on LCVSAs, it has provided a preliminary recommendation to require new developments to offer at least 25 percent of units that are lower cost, when economically feasible. This will allow a range of opportunities for visitors of all incomes. On-site provision of LCVSAs is the Commission's preference for new development requirements. The Commission has approved numerous permits and certified LCP policies that require developers to provide non-overnight lower-cost facilities in new hotel projects.

*Sample Policy Language:* If and when the number of Low Cost Visitor Serving accommodations (rooms) has fallen below the 25% of the total room inventory, require development projects to provide 25 percent of units at a lower-cost rate approved by the Commission.

## **4. Provide Public Access to Day-Use Facilities**

Language in the Commission LCP Update Guide notes that "developments providing public recreational opportunities are preferred." Although these facilities do not provide overnight accommodations, they do ensure that visitors who cannot or choose not to pay for a hotel room can nonetheless access the facility for activities during the day.

*Sample Policy Language:* New hotel and motel projects, that do not offer at least 25% of accommodations as lower cost options, shall incorporate non-overnight facilities that are open to the general public. Such amenities may include public plazas and spaces, restaurants, retail units, gardens, viewing areas, free Wi-Fi, bike parking facilities, or other day-use features that may be used by the general public at no or relatively low cost. The quality and quantity of amenities will be considered in the Coastal Development Permit review process. This policy does not prohibit a new hotel or motel project from charging a user fee or resort fee for active amenities, such as pool and spa access, recreation activities and equipment, or organized group activities on the property.

## **5. Maintain Camping Facilities**

RV parks are important components of the City's accommodation stock, as they will almost always be LCVSAs. However, these facilities degrade overtime due to heavy use and direct exposure to weather and wear and tear. Regular maintenance will ensure these facilities remain a feasible option for tourists.

*Sample Policy Language:* Campgrounds and RV parks shall be regularly maintained.

## **6. Sea Level Rise Exposure**

Currently, a great deal of coastal property is threatened by sea level rise state wide. However none of Fort Bragg accommodations are threatened by Sea Level Rise as the town is located on a coastal bluff, therefore no new policies are required to protect LCVSA from sea level rise.

## **CONCLUSION**

Fort Bragg offers a range of coastal recreational destinations for walking, cycling, fishing, picnicking, beach combing, boating, kayaking, off shore water sports and nature education. Demand for these facilities is variable and is anticipated to increase as the mill site is developed and as the City's tourism attraction efforts expand.

Fort Bragg is one of the most affordable and accessible destinations on the Northern Coast of California. Approximately 57 percent of all accommodations, including hotels, motels, short-term vacation rentals, and RV campgrounds, are lower-cost. The City will continue to be a low cost accommodation destination, in part because the redevelopment of the Mill Site provides an opportunity for additional land for visitor serving accommodations which will help the community meet future development pressures. Additionally Fort Bragg's LCP already includes policies to protect low cost accommodation affordability into the future.