

Incorporated August 5, 1889 416 N. Franklin Street Fort Bragg, California 95437 tel. 707.961.2823 fax 707.961.2802 www.fortbragg.com

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

PROJECT TITLE:	Franco Subdivision
APPLICATION NO.:	Subdivision 1-20 (DIV 1-20)
LEAD AGENCY:	City of Fort Bragg 416 N Franklin Street Fort Bragg, CA 95437
CONTACT:	Sokuntia Sar, Senior Planner Community Development Department (707) 961-2827 x112
PROJECT LOCATION:	130 Halsey Way, Fort Bragg, CA
PROJECT APN:	APN 005-264-17
PROPERTY OWNER:	Franco, Carlos and Heather
PROJECT APPLICANT:	Franco, Carlos and Heather
INLAND LAND USE AND DEVELOPMENT CODE DESIGNATION:	Low Density Residential (RL)
INLAND GENERAL PLAN DESIGNATION:	Low Density Residential (RL)

OBJECTIVE

The objective of this Initial Study and Mitigated Negative Declaration (MND) is to determine if there are significant adverse environmental impacts associated with the subdivision of the existing $\pm 22,989$ SF parcel into three parcels of $\pm 7,515$ SF, $\pm 7,793$ SF and $\pm 7,681$ SF. The report also

recommends appropriate mitigation measures, as necessary, to reduce environmental impacts to less than significant levels.

The Initial Study and MND have been prepared in compliance with California Environmental Quality Act (CEQA). The City of Fort Bragg is the Lead Agency for the project and consulted with trustee and responsible agencies in preparation of this environmental document. A CEQA Initial Study checklist was prepared and concluded that, with implementation of mitigation measures, the project would not have significant effect on the environment.

Environmental issues as identified by the Initial Study are analyzed in this MND. This MND concludes that this project, as proposed and mitigated, will not have significant adverse effects on the environment.

PUBLIC AGENCIES CONSULTED

On April 21, 2020, the City of Fort Bragg referred the project application to the following agencies for review and comment.

- City of Fort Bragg Police Department
- City of Fort Bragg Fire Department
- City of Fort Bragg Public Works
- Mendocino County Department of Planning and Building Services
- State of California Department of Fish and Wildlife
- Sherwood Valley Band of Pomo

The City received responses from Public Works, Fish and Wildlife, Mendocino County Planning and Building Services and the Police Department. These comments have been incorporated into the review of this project.

PROJECT LOCATION & SURROUNDING LAND USES

The subject parcel is located in within the City of Fort Bragg in the Low Density Residential (RL) zoning district. The site is located at the eastern terminus of Halsey Way. The following describes the surrounding land uses:

SOUTH: Single-unit residential

- EAST: Single-unit residential
- NORTH: Single-unit residential
- WEST: Single-unit residential

PROJECT SETTING

The existing parcel is approximately 22,989 SF and is developed with an existing single-unit residential dwelling, two residential accessory structures (sheds) and paved walkways. The undeveloped portions of the parcel are landscaped.

There are single-unit residential dwellings on all sides of the project parcel. Surrounding parcels vary in size from 4,630 SF (126 Halsey Way to the west) to 15,031 SF (1020 E. Alder Street to the north).

DESCRIPTION OF PROJECT

The proposed project would consist of the components described below:

Subdivision

The project would subdivide an existing $\pm 22,989$ SF parcel into three parcels of $\pm 7,515$ SF, $\pm 7,793$ SF and $\pm 7,681$ SF.

Parking and Vehicle Access

The three newly-created parcels would share a proposed permeable paved driveway via a 22foot access and public utility easement along the south property boundary. The access would be paved for the first 20 feet from its intersection with Halsey Way. Permeable driveway/parking spaces are proposed for each of the three parcels that are sufficient for two vehicles each. The access point at the terminus of Halsey Way would be improved with a 4-foot concrete sidewalk with driveway cutout.

Utilities

The project would connect two of the three proposed parcels to public water and sewer, and realign/repurpose one existing public water and sewer connection. The utilities would run within the proposed access driveway and public utility easement. The existing residence, which is proposed to be relocated, would relocate its existing water and sewer connection. Three cleanouts are proposed.

Vegetation

The project would remove two small stands of holly trees (one with specimens 3 inches to 12 inches in diameter, the other with specimens 3 inches to 8 inches in diameter), in addition to a solitary holly tree of 8 inches in diameter.

Structures

The existing parcel includes an existing single-residential unit and two residential accessory structures (sheds). The residence would be relocated from its present location to the west within proposed Parcel 1. The existing residential accessory structures would remain in place.

ENVIRONMENTAL FACTORS POTENTIALL AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Less than significant with mitigation incorporated" as indicated by the checklist on the following pages.

	Aesthetics	Agriculture and Forestry Resources	Air Quality
V	Biological Resources	Cultural Resources	Energy
	Geology and Soils	Greenhouse Gas Emissions	Hazards and Hazardous Materials
	Hydrology and Water Quality	Land Use and Planning	Mineral Resources
	Noise	Population and Housing	Public Services

Recreation	Transportation	Tribal Cultural Resources
Utilities and Service Systems	Wildfire	Mandatory Findings of Significance

DETERMINATION

On the basis of this evaluation:

	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
V	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Sokuntia Sar

October 8, 2020

Signature

Date

Sokuntia Sar, Senior Planner Printed Name

City of Fort Bragg Agency

I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?				\checkmark
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

a-c) No impact: A scenic vista is typically considered a location from which the public can experience unique and exemplary high-quality views of an area. In order to identify sites where public views require protection and enhancement, the City's Community Design Element of the Inland General Plan includes the following policies that relate to scenic views:

Policy CD-1.3 Scenic Views and Resource Areas: Ensure that development does not adversely impact scenic views and resources as seen from public rights-of-way.

Program CD-3.2.1: Consider adopting the following standards for Gateway Developments in the Citywide Design Standards:

Define gateway development as development located south of the Noyo Harbor Bridge
 North of the Dudding Oracle Didge

- or North of the Pudding Creek Bridge.
- Gateway development should not detract from views to the ocean.
- Signage should be modest in scale and should not block the viewshed.

Views from public rights-of-way for this project are limited to views from Halsey Way. The current view into the property from Halsey Way is characterized by an existing single residential unit. The proposed project would introduce two new parcels that could be reasonably expected to be

developed with single residential units, and potentially accessory dwelling units and residential accessory structures. Views through and around the property are characterized by existing single residential units. This project would not adversely impact scenic views and resources from public rights-of-way, as the resulting view following reasonably-expected development would be substantially similar to the existing setting.

Neither of the two highways in the City limits (SR 1 and SR 20) are state scenic highways. Per the California Scenic Highway Mapping System, SR 1 and SR 20 are eligible state scenic highways, although they have not been designated as scenic. Furthermore, the proposed project is far removed from both highways, and is not visible from their rights-of-way.

The scenic view policies in the General Plan that relate to gateways are not applicable to this project, since it would be located in an area outside of the gateway definition in the General Plan. Therefore, policies relating to gateway development do not apply.

d) No impact. The project could reasonably be expected to lead to the eventual development of two additional single-unit residences and potentially accessory dwelling units and/or residential accessory structures. The future conditions of the project site after potential development would be consistent with the surrounding land uses and surrounding neighborhood. Inland Land Use and Development Code (ILUDC) Section 18.30.070 regulates outdoor lighting and limits new sources of substantial light or glare. Future development on the newly-created parcels, as well as the relocation of the existing single-unit residence, would require an approved building permit. During review of future building permits, the City would be able to ensure that outdoor lighting is consistent with ILUDC Section 18.30.070, and therefore not an impact to the environment.

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
 a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California 				V

	Resources Agency, to non- agricultural use?		
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?		
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?		
d)	Result in the loss of forest land or conversion of forest land to non- forest use?		V
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non- agricultural use of conversion of forest land to non-forest use?		V

a, **b**, **e**) **No impact:** Per the Mendocino County Important Farmland map published by the California Department of Conservation, Division of Land Resource Protection, the subject property is "Urban and Built Up Land." This designation is described as land "occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures." The project would not convert any Farmland of State Importance to nonagricultural uses.

The subject parcel is zoned Low Density Residential, which permits limited agricultural activities such as animal keeping and horticulture, but the parcel is not under Williamson Act contract, nor are ongoing agricultural activities occurring at present. The proposed project would not affect the permitted land uses on the parcel, and animal keeping and horticulture would continue to be allowed in a manner consistent with private gardens and small animal keeping in the neighborhood.

c, **d**) **No impact:** The parcel contains a limited quantity of ornamental holly trees and landscaping consistent with the site's historic residential use. The project is surrounded on all sides by urban residential development. There are no forest lands on or near the site that would be lost or converted as a result of this project.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with or obstruct implementation of the applicable air quality plan?			V	
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				
c)	Expose sensitive receptors to substantial pollutant concentrations?			\checkmark	
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			V	

The City of Fort Bragg is located within the North Coast Air Basin, consisting of Del Norte, Humboldt, Trinity, Mendocino and northern Sonoma counties. Additionally, the Mendocino County Air Quality Management District (MCAQMD) is responsible for enforcing the state and federal Clean Air Acts, as well as local air quality protection regulations. Any new emission point source is subject to an air quality permit, consistent with the District's air quality plan, prior to project construction. The MCAQMN also enforces standards requiring new construction, including houses, to use energy efficient heating, low-emission, EPA-certified wood stoves and similar combustion devices to help reduce source emissions.

Based on the results of monitoring, the entire Mendocino County has been determined to be in attainment for all Federal criteria air pollutants and in attainment for all State standards except Particulate Matter less than 10 microns in size (PM10). In 2005, MCAQMD adopted a Particulate Matter Attainment Plan establishing a policy framework for the reduction of PM10 emissions, and has adopted Rule 1-430 requiring specific dust control measures during all construction operations, grading of roads, or clearing of land.

Sensitive receptors refer to those segments of the population most susceptible to poor air quality, such as children, the elderly and those with serious health problems affected by air quality. Land uses where sensitive individuals are most likely to spend time include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities.

a, **b**) Less than Significant Impact: The proposed project would not obstruct any air quality plan, nor would it violate any air quality standards. The proposed subdivision does not involve any further physical development. While new development could occur at a later date, zoning restrictions would limit the size and scope of future development. Future construction would be subject to the MCAQMD review and regulation, keeping any impacts to a less than significant level.

c) Less than Significant Impact: The proposed project is located in an established residential neighborhood with the potential for nearby sensitive residents. Nearby land uses where sensitive individuals may spend time include Sherwood Oakes Health Center (±1,250 feet away), Noyo High School (±1,100 feet away), CV Starr Center (±1,100 feet away), and Otis Johnson Park (±700 feet away). However, future impacts to air quality as a result of this project are limited to future construction activities that may occur on the two newly-created vacant parcels. Future construction activities are reasonably expected to include single-unit residences and possibly accessory dwelling units and residential accessory structures. Future development would be subject to building permit review and issuance, and therefore would require compliance with the MCAQMD Rule 1-430 measures to limit construction-related air quality impacts to a less than significant level.

d) Less than Significant Impact: The proposed project does not include any additional development or activities that would otherwise create a nuisance with regard to releasing noxious odors or pollutants that could affect sensitive receptors. Future development would be subject to building permit review and issuance, and therefore would require compliance with the MCAQMD Rule 1-430 measures, as well as City Municipal Code regulations regarding nuisance conditions to limit odor impacts to a less than significant level.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
 a) Have a substantial adverse effect, either directly or indirectly, through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, o regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services? 	r r	M		
 b) Have a substantial adverse effect of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 	n			V
 c) Have a substantial adverse effect of state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means? 	6			

IV. BIOLOGICAL RESOURCES. Would the project:

d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or imped the use of native wildlife nursery sites?		V
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		

a) Less than significant with mitigation. The existing parcel contains a single-unit residence and is located in an established urban, residential neighborhood. The lot contains mowed grasses, holly bushes and landscaping. The existing setting is not conducive habitat for most candidate, sensitive or special status species due to the density of urban development, lack of wildlife corridors and human interaction. It is reasonably expected that single-unit residential development may occur on the newly-created parcels in the future, including auxiliary development (such as accessory dwelling units and/or residential accessory structures). The nature of the project and the expectation for future residential development would not substantially modify the habitat since it is already characterized by urban, residential development.

The project was referred to California Department of Fish and Wildlife (CDFW) to review the project's potential for impacts on biological resources. After reviewing the project, CDFW responded that they do not have any comments to provide on the referral. City staff followed up with Fish and Wildlife to discuss the proposed removal of several holly bushes as part of the application. The holly bushes located on site are not protected habitat; however, they have the potential to provide habitat for sensitive or special status species. The holly bushes proposed for removal provide approximately 1,050 SF of habitat. In a telephone conversation with Fish and Wildlife on June 16, 2020, it was suggested that replanting of native, locally-purchased shrubs would offset any potential impacts to special status species that utilize the existing holly bushes for habitat. The following mitigation measure is proposed to ensure that any impacts related to the removal of the holly bushes are less than significant.

BIO-1: Prior to approval of a Final Map, the applicant shall submit a landscape plan for the approval of the Community Development Director that identifies no less than 1,050 SF of area for the planting of native, drought-tolerant, locally-purchased shrubs or trees. The area of planting shall be based on the ultimate canopy/growth size of the specimens proposed. The area of planting may be split into multiple locations throughout the project site of no less than 300 SF each. Plantings proposed by the approved landscape plan shall be complete/installed prior to final inspection of a building permit on parcels where the plantings are proposed.

b) No impact. There are no riparian habitats evident on the project site. Available mapping resources do not indicate a blue-line creek or other riparian habitat in the area. The City's Inland General Plan identifies "special review areas" as "areas in the City containing watercourses, wetlands, sensitive plant and wildlife habitat, and forested land," and requires a biological report for these special review areas. Staff reviewed available records of the project site and properties nearby, and visited the site to determine if it could qualify as a special review area. Staff did not identify watercourses, wetlands, sensitive plant and wildlife habit and wildlife habitat (see response to "a" above regarding habitat), and forested land, and did not require submission of a biological report.

The project was referred to California Department of Fish and Wildlife (CDFW) to review the project's potential for impacts on biological resources, including riparian habitats and other sensitive natural communities, and to receive feedback on if a biological report should be required. After reviewing the project, CDFW responded that they do not have any comments to provide on the referral, and did not request additional information or analysis. Due to the lack of evidence of riparian habitats or other sensitive natural communities on or near the project site, no impact would occur.

c) No impact. There are no federally protected wetlands evident on the project site. Staff reviewed the U.S. Fish and Wildlife Service's National Wetlands Inventory, which does not identify any known wetlands on or near the project site. Staff reviewed available records of the project site and properties nearby, and visited the site to determine if a wetland may be present. Staff did not identify evidence of wetlands that may have warranted further exploration.

The project was referred to California Department of Fish and Wildlife (CDFW) to review the project's potential for impacts on wetlands. After reviewing the project, CDFW responded that they do not have any comments to provide on the referral. Due to the lack of evidence of wetlands on or near the project site, no impact would occur.

d) No impact. The project would subdivide an existing parcel with an existing single-unit residence with residential accessory structures. It is reasonably expected that single-unit residences with allowable accessory development may eventually be constructed on the newlycreated parcels. The project is located within an existing established urban neighborhood, with single-unit residential development surrounding the project. No existing significant wildlife corridors are present on or near the site.

e) Less than significant with mitigation. The only vegetation located on the parcel is holly bushes, ornamental plantings such as rhododendrons and mowed grasses. The City of Fort Bragg's Inland General Plan contains the following policies that relate to tree/vegetation preservation and removal:

Policy OS-2.2 Prohibit Invasive Species: Condition development projects requiring discretionary approval to prohibit the planting of any species of broom, pampas grass, gorse, or other species of invasive non-native plants deemed undesirable by the City.

Policy OS-2.3 Preserve Native Vegetation and Trees: To the maximum extent feasible and balanced with permitted use, require that site planning, construction, and

maintenance of development preserve existing healthy trees and native vegetation on the site.

The hollies proposed for removal have not been identified as non-native. As the hollies are non-native, Policy OS-2.2 encourages their removal.

Proposed mitigation measure BIO-1 above requires the applicant replant an equivalent amount of vegetation habitat (as either trees or shrubs) as is proposed for removal. The mitigation measure requires that the replantings be native, drought-tolerant and locally-purchased. The new plantings would offset potential impacts cause by the removal of vegetation, and provide additional native vegetation beyond what is presently existing on site as the existing hollies are non-native.

f) No impact. The proposed subdivision, development of site infrastructure, and potential future development of residences would not conflict with any Habitat Conservation Plan. Natural Community Conservation Plan or other local, regional or state habitat conservation plan. Mendocino County currently has one Habitat Conservation Plan with the California Department of Fish and Wildlife which provides protections for the Point Arena Mountain Beaver, and covers 24 acres of coastal scrub on the south Mendocino Coast. Additionally, since 2003, the Mendocino Redwood Company (MRC) has managed the County's only Natural Community Conservation Plan, which covers all lands owned by MRC to preserve regional important habitat. This project is not located within or near either of these two conservation plan areas, and no impact would occur.

V. CULTURAL RESOURCES. Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			V	
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				
c)	Disturb any human remains, including those interred outside of formal cemeteries?			V	

a-c) Less than significant impact. ILUDC Section 18.50.030 governs archaeological resources in the city limits, which echoes state law regarding discovery of artifacts. This code section states that archaeological reports are required for development proposals in areas where there are known archaeological or paleontological resources or sacred sites on the site or in the vicinity, or where there is a moderate to high probability for previously unidentified resources to be encountered during the development activity.

The proposed project takes place on a site with a developed single-unit residence and accessory development. The project is surrounded on all sides by urban residential development. City records do not indicate the presence of historical resources on the site or in the vicinity, and it is not presumed to be a moderate to high probability for previously unidentified resources.

The City referred the project application to the Sherwood Valley Band of Pomo (SVBP) for review and input. SVBP did not respond to the inquiry requesting mitigation measures or further analysis into the possibility of archaeological resources located on or near the site.

ILUDC Section 18.50.030 states the procedures that shall be followed if future development discovers evidence of archaeological, paleontological, or other potentially significant historic resources. These procedures require the project proponent notify the City of the discovery, engage an archaeologist to determine if the discovery is significant and determine the correct course of action to avoid, minimize or mitigate damage to the resource. Upon notification, the City shall notify the State Historic Preservation Officer and the Sherwood Valley Band of Pomo. Any and all work which could potentially damage or destroy the resource shall be halted until appropriate avoidance, minimization, and mitigation measures can be developed and implemented.

Adherence to the required provisions of the ILUDC protecting archaeological resources will limit any potential impacts to historical and archaeological resources to a less than significant level.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				V

VI. ENERGY. Would the project:

a-b) No impact. Senate Bill (SB) 350, known as the Clean Energy and Pollution Reduction Act of 2015, set ambitious annual targets for energy efficiency and renewable electricity aimed at reducing greenhouse gas emissions. SB 350 requires the California Energy Commission to establish annual energy efficiency targets that will achieve a cumulative doubling of statewide energy efficiency savings and demand reductions in electricity final end uses by January 1, 2030. This mandate is one of the primary measures to help the state achieve its long-term climate goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

Future residential development constructed as a result of the proposed subdivision would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings in California. These standards are designed to reduce wasteful, uneconomic, inefficient or unnecessary consumption of energy. It is estimate that single-unit residences built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards (source: California Energy Commission, 2018). Due to future development's required adherence to SB 350 and the California Energy Code, there would be no significant impacts related to energy.

VII. GEOLOGY AND SOILS. Would the project:

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	
		Impact	Incorporated	Impact	No Impact
a)	Expose people or structures to potential substantial adverse effects, including the risk o1 loss, injury, or death involving:				
	 Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 				
	ii) Strong seismic ground shaking?				\checkmark
	iii) Seismic-related ground failure, including liquefaction?				V
	iv) Landslides?				\checkmark
b)	Result in substantial soil erosion or the loss of topsoil?			V	
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994),				

	creating substantial direct or indirect risks to life or property?		
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?		
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?		

a) No impact. The proposed subdivision is located in an area that is known for seismic activity, however, the site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards.

Similar to other areas along the California coastline, the subject site could be subject to ground shaking caused by regional fault systems. Potentially active faults in the vicinity include: 1) the North San Andreas Fault system located approximately 6 miles west of the site, which is the most likely source of earth shaking; 2) the Maacama Fault zone located approximately 21 miles to the east of the City; 3) the Mendocino Fault zone located approximately 60 miles to the northwest; and 4) the Pacific Star Fault located between the towns of Fort Bragg and Westport, all of which could potentially cause earth shaking activity. To mitigate potential shaking effects, all structures would be required to be designed using sound engineering judgement and standards of the California Building Code (CBC).

In general, lateral spreading is caused by liquefaction adjacent to slopes. In these cases, the saturated soils move toward an unsupported face, such as a bluff, river channel bank or body of water. The project site is flat, as is the surrounding area. The nearest river channel bank, body or body of water with an increased risk of liquefaction is located approximately 300 feet to the northeast of the parcel boundaries, where there is a minor tributary to Pudding Creek. Future development within the project boundaries would not be subject to significant impacts related to liquefaction.

The topography of the site and surrounding area is flat, and the project would not create or be subject to significant impacts related to landslides.

b) Less than significant impact. The project includes the installation of a permeable paved accessway, utility connections, and relocation of an existing residence. Reasonably anticipated future development resulting from approval of this subdivision could include single-unit residences and related accessory development. These activities could result in erosion and sedimentation, and would modify the existing ground surface, thereby altering the patterns of surface runoff and infiltration. However, proposed and anticipated future development would require building permit approval. Building Permit approval would require consistency with ILUDC Chapters 60, 62, and 64, which provide standards for site design and grading activities. Best Management Practices are required as part of permit approval to retain natural drainage patterns and healthy soil conditions, and reduce any impacts related to soil erosion to a less than significant level.

- c) No impact. The subsurface conditions would be expected to be typical of those found in the geologic region of the site with very low expansion potential. The site and vicinity contain single-unit residential development of the type and scale reasonably anticipated as a result of this subdivision. Future development would be regulated by the California Building Code, resulting in no impacts related to unstable soils.
- **d)** No impact. The National Resource Conservation Service of the US Department of Agriculture lists the project site and surrounding area as soil unit 219-Urban Land, which is not an expansive soil as defined in the Uniform Building Code. Future development would be regulated by the California Building Code, resulting in no impacts related to expansive soils.
- e) No impact. The project is proposed and would be required to be connected to the City of Fort Bragg municipal sewer system. Septic is not proposed nor permitted as part of the project, and no impacts related to septic systems would occur.
- f) No impact. ILUDC Section 18.50.030 states the procedures that shall be followed if future development discovers evidence of paleontological resources. These procedures require the project proponent notify the City of the discovery, engage an archaeologist to determine if the discovery is significant and determine the correct course of action to avoid, minimize or mitigate damage to the resource. Upon notification, the City shall notify the State Historic Preservation Officer and the Sherwood Valley Band of Pomo. Any and all work which could potentially damage or destroy the resource shall be halted until appropriate avoidance, minimization, and mitigation measures can be developed and implemented.

The project site and surrounding area consists of single-unit residential development. There are no unique geological features present or in the vicinity, and no impacts would occur.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate gre emissions, ei indirectly, tha significant im environment?	ther directly or t may have a pact on the				
policy or regu	an applicable plan, Ilation adopted for the ducing the emissions e gases?				V

a) Less than significant impact. Construction activities associated with the relocation of the existing house, development of utilities and accessways, and the reasonably anticipated development of single-unit residential development with potential accessory development on

the newly-created parcels could generate greenhouse gases (GHG) from the engine emissions of construction equipment, but these activities are limited in scope and duration and would not contribute significantly to GHG emissions. Once constructed, future residences would require power/electricity to operate; however, energy use and associated GHG emissions would be minimal. Given that the construction would be short term and the project scale would be relatively small, the proposed project would not have a measurable or considerable contribution to the cumulative GHG impact at the local, regional or state level.

b) No impact. The City of Fort Bragg adopted a Climate Action Plan (CAP) in 2012. The plan sets greenhouse gas reduction goals including a 30% reduction in greenhouse gasses for the municipality by 2020, and a 7% reduction goal for the community by 2020. According to the CAP, nearly 70% of the City's GHG emissions were produced by vehicles, primarily automobiles. Transportation emissions are high because of the City's geographically isolated location and because the majority of tourists and visitors travel to Fort Bragg in personal vehicles. In order to reduce GHG emissions improvements to the public transportation system would be required, as well as improved walking and bicycle facilities. The proposed project does not conflict with these efforts and the frontage improvements proposed at the Halsey Way frontage would incrementally support them. The project would have no impact on any plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

_		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				V
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				V
d)	Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			
f)	Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?			
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?		V	

a-c) No impact. The proposed subdivision does not include the use of any hazardous materials; therefore, no impacts would occur resulting from the transportation, storage, or accidental release or emissions of hazardous materials.

d) **No impact.** There are no identified hazardous material sites located on the subject parcel, historically or currently, by which the proposed subdivision would be impacted.

e-f) **No impact.** The proposed subdivision is not located within the boundaries of an airport land use plan, and is does not conflict with any emergency response or evacuation plan.

g) **Less than significant impact.** There is an existing single-unit residence on the project site, and the site is surrounded by similar single-unit residential development. The project site is and would continue to be served by the Fort Bragg Volunteer Fire Department. According to the California Department of Forestry and Fire Protection Hazard Severity Zones in Local Responsibility Areas map for Mendocino County, the project is not located in an area of high or very high severity. The project would not have significant impacts related to wildland fires.

X. HYDROLOGY AND WATER QUALITY. Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			V	
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable				V

	groundwater management of the basin.		
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:		
	 result in substantial erosion or siltation on- or –offsite? 		V
	substantially increase the rate of surface runoff in a manner which would result in flooding on- or off-site?		V
	 iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? 		
	iv) impede or redirect flood flows?		\checkmark
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?		V
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		

a) and c) Less than significant impact. The project would be subject to Article 6 of the Land Use and Development code, which provides standards for site design and grading activities. These codes are consistent with State regulations aimed to minimize pollutants of waterways through stormwater runoff. Low Impact Development methods are required within the City's boundaries for all projects that will disturb any soil, including the ground-disturbing activities of this project application, and future reasonably anticipated development on the newly-created parcels. The design and construction activities would be required to retain natural drainage patterns and healthy soil conditions to preserve infiltration, purification, detention and retention functions, and minimize increases in stormwater runoff volume and peak flows to reduce projected runoff by 20%. The code standards prohibit construction waste or other pollution from entering the storm drainage system. The project's required consistency with these code requirements will be reviewed as part of the building permit review for future construction activities, and would reduce project impacts related to drainage to less than significant levels.

b) No impact. The project would be served by the City of Fort Bragg municipal water system, and would not draw from any groundwater sources. Future development would also be subject to the City's zoning code requirements relating to lot coverage, ensuring that adequate pervious surfaces are maintained to allow ongoing infiltration of rainwater. As a result, the project would have no impact on groundwater supplies or recharge.

d) No impact. The proposed project is not located in a flood hazard, tsunami or seiche zone, and there will be no impacts related to these areas.

e) No impact. As stated above, the project will be required to adhere to the City's standards for site design and grading activities to minimize pollutants and protect water quality associated with construction activities. The proposed project would therefore not conflict with or obstruct implementation of any water quality control plan or sustainable groundwater management plan, and not impacts would occur.

XI. LAND USE AND PLANNING. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
 a) Physically divide an established community? 				V
 b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? 				M

- a) No impact. The proposed project is located within an existing and established urban residential community. The project would create three parcels where one currently exists, and would allow for the future development of additional single-unit residences and potential accessory structures. The project would add to the existing community with consistent development and would not physically divide the established community.
- **b)** No impact. The Tentative Map would require approval by the Fort Bragg Planning Commission, which would need to find the project consistent with the Inland General Plan and the Inland Land Use and Development Code, ensuring that there would be no impacts due to conflicts with land use plans, policies or regulations adopted for the purpose of avoiding or mitigating environmental impacts or effects.

XII. MINERAL RESOURCES. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				V

b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?		Ø

a-b) No impact. The proposed project is not located in an area of known rock, aggregate, sand, or other mineral resource deposits of value to local, regional, or State residents. The project area is not identified as a locally important mineral resource recovery site delineated on a local General Plan, specific plan, or other land use plan. Furthermore, the parcel is not utilized for Surface Mining and Reclamation Act (SMARA) activities. Therefore, the proposed project would not interfere with materials extraction or otherwise cause a short-term or long-term decrease in the availability of mineral resources. No impact would occur.

XIII. NOISE. Would the project result in:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			V	
b)	Generation of excessive groundborne vibration or groundborne noise levels?			V	
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				

a) and b) Less than significant impact. The subject parcel is currently developed with an existing single-unit residence and accessory structures. The newly-created parcels would be limited in the types of development that could occur, allowing only development consistent with the surrounding land uses. Noise levels would be consistent with existing noise levels in the vicinity. Furthermore, future land uses would be subject to the City Municipal Code Section 9.44.020, which limits noise levels in residential areas, such as the project location, to prevent significant impacts related to noise. Construction activity would also be subject to the policies within Section 9.44.020, limiting the hours of operation of equipment or any outside construction.

Any impacts related to groundborne vibration or groundborne noise levels would be associated with construction, and those impacts would also be less than significant with the required adherence to Section 9.44.020.

c) No impact. The project is just shy of two miles south of Fort Bragg Airport (82CL), which is classified as a private use airfield. The project is also less than a mile north of the Mendocino Coast District Hospital Helipad (CN01), which is classified as a private use heliport. The project is not located within the vicinity of a public airport or public use airport, or within the boundaries of an airport land use plan. As such, there would be no impacts related to noise caused by air transportation.

XIV. POPULATION AND HOUSING. Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				

- a) No impact. While the proposed subdivision would allow for the establishment of additional dwelling units, the property is in the Low-Density Residential zoning district, which allows for and anticipates residential development at a density of three to six units per acre. The existing parcel is approximately 0.52 acres, which would permit a maximum density of three units. The result of the proposed development would allow the eventual development of up to three single-unit residences. These newly-created parcels could also develop accessory dwelling units; however, Inland Land Use and Development Code Section 18.42.170(C) exempts accessory dwelling units from the calculation of maximum allowable density, consistent with California law. As a result, the eventual development of three units with potential accessory development (including accessory dwelling units) would meet the planned-for density of the zoning district. The growth that may result from this project is planned and expected in the district, and there would be no impact related to unplanned population growth.
- **b)** No impact. The proposed project would relocate an existing residence, and could reasonably be expected to eventually create up to two new residential units on the newly-created parcels. The project would not displace any people or housing, and no impacts would occur.

XV. PUBLIC SERVICES.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?				V
Police protection?				V
Schools?				V
Parks?				\checkmark
Other public facilities?				\checkmark

a) Less than significant impact. The project would subdivide an existing parcel into three parcels, relocate an existing residence, and add accessways and utilities for the future development of the newly-created lots. The newly-created lots would likely see the future development of single-unit residences and accessory structures. The maximum potential future development would not result in substantial impacts creating the need for new or physically altered government facilities. The project is located within the service area of the Fort Bragg Volunteer Fire Department and Fort Bragg Police Department. Both agencies were provided an opportunity for input on the project, and neither entity responded with concerns about the project affecting the capacity or service objectives for fire protection or police protection. The potential creation of two new residences would not significantly affect the City's park or school services, or the need to create or alter any other public facilities.

XVI. RECREATION.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial				Ø

physical deterioration of the facility would occur or be accelerated?		
 b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? 		Ø

a and b) No impact. The development could lead to the ultimate development of two additional single-unit residences and potential accessory development. The addition of a limited number of new residences within a district and land use designation appropriate and planned for residential development would not lead the substantial deterioration of the facility, nor require the construction or expansion of new facilities.

XVII. TRANSPORTATION. Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?				
b)	Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			V	
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
d)	Result in inadequate emergency access?				

- a) No impact. The Circulation Element of the City's Inland General Plan includes numerous policies and programs related to the city's circulation system. The proposed project requires ADA-compliant sidewalk installation along the eastern terminus of Halsey Way, consistent with the Circulation Element requirements. The proposed project would not conflict with any plan, ordinance or policy relating to circulation.
- b) Less than significant impact. The proposed project would in-fill a vacant area within an established residential neighborhood. Additionally, the project is located approximately 400 feet from an existing bus stop along a Mendocino Transit Authority bus line. The project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

- c) No impact. The project would be located on an existing residential street, improve the frontage at the terminus of Halsey Way, and install a private, interior driveway. The project would not substantially increase hazards due to geometric design features, or create impacts related to incompatible roadway or transportation network uses, such as farm equipment.
- d) No impact. The project would create two lots where one currently exists, and could reasonably be expected to lead to the future development of two additional single-unit residences and accessory development. The project is located at the terminus of an existing public street. The project was referred to Public Works and the Fire Department for review, including to provide feedback on the adequacy of emergency access. The proposed access driveway is proposed as a standard width, compliant with the access requirements of the Inland Land Use and Development Code. As such, adequate emergency access is provided.

XVIII. TRIBAL CULTURAL RESOURCES.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
 a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 				
 (i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k), or 				
 ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall 				V

a) No impact. The proposed project is not located in an area shown in available resources studies to contain features of cultural value to Native American tribes. On April 21, 2020, the City sent the application materials with a request for comments to the Sherwood Valley Band of Pomo, who did not provide feedback or concerns about the project. Neither the project site nor the structures on the parcel are eligible for listing with the California Register of Historical resources or in a local register of historical resources. No impacts would occur as a result of this subdivision and the likely development that would follow.

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e)	Comply with federal, state, and local management and reduction statutes				

and regulations related to solid	
waste?	

a-c) No impact. The project would subdivide an existing parcel into three parcels that would meet the minimum lot size requirements of the Low Density Residential Zoning District. This district is planned to accommodate housing of a density that is proposed, and can accommodate this level of development with the existing utility infrastructure in place.

d-e) No impact. The proposed subdivision would not create any additional solid waste. However, reasonably expected residential development that may follow the subdivision would create construction waste, and future households would generate waste. The City requires the reuse and/or recycling of construction materials as part of building permit review and approval in order to reduce waste associated with construction. Additionally, the parcels are within the geographic boundary of the City's contract with a waste hauler, which would allow for appropriate household garbage, recycling and compost services.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				V
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?				
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				

a-d) No impact. The proposed project would establish residential lots that conform to the requirements of the Low Density Residential zoning district. These new lots would be surrounded

on all sides by existing residential development. Access to and from the site would remain to allow emergency response and evacuation as required. The parcel is relatively flat, and subject to the same wildfire risks as lots surrounding it, and the project would not exacerbate this risk.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				Ø