

APPENDIX A: COASTAL DEVELOPMENT CHECKLIST
CDP 2014-0019 California Department of Transportation
MARCH 12, 2015

20.532.095 Required Findings for All Coastal Development Permits	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
(A) The granting or modification of any coastal development permit by the approving authority shall be supported by findings which establish the following:				
(1) The proposed development is in conformity with the certified local coastal program.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) The proposed development will be provided with adequate utilities, access roads, drainage and other necessary facilities.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(3) The proposed development is consistent with the purpose and intent of the zoning district applicable to the property, as well as the provisions of this Division and preserves the integrity of the zoning district.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) The proposed development will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(5) The proposed development will not have any adverse impacts on any known archaeological or paleontological resource.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(6) Other public services, including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve the proposed development.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(B) If the proposed development is located between the first public road and the sea or the shoreline of any body of water, the following additional finding must be made:				
(1) The proposed development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act and the Coastal Element of the General Plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings

- **20.532.095(A)(1) The proposed development is in conformity with the certified local coastal program.**

Consistent (With Conditions of Approval)

The Local Coastal Program sets goals and policies for managing resource protection and development activity in the Coastal Zone of Mendocino County, an area that extends from the Humboldt County line to the Gualala River. The Local Coastal Program addresses topics such as shoreline access and public trails; development in scenic areas, hazardous areas, and coastal bluffs; environmentally sensitive habitat areas; cultural resources; transportation; public services; and more. The Local Coastal Program serves as an element of the General Plan (Chapter 7 Coastal Element) and includes zoning regulations for the Coastal Zone, and its policies are certified to be consistent with the goals of the California Coastal Act.

Various aspects of the Local Coastal Program are specifically addressed by separate Required and Supplemental Findings for Coastal Development Permits, including utilities, transportation, zoning, CEQA

compliance, archaeological resources, public services, coastal access, and resource protection. The following is a discussion of elements of the Local Coastal Program not specifically addressed elsewhere in this checklist.

General Plan – Coastal Element: Land Use Plan

The land associated with this application is situated within the boundaries of Mendocino County's Local Coastal Program, but the land does not have a General Plan designation. The project site consists of right-of-way land that is outside the boundaries of parcels or subdivided land. General Plan designations are assigned to parcels or subdivided lands; they are not assigned to rights-of-way.

General Plan – Coastal Element: Hazard Management

Chapter 3.4 of the Mendocino County Coastal Element addresses Hazard Management within the Coastal Zone.

Seismic Activity: The project site is outside the mapped boundaries of the Alquist-Priolo Earthquake fault special study zone.

Landslides: Soil erosion has occurred at the project site and is the focus of the proposed roadway improvement. The scope of work includes constructing a retaining wall and culvert to reduce erosion.

Erosion: The location along Highway 1 where the roadbed has failed resides on a coastal bluff plateau, immediately above the ocean. The bluff is approximately 80 feet tall and erosion is constant at the toe of the slope from concentrated water flow from a cross-culvert. A 45 foot long section of the roadway shoulder is slipping into the ocean, although only 10 feet of a corresponding section of the highway was experiencing settlement. The proposal is to construct a retaining wall, direct water off the roadway to a culvert (and diverting the water onto the rocks and cliff), and install a guardrail. See *Initial Study with Negative Declaration*, pages 34-36.

Initial Study with Negative Declaration SCH # 2013102005 is attached as Appendix C.

Flooding: Project site is outside of FEMA 100-year flood zones.

Fire: The project is located in an area that has a "high" fire hazard severity rating, as determined by the California Department of Forestry and Fire Prevention (CDF). CDF has not submitted recommended conditions of approval; the scope of the project is to repair roadbed, erosion, and construct a retaining wall to reduce future soil failure.

General Plan – Coastal Element: Visual Resources

Protection of visual resources is a specific mandate of Section 30251 of the Coastal Act, and subsequently addressed in Chapter 3.5 of General Plan's Coastal Element and Section 20.504 of the Mendocino County Coastal Zoning Code (MCCZC).

This project, located on Highway 1 north of the town of Gualala, has been reviewed for potential impacts to visual resources. Highway 1, through the project limits, is a candidate for scenic highway status in the California Scenic Highway System. Highway 1 is part of the Pacific Coast Highway and popular with tourists. The Mendocino County Coast is highly scenic which attracts visitors from around the state and internationally. The project is within the Coastal Zone, and is considered a sensitive corridor regarding visual resource issues. Ocean and coastal views are available from the highway along most of the length of the project.

Backfilling the slope below the retaining wall will minimize visibility of the structure from the Pacific Ocean and the use of timber soldier piles in the retaining wall will provide a natural surface that blends into the natural landscape. The use of metal beam guard rail, in lieu of concrete or steel bridge rail, is the least

visually intrusive method for providing a safety barrier above the proposed wall. The rail will be constructed at the lowest height which protects views towards the ocean for passing motorists.

Removal of exotic plant species and revegetation with native plants would help restore the site to a more natural condition, making it more consistent with the indigenous aesthetic of the area. Materials and design of site features are proposed to be appropriate for the rural visual character of this coastal location. The down drain would be black in color, which minimizes the noticeability of the element within its surroundings. The steel I-Beams in the retaining wall would be painted Dark Brown. All disturbed ground below and adjacent to the wall should be revegetated with plant species native to the Mendocino Coast.

Consequently, the project will be visually compatible with the character of the surrounding areas and existing development, and is in conformity with the visual resources policies of the Local Coastal Program.

Summary of Conditions

If developed in compliance with the recommended avoidance and minimization measures of the *Initial Study with Negative Declaration* (SCH # 2013102005) and the additional findings relating to the Local Coastal Program (enumerated elsewhere in this checklist) can be made, the proposed development will be in conformity with Mendocino County's Local Coastal Program, including its policies for land use, hazard management, and visual resources, and Section 20.532.095(A)(1) of the MCCZC.

Condition 3 The application, along with supplemental exhibits and related material, including *Initial Study with Negative Declaration* SCH # 2013102005, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.

- **20.532.095(A)(2) The proposed development will be provided with adequate utilities, access roads, drainage and other necessary facilities.**

Consistent (With Conditions of Approval)

Utilities

The Mendocino County Division of Environmental Health (DEH) reviewed the project with regards to septic. In a comment letter dated September 11, 2014, DEH provided conditional approval, requiring that "All construction must maintain an eight (8) foot setback to any nearby septic leachfield area." **Condition 9** is recommended to comply with this request.

Access Roads

Mendocino County Department of Transportation (DOT) had the opportunity to comment on the application concerning access. In a letter dated December 16, 2014, DOT issued a response to the application, stating, "We recommend approval of this permit request as the proposed work does not directly impact a County road."

Drainage

Drainage is subject to the provisions of Section 20.492.025 of the MCCZC. Although the project is located within the Garcia River watershed, all storm water within the project limits either sheet flows off the highway and infiltrates, sheet flows to an existing drainage ditch east of the highway and infiltrates, or sheet flows to the existing drainage ditch and discharges to the Pacific Ocean. The existing culvert conveys storm water and groundwater to the Pacific Ocean. Vegetation suggest groundwater is close to the surface and seeps into the existing drainage ditch. Water quality impacts would be minimal as most of the disturbed soil area would be on and near the roadway.

A Storm Water Pollution Prevention Plan or a Water Pollution Control Plan, depending on the total disturbed soil area, will be required and would identify construction site Best Management Practices that will reduce or eliminate any potential water quality impacts. For groundwater, no impacts are anticipated from the project. **Condition 10** is recommended, requiring the applicant to specify Best Management Practices to be implemented to reduce erosion and sedimentation from construction activities, and, if the amount of grading on the site exceeds fifty (50) cubic yards, the applicant will be required to submit a Grading and Erosion Control Plan.

Summary of Conditions

If developed in compliance with the recommended conditions of approval, the proposed development will be provided with adequate utilities, access roads, drainage and other necessary facilities, thus also satisfying Section 20.532.095(A)(2) of the *MCCZC*.

Condition 9 All construction shall maintain an eight (8) foot setback to any nearby septic leach field area.

Condition 10 Prior to commencement of work, the applicant shall specify Best Management Practices to be implemented to reduce erosion and sedimentation from construction activities. If the amount of grading on the site exceeds fifty (50) cubic yards, the applicant shall cease construction activities and develop a Grading and Erosion Control Plan for the site and submit it to the Planning Division for review and approval.

- **20.532.095(A)(3) The proposed development is consistent with the purpose and intent of the zoning district applicable to the property, as well as the provisions of this Division and preserves the integrity of the zoning district.**

Not applicable

The proposal is to repair erosion of road bed within Highway 1 right-of-way. Public roads are outside the boundaries of zoning districts, because district designations are assigned to parcels. All of the proposed work will take place within the right-of-way and outside the boundaries of any zoning district.

- **20.532.095(A)(4) The proposed development will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.**

Consistent (With Conditions of Approval)

The lead agency (California Department of Transportation) prepared an *Initial Study with Negative Declaration* for this project. Based on this study, it was determined that the proposal would not have a significant effect upon the environment for the following reasons:

- The proposed project would have minimal or no impact on agricultural resources, air quality, cultural resources, geology and soils, hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic patterns, and utility and service systems.
- Potential impacts to water quality would be reduced through the implementation of avoidance and minimization measures.
- Potential impacts to waters of the United States and waters of the State of California would be offset by vegetating and restoring the site to pre-project conditions.
- Potential impacts to the California red-legged frog would be reduced through the implementation of avoidance and minimization measures.

Summary of Conditions

If developed in compliance with the recommended avoidance and minimization measures of the *Initial Study with Negative Declaration* (SCH#2013102005) and the additional findings relating to the Local Coastal Program (enumerated elsewhere in this checklist) can be made, the proposed development will be in conformity with the Mendocino County's Local Coastal Program, including compliance with CEQA, and Section 20.532.095(A)(4) of the *MCCZC*.

Condition 3 The application, along with supplemental exhibits and related material, including *Initial Study with Negative Declaration* SCH # 2013102005, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.

- **20.532.095(A)(5) The proposed development will not have any adverse impacts on any known archaeological or paleontological resource.**

Consistent (With Conditions of Approval)

The *Initial Study with Negative Declaration* SCH # 2013102005 (Appendix C) found that cultural resources, such as archaeological or paleontological resources, were unlikely to be affected by this project. Whenever it is anticipated that soil may be disturbed, **Condition 8** is recommended to ensure archaeological sites and artifacts are protected.

Summary of Condition

If developed in compliance with the recommended avoidance and minimization measures of the *Initial Study with Negative Declaration* (SCH # 2013102005) and the additional findings relating to the Local Coastal Program (enumerated elsewhere in this checklist) can be made, the proposed development will be in conformity with the Mendocino County's Local Coastal Program, including avoiding adverse impacts on any known archaeological or paleontological resource, and Section 20.532.095(A)(5) of the *MCCZC*.

Condition 8 If any archaeological sites or artifacts are discovered during site excavation or construction activities, the applicant shall cease and desist from all further excavation and disturbances within one hundred (100) feet of the discovery, and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resources in accordance with Section 22.12.090 of the Mendocino County Code.

- **20.532.095(A)(6) Other public services, including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve the proposed development.**

Not applicable

Solid Waste

The project is repair of Highway 1 roadway; as such, the demand for solid waste service would be limited to the period of construction and will be managed by the contractor.

Roadway Capacity

The 2012 Traffic Volumes Book, produced by Caltrans, provides traffic volume data relating to State roadways. The subject land is located along Highway 1 between PM 2.34 and 2.53, one mile north of Gualala. The nearest data breakpoint of the 2012 Traffic Volumes book is located at PM 5.09 near Fish Rock Road. The total peak hour traffic volume at this location is 350 trips, resulting in a Level of Service of service of B or better.

From PM 2.41 to 2.44, the traveled way (meaning the portion of the roadway used for movement of through traffic) will be widened from 11.5 feet to 12 feet wide. Currently, the shoulders vary and measure from 11 feet (at the slide area) to having no shoulder. From PM 2.37 to 2.46, the shoulders on both sides of the road will be widened to 4 feet. Beyond these PMs, the shoulders widths will gradually taper down to match the existing roadway.

- **20.532.095(B)(1) The proposed development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act and the Coastal Element of the General Plan.**

Consistent (Without Conditions of Approval)

No existing access or public recreation policies, pursuant to Chapter 3 of the California Coastal Act and the Coastal Element of the General Plan, are affected by the application.

“At the project site, no designated coastal access exists. Furthermore, no improvement or expansion to coastal access for pedestrian and bicycle trails is possible due to the steepness and cliff at the project site (*Initial Study*, page 41).”

20.532.100 (A) Resource Protection Impact Findings	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
(1) Development in Environmentally Sensitive Habitat Areas. No Development shall be allowed in an ESHA unless the following findings are made:				
(a) The resource as identified will not be significantly degraded by the proposed development.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) There is no feasible less environmentally damaging alternative.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) All feasible mitigation measures capable of reducing or eliminating project related impacts have been adopted.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) Impact Finding For Resource Lands Designated AG, RL and FL. No permit shall be granted in these zoning districts until the following finding is made:				
(a) The proposed use is compatible with the long-term protection of resource lands.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings

➤ **20.532.100(A)(1) et seq. Development in Environmentally Sensitive Habitat Areas. No Development shall be allowed in an ESHA unless the following findings are made:**

Consistent (With Conditions of Approval)

To restore waters to pre-project conditions, implementation of the following measures would occur before, during, and after construction as described below:

Work windows for in-stream activities. Within the environmental study limits (ESL), no work would be performed within streams and drainages until flows are at their seasonal low or have ceased and the streambed is dry. It is predicted that in most years, the seasonal low-flow or dry period of these drainages occurs between June 15th and October 15th; however, work within these drainages will be subject to stream conditions and permit restrictions.

- All waters and wetlands within Caltrans right-of-way adjacent to the construction zone shall be fenced and signed to assure no inadvertent damage to these resources.
- Disruption of the wetlands, streambeds, and adjacent riparian corridors will be minimized, and vegetation removal shall be limited to the absolute minimum amount required for construction.
- Depending on seasonal flows, de-watering of the streambed or culvert course and/or a temporary stream diversion may be necessary. If de-watering of the site is deemed necessary, a temporary sediment-settling basin will be constructed downstream of the activity.
- Permit conditions would include any further avoidance and minimization measures.

Revegetation of disturbed habitats. During the permitting phase, Caltrans will prepare a revegetation plan to restore temporary impacts to waters of the U. S. and waters of the State (including wetlands) to pre-construction conditions. The revegetation plan will include re-grading, vegetating, and monitoring to ensure success. Implementation of onsite revegetation will occur after construction.

- Prior to vegetation removal, the area will be surveyed by a qualified biologist for a complete accounting of species and their quantities present within the construction limits.
- Upon completion of the project construction, streambanks will be permanently stabilized with a hydroseed mixture of native species.
- Only native seed material must be used: seed, hay and straw used in erosion control applications shall be certified weed-free or see-seed free.

Environmentally sensitive areas. Sensitive natural resource features occurring outside of the expected construction impact area will be avoided or minimized by designating these feature on project plans and in project specifications.

- ESA information would be shown on contract plans and discussed in the project contract. ESA provisions may include, but are not limited to, the use of temporary orange fencing to delineate the proposed limit of work in areas adjacent to sensitive resources, or to delineate and exclude sensitive resources from potential construction impacts.
- Contractor encroachment into ESAs will be restricted (including the staging/operation of heavy equipment or casting of excavation materials).
- ESA provisions shall be implemented as a first order of work and remain in place until all construction activities are complete.

California red-legged frog. Habitat for the California red-legged frog is potentially located within the project area. The project location is within the area described in the guidance issued by the USFWS Arcata Office on June 12, 2009, extending regulatory protections to all red-legged frogs that occur in the Point Arena, Garcia, and Gualala hydrographic units. On November 8, 2013, the USFWS concurred that no critical habitat occurs within the project area. With implementation of the avoidance and minimization measures, the project “may affect, but is not likely to adversely affect” the California red-legged frog and its habitat during construction of the proposed project. The project would not result in a permanent loss of habitat. Therefore, no mitigation is required, but avoidance and minimization measures will be implemented during construction, as follows:

- A qualified biologist would conduct Worker Environmental Awareness Training for the construction workers prior to the start of construction activities.
- Within 24-hours prior to the onset of ground disturbance activities, the qualified biologist will survey the project area for all life stages of the California re-legged frog. This is to lower the probability of one or more adult or sub-adult frogs moving into or laying eggs within the project area after a survey has already been conducted.
- If California red-legged frogs, eggs or tadpoles are encountered at any time during project activities, construction activities will cease in the area. USFWS will be notified to determine how to proceed.
- Water pumps will be screened with wire mesh no larger than 0.2-inches to prevent tadpoles, sub-adults, and adults from entering the pump system.
- Food-related trash will be disposed in closed containers and removed from the project area.
- The contractor will implement a toxic materials control and spill response plan. Equipment refueling will only occur at staging areas where fuel will not enter the floodplain.
- All vegetation removal activities will be done with the use of hand tools only (including chainsaws).
- The number of access routes, numbers and sizes of staging areas, and the total area of the activity will be limited to the minimum necessary to achieve the project goal. Routes and boundaries will be clearly demarcated.

Summary of Conditions

If developed in compliance with the recommended avoidance and minimization measures of the *Initial Study with Negative Declaration* (SCH # 2013102005) and the additional findings relating to the Local Coastal Program (enumerated elsewhere in this checklist) can be made, the proposed development will be in conformity with the Mendocino County's Local Coastal Program, including compliance with CEQA, and Section 20.532.100(A)(1)(a) through (c) of the *MCCZC*.

Condition 3 The application, along with supplemental exhibits and related material, including *Initial Study with Negative Declaration* SCH # 2013102005, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.

- **20.532.100(A)(2) Impact Finding For Resource Lands Designated AG, RL and FL. No permit shall be granted in these zoning districts until the following finding is made: The proposed use is compatible with the long-term protection of resource lands.**

Not Applicable

The proposed project is not on land designated as agricultural land. The findings relating to impacts on agricultural land are not applicable to this project.

20.532.100 (B) Agricultural Land Impact Findings	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
(1) Development in Agricultural Zones. No development subject to a coastal development use permit shall be issued on agricultural land until the following findings are made:				
(a) The project maximizes protection of environmentally sensitive habitat areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) The project minimizes construction of new roads and other facilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) The project maintains views from beaches, public trails, roads, and views from public viewing areas, or other recreational areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) The project ensures the adequacy of water, waste water disposal and other services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) The project ensures the preservation of the rural character of the site.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) The project maximizes preservation of prime agricultural soils.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(g) The project ensures existing land use compatibility by maintaining productivity of on-site and adjacent agricultural lands.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings

- **20.532.100(B)(1) et seq. Development in Agricultural Zones. No development subject to a coastal development use permit shall be issued on agricultural land until the following findings are made...**

Not Applicable

The application is for a Coastal Development Permit, and is not subject to a Coastal Development Permit Use application. No conditional uses are requested; therefore, the application is not subject to the required use permit findings associated with Section 20.532.100(B)(1) *et seq.*

20.532.100 (B) Agricultural Land Impact Findings	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
(2) Conversion of Prime Agricultural or Williamson Act Contracted Lands. Conversion of prime land and/or land under Williamson Act Contract to non-agricultural uses is prohibited, unless all of the following findings are made:				
(a) All agriculturally unsuitable lands on the parcel have been developed or determined to be undevelopable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Agricultural use of the soils cannot be successfully continued or renewed within a reasonable period of time, taking into account economic, environmental, social and technological factors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Clearly defined buffer areas are established between agricultural and non-agricultural uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) The productivity of any adjacent agricultural lands will not be diminished, including the ability of the land to sustain dry farming or animal grazing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) Public service and facility expansions and permitted uses do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) For parcels adjacent to urban areas, the viability of agricultural uses is severely limited by contacts with urban uses, and the conversion of land would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings

- **20.532.100(B)(2) et seq. Conversion of Prime Agricultural or Williamson Act Contracted Lands. Conversion of prime land and/or land under Williamson Act Contract to non-agricultural uses is prohibited, unless all of the following findings are made...**

Not Applicable

Proposed project is not on land that is designated as agricultural land nor is it under Williamson Act Contract. Findings relating to the conversion of agricultural land are not applicable to this project.

20.532.100(B) Agricultural Land Impact Findings	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
(3) Conversion of Non-prime Agricultural Lands. Conversion of all other agricultural lands to non-agricultural uses will be prohibited unless it is found that such development will be compatible with continued agricultural use of surrounding lands and at least one of the following findings applies:				
(a) Continued or renewed agricultural use is not feasible as demonstrated by an economic feasibility evaluation prepared pursuant to Section 20.524.015(C)(3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Such development would result in protecting prime agricultural land and/or concentrate development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings

- **20.532.100(B)(3) et seq. Conversion of Non-prime Agricultural Lands. Conversion of all other agricultural lands to non-agricultural uses will be prohibited unless it is found that such development will be compatible with continued agricultural use of surrounding lands and at least one of the following findings applies...**

Not Applicable

Proposed project is not on land that is designated as agricultural land nor is it under Williamson Act Contract. Findings relating to the conversion of agricultural land are not applicable to this project.

Land Division Findings 20.532.100 (C)(1) All Coastal Land Divisions No coastal lands shall be divided unless the following findings are made:	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
(a) The new lots created have or will have adequate water, sewage, including a long term arrangement for septage disposal, roadway and other necessary services to serve them	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) The new lots created will not have, individually or cumulatively, a significant adverse environmental effect on environmentally sensitive habitat areas or on other coastal resources	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) The new lots created will not significantly adversely affect the long-term productivity of adjacent agricultural or timber lands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Other public services, including but not limited to, solid waste and public roadway capacity, have been considered and are adequate to serve the proposed parcels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) The proposed land division meets the requirements of Chapter 20.524 and is consistent with all applicable policies of the Coastal Element	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings

- **20.532.100(C)(1) et seq. No coastal lands shall be divided unless the following findings are made...**

Not Applicable

The application does not propose land division, therefore the findings associated with Land Divisions in Section 20.532.100(C)(1), *et seq.*, are not applicable.

Land Division Findings 20.532.100 (C)(2) Land Divisions of Prime Agricultural Lands	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
No land divisions of prime agricultural lands designated AG or RL shall be approved until a Master Plan is completed which shows how the proposed division would affect agricultural uses on the proposed parcel(s), and the overall agricultural operation on the residual ownership and the following findings are made:				
(a) The division will protect continued agricultural use and contribute to agricultural viability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) The division will not conflict with continued agricultural use of the subject property and the overall operation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) The division is only for purposes allowed in AG or RL designations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) The division will not contribute to development conflicts with natural resource habitats and visual resource policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings

- **20.532.100(C)(2) et seq. No land divisions of prime agricultural lands designated AG or RL shall be approved until a Master Plan is completed which shows how the proposed division would affect agricultural uses on the proposed parcel(s), and the overall agricultural operation on the residual ownership and the following findings are made...**

Not Applicable

The application includes no division of land, therefore the findings associated with Land Divisions in Section 20.532.100(C)(2), *et seq.*, are not applicable.

Land Division Findings 20.532.100 (C)(3) Land Divisions of Non-Prime Agricultural Lands	Inconsistent	Consistent (With Conditions of Approval)	Consistent (Without Conditions of Approval)	Not Applicable
No lands designated RL or AG shall be divided or converted to non-agricultural use(s) unless at least one of the following findings are made:				
(a) Continued or renewed agricultural use is not feasible	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Such conversion would preserve prime agricultural land	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Such conversion would concentrate development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings

- **20.532.100(C)(3) et seq. No lands designated RL or AG shall be divided or converted to non-agricultural use(s) unless at least one of the following findings are made...**

Not Applicable

The application includes no division of land, therefore the findings associated with Land Divisions in Section 20.532.100(C)(3), *et seq.*, are not applicable.