

Jones, Marie

From: Liebenberg, Angela@Wildlife <Angela.Liebenberg@wildlife.ca.gov>
Sent: Thursday, July 31, 2014 1:07 PM
To: Jones, Marie
Cc: Macedo, Richard@Wildlife
Subject: CDP #8-2013 comments

Marie –

This is in response to the Request for Comments on Coastal Development Permit (CDP) #8-2013. The project is a proposed shopping center consisting of three separate buildings, totaling 29,500 square feet of building space. Additional development would include a new access road, parking lot, pedestrian improvements, rain water storage tanks, utility connections and landscaping.

The biological scoping surveys and associated Coastal Act Compliance Report prepared by WRA Environmental Consultants did not identify Environmentally Sensitive Habitat Areas, special status species or their habitats on the project site. Vegetation communities reported include non-native grassland and ruderal scrub. Areas with shore pine and Bishop pine trees were observed, but were not classified as forest habitat due to their scattered distribution and lack of understory recruitment. Native shrubs and forbs were also observed.

Project design sheets show many reduced-impact elements, such as solar panels, rainwater storage tanks, vegetated areas to infiltrate water runoff, and use of native plants for landscaping.

The City of Fort Bragg (City) currently provides municipal water from three surface water sources (Noyo River, Newman Gulch, and Waterfall Gulch) which are experiencing low flows due in part to continuing and historic drought conditions. Independent of drought conditions, the City has experienced water-related shortfalls and issues including potential violations of its appropriative water right and failure to notify the Department of Fish and Wildlife as required under section 1602 of the Fish and Game Code (FGC). To fully address potential impacts to surface water sources, the CDP should include: a) a detailed water budget for the entire project and b) a detailed assessment documenting how water will be provided to this project in a manner that does not result in new or continuing violations of the FGC and other related laws and regulations.

Storage and use of rainwater is an increasingly important strategy for maximizing existing water supplies. Details were not provided regarding the expected water demand of the project in relation to the volume of rainwater that will be used and stored. In order to minimize the amount of water to be supplied by the City, the rainwater storage and use system should be designed with the capacity to provide as much of the expected water demand as is feasible.

Layout of landscaping and vegetated “bio-filtration” areas are shown in the Landscape plan, but Monterey cypress and shore pine are the only species identified. Monterey cypress trees should not be used because this species may become invasive in parts of California outside of its native range on the Monterey coast. Other plant species selected for landscaping should be native, or if not native, non-invasive, and preferably drought-tolerant.

Within the shopping center complex, permeable pavers are specified. Where feasible, other surfaces such as the new access road, sidewalk and walkway areas should be constructed using permeable paving. Where permeable surfaces are not feasible, runoff should be directed into or across vegetated areas to help filter runoff and encourage groundwater recharge.

My recommendations are as follow:

1. The CDP should include: a) a detailed water budget for the entire project and b) a detailed assessment documenting how water will be provided to this project in a manner that does not result in new or continuing violations of the Fish and Game Code and other related laws and regulations.
2. If feasible, rainwater storage and use system should be designed with the capacity to meet or exceed expected water demand.
3. Species used for landscaping and revegetation should preferably be native, or if non-native, should be non-invasive. Drought-tolerant species are preferable. No known invasive species should be used. Exotic plant species to avoid include those identified in the California Invasive Plant Council's database, which is accessible at: <http://www.cal-ipc.org/paf/>.
4. Permeable surfaces should be used wherever feasible. Otherwise, runoff should be directed into or across properly vegetated areas.

These comments and recommendations are not making a determination that the proposed project is consistent with the certified City of Fort Bragg LCP or certified Mendocino County LCP.

Thank you for the opportunity to comment. If you have any questions, please feel free to contact me at (707) 964-4830 or angela.liebenberg@wildlife.ca.gov.

- Angela

Angela M. Liebenberg
Environmental Scientist
California Department of Fish and Wildlife
Coastal Conservation Planning
32330 North Harbor Drive
Fort Bragg, CA 95437
(707) 964-4830
angela.liebenberg@wildlife.ca.gov