PLANNING COMMISSION STAFF REPORT
GENERAL PLAN AMENDMENT/
REZONE

NOVEMBER 5, 2026
GP_2021-0002
R_2021-0005

PROJECT PLANNER CONTACT
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PROJECT SUMMARY

OWNER/APPLICANT:	Cally Dym PO Box 548 Little River, CA 95456
AGENT:	Wynn Coastal Planning & Biology, Inc. 703 N. Main Street Fort Bragg, CA 95437
REQUEST:	Amendment to the Local Coastal Program (LCP), including Land Use Map No. 17 (Mendocino) and the coastal zoning map, to apply the Visitor Accommodations and Services (VAS) Inn/Bed and Breakfast Accommodation (*1C) combining district to the subject parcel (APN 121-280-15) currently zoned Rural Residential (RR5).
LOCATION:	In the Coastal Zone, in the town of Little River, on the west side of State Route 1 (SR 1) 700± feet north of its intersection with Little River Airport Road (CR 404), located at 7720 N Highway 1, Little River; APN: 121-280-15.
TOTAL ACREAGE:	5.25± Acres
GENERAL PLAN:	Rural Residential 5-Acre Minimum Lot Size (RR:5) General Plan (Chapter 7 – Coastal Element)
ZONING:	Rural Residential 5-Acre Minimum Lot Size (RR:5) Mendocino County Code Title 20, Division II
CODE REFERENCE:	Visitor Accommodations and Services Mendocino County Code (MCC) Chapter 20.436
APPEALABLE	N/A: LCP Amendments do not become effective until they have been approved and certified by the Coastal Commission.
SUPERVISORIAL DISTRICT:	District 5 (Williams)
ENVIRONMENTAL DETERMINATION:	Mitigated Negative Declaration
RECOMMENDATION:	By Resolution, recommend adoption of the Mitigated Negative Declaration and approval of the project to the Board of Supervisors, based on the facts and findings and subject to the conditions of approval in the attached Resolution.

PROJECT BACKGROUND & INFORMATION

(A) PROJECT DESCRIPTION: The applicant intends to build a five (5) unit Inn on the subject parcel. Inns are classified as a Visitor Accommodations and Services use type in Mendocino County Code (MCC) Section 20.332.015. The property is currently within the Rural Residential 5-Acre Minimum Coastal Element Land Use classification and zoning district (RR:5). The Inn use type is not permitted in the RR:5 zoning district unless that property has been overlain with the Visitor Accommodations and Services Combining District. Therefore, the applicant has requested that the Local Coastal Program (LCP) be amended to apply the Visitor Accommodations and Services (VAS) Inn/Bed and Breakfast Accommodation (*1C) combining district to the subject parcel.

When the LCP was first adopted, existing visitor-serving facilities were designated by an asterisk (*) and a number, such as "*1" or "*2". Sites identified for future conditional facilities are designated by an asterisk (*) and a number followed by a "C" for conditional. The number corresponds with the category of visitor serving facility. Number one (1) corresponds to Inns or Bed and Breakfast accommodations. The proposed amendment would apply the "*1C" combining district designation to the site because there are no existing visitor-serving facilities on the site.

The proposal would involve an amendment to both the Land Use Plan (LUP) and Implementation Plan (IP) portions of the Local Coastal Program (LCP). Land Use Map No. 17: Mendocino (see attachment A), which is part of the LUP, would be amended to add the *1C designation. Likewise, the coastal zoning map, which is part of the IP, would be amended to add the *1C combining district (see attachment A).

Pursuant to Mendocino County Code (MCC) section 20.548.020, the Planning Commission shall hold a public hearing on the application for amendment and shall render its decision in the form of a report incorporating a written recommendation to the Board of Supervisors. After holding a public hearing, the Board of Supervisors may approve, modify, or disapprove the recommendation of the Planning Commission. Any modification of the amendment by the Board of Supervisors must first be referred to the Planning Commission for report and recommendation, but a failure of the Planning Commission to report within forty (40) days after the referral shall be deemed to be approval of the proposed modification. Any approval of the amendment would not become effective until the amendment has been approved and certified by the Coastal Commission.

If the proposed amendment were approved and certified by the Coastal Commission, future development of an inn on the property would be permitted upon issuance of a Coastal Development Use Permit pursuant to MCC section 20.436.015. The applicant preemptively submitted a Coastal Development Use Permit application (CDP_2022-0040) which has been placed on hold pending the outcome of this project.

On December 21, 2023, the Planning Commission held a public hearing regarding this project. Questions and concerns were expressed at the meeting regarding consultation with Caltrans about traffic safety, the age of the botanical report, the proper procedure between the proposed LCP amendment, rezone, and Coastal Development Use Permit as it pertains to CEQA, the analysis used for the proposed septic system, the status and build-out of visitor accommodation facilities in the area, and existing easements on the property. The project was continued to a date uncertain at that meeting to allow staff to address these concerns and questions with the applicant and the Coastal Commission.

(B) SITE CHARACTERISTICS: The property is a blufftop lot on a relatively flat marine terrace. Much of the lot was previously used for animal raising. CDP 77-04 authorized the installation of a wood post and wire mesh fence, shed, and paddock area for horses. The lot also contains an existing 10,000-gallon concrete water tank and pump house. The lot was created by Coastal Development Permit 1-89-151, a minor subdivision of a previously 13± acre parcel, the other portion of which became APN 121-280-16 to the south. That Coastal Development Permit also required that the applicant offer a dedication of land for vertical public access and an open space easement on APN 121-280-16, which was eventually accepted by the Mendocino Land Trust in 2005. In 2010, the Mendocino Land Trust obtained a Coastal Development Permit to construct a trail within the vertical access easement, which is known as the Little River Blowhole Trail.

APN 121-280-16 also contains an existing four (4) unit visitor accommodation facility that is considered a part of the Little River Inn, which includes several other properties in the vicinity, most notably the property

at 7901 N Highway 1. According to the staff report for CDP 1-89-151, the applicant at that time provided evidence that the visitor accommodation facility had been in use since 1964. However, the staff report for CDP 77-04 notes that Building Permit No. F-7177 & Permit No. FB84-263, to *"change a single-family residence to a 4-unit visitor facility"*, was finalized on 11/28/1984.

Both properties are accessed via a forty (40) foot wide private roadway & public utility easement connected to State Route 1, which ends at a cul-de-sac whose center is on the property line between the two properties. The cul-de-sac has a radius of forty-five (45) feet. However, the actual paved encroachment and driveway from the existing visitor accommodation facility to State Route 1 does not appear to lie precisely within the easement. APN: 121-280-15 also has a small rectangular drainage easement in the northeastern corner.

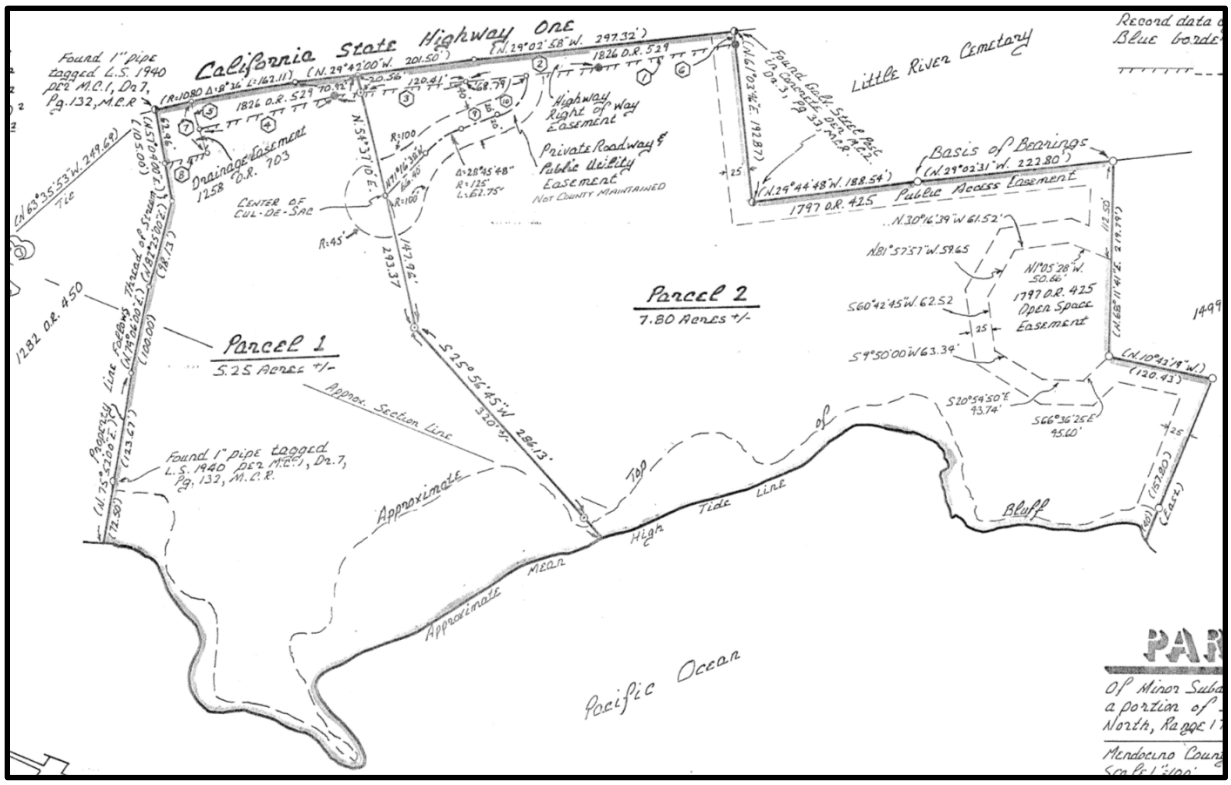


Figure 1. Zoomed and cropped image of the parcel map for the subdivision which created the lot, including the private road easement and drainage easement. The full map is included as attachment B.

(B)(1) Public Services:
Access: State Route 1 (SR 1)
Water District: None
Sewer District: None
Fire District: Mendocino FPD

(C) RELATED APPLICATIONS: The following applications have occurred on the subject parcel or on the surrounding properties and are relevant to the proposed project. All projects listed below have already been approved, unless otherwise stated.

(C)(1) Subject Parcel Projects:

- **MS 17-88:** Minor Subdivision to create two parcels of 7.8± acres and 5.25± acres. Approved by Mendocino County 09/15/1989.

- **1-89-151-W:** Coastal Development Permit Waiver to *"drill two test holes"*. Approved by the Coastal Commission 09/15/1989.

- **1-89-151:** Minor Subdivision of a 13.05-acre parcel into two lots; demolition of a gatehouse building,

tack house, and well house; construction of a new gatehouse building, two new wells, and rocked roadway; and an Offer to Dedicate a vertical accessway at the site of an existing four (4) unit visitor accommodation facility. Approved by the Coastal Commission on 10/10/1989. Parcel Map recorded 12/20/1990.

- **CDP 77-04:** Coastal Development Permit to fence 6± acres of a 13± acre ownership with 2,900± linear feet of wood post and wire mesh fencing six (6) feet high; construct a twelve (12) by twenty (20) foot "run in shed" with wood siding, a metal roof, and an adjacent 2,000± square foot paddock area enclosed with 6 foot-high metal post and rail fencing for four (4) horses; and install four (4) gates. Approved 11/21/2005.

- **CDP_2022-0040:** Coastal Development Permit to construct an inn comprised of five (5) detached cabins, one (1) guest welcome center, (1) event patio, one (1) housekeeping structure, parking, walkways, landscaping, roof and ground-mounted solar panels, septic system, connection to an existing well, connection to existing water and propane tanks on the neighboring parcel, and associated grading. The project would also involve rerouting and extending the existing driveway. This application is currently on hold pending the proposed LCP amendment and rezone. The application materials submitted for CDP_2022-0040 can be found on the Department's website.[1] The set of plans, exterior colors, exterior lighting, and other surveys associated with CDP_2022-0040 have also been included as attachments.

(C)(2) Neighboring Projects:

- **CDP 68-08:** Coastal Development Permit to construct a two (2) foot wide public trail, including fencing and signs (APN 121-280-16). The trail would run from State Route 1 along the outside of the Little River Cemetery, around a sinkhole, and to approximately fifty (50) feet from the ocean bluff edge. Approved 01/28/2010.

(D) AGENCY COMMENTS: On January 3, 2022, project referrals were sent to the following responsible or trustee agencies with jurisdiction over the Project. Their submitted recommended conditions are discussed in this staff report and contained in Conditions of Approval. A summary of the submitted agency comments are listed below.

TABLE 1: Referral Agency Responses

REFERRAL AGENCIES	COMMENT
Planning Division – Fort Bragg	Comments
Department of Transportation	No Comments
Division of Environmental Health	Comments
Building Inspection – Fort Bragg	Comments
Assessor	No Response
Caltrans	Comments
CAL FIRE (Land Use)	No Response
California Dept. of Fish & Wildlife	Comments
California Coastal Commission	Comments
Cloverdale Rancheria	No Response
Redwood Valley Rancheria	No Response
Sherwood Valley Band of Pomo Indians	No Response
Mendocino Fire Protection District	No Response
Trails Advisory Council	No Response

(D)(1) Fort Bragg Planning Division: On January 4, 2022, the Fort Bragg Planning Division provided additional information regarding the permit history of the subject parcel, which is captured in the "Related Applications" section above.

(D)(2) Caltrans: On January 28, 2022, Caltrans provided a letter explaining that under the proposed LCP amendment and rezone, there are no proposed changes to the existing site for their agency to review.

[1] CDP_2022-0040 Application materials

However, Caltrans did request the opportunity to comment on any future development that may occur on the subject property to ensure that access to State Route 1 will meet State standards. On April 7, 2023, Caltrans provided comments on the associated CDP_2022-0040 application. Caltrans noted that District 1 *"does not support a new access to the applicant's parcel primarily due to sight distance requirements being difficult to meet along the subject parcel's frontage."* Accordingly, Caltrans requested that *"the applicant obtain an encroachment permit to recognize (shared) ownership and future maintenance responsibility of the existing access."* Caltrans also noted that any work within their right-of-way requires an encroachment permit. As part of CDP_2022-0040, the applicant proposes to maintain the existing shared access to State Route 1 through APN 121-280-16.

(D)(3) Environmental Health: The Division of Environmental Health (DEH) responded with no comment on the proposed LCP amendment and rezone. However, DEH did review and approve the proposed five (5) unit (650 gallons per day) septic system design for the associated CDP_2022-0040 under Septic Permit ST27879.

(D)(4) Building Inspection: On April 14, 2023, the Building Inspection Division provided comments on CDP_2022-0040, noting that the proposed work is required to have plans prepared by a California licensed architect or engineer.

(D)(5) Dept. of Fish & Wildlife: On November 21, 2023, the California Dept. of Fish & Wildlife (CDFW) provided the following comment: *"In our Trustee Agency role, CDFW will have comments to provide the County on the CDP application, as we discussed during our site visit on October 24, 2023. These will be related to the proposed ESHA buffer reduction and would support measures proposed by the consultant to minimize potential impacts to the environment."*

(D)(6) Coastal Commission: On April 25, 2022, the Coastal Commission provided preliminary comments on the project, including (1) a request that the project description be clarified, (2) a note that Section 3.7 of the County's Land Use Plan (LUP) discourages additional development of visitor accommodations between Russian Gulch and the Navarro River (where this property is located), (3) a request that the applicant provide a low-cost visitor services assessment to analyze compatibility with LCP Policy 3.7-5, (4) a request that additional proof of water be provided for full development of the site and a request that a traffic study be submitted, (5) that the visual resource analysis account for the removal of trees, and (6) a request that a biological report be submitted.

On March 8, 2024, staff met with the Coastal Commission to discuss the project. Among other things, the Coastal Commission confirmed that the LCP amendment should be processed separately from the associated use permit (CDP_2022-0040). This was captured in an e-mail from the prior staff planner assigned to this project. However, a detailed explanation by the prior staff planner or Coastal Commission was not included in the e-mail. Staff believes the reason for this is as follows:

The authority to act on a Coastal Development Use Permit lies with the Planning Commission pursuant to MCC Section 20.532.045. There is not an explicit mechanism elsewhere in the code to elevate the decision-making responsibility for a Coastal Development Use Permit to the Board of Supervisors. As noted above, the development of an inn in the Rural Residential zone is only permitted when a Visitor Accommodations and Services Combining District has been applied to the property and the associated use permit has been approved. Because the Planning Commission provides a recommendation to the Board of Supervisors regarding the LCP amendment and is not the final decision-making authority, simultaneous approval of the use permit would be unfounded until the associated LCP amendment has been finalized. If the use permit were approved by the Planning Commission but the Board of Supervisors or Coastal Commission were to later disapprove of the LCP amendment, the status of the use permit entitlement would be questionable. Conditioning the approval of a use permit on a future discretionary action of the Board of Supervisors and Coastal Commission is undesirable because it would circumvent the planning process and delegitimize the findings which must be made in support of a use permit regarding a development's consistency with the LCP.

On March 15, 2024, the Coastal Commission provided comments on the project. Those comments addressed visitor serving uses, consideration of a full potential build-out scenario, ESHA, water & sewer, traffic & circulation, and scenic & visual resources. Importantly, the Commission noted that the *1C combining district would allow a developer to construct a ten (10) unit inn, and that the potential for full

build-out of the site under this combining district should be analyzed. In April 2024, there was further discussion between staff, the applicant, and the Coastal Commission. There are examples of past visitor accommodation projects that have involved the placement of a note on the Land Use Maps restricting the development of additional units to a certain number. The applicant questioned whether, instead of analyzing the project under a full build-out scenario, it may be feasible to simply place a note on the Land Use Maps restricting the development of this property to five (5) units. However, those examples and corresponding notes on the Land Use Maps involved the certification of existing legal nonconforming uses rather than the development of new units. Therefore, staff determined that it was not appropriate to add a note to the Land Use Map restricting development of the subject property. The applicant provided a response to other comments from the Coastal Commission, which are discussed in sections (F) and (G) below.

(D)(7) CAL FIRE: Although CAL FIRE did not formally respond to application referral, Planning & Building Services staff contacted CAL FIRE staff on August 20, 2026 to determine whether CAL FIRE would review the theoretical 10-unit inn plans for compliance with State Fire Safe Regulations. CAL FIRE staff stated it was their preference that only the actual development plans for the 5-unit inn be reviewed. This would occur during the Use Permit process. Nevertheless, Planning & Building Services staff reviewed the submitted plans against the State Fire Safe Regulations and found them to be consistent with property line setback, road width and surface, turnaround, and grade requirements.

(D)(8) California Environmental Quality Act (CEQA): Public Resources Code (PRC) section 21080.9 states the following:

> *"This division [CEQA] shall not apply to activities and approvals by any local government, as defined in Section 30109, or any state university or college, as defined in Section 30119, as necessary for the preparation and adoption of a local coastal program or long-range land use development plan pursuant to Division 20 (commencing with Section 30000); provided, however, that certification of a local coastal program or long-range land use development plan by the California Coastal Commission pursuant to Chapter 6 (commencing with Section 30500) of Division 20 shall be subject to the requirements of this division. For the purpose of Section 21080.5, a certified local coastal program or long-range land use development plan constitutes a plan for use in the California Coastal Commission's regulatory program."*

Therefore, the County's action on the LCP amendment is exempt from CEQA. However, the approval of a subsequent Coastal Development Use Permit on the property would be subject to CEQA review. The Coastal Commission is not exempt from satisfying CEQA requirements with respect to LCP amendments, but the Commission's LCP amendment review, approval, and certification process has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA (California Code of Regulations section 15251(f)). PRC section 21080.5(d)(2)(A) prohibits a proposed LCP amendment from being approved if there are feasible alternatives and/or feasible mitigation measures available that would substantially lessen any significant adverse effect that the LCP amendment may have on the environment. Although local governments are not required to satisfy CEQA in terms of local preparation and adoption of LCPs and LCP amendments, many local governments use the CEQA process to develop information about proposed LCPs and LCP amendments, including to help facilitate Coastal Commission review.

During the December 21, 2023 Planning Commission hearing, concerns were raised regarding "piecemealing" under CEQA. Piecemealing means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. The CEQA guidelines define a project as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. Piecemealing is forbidden under CEQA. In addition, CEQA guidelines section 15004(b) states that *"negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment."*

The proposed LCP amendment could have reasonably foreseeable indirect impacts on the environment, such as the future development of an inn on the property that would otherwise not be allowed in the base zone. If the LCP amendment were approved, piecemealing would be unlikely to occur because the Coastal Commission's review, approval, and certification process is the functional equivalent of CEQA review, which

must necessarily involve reasonably foreseeable future development brought about by the amendment. However, the County's process of reviewing and approving Coastal Development Use Permits has not been certified as being the functional equivalent of CEQA review. An individualized CEQA determination would eventually be necessary during any review and approval of a subsequent Use Permit. Therefore, to (1) help facilitate Coastal Commission review of the LCP amendment, (2) ensure that piecemealing does not occur, and (3) ensure that environmental documents are prepared as early as feasible in the planning process, staff conducted an Initial Study and found that no significant environmental impacts would occur as a result of the whole project (i.e., the LCP amendment itself and its reasonably foreseeable future effects, including the development of an inn) that could not be mitigated to less than significant. Therefore, a mitigated negative declaration was prepared.

The mitigation measures identified in the mitigated negative declaration would not be applicable to the proposed General Plan Amendment and Rezoning because they are legislative actions would not involve any physical development. Instead, the measures would be implemented as conditions of a future Use Permit application for the development of an inn on the site.

PROJECT ANALYSIS

(E) STANDARD OF REVIEW: MCC section 20.548.020(A) states that the application shall be processed in accordance with sections 65800 through 65993 of the Government Code, sections 21000 through 21176 of the Public Resources Code, and sections 15000 through 15387 of the California Administrative Code. Pursuant to Public Resources Code section 30500(b), the proposed amendment of the Coastal Element of the General Plan does not constitute an amendment of the general plan for the purposes of section 65358 of the Government Code.

Only sections 65853 through 65857 of the Government Code are applicable to a discussion regarding the standard of review for an LCP amendment. Those sections establish the process by which changes of zone are adopted, which is memorialized in MCC section 20.548.020(B) through (E).

Sections 21000 through 21176 of the Public Resources Code refer to CEQA. Sections 15000 through 15387 of the California Administrative Code (also known as the California Code of Regulations, or "CCR") refer to the Guidelines for Implementation of CEQA. Further discussion of CEQA can be found in section (D)(8) above and in the associated Negative Declaration.

Additionally, CCR sections 13551 through 13555 regulate LCP amendments. Pursuant to section 13552, an LCP amendment submittal to the Coastal Commission must include (1) a discussion of the amendment's relation to and effect on the other sections of the certified LCP, (2) an analysis that meets the requirements of section 13511, and (3) an analysis that demonstrates conformity with the requirements of Chapter 6 of the Coastal Act.

Section 13511 requires that the local government include the following in the scope of the LCP:

(a) The policies of Chapter 3 of the California Coastal Act of 1976 concerning specific coastal resources, hazard areas, coastal access concerns, and use priorities, including consideration of public access and recommended uses of more than local importance and relating to the area governed by the LCP, shall be applied to determine the kind, location and intensity of land and water uses that would be in conformity with the policies of the Act. This determination shall include an analysis of the potential significant adverse cumulative impacts on coastal resources and on public access to or along the coast, due to existing and potentially allowable development proposed in the LCP.

(b) The level and pattern of development selected by the local government shall be reflected in a land use plan, zoning ordinances and zoning district maps. The local coastal program shall include measures necessary to achieve conformity with the policies of Chapter 3 of the California Coastal Act of 1976; such measures shall be based on the authority inherent in the reasonable exercise of police power, and specifically to the authority provided in the California Coastal Act of 1976 to control or prevent uses harmful to the coastal resources of the state.

Chapter 6 of the Coastal Act includes articles related to general implementation of LCPs, the procedure for

preparation, approval, and certification of LCPs, and coastal public access programs. Those articles are mostly procedural and are not applicable to the standard of review for the proposed amendment. However, section 30503 of Chapter 6 states that during the amendment of any LCP, *"the public, as well as all affected governmental agencies, including special districts, shall be provided maximum opportunities to participate."* In this case, the public and governmental agencies would have the opportunity to participate either in-person or virtually at the Planning Commission hearing, Board of Supervisors hearing, and Coastal Commission hearing for the proposed LCP amendment. Governmental agencies also have the opportunity to submit comments at any time. As noted above, the application was referred to other governmental agencies in 2022. The public and other governmental agencies also have the opportunity to participate in the CEQA process while the Negative Declaration is circulated for public review.

Additionally, section 30512 of Chapter 6 confirms that the Coastal Commission *"shall certify a land use plan, or any amendments thereto, if it finds that a land use plan meets the requirements of, and is in conformity with, the policies of Chapter 3."* Therefore, the proposed amendment must be evaluated to determine whether it conforms with the policies of Chapter 3 and the other sections of the existing LCP.

(F) COASTAL ACT CHAPTER 3 CONSISTENCY:

(F)(1) Public Access: Coastal Act sections 30210 and 30212 state the following in pertinent part:

> *30210: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*
>
> *30212: Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected.*

Applying the *1C overlay to the site would marginally increase access to the coastline. MCC section 20.528.010(A) states that *"in specified areas identified in Chapter 4 of the Coastal Element or as indicated on land use maps, prior to the issuance of a coastal development permit, an offer to dedicate an easement for public access shall be recorded unless required public access has otherwise been secured as provided herein."* LCP Land Use Map 17: Mendocino currently shows proposed shoreline access vertically along what appears to be the border between the subject parcel and APN 121-280-16 and laterally along the bluff of both properties (see Figure 2 below). Therefore, under current conditions, future development may require the provision of additional public access.

However, nearby vertical access was created across adjacent property (APN 121-280-16) in 1989 as a result of permit 1-89-151. The accessway is currently managed by the Mendocino Land Trust as the Little River Blowhole trail. The trail wraps around the northern and western boundary of the Little River Cemetery property and terminates at the bluff (see Figure 3 below). Due to the discrepancy between proposed access in Land Use Map 17 and the established trail, it is unclear whether development of the subject parcel under existing conditions would trigger section 20.528.010(A) such that additional vertical or lateral public access would be required. It seems clear that the vertical access envisioned by Land Use Map 17 has already been adequately provided by the Blowhole trail, but additional lateral access along the bluffs of the two properties may be necessary. However, the provision of lateral access across the bluffs of the subject property under current conditions would not be accessible unless vertical access were provided across the subject property or additional lateral access were provided across APN 121-280-16 to connect to the terminus of the Blowhole trail.

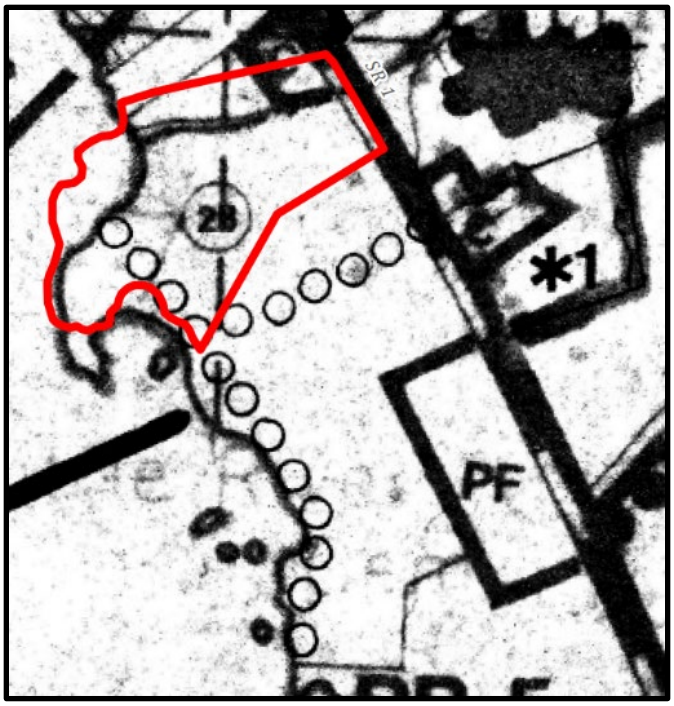


Figure 2. Zoomed and cropped image of Land Use Map 17. The dotted lines represent proposed shoreline access, and the red outline represents the subject parcel.



Figure 3. Excerpt from the Coastal Commission's 2016 Status Report of Vertical Accessways showing the existing Blowhole trail

If development of the subject property under current conditions would not require the provision of public access beyond what is provided by the existing blowhole trail, then applying the *1C overlay would increase public access because it would allow future development of visitor accommodations and services on the site. Existing LCP regulations require that the development of visitor accommodations and services include the provision of public access. MCC section 20.528.010(B) states that *"visitor accommodations and services on parcels adjoining the shoreline shall provide public access to the blufftop and/or the shoreline. The access, to be required as a condition of permit approval in conjunction with all new or expanded developments on such sites, shall be available to the public at large as well as to guests."* Indeed, the site plan submitted by the applicant shows a proposed public access trail along the northern edge of the proposed inn development.

Coastal Act section 30212.5 states:

> *Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

This section was implemented within MCC section 20.528.015, which requires that *"parking areas to adequately serve public access shall be considered in the permit review process."* Applying the *1C overlay to the site would allow the development of a maximum 10-unit inn with a Use Permit. Section 20.528.015 would require that parking areas be considered within the review of the Use Permit application. A design for a 10-unit inn was provided by the applicant as shown on the submitted site plan (see attachment G). The design would provide a total of 12 parking spaces. 10 spaces would be reserved for guests and 2 would be for inn staff.

It is unlikely that additional parking areas could be developed where the proposed public access trail intersects State Route 1 because Caltrans has stated that they do not support an additional encroachment onto the property. Parking is limited at the nearby Blowhole trailhead. The highway widens slightly along the shoulder at the north end of the Little River Cemetery, allowing 2-3 cars to park. According to Caltrans' 2022 Long-Term Socio-Economic Forecast for Mendocino County[1], hotel occupancy rates varied from 30% to 85% between September 2018 and September 2021. According to AirROI[2], the occupancy rate of vacation rentals in Mendocino County as of January 1, 2026 is approximately 41%. Therefore, several parking spaces may be vacant at a given time, which could provide additional parking for the general public not staying at the inn.

Coastal Act section 30213 states:

> *Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

Applying the *1C overlay to the site would not directly conflict with this section, but it would allow the future development of visitor facilities that could conflict with this section if lower cost facilities are not provided. Typically, the Coastal Commission has required mitigation for 25% of new rooms created and 100% of existing rooms lost. "Lower cost" has been defined in various ways by the Commission in the past, but is most commonly defined as rates at or below 75% of the statewide Average Daily Rate (ADR) for the year prior to final action on the permit. Higher cost accommodations are typically considered to be rates that are greater than 125% of the statewide ADR. Everything else would be considered Moderate cost. Lower cost accommodations have generally been required to be provided in one of three ways: either (1) on-site lower cost accommodations, (2) off-site lower cost accommodations, or (3) payment of an in-lieu fee to fund future development of lower cost accommodations.

Prior comments from the Coastal Commission noted the following:

> *The County's staff report analysis of the proposed LCP amendment should also address the feasibility of providing a range of visitor-serving and recreational opportunities at the subject site, including but not limited to lower cost visitor-serving facilities, taking into account the other coastal resource issues described in this letter.*
>
> *The applicant should cite the current amount of low-cost VSF available in the area and justify why it is not feasible to include low-cost VSF in the development as required in LCP Policy 3.7-5.*
>
> *As part of their CDP application, the applicant should provide a feasibility study addressing whether providing the 25% lower cost rooms on-site is or is not feasible, which is usually done through an analysis of land value, development costs, estimated annual revenue based on projected ADRs and occupancy rates, and estimated operating costs.*

[1] Available online at: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/new-state-planning/transportation-economics/socioeconomic-forecasts/2022/mendocino-2022-a11y.pdf.
[2] Available online at: https://www.airroi.com/report/world/united-states/california/mendocino.

The owner of the subject property is also the registered agent of Little River Inn, LLC, which is the owner of the nearby Little River Inn. The applicant has stated that the proposed inn units would be High cost. In their letter dated November 3, 2025, the applicant's agent notes that the *"property owner/applicant is willing to designate the applicable number of units as low cost."* However, the applicant has proposed designating existing units off-site on the nearby Little River Inn property as lower cost rather than providing lower cost units on the subject property. Although this is not the most preferential method of providing lower cost accommodation, it is evidence that providing lower cost accommodation is feasible.

(F)(2) Recreation: Coastal Act sections 30220 through 30223 provide for the protection of land suitable for water-oriented recreational activities, oceanfront land suitable for recreational use, visitor-serving commercial recreational facilities, oceanfront land suitable for coastal dependent aquaculture, and upland areas necessary to support coastal recreational uses. Section 30224 encourages increased recreational boating use of coastal waters.

Future development of an inn would not interfere with the preservation of land suitable for recreation because the subject property was not previously designated as land intended for recreational uses. The subject land was placed within the Rural Residential land use classification, which is intended *"to encourage and preserve local small scale farming in the Coastal Zone on lands which are not well-suited for large scale commercial agriculture."* However, Passive Recreation is a principal permitted use within the Rural Residential zoning district. Community Recreation and Active Recreation are conditional uses.

Applying the *1C overlay would either have no impact or marginally increase recreational opportunities due to the potential increase in public access via future development of visitor accommodations. Future public access would allow passive recreation along the access trail and at the bluff edge, such as sightseeing, hiking, or photography. Development of an inn may also indirectly increase recreational opportunities in the area by providing visitor accommodations near existing recreational areas, such as Van Damme State Park.

(F)(3) Marine Environment: Coastal Act sections 30230 through 30236 provide for the protection of marine resources, including protection of streams, wetlands, estuaries, and lakes; prevention of hazardous substance spillage; protection of commercial fishing and recreational boating; and protection of natural shoreline processes such as bluff erosion. Applying the *1C overlay would not directly impact the protection of marine resources because it would not change any existing policies or implemented regulations within the LCP that are intended to protect marine resources. However, the *1C overlay may indirectly impact the protection of marine resources by inducing the future development of an inn on the property, which could conflict with existing LCP policies or regulations. Section (G) below discusses a theoretical inn development's consistency with existing LCP policies and regulations.

(F)(4) Land Resources: Coastal Act sections 30240 through 30244 provide for the protection of environmentally sensitive habitat areas, agricultural land, soils, timberlands, and archaeological resources. Applying the *1C overlay would not directly impact the protection of these resources because it would not change any existing policies or implemented regulations within the LCP that are intended to protect the resources. However, the *1C overlay may indirectly impact these resources by inducing the future development of an inn on the property, which could conflict with existing LCP policies or regulations, including the intent of the underlying zoning district applied to the property.

The potential impact on Environmentally Sensitive Habitat Areas (ESHA) is discussed in section (G)(6) below.

Coastal Act section 30241 states:

> *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*
>
> *(a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.*

(b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.

(c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.

(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.

(e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.

(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of prime agricultural lands.

The subject property does not contain prime agricultural land. According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), the property contains both Grazing Land (G) and Urban & Built-Up Land (D). The property is bordered to the north by commercial uses, to the east by residential and visitor accommodation uses, and to the south by visitor accommodation uses. Applying the *1C overlay to the property would not destabilize established urban and rural boundaries because it is not at the periphery of urban or rural areas.

The Rural Residential land use classification and zoning district is intended *"to encourage and preserve local small scale farming in the Coastal Zone on lands which are not well-suited for large scale commercial agriculture. Residential uses should be located as to create minimal impact on the agricultural viability."* Applying the *1C overlay may interfere with the underlying intent of the Rural Residential district if the future development of an inn would significantly impact the agricultural viability of the lot. As noted above, the property was previously used for horse raising. The Department of Water Resources (DWR) Land Use Program 2024 Statewide Crop Map classifies much of the property as Pasture (P). Due to the size of a theoretical 10-unit inn as provided in the attached site plan (see attachment G), it is unlikely that remaining property could be used as viable pastureland or paddocks. As noted in the Mitigated Negative Declaration, the California Department of Conservation's Land Evaluation & Site Assessment (LESA) Model was used to determine the significance of agricultural land conversion based on soil resource quality, project size, water availability, surrounding agricultural land, and surrounding protected resource lands. The model determined that the impact of agricultural land conversion would not be significant, primarily due to the small project size and lack of surrounding agricultural land.

Coastal Act section 30242 states:

> *All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.*

Applying the *1C overlay would not conflict with this section because the property does not contain prime agricultural land and surrounding lands are not used for agriculture.

Coastal Act section 30244 states:

> *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

Applying the *1C overlay would not conflict with this section because it would not change existing LCP regulations related to archaeological or paleontological resources. Coastal Element policy 3.5-10 states:

> *The County shall review all development permits to ensure that proposed projects will not adversely affect existing archaeological and paleontological resources. Prior to approval of any proposed development within an area of known or probable archaeological or paleontological significance, a limited field survey by a qualified professional shall be required at the applicant's expense to determine the extent of the resource. Results of the field survey shall be transmitted to the State Historical Preservation Officer and Cultural Resource Facility at Sonoma State University for comment. The County shall review all coastal development permits to ensure that proposed projects incorporate reasonable mitigation measures so the development will not adversely affect existing archaeological/paleontological resources. Development in these areas are subject to any additional requirements of the Mendocino County Archaeological Ordinance.*

MCC chapter 22.12, the "Archaeological Ordinance", provides that any CDP application be referred to the Northwest Information Center at Sonoma State University for literature review and establishes the process by which the Archaeological Commission reviews projects and surveys to ensure that impacts to resources are avoided or mitigated. Future development of an inn on the property under a Coastal Development Use Permit would be subject to referral and review under the Archaeological Ordinance. A survey was conducted on the property in 2022, and the survey report was submitted to the Archaeological Commission for review at their meeting on July 12, 2023. The survey found no cultural resources on the site and was unanimously accepted by the Commission.

(F)(5) Development: Coastal Act sections 30250 through 30255 direct new development to existing developed areas, protect the scenic and visual qualities of coastal areas, regulate the location and amount of new development, minimize risks and hazards, regulate public works, and prioritize coastal-dependent development.

Coastal Act section 30250 states, in pertinent part:

> *New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.*
>
> *Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.*

Applying the *1C overlay to the site would allow future development of visitor-serving facilities. Although visitor accommodations and services are considered a separate use type category in the Coastal Zoning Code, they may also be considered commercial uses within the meaning of section 30250. The site is contiguous with developed areas in that an existing gas station is located to the north, a visitor-serving facility to the south, and residential uses to the east. The property is also near the Little River Inn and the Cottages at Little River Cove. However, the site is not contiguous with developed areas in that it is not within or adjacent to a water district or sanitation district. The nearest water/sanitation district is the Mendocino City Community Services District (MCCSD) approximately two (2) miles north. Whether the area can accommodate the future development of an inn is dependent in part on the water supply, soil and space available for a septic system, access, and other utilities. These are discussed in section "(G) Existing LCP Consistency" below.

Coastal Act section 30251 states:

> *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New*

> *development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

Applying the *1C overlay to the site would have no impact on the LCPs consistency with this section because existing LCP policies and regulations are sufficient to protect the visual resources in the area and the proposed amendment would not change those policies and regulations. The policies within Coastal Element chapter 3.5 and MCC chapter 20.504 contain regulations to protect scenic and visual quality. Pursuant to section 20.504.015, the property is within a Highly Scenic Area. Therefore, any future development is subject to the development criteria in section 20.504.015(C). The consistency between a theoretical 10-unit inn development and these existing regulations is discussed in section (G)(8) below.

Coastal Act section 30252 states:

> *The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.*

Applying the *1C overlay to the site may marginally increase transit ridership. Mendocino Transit Authority (MTA) provides bus service to Little River via "Route 60 – The Coaster". The Little River bus stop is located just north of the Little River Market, which borders the subject property to the north. If an inn is considered a commercial facility, its future development at the subject property would not require the use of coastal access roads because it would share use of the existing encroachment onto State Route 1 on the "Van Damme" property to the south. As noted in section (F)(1) above, future development of visitor accommodations would require the provision of additional public access to the coast. Parking would be available within the development. The site would be accessible from the nearby bus stop. The future development of an inn may marginally increase the use of nearby recreational facilities, such as Van Damme State Park. As discussed in section (F)(2) above, providing public access to the bluff would allow limited recreational activities. Applying the *1C overlay to the site would not increase the number of new residents because it would not increase the allowable residential density of the property.

Coastal Act section 30253 states:

> *New development shall do all of the following:*
> *(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
> *(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*
> *(c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.*
> *(d) Minimize energy consumption and vehicle miles traveled.*
> *(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

Applying the *1C overlay to the site would have no direct impact on subsection (a) or (b) because existing LCP policies and regulations are sufficient to minimize risks and the proposal would not change those regulations. A theoretical 10-unit inn development's consistency with existing LCP policies and regulations is discussed in section (G)(7) below. The theoretical development's consistency with air quality requirements, energy consumption, and vehicle miles traveled is discussed in the Air Quality, Energy, and Transportation sections of the Negative Declaration, respectively. The CalEEMod model was used to estimate pollutant emissions, where it was found that construction and operational emissions would be

below thresholds established by the Air Quality Management District. Section (G)(9) below also discussed transportation impacts, where it was found that the project would mostly redistribute existing lodging demand rather than inducing additional vehicle trips. Compliance with CalGreen building code standards would help prevent wasteful or inefficient use of energy MCC section 20.504.020 provides protections for special communities and neighborhoods, which includes the area of Little River from *"Schoolhouse Creek on the south to the northern boundary of the Steven's Wood Inn property on the north including all parcels with highway frontage on the east side of Highway 1 and all parcels west of Highway 1."* The subject property is within this neighborhood and is therefore subject to the development criteria in section 20.504.020(C). Applying the *1C overlay to the site would have no direct impact on subsection (e) because existing LCP policies and regulations are sufficient to protect special communities and neighborhoods and the proposal would not change these regulations. A theoretical 10-unit inn's consistency with special community regulations is discussed in section (G)(8) below.

(G) EXISTING LCP CONSISTENCY: Applying the *1C overlay to the site would allow the conditional development of an inn with a Coastal Development Use Permit. An inn is defined in MCC section 20.332.015 as *"any building or portion thereof or group of buildings containing five (5) but no more than ten (10) guest rooms or suites each used, designed or intended to be used, let or hired out for occupancy by transient guests for compensation or profit, and where regular meals may be provided for compensation or profit to guests occupying the overnight accommodations. Provision of regular meals to other than transient occupants of the facility shall require a coastal development use permit."* To evaluate the capacity of the site to accommodate an inn and the potential impact of inn development on coastal resources, a theoretical 10-unit inn development was analyzed to represent the maximum potential buildout. The 10-unit inn site plan and other drawings can be found in attachments (G) and (H).

(G)(1) Zoning: The property is within the Rural Residential (RR) zoning district. Pursuant to MCC section 20.376.005, the RR zone is intended *"to encourage and preserve local small scale farming in the Coastal Zone on lands which are not well-suited for large scale commercial agriculture. Residential uses should be located as to create minimal impact on the agricultural viability."*

The RR zone is not intended for visitor accommodations. However, of the twelve (12) parcels elsewhere to which the *1C overlay has been applied, six (6) are within the RR zone, three (3) are within the Forest Lands (FL) zone, two (2) are within the Remote Residential (RMR) zone, and one is within the Range Lands (RL) zone. Likewise, the FL, RMR, and RL zones are not intended for visitor accommodations.

As noted in section (F)(4) above, the property was previously used for horse raising, which falls within the Light Agriculture use type. Development of an inn would likely eliminate the possibility of future horse raising due to the significant portion of the property devoted to inn development. As noted in the Mitigated Negative Declaration, the California Department of Conservation's Land Evaluation & Site Assessment (LESA) Model was used to determine the significance of agricultural land conversion based on soil resource quality, project size, water availability, surrounding agricultural land, and surrounding protected resource lands. The model primarily analyzes the potential loss of cropland rather than pastureland. The model determined that the impact of agricultural land conversion would not be significant, primarily due to the small project size and lack of surrounding agricultural land. Therefore, the agricultural viability of the property would not be diminished. Per Coastal Act section 30222, *"the use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry."*

(G)(2) VAS Combining District: MCC section 20.436.005 describes the intent of the Visitor Accommodations and Services (VAS) Combining District as follows:

> *The VAS Combining District is intended to allow visitor accommodations and services to be developed on selected sites designated by the asterisk (*) symbol on the land use plan maps of the Coastal Element of the General Plan and Coastal Zoning Maps. Additional sites for visitor accommodations outside of Commercial and Rural Village land use designations shall be the subject of a Local Coastal Program amendment. A single-family residence may be developed in conjunction with or prior to the establishment of visitor accommodations and services if the site/parcel is not preempted for VAS facilities by such action. Preemption analysis will be performed prior to approval of a development permit pursuant to Chapter 20.532.*

MCC section 20.436.025 establishes the following requirements for the VAS combining district:

(A) No development more intense than a single family residence shall be allowed on a parcel within the VAS Combining District prior to the parcel being developed with a Coastal Visitor Accommodations and Services Use Type. A residence will be allowed only if it is sited in such a location and manner that a Coastal Visitor Accommodations and Services Use Type may still be placed upon the site.

This requirement is not applicable to the request to apply the *1C overlay to the site. The applicant has not proposed the development of a single-family residence on the site.

(B) Approval of visitor accommodation and service facilities shall be based upon the suitability of the site to accommodate the use(s) proposed, including water availability, septic disposal capability, environmental constraints, the number of visitor serving uses existing or approved in the immediate vicinity and in the planning area, and consistency with all other regulations of this Division.

The water availability and septic capacity of the site to accommodate a 10-unit inn development is discussed in section (G)(9) below. The environmental constraints of the site are discussed in section (G)(6) below. There are 188 visitor-serving units within one half (0.5) mile of the subject property across eight (8) visitor-serving facilities. Most nearby units are within either Van Damme State Park (74) or the Little River Inn (54). Table 1 below lists all units in the vicinity. The property is within the Little River Planning Area, which spans from Van Damme State Park to Dark Gulch. There are 285 visitor-serving units within the Little River Planning Area. Table 2 below lists all units in the planning area.

Table 2: VAS Units (Vicinity)

Name	APN	Address	Type	# of Units	Source
SCP Mendocino Inn & Farm	121-010-13, et al.	8211 N Highway 1	*1 & *2C Inn/Hotel	10	UM_2017-0002
Inn at Cobbler's Walk	121-260-22	8200 N Highway 1	*1 Inn	9	CDP 3-99
Van Damme State Park	121-260-03, et al.	8001 N Highway 1	*3 Campground	74	Park Website
Little River Inn	121-290-26, et al.	7901 N Highway 1, et al.	*5 Resort	54	Little River Inn Website
Cottages at Little River Cove	121-290-04	7533 N Highway 1	*1 Inn	9	CDP 02-01
Inn at Schoolhouse Creek	121-020-21	7051 N Highway 1	*2C Hotel	17	CDUM 17-99(07)
Dennen's Victorian Farmhouse	121-020-03	7001 N Highway 1	*1 Inn	10	CDP 106-99
Little River Inn (Van Damme)	121-280-16	7700 N Highway 1	Inn (no VAS overlay)	5	Little River Inn Website
			TOTAL	**188**	

Table 3: VAS Units (Little River Planning Area)

Name	APN	Address	Type	# of Units	Source
Van Damme State Park	121-260-03, et al.	8001 N Highway 1	*3 Campground	74	Park Website
Little River Inn	121-290-26, et al.	7901 N Highway 1, et al.	*5 Resort	54	Little River Inn Website
Cottages at Little River Cove	121-290-04	7533 N Highway 1	*1 Inn	9	CDP 02-01
Inn at Schoolhouse Creek	121-020-21	7051 N Highway 1	*2C Hotel	17	CDUM 17-99(07)
Dennen's Victorian Farmhouse	121-020-03	7001 N Highway 1	*1 Inn	10	CDP 106-99
Little River Inn (Van Damme)	121-280-16	7700 N Highway 1	Inn (no VAS overlay)	5	Little River Inn Website
Seafoam Lodge	121-050-10	6751 N Highway 1	*2 Hotel	21	BL_2019-0167
Inn at Buckhorn Cove	121-050-09	6801 N Highway 1	Inn (no VAS overlay)	6	CDP_2017-0012
Andiron Seaside Inn	121-040-21	49801 Andiron Rd.	*2 Motel	12	D_2025-0043
Heritage House Resort	123-010-33 et al.	5200 N Highway 1	*5 Resort	77	CDP 69-93
			TOTAL	**285**	

(C) Approval of new visitor accommodation and service facilities or expansion of existing visitor accommodation and service facilities shall minimize encroachment on resource lands. The development of new visitor facilities in the Resort category shall not be allowed on resource lands in the AG, FL, TP, or RL Districts.

The development of an inn on the subject property would not encroach on resource lands because the property is not within the AG, FL, TP, or RL districts.

*(D) Employee housing, other than Employee Caretaker Housing, may be allowed only with a Resort—*5 designation, consistent with all other regulations of this Division including density/intensity of the base zoning district.*

Employee housing would not be allowed on the subject property under the *1C overlay. The applicant has not proposed employee housing.

(E) Visitor accommodations and services on parcels adjoining the shoreline as identified on the public access maps shall provide public access to the blufftop and/or the shoreline. The access, to be required as a condition of permit approval or other methods as described in Chapter 20.528, shall be available to the public at large as well as to guests. In the event that the use is changed to a use other than visitor accommodations or services, an irrevocable offer to dedicate an easement for public access shall be made available to a public entity for acceptance and management. If the accessway is reopened, it shall remain available to the public free of entrance charge.

As noted in section (F)(1) above, this requirement is mirrored in MCC section 20.528.010(B). As shown on the attached site plan, a theoretical 10-unit inn development could provide public access to the shoreline between the leach fields and ESHA buffers. Conditions of approval could be adopted as part of a Use Permit to implement this requirement.

(F) Where a site contains a single-family residence and a visitor accommodation and service facility, the conversion of a single-family residence to a vacation home rental shall be considered an addition or expansion of unit(s) to the visitor accommodation and service facility. The conversion may be allowed with a coastal development permit, provided that the conversion meets the allowable density of the visitor accommodation and service facility and all other provisions of this Division.

The subject property does not contain a single-family residence.

(G) If a resort is proposed to be developed on more than one (1) legal lot, it shall be developed on contiguous lots held under one (1) ownership and will be considered one (1) lot for all purposes under the Coastal Element and this Division. Property developed with a resort shall not be allowed to be divided and/or sold from the remainder of the property unless all resort uses on the property are discontinued or a Local Coastal Program amendment and/or new use permits are processed and approved for the continuation of any visitor serving uses.

This regulation is not applicable to the proposal.

(H) Expansion and development of visitor serving facilities, including restaurants, shall be compatible with the character of their surroundings. A site plan, grading plan, landscaping plan, and outdoor lighting plan shall be submitted and shall illustrate the following.

This section is not applicable to the proposed LCP amendment. Rather, these requirements would be review during the processing of an associated Use Permit for the development of visitor-serving facilities. However, it may be necessary to determine whether applying these regulations to future development would be infeasible due to site constraints.

1) Building materials shall be natural, such as wood or stone, and shall utilize primarily earth-tone colors.

It is feasible to require that future development of visitor-serving facilities on this site utilize

appropriate building materials. The applicant submitted proposed exterior materials and colors with their Use Permit application (see attachment R). According to the submittal, exterior materials would include fiber cement siding, which imitates wood, aluminum roofing and doors, and concrete and earth retaining walls. Each of these materials would utilize mostly brown colors and some black color around windows and doors.

2) *Proposed tree removal and grading shall be shown on the site development plans but shall be minimized to that which is necessary for accommodation of the main and accessory structures. Where there are alternatives to development which minimize tree removal and/or grading, the development proposal shall be modified as necessary such as in location, siting, size, design, and bulk, in order to incorporate the alternative.*

   Tree removal would not be necessary to accommodate either a theoretical 10-unit inn or the proposed 5-unit inn. However, as discussed in section (G)(8) below, the property is within a Tree Removal Area as shown on LCP maps. Pursuant to MCC section 20.504.015(C)(9), tree thinning or removal shall be made a condition of permit approval for circumstances in which concentrations of trees unreasonably obstruct views to and along the ocean and in scenic coastal areas. There is a group of non-native, potentially invasive eucalyptus trees along the northern property boundary that is proposed for removal both as a mitigation strategy to account for biological impacts as well as to provide views of the coastline. The proposed tree removal would not conflict with this section.

3) *The design and scale of individual proposed structures shall be subordinate to surrounding landforms.*

   It is feasible for the design and scale of a theoretical 10-unit inn development to be subordinate to surrounding landforms. As shown on the submitted plans for a 10-unit inn, the proposed welcome center would be 13.5 feet tall, the housekeeping structure would be 12 feet tall, and each inn unit would be 18 feet tall. As shown in Figure 4 below, the property slopes downward from State Route 1 to the bluff edge, except for a berm near the center of the property. Eight of the ten units could be located downslope of the berm, preventing those units from obstructing coastal views. However, due to ESHA buffers, septic infrastructure, and bluff setbacks, two of the units would have to be placed near the top of the berm.

(G)(3) General Provisions: MCC section 20.444.020 requires that a corridor preservation setback of forty (40) feet be established from the center line of State Route 1. As shown on the site plan, it is feasible to site a 10-unit inn development outside of the corridor preservation setback.

(G)(4) Off-Street Parking: MCC section 20.472.010 requires that parking spaces be surfaced with gravel at minimum, that required parking spaces be at least nine (9) by twenty (20) feet, and that handicapped parking spaces be at least fourteen (14) by twenty (20) feet. As shown on the submitted plans, the theoretical 10-unit inn development parking spaces would be surfaced with asphalt and would meet size requirements. Pursuant to MCC section 20.472.020(H), a total of twelve (12) spaces would be required for a 10-unit inn. As shown on the submitted plans, the theoretical 10-unit inn design would have twelve (12) spaces.

(G)(5) Grading, Erosion, and Runoff: MCC chapter 20.492 establishes standards for grading, erosion, sedimentation, and runoff. Section 20.492.005 provides that the approving authority *"shall review all permit applications for coastal developments to determine the extent of project related impacts due to grading, erosion and runoff. The approving authority shall determine the extent to which the following standards should apply to specific projects, and the extent to which additional studies and/or mitigation are required".*

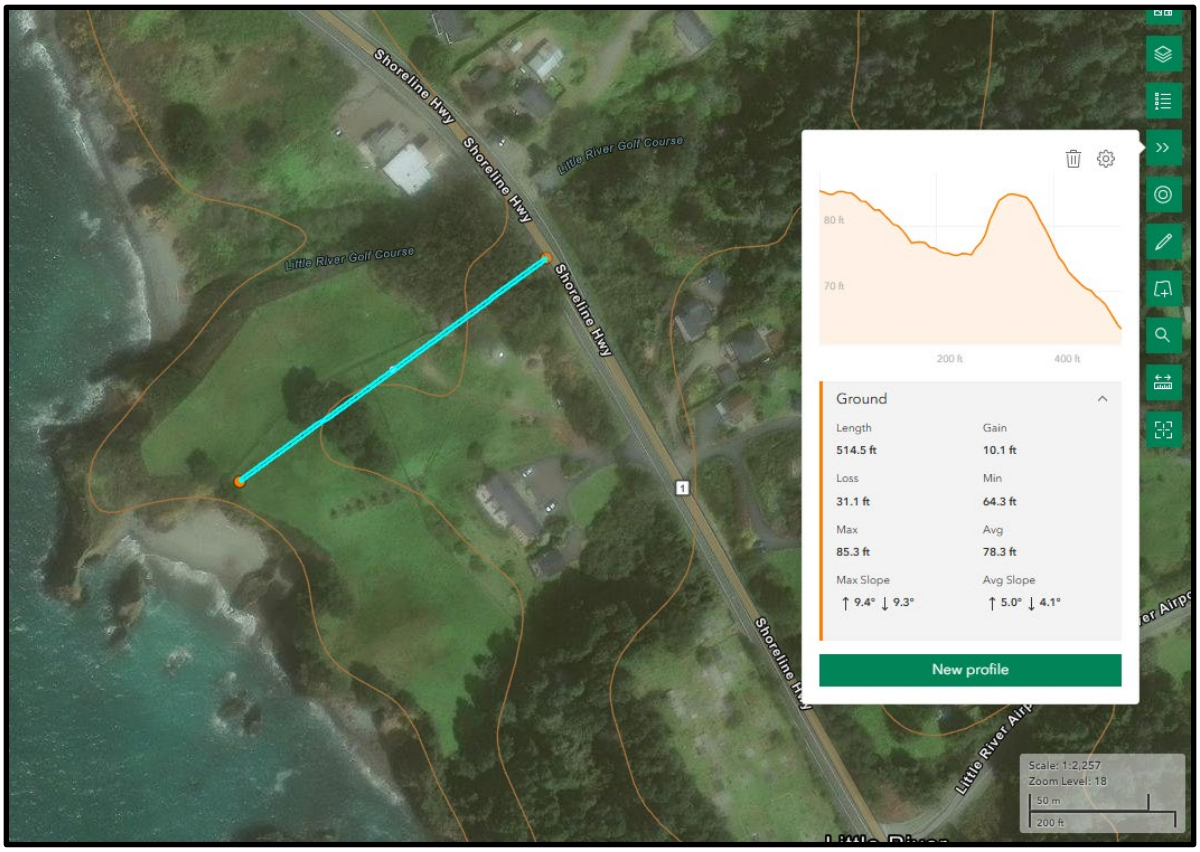


Figure 4. Aerial view of property with USGS 40-foot contours and elevation profile. The blue line represents the path of the elevation profile.

A geotechnical investigation was conducted in 2020 for a single-family residence at the site (see attachment Y). The investigation was updated in 2025 to analyze the theoretical 10-unit inn development (see attachment M). The 2025 update determined that the 2020 recommendations for grading, foundations, retaining walls, and site drainage remain valid and suitable for the inn design. This indicates that a 10-unit inn design is feasible from a geotechnical perspective. Specific standards regarding grading, erosion, sedimentation, and runoff would be applied to the associated Use Permit.

(G)(6) Environmentally Sensitive Habitat Areas (ESHA): MCC section 20.488.010 establishes general review standards for all CDP applications. These standards would be applied to any future Use Permit application for an inn on the property. Therefore, it is necessary to determine whether it would be feasible to build an inn on the property that is consistent with the following general review standards:

(A) Development shall not significantly degrade, or destroy the habitat for, endangered plant and animal species, including native mammals and resident and migratory birds. Diversity, both functionally and numerically, shall be maintained.

(B) The productivity of wetlands, estuaries, tidal zones and streams shall be protected, preserved, and, where feasible, restored.

(C) Approved grading activities shall be conducted in a manner that will assure that environmentally sensitive habitat areas will be protected from adverse impacts that can result from mechanical damage and undesirable changes in the water table, subsurface aeration and impacts to the root system of riparian vegetation, the alteration of surface or subsurface drainage, or other environmental conditions.

(D) Wetland buffer areas (the transition areas between wetland and upland habitats) shall be protected, preserved, and, where feasible, restored.

Additionally, MCC chapter 20.496 and Coastal Element Policy 3.1-2 establish standards for development

in relation to ESHA, which include *"anadromous fish streams, sand dunes, rookeries and marine mammal haul-out areas, wetlands, riparian areas, areas of pygmy vegetation which contain species of rare or endangered plants and habitats of rare and endangered plants and animals."*

MCC section 20.496.020 and Coastal Element Policy 3.1-7 require that a minimum one hundred (100) foot wide buffer be established between development and ESHA, unless an applicant can demonstrate that one hundred (100) feet is not necessary to protect the resources of that particular ESHA from significant disruption caused by the proposed development, in which case the buffer may be reduced to a minimum of fifty (50) feet. A reduced buffer distance must be agreed upon by California Department of Fish & Wildlife (CDFW) staff. Therefore, it is necessary to determine whether it would be feasible to build an inn on the property that is consistent with ESHA buffer requirements.

The applicant submitted a Biological Scoping, Wetland Delineation, and Botanical Survey Report completed in November 2022. Surveys were conducted in 2016, 2017, 2018, 2021, and 2022. The biologist also visited the site during the spring and summer of 2024 and found no significant changes to the vegetation or site conditions (see attachment K). Two special status plants were observed that constitute ESHA. The various plant communities observed on the property were not considered ESHA. However, an area of riparian vegetation adjacent to a stream just north of the property was considered ESHA, along with two (2) wetlands at the southeastern and northeastern corner of the property. No special-status wildlife was observed during surveys, but suitable habitat for special status wildlife was present. A Reduced Buffer Analysis was completed in accordance with Mendocino County Code (MCC) Section 20.496.020(A)(1). However, a fifty (50) foot buffer reduction has not yet been agreed upon by CDFW staff because of their desire to defer comments until the associated Use Permit is processed.

As shown in Figure 5 below, several elements of the initial 5-unit inn design would have been located within one hundred (100) or fifty (50) feet of ESHA. However, during the development of a theoretical 10-unit inn design, the applicant revised their plans to locate all development outside of the minimum 50-foot ESHA buffers. For example, a new asphalt driveway was originally proposed to be located within the 50-foot ESHA buffer due to a conflict with the existing septic system on the adjacent Van Damme property. The adjacent Van Damme property is part of the Little River Inn. The applicant is a co-owner of the Van Damme property. As noted in attachment L, the septic system on the adjacent property is nearing the end of its useful life. As such, the ownership partners of the adjacent property are amenable to replacing the septic system in a new location that would allow the driveway to be reconfigured outside of ESHA buffers. As shown in Figure 6 below and attachment G, the site plan was amended to show a driveway configuration that avoids 50-foot ESHA buffers.

Therefore, it is feasible to develop a 10-unit inn on the property that would remain consistent with 50-foot minimum ESHA buffer requirements. Maintaining adequate buffers would ensure that habitat is not significantly degraded as required by section 20.488.010.

(G)(7) Hazard Areas: MCC chapter 20.500 establishes standards for all development proposals in the Coastal Zone. These standards would be applied to any future Use Permit application for an inn on the property. Therefore, it is necessary to determine whether it would be feasible to build an inn on the property that is consistent with the development standards.

Pursuant to MCC section 20.500.015 and Coastal Element Policy 3.4-1, the property is within a potentially geologically hazardous area because it is a blufftop lot. Accordingly, a Geotechnical Investigation was performed to determine the appropriate setback for new development from the bluff edge (see attachments Y & M). Pursuant to MCC section 20.500.020(B) and Coastal Element Policy 3.4-7 investigation recommended a bluff setback of thirty-six (36) feet. The investigation also discovered a small landslide southwest of the development area along the bluff. The investigation recommended that all structures be located at least fifty (50) feet from the landslide. The site plan shows that a theoretical 10-unit inn design could site all structures outside of the bluff and landslide setbacks.

MCC section 20.500.020(A)(1) and Coastal Element Policy 3.4-5 require that structures be sited at least fifty (50) feet from faults. Coastal Element Policies 3.4-3 and 3.4-4 also require compliance with the Alquist-Priolo Act and prohibit infrastructure from crossing fault lines. However, the geotechnical investigation noted that no evidence of recent faulting was observed or shown in the vicinity on published geologic maps.



Figure 5. ESHA map from 2022 biological survey report. 50-foot ESHA buffers can also be seen on the site plan (attachment G). Note that some revisions to the design have been made since the survey report was published, such as the evaluation of a theoretical 10-unit inn rather than 5-units and reconfiguration of the driveway.

Pursuant to MCC section 20.500.020(C) and Coastal Element Policy 3.4-6, only harbor development and related uses are allowed in mapped tsunami inundation areas. According to the geotechnical investigation, *"since the bluffs are approximately 40 to 45 feet in vertical height, impact or inundation from a severe storm surge or tsunami event is considered a low (but nonetheless real) risk for the site."* In addition, the location of development is not within a Tsunami Hazard Area as mapped by the California Geological Survey.

The 10-unit inn design does not include any structures that would alter natural shoreline processes, such as bluff armoring structures.

Pursuant to MCC section 20.500.025 and Coastal Element Policy 3.4-13, *"all new development shall be sited taking into consideration the fire hazard severity of the site, the type of development and the risk added by the development to the fire hazard risk. Where feasible, areas of extreme high risk should be avoided for development except agricultural and open space uses."* This requirement would be applied to any associated Use Permit for development of an inn. The property is within a High Fire Hazard Severity Zone as mapped by CAL FIRE. As such, it is not within an area of extremely high risk, such as the "Very High" severity zone. CAL FIRE did not respond with any comment on the proposed LCP amendment.

Pursuant to MCC section 20.500.030(B)(1), the property is not within a flood hazard area as mapped by the Federal Emergency Management Agency (FEMA).

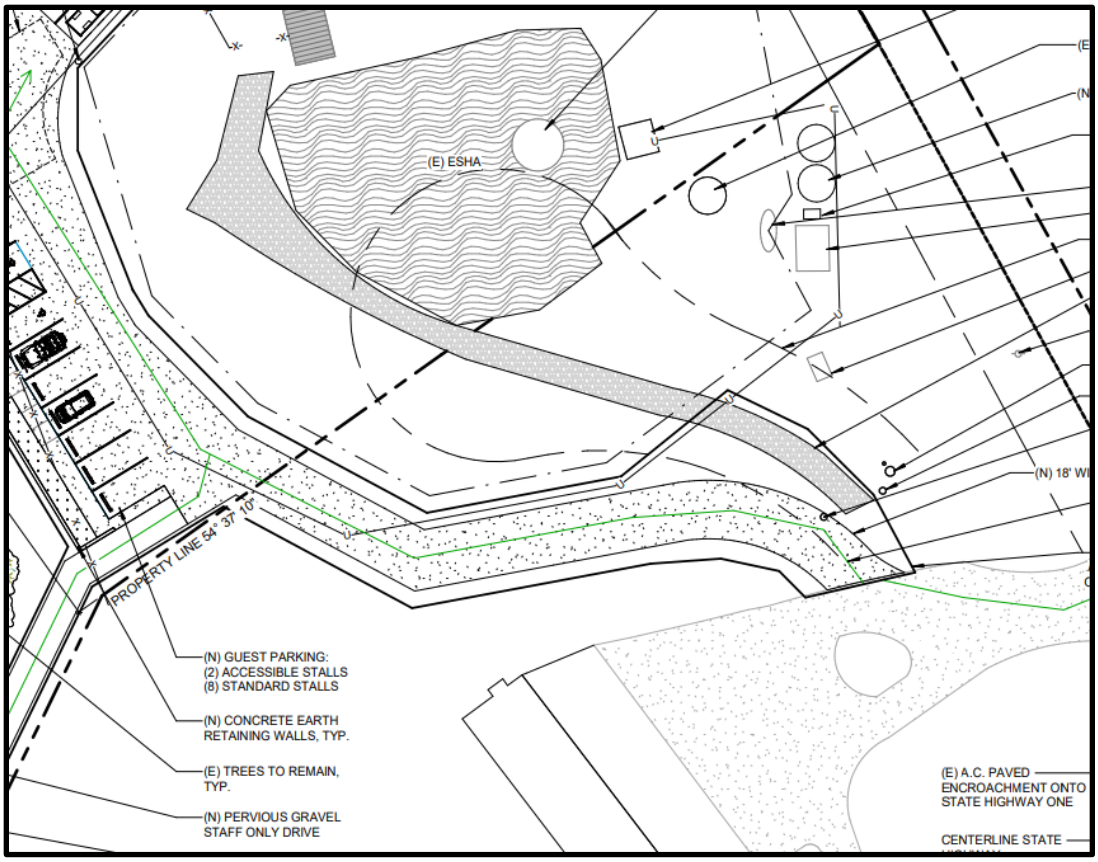


Figure 6. Excerpt from revised site plan showing reconfigured driveway outside of ESHA buffers represented by the dash-dot line.

(G)(8) Visual Resources: MCC chapter 20.504 and Coastal Element Policies 3.5-1, 3.5-3, and 3.5-4 establish development criteria to protect visual resources in scenic areas of the coast. Pursuant to MCC section 20.504.015(A), the property is within a mapped Highly Scenic Area and is therefore subject to the development criteria outlined in section 20.504.015(C). Although the development criteria would normally be applied to development proposals, such as the associated Use Permit application for development of an inn, it is necessary to determine whether applying the *1C overlay to the site would conflict with the development criteria. Applying the *1C overlay to the site would conflict with the development criteria if it would be impossible or infeasible to develop an inn that is consistent with the criteria. As such, the theoretical 10-unit inn design's consistency with the development criteria is discussed as follows:

1. *Any development permitted in highly scenic areas shall provide for the protection of coastal views from public areas including highways, roads, coastal trails, vista points, beaches, parks, coastal streams, and waters used for recreational purposes.*

   Public coastal views in the vicinity are primarily from State Route 1, Van Damme State Park, and the Little River Blowhole Trail. Views of the coast through the subject property are primarily through State Route 1. Most of the site cannot be seen from Van Damme State Park due to elevation change between the two properties. Dense vegetation blocks views through the site from the Blowhole Trail. As noted in section (G)(2) and Figure 4 above, eight (8) of the ten (10) inn unit structures could be located downslope of a berm near the center of the property, which would prevent them from blocking coastal views, but two (2) of the units, the welcome center, and the housekeeping structures would be located either at the top of the berm or upslope in areas that would block coastal views. The applicant provided photo simulations of the proposed structures (see attachment S). The photo simulations also show before-and-after views based on the proposed removal of eucalyptus trees along the northern property boundary, which would provide new coastal views from the highway. The property is within a mapped "Tree Removal Area" as described by Coastal Element Policy 3.5-5, which requires that *"trees currently blocking views to and along the coast shall be required to be removed or thinned as a condition of new development*

in those specific areas." Additionally, the required public access trail would provide new coastal views. These factors would mitigate the potential loss of views due to the development of a 10-unit inn.

2. *In highly scenic areas west of Highway 1 as identified on the Coastal Element land use plan maps, new development shall be limited to eighteen (18) feet above natural grade, unless an increase in height would not affect public views to the ocean or be out of character with surrounding structures.*

   It is feasible to require that all structures within a 10-unit inn development be limited to eighteen (18) feet in height above natural grade, as shown on the submitted plans.

3. *New development shall be subordinate to the natural setting and minimize reflective surfaces. In highly scenic areas, building materials including siding and roof materials shall be selected to blend in hue and brightness with their surroundings.*

   Applying the *1C overlay to the site would not prevent future development from being required to minimize reflective surfaces and select building materials that blend with surroundings. Development of a 10-unit inn would require some structures to be located at the top of a berm near the center of the property. Those structures would be located within a group of Bishop pine trees.

4. *Proposed divisions of land and boundary line adjustments within highly scenic areas shall be analyzed for consistency of potential future development with the regulations of this Chapter, and no division of land or boundary line adjustment shall be approved if development of resulting parcel(s) would be inconsistent with this Chapter.*

   The proposal is not a division of land or boundary line adjustment.

5. *Buildings and building groups that must be sited in highly scenic areas shall be sited:*
   a. *Near the toe of a slope;*
   b. *Below rather than on a ridge; and*
   c. *In or near a wooded area.*

   Eight (8) of the ten (10) inn units could be located near the toe of the berm. Two (2) of the units would have to be located at the top of the berm. The welcome center and housekeeping structures would be located further upslope of the bluff edge. Although two (2) of the units would be located at the top of a slope, they would be located within a group of Bishop pine trees, which would provide some visual screening.

6. *Minimize visual impact of development on hillsides by the following criteria:*
   a. *Requiring grading or construction to follow the natural contours;*
   b. *Resiting or prohibiting new development that requires grading, cutting and filling that would significantly and permanently alter or destroy the appearance of natural landforms;*
   c. *Designing structures to fit hillside sites rather than altering landform to accommodate buildings designed for level sites;*
   d. *Concentrate development near existing major vegetation; and*
   e. *Promote roof angles and exterior finish which blend with hillside.*

   The property is not on a hillside.

7. *Minimize visual impacts of development on terraces by the following criteria:*
   a. *Avoiding development, other than farm buildings, in large open areas if alternative site exists;*
   b. *Minimize the number of structures and cluster them near existing vegetation, natural landforms or artificial berms;*
   c. *Provide bluff setbacks for development adjacent to or near public areas along the shoreline;*
   d. *Design development to be in scale with rural character of the area.*

Most of the structures would be within a relatively open area, although the group of Bishop pine trees would provide some screening. However, alternative sites would not be available due to bluff setbacks, ESHA buffers, and a lack of other wooded areas outside of those areas. The theoretical 10-unit inn design would not minimize the number of structures. Seven (7) structures would be developed, including five (5) inn unit structures, the welcome center, and the housekeeping structure. It appears that several of the inn units could be consolidated into a single structure, but the visual resource benefit of consolidation would appear to be minimal due to the eighteen (18) foot height limit and other development constraints, such as blufftop setbacks and ESHA buffers. A single, larger structure housing all ten (10) theoretical units may reduce the possibility of locating units downslope of the berm. All structures except for the housekeeping unit could be clustered together near the group of Bishop pine trees and natural berm. The single-story inn units appear to be of similar or reduced scale to nearby visitor-serving facilities at the Cottages at Little River Cove and Little River Inn.

8. *Minimize visual impact of development on ridges by the following criteria:*
    a. *Prohibiting development that projects above the ridgeline;*
    b. *If no alternative site is available below the ridgeline, development shall be sited and designed to reduce visual impacts by utilizing existing vegetation, structural orientation, landscaping, and shall be limited to a single story above the natural elevation;*
    c. *Prohibiting removal of tree masses which destroy the ridgeline silhouette.*

    The property is not on a ridge.

9. *In specific areas, as designated on the Land Use Maps and other circumstances in which concentrations of trees unreasonably obstruct views to and along the ocean and scenic coastal areas, tree thinning or removal shall be made a condition of permit approval.*

    The property is within a mapped Tree Removal Area. The applicant has proposed the removal of eucalyptus trees along the northern border of the property. Although trees often enhance views of the ocean area, eucalyptus trees (Eucalyptus globule) are not native to the area and are an invasive species recognized by the California Invasive Plan Council. Therefore, the removal of these trees would both improve public views of the coast and improve the ecological health of the habitat.

10. *Tree planting to screen buildings shall be encouraged, however, new development shall not allow trees to interfere with coastal/ocean views from public areas.*

    No tree planting is proposed. Tree planting to screen buildings would likely block coastal views once the trees have matured.

11. *Power transmission lines shall be located along established corridors where possible and where the corridors are not visually intrusive.*

    New power transmission lines would not be necessary to accommodate a theoretical 10-unit inn.

12. *Power distribution lines shall be placed underground in designated "highly scenic areas" west of Highway 1 and in new subdivisions. East of Highway 1, power lines shall be placed below ridgelines if technically feasible.*

    Utility lines for a theoretical 10-unit inn are shown on the site plan. The applicant has clarified that the utility lines would be placed underground.

13. *Access roads and driveways shall be sited such that they cause minimum visual disturbance and shall not directly access Highway I where an alternate configuration is feasible.*

    As shown on the site plan, a 10-unit inn design would utilize the existing highway encroachment on the adjacent Van Damme property. The new driveway areas would be downslope of the highway at ground level and therefore would cause minimal visual disturbance.

MCC section 20.504.020 establishes additional development criteria for Special Communities and Neighborhoods. The subject property is within the Little River community and is subject to the following criteria:

1. *The scale of new development (building height and bulk) shall be within the scope and character of existing development in the surrounding neighborhood.*

   As noted above, the height and bulk of the 10-unit inn structures would be similar to nearby visitor-serving facilities such as the Cottages at Little River Code. The height and bulk of the structures would be smaller than the nearby Little River Inn.

2. *New development shall be sited such that public coastal views are protected.*

   As noted above, some coastal views would be affected by development of a 10-unit inn, but requires public access trails and tree removal would mitigate those impacts.

3. *The location and scale of a proposed structure will not have an adverse effect on nearby historic structures greater than an alternative design providing the same floor area. Historic structure, as used in this subsection, means any structure where the construction date has been identified, its history has been substantiated, and only minor alterations have been made in character with the original architecture.*

   The property does not contain any historic structures, and the development of a 10-unit inn would not conflict with or modify any off-site historic structures.

4. *Building materials and exterior colors shall be compatible with those of existing structures.*

   As noted above, it is feasible to require that future development of an inn utilize building materials and exterior colors that are compatible with existing structures.

MCC section 20.504.035 and Coastal Element Policy 3.5-15 establish exterior lighting regulations, including that *"no light or light standard shall be erected in a manner that exceeds either the height limit designated in this Division for the zoning district in which the light is located or the height of the closest building on the subject property whichever is the lesser."* It is feasible to require that the future development of an inn utilize downcast and shielded lighting to prevent light pollution.

(G)(9) Transportation, Utilities, and Public Services: MCC chapter 20.516 and Coastal Element Policies 3.8-1, 3.8-7, 3.8-9, and 3.9-1 establish criteria to determine whether public services are available to serve development, including septic capacity, water supply, and transportation systems.

MCC section 20.516.015(A)(1) requires that additional commercial building sites shall only be approved where a satisfactory site for an individual sewage system exists, and that leach field approval shall require the completion of a site evaluation performed by a qualified hydrologist or soils engineer pursuant to Division of Environmental Health standards. The applicant originally submitted a Site Evaluation Report for a 5-unit inn development (see attachment Z). Following the determination that a theoretical 10-unit inn design must be evaluated, the applicant submitted a supplemental letter from the soil scientist describing the site's capacity to accommodate a septic system for a 10-unit inn (see attachment I). The supplemental letter concluded that a design could be prepared that accommodates the increase in units from 5 to 10, which would include the following changes to the original 5-unit design:

- *The primary leachfield would become a pressurized system, allowing for additional gravel to be placed in each leachline (creating more surface area).*
- *The total leachline in the primary field would increase, from 300 feet to 475 feet. This would include the original primary leachline locations as well as several of the previously identified replacement leachlines.*
- *The replacement leachfield location and configuration would change. The replacement area would extend east to include the area around Soil Profiles P1, P2 and P3. The replacement area design would become more complex (based on the soil conditions within*

those profiles) and would consist of several At-Grade leach beds. Secondary effluent treatment (i.e. aerobic treatment) would also be incorporated into the replacement area design.

The revised 10-unit septic system design is shown on the site plans in attachments G & J.

MCC section 20.516.015(B)(1) requires that the approval of any additional building sites *"shall be contingent upon an adequate water supply during dry summer months which will accommodate the proposed parcels, and will not adversely affect the groundwater table of contiguous or surrounding areas. Demonstration of the proof of water supply shall be made in accordance with policies found in the Mendocino Coastal Groundwater Study dated June 1982, as revised from time to time and the Mendocino County Division of Environmental Health's Land Division requirements as revised."*

An existing well on the subject property currently supplies water to the five (5) visitor-serving units on the Van Damme property to the south. The applicant originally submitted a Proof of Water test conducted in October 2018 which analyzed a proposed six (6) bedroom residence (see attachment E). The test report notes that a total of 850 gallons per day (gpd) of water is provided to the visitor-serving uses on the Van Damme property from the well on the subject property. The test report determined that a minimum of 2,960 gpd must be demonstrated to accommodate the originally proposed six (6) bedroom residence plus the existing visitor-serving units on the Van Damme property plus outdoor water use. The well pumped at a flow rate of 2.2 gallons per minute (gpm) during the test, or 3,168 gpd.

The applicant submitted a supplemental letter in 2024 addressing the additional water well production needs of a 10-unit inn design (see attachment I). The supplemental letter estimated that the new water demand of the site would be 1,200 gpd for ten (10) visitor-serving units, 50 gpd for patio wastewater, and 100 gpd for outdoor use for a total of 1,350 gpd. The supplemental letter estimated the existing water demand of the Van Damme property to be 700 gpd, for a total demand of 2,050 gpd for both properties. The letter states that according to Division of Environmental Health guidelines, minimum water production requirements for the creation of a parcel and for second residential units are typically 1.6 times the assigned daily use. Therefore, the total required well production for both properties was determined to be 3,280 gpd. Given the previously determined flow rate of 3,168 gpd, an additional 112 gpd would be necessary to accommodate a 10-unit inn. The letter notes that the properties currently have 12,500 gallons of water storage, with an additional 5,000 gallons of storage proposed for a total of 17,500 gallons. Given the substantial water storage capacity, the letter asserts that the properties have the capacity to serve a 10-unit inn in addition to existing uses.

Caltrans provided comments on both the LCP amendment and Coastal Development Use Permit applications related to this project. When commenting on the LCP amendment in 2022, Caltrans noted that *"there is a two-way left turn lane on Route 1 that transitions to a double-yellow centerline across the parcel frontage, which would be expected to affect the development of a new road approach (driveway), if one is desired."* Caltrans requested the opportunity to comment on any future development of the subject parcel, and noted that *"at that time, Caltrans will require additional details regarding ingress/egress, expected guest occupancy, hours of operation, etc."*

When commenting on the Use Permit application in 2023, Caltrans noted that they do not support a new access to the subject parcel due to sight distance requirements being difficult to meet along the subject parcel's frontage. This is consistent with the applicant's intent to share driveway access with the adjacent parcel to the south. Caltrans noted that the proposed shared driveway meets their standards for a commercial road approach. The access was most recently repaved in 2016. Caltrans requested that the applicant obtain an encroachment permit to formally recognize the shared ownership and future maintenance responsibility of the existing access but did not request any additional information as noted in the 2022 letter.

Comments from the Coastal Commission noted that the County should analyze the *"range of additional traffic [that] could be generated as a result of the proposed density increase from the current zoning of RR to *1C"*. According to the Mendocino Council of Government (MCOG) 2010 Travel Demand Forecasting Model, a hotel/motel/resort is expected to generate 8.17 trips per room. This value was sourced from the ITE Trip Generation Manual. Therefore, the increased density would be expected to create about 82 trips per day.

According to the Office of Planning & Research's 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA, *"absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."* Therefore, staff would expect the project to generate a less-than-significant number of new trips per day within a CEQA context.

The applicant submitted a Transportation Assessment dated October 3, 2025. The assessment noted that new lodging land uses typically *"result in a redistribution of lodging demand, similar to other retail/goods and services land uses; if this is the case, then the trips to and from the proposed project are not new vehicle trips – rather, they are trips that would have been made regardless of the project and thus the project would have no effect on [Vehicle Miles Traveled]."* To confirm this presumption, the assessment reviewed Smith Travel Research occupancy data and Replica database trip length data. Based on those sources, the assessment concluded that *"the proposed project would not generate net new regional trips, and the trips coming to/from the project site would tend to be the same length or shorter than they otherwise would be. Therefore, the project's effect on VMT is expected to be a net reduction in VMT at the regional level, and the project's VMT impact is less-than-significant."*

Comments from the Coastal Commission also noted that *"the County should specify how left-turn movements against oncoming traffic along the highway can occur without compromising safety, traffic flow, and circulation"*, and that the traffic analysis *"should identify any required roadway improvements or traffic calming measures needed to accommodate the proposed rezone within this LCPA."*

Vehicles travelling northbound on State Route 1 must cross oncoming traffic to access the project site's shared driveway. The speed limit in this area is thirty-five (35) miles per hour. The nearest intersection is Little River Airport Road (CR 404). According to the 2008 State Route 1 Corridor Study Update, Little River Airport Road operated at Level of Service A. Between 2002-2006, one (1) collision occurred at this intersection for a rate of 0.07 collisions per million vehicles entering the intersection, which was below the statewide average of 0.22. Along the segment of State Route 1 between Little River Airport Road and Van Damme State Park, two (2) collisions occurred between 2002-2006 for a rate of 0.3 collisions per million vehicle miles, which was below the statewide average of 1.2. The Corridor Study Update recommended that a southbound left turn lane be installed at the Little River Airport Road intersection.

According to the 2024 State Route 1 Existing Conditions Traffic Highway Capacity Analysis, the Little River Airport Road intersection operated at level of service B. The nearest studied roadway segment from Albion-Little River Road to Little River Airport Road operated at level of service A.

Comments from the Coastal Commission also noted that *"it will be especially important to address how vehicular, bicycle, and pedestrian activity to and from the subject site could be accommodated without adversely impacting traffic and circulation."*

Bicycles are expected to use the existing shoulders along State Route 1. Without the need for improvements to State Route 1, cyclists could continue to use the existing shoulders as before. The most likely source of pedestrian activity to and from the site would be other nearby visitor accommodation uses, such as the Little River Inn, or public areas like Van Damme State Park. Currently, there are few sidewalks and no crosswalks in the area. There is a pedestrian warning sign just across the street from the subject property. The submitted Transportation Assessment also made the following recommendation:

> *The public access trail connection to Highway 1 is located near the existing Little River Market convenience store. It is likely that the public may desire to walk between the trailhead and the market, which would need to take place within the State right-of-way. Given the lack of pedestrian facilities, it is recommended that that project applicant work with the County and Caltrans to establish a more formal connection between compatible land uses to ensure the safe and efficient circulation of nonmotorized travelers.*

Given the low number of new trips expected to be generated by the development of a 10-unit inn and the lack of comment from Caltrans, it is expected that turning movements could be made safely and that future highway improvements could be made without adversely impacting traffic and circulation.

(G)(10) Coastal Access Regulations: MCC chapter 20.528 establishes standards and procedures for the provision of public access to the coast. Section (F)(1) above discusses the requirements of MCC chapter 20.528 at length. As discussed above, the development of VAS uses must provide public access to the blufftop as a condition of permit approval. As shown on the site plans, the 10-unit inn design could provide an access trail to the blufftop that avoids ESHA buffers. Pursuant to Coastal Element Policy 3.6-10, the proposed public access trail would be only three (3) feet wide to avoid encroachment into the inn development and ESHA buffers. Policy 3.6-26 requires that a management plan be developed before an accessway is opened. This can be accomplished during the processing of the associated Use Permit for inn development.

(G)(11) Archaeological Resources: In accordance with Coastal Element Policy 3.5-10 and MCC Chapter 22.12, an archaeological survey was conducted on the property in 2021 and 2022. No cultural resources were identified as a result of the survey. The survey was presented to the Mendocino County Archaeological Commission at their meeting on March 17, 2022. The Commission unanimously accepted the survey.

(G)(12) Recreation and Visitor Serving Facilities: Coastal Element Policy 3.7-2 requires the following:

> *Because unrestricted development of visitor facilities would destroy those qualities that attract both residents and tourists, limitations on visitor facilities by type and location shall be as set by Policy 3.7-1 and illustrated by Table 3.7-2 which reflects a tabulation based on land use maps (see footnotes) to avoid highway congestion, degradation of special communities, and disruption of enjoyment of the coast.*

Policy 3.7-1 notes that the *"land use plan designates the existing visitor serving facilities and reserves appropriate sites for future or potential visitor serving facilities."* Table 3.7-2 is included as attachment T. Because the proposed LCP amendment would change the number of additional *1C-designated inn units shown on Table 3.7-2, the proposal must be evaluated to determine whether applying the *1C overlay would result in highway congestion, degradation of special communities, and disruption of enjoyment of the coast. As noted in section (G)(9) above, a 10-unit inn development is not expected to result in a significant number of new vehicle trips, and the segment of State Route 1 in Little River currently operates at an acceptable level of service. Pursuant to MCC section 20.504.020(A), the Town of Mendocino is the only recognized special community in Mendocino County. The proposal is not expected to degrade the Town of Mendocino. The proposal is not expected to disrupt enjoyment of the coast because future inn development would be required to provide on-site coastal access to the blufftop, and the applicant has agreed to provide lower-cost accommodation off-site at the nearby Little River inn.

Policy 3.7-4.1 provides the following:

> *Transference from one location to another of a visitor serving facility designation shown on the Land Use Plan maps shall require a Land Use Plan amendment. If an existing facility is being relocated, operation of the existing facility shall not continue beyond commencement of operations at the new site.*

Although the applicant has not pursued transference of an existing visitor-serving facility designation to the subject property, it should be noted that several nearby properties are currently within a *1C designation that have not developed visitor-serving facilities, such as 3980 N Highway 1 (APN 123-030-09) and 2900 Spring Grove Road (APN 123-330-02).

Policy 3.7-5 provides the following:

> *The locations designated and types of use permitted are intended to result in accommodations of all price ranges, including lower cost ones such as campgrounds and hostels. Lower-cost visitor and recreational facilities for persons and families of low and moderate income shall be protected, encouraged and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

As noted in section (F)(1), the applicant has agreed to provide lower cost accommodations off-site at the Littler River Inn in lieu of providing lower cost accommodations on the subject property.

Per Chapter 2.2 of the Land Use Plan (Coastal Element), the intent of the Visitor Accommodations and Services Combining District is described as follows:

> *"To recognize visitor accommodations and services developed prior to adoption of the Coastal Plan and to provide for their continuation and expansion within the prescribed density limits. The combining district is also intended to ensure that sufficient sites are reserved for future facilities to meet the Coastal Act's requirement for this priority use."*

Therefore, it must be determined whether the proposed amendment would accomplish the goal of reserving a sufficient site for future visitor accommodation facilities. Section 3.7 of the Coastal Element helps inform this determination.

Section 3.7 states that *"meeting the sections of the Act that call for preservation of special communities and for limiting highway improvements result in allocating the increase in visitor accommodations to distribute a higher proportion of trips south of the Navarro River and a smaller share between Russian Gulch and the Navarro River. Increases in visitor accommodations in the latter area must be curtailed, but it remains to be seen how much of the demand can be shifted to the south coast."*

Further, the appropriateness of overnight accommodations on parcels where they are a conditional use (*C) *"will depend on the design of the project, its impact on adjoining uses and coastal resources, and the number of similar accommodations in operation nearby at the time."*

In accordance with Coastal Element Table 3.7-2, the subject parcel is in the South Central CAC Area, which extends from Jug Handle Creek to the Navarro River. Excluding private residences used as vacation rentals and excluding the Town of Mendocino, the South Central CAC Area had fifty-two (52) existing *1 designated inn rooms in 1985 and was projected to demand an additional fifty (50) *1C rooms by 2005.

Coastal Element Appendix 10 lists the existing private visitor accommodations in the Coastal Zone as of 1982. This table was revised in 2005. The list of properties within the South Central CAC area begins with Jug Handle Farm and ends with the Navarro Ridge Inn. According to this table, there were a total of eighty-two (82) units with the *1 LCP designation in 2005. This indicates that thirty (30) additional units were built between 1982 and 2005.

To update these data sources, staff reviewed all properties within the South Central CAC that are currently assigned a Visitor Accommodations and Services Combining District (see attachment V). However, there were several properties in which the Combining District had changed since 1985. Staff also discovered properties that were not previously listed in Appendix 10. To determine how the application of the *1C combining district to this property would affect consistency with the LUP, staff recommends that the following factors be considered:

- The number of units previously within the *1 or *1C designation that were changed to a different designation between 1985 and 2026.

- Based on the changes in designation, the adjusted number of additional units that have been built between 1985 and 2026 across the Inn, Hotel, Motel, and B&B VAS use types.

- The potential demand for additional inn units from 2005 to 2024 and projected future demand.

As shown in attachment V, the number of *1 or *1C units decreased from eighty-two (82) to eighty (80) between 2005 and 2026. This was due to the following:

- The Inn at Schoolhouse Creek changed from *1 to *2C and the Seafoam Lodge and Andiron Lodge changed from *1 to *2. This resulted in fifty-four (54) units being transferred from *1 or *1C to *2 or *2C.

- The Fools Rush Inn (now Cottages at Little River Cove) changed from *2 to *1. This resulted in nine (9) units being transferred from *2 to *1.

- The Agate Cove Inn, Mendocino Farmhouse, Brewery Gulch Inn & Spa, and Inn at Cobbler's Walk were not listed in the 2005 Appendix 10 table. This resulted in an increase of thirty-three (33) units within either *1 or *1C.

- The Glendeven Inn (now SCP Mendocino Inn & Farm) and Victorian Farmhouse built additional units. This resulted in an increase of ten (10) units within either *1 or *1C.

Table 4 below shows the existing and projected VAS units in the South Central CAC from Coastal Element Table 3.7-2. Table 5 below shows the change in VAS units from the 2005 Coastal Element Appendix 10 and the 2026 update. It is not clear why some unit totals seem to have dramatically changed between 1985 and 2005, such as the apparent loss of 189 campsites. It could be because State Park campgrounds were included in the 1985 calculation but were not included in the 2005 Appendix 10 update. However, this does not explain the apparent loss of 141 campsites between 1985 and 2026. This could be due to changes in the number of campsites at State Parks between 1985 and 2026. The changes in VAS overlay designation, differences in properties listed between Table 3.7-2 and Appendix 10, and uncertainty regarding the method of calculating VAS units in 1985 and 2005 make it difficult to evaluate the changes in South Central CAC VAS units over the last forty (40) years.

However, it seems clear that the total number of VAS units has increased. When taken together, the total number of existing *1 and *2 VAS units in Table 3.7-2 and Appendix 10 was one hundred sixty-one (161). Table 3.7-2 projected an increase of fifty (50) *1 and *2 units (30%). The 2026 calculation revealed an actual increase of sixty (60) units (37%). Therefore, it seems that the 20-year demand projection from 1991 (LCP adoption) to 2011 has been met. However, additional demand may have been generated between 2011 and 2026.

According to the Mendocino County Tourism Commission's annual report for fiscal year 2022-2023 (attachment W), total visitor spending for people that stayed in hotels, motels, and vacation rentals throughout the County totaled 249.5 million dollars in 2022, a 25% increase from 2013. Visitors spent 156.9 million dollars on all types of accommodations, an 84% increase from 2013. Travel industry earnings for accommodation and food service alone were 187.5 million, a 68% increase from 2013. The average inflation rate in the United States between 2013 and 2023 was 2.62%.

According to the submitted Traffic Assessment, for eleven (11) properties between Albion and Fort Bragg between 2018 and 2024, the highest observed occupancy rate over any month was 66.9%. Excluding 2020 because of COVID-19, the average occupancy rate was about 60%.

Table 4: South Central CAC VAS Units from LCP Table 3.7-2

Designation	Existing	Projected	% Change
*1	52	102 (+50)	96%
*2	109	109 (±0)	0%
*3	396	556 (+160)	40%
*5	104	104 (±0)	0%
Total	661	871 (+210)	32%

Table 5: South Central CAC VAS Units 1985-2026 Change

Designation	1985 Total	2005 Total	2026 Total
*1 or *1C only	52	82	80
*2 or *2C only	109	79	141
*3 or *3C only	396	207	291
*5 or *5C only	104	104	224
Total	661	557	808

According to attachment V, a maximum density of two hundred eighty (280) *1, *1C, *2, and *2C units can be developed within the South Central CAC. As of 2026, two hundred eleven (211) units have been established for a "build-out" of about 75%. Between 2005 and 2026, twenty-nine (29) *1, *1C, *2, and *2C units were built. Applying the *1C overlay to the site would increase the maximum density of units in the South Central CAC by about 3.6%.

The properties designated with a *1C overlay in the South Central CAC include the Agate Cove Inn, Brewery Gulch Inn & Spa, and two other unnamed properties that have not developed any VAS units. One of the properties remains vacant, while the other has developed residential uses. The Agate Cove Inn was originally a residence, was converted to an inn around 1980, and was expanded by two (2) units in 2002. The Brewery Gulch Inn & Spa was built in 2001. Both the Agate Cove Inn and Brewery Gulch Inn & Spa have ten (10) units, the maximum allowable density.

Given the increased tourism spending in Mendocino County, it seems appropriate to apply the *1C overlay to the site for an applicant with current plans to develop additional VAS units.

Section 3.7 of the LCP states the following:

> *Meeting the sections of the Act that call for preservation of special communities and for limiting highway improvements result in allocating the increase in visitor accommodations to distribute a higher proportion of trips south of the Navarro River and a smaller share between Russian Gulch and the Navarro River. Increases in visitor accommodations in the latter area must be curtailed, but it remains to be seen how much of the demand can be shifted to the south coast.*

According to attachment V, there are four *1C properties in the South Central CAC. Of the maximum 40 units allowed by those designations, 12 have been built since 1991. There are four *2C properties in the South Central CAC. Of the maximum 80 units allowed by those designations, 12 have been built since 1991.

There are five *1C properties in the South Coast CAC. Of the maximum 50 units allowed by those designations, 13 have been built since 1991. There are six *2C properties in the South Coast CAC. Of the maximum 120 units allowed by those designations, two (2) have been built since 1991.

Of the *1, *2, and RV properties in the South Coast CAC, there has been a net increase of 24 units.

This suggests that although the County has increased the potential supply of units on the South Coast, demand or development has not shifted or units have been developed on other properties.

(H) CONCLUSION: The following general conclusions can be drawn from the discussion above:

- Applying the *1C overlay to the site would increase public access to the coast through the development of a public access trail on the property required by the County Code.

- Applying the *1C overlay to the site would have no impact or marginally improve access to coastal recreation by providing visitor-serving accommodations near existing recreation areas, such as Van Damme State Park.

- Lower-cost visitor accommodation facilities can be provided off-site by reclassifying some rooms at the Little River Inn as lower-cost rooms in lieu of the subject property.

- Impacts to the marine environment can be avoided due to consistency with LCP ESHA buffer regulations and bluff setbacks.

- Applying the *1C overlay to the site would have mixed impacts to land resources. Marginally negative impacts on agricultural lands and soil would occur due to the historical use of the property for horse raising and quality of soil that would be eliminated by development of an inn. No impacts would occur to timber or archaeological resources. The Coastal Act generally prioritizes visitor-serving accommodations but does not prioritize those uses over agricultural land.

- Water and sewer supply are adequate to serve a theoretical 10-unit inn development. Highway impacts would be less-than-significant. Some negative visual resource impacts would occur due to development atop a berm and the general bulk of proposed structures. Visual resource impacts would be mitigated by the provision of coastal access and invasive tree removal. Development can avoid hazardous areas like landslides and bluffs.

- Tourism spending in Mendocino County continues to outpace inflation. A lack of visitor-serving facility development on the South Coast suggests that demand has not shifted significantly, that previously designated sites are not suitable for development, or other factors have limited development.

SEPTEMBER 29, 2026
DATE

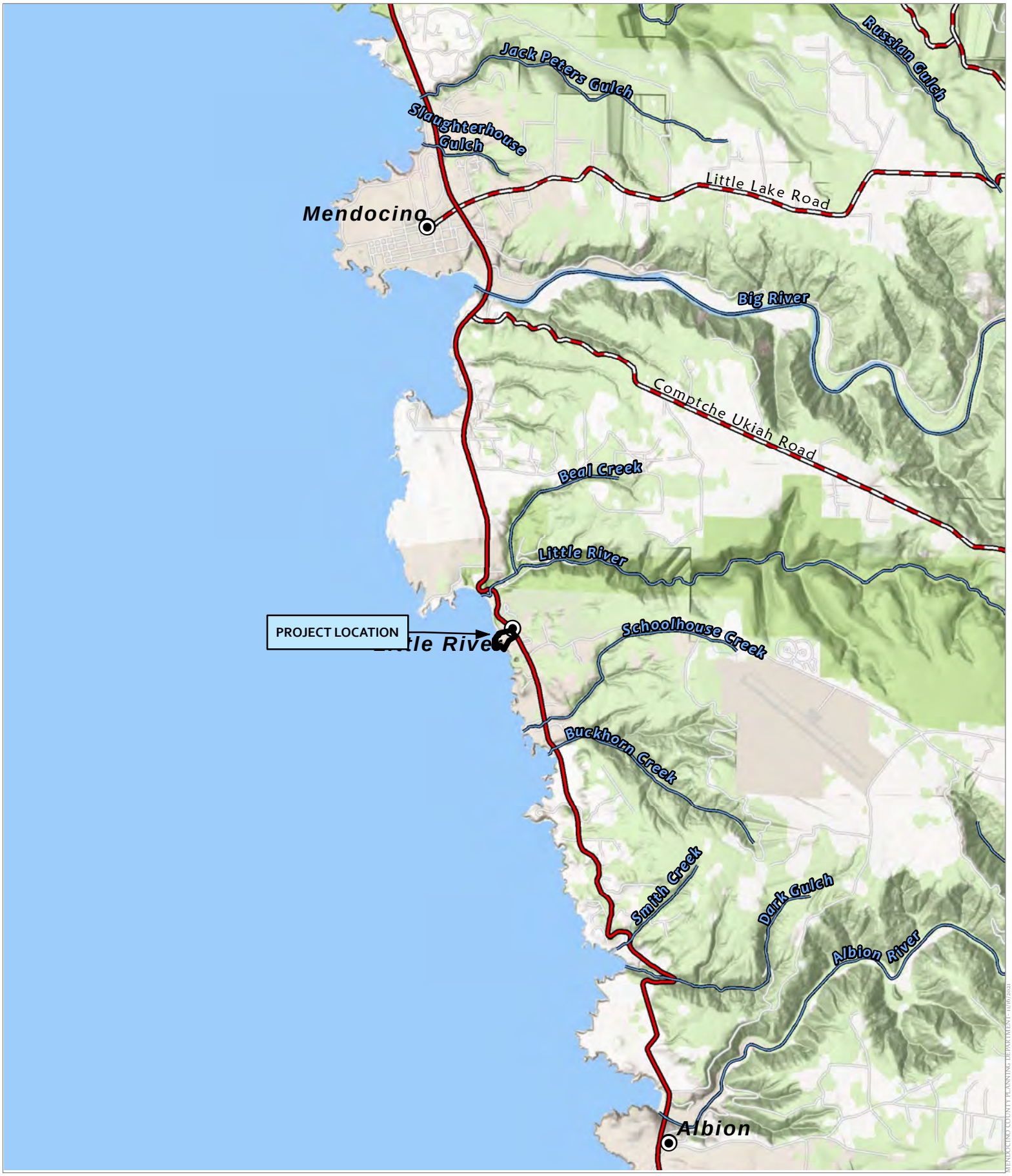
L Crowley
LIAM CROWLEY
PLANNER II

ATTACHMENTS:

A. County Maps
B. MS 17-88 Parcel Map
C. 2021 Applicant Submittal Letter
D. 2022 Applicant Submittal Letter
E. Proof Of Water
F. 2025 Applicant Submittal Letter
G. Revised 10-Unit Inn Site Plan
H. Plans
I. 10-Unit Inn Septic and Water Feasibility
J. 10-Unit Inn Septic Map
K. 2024 Biological Update Letter
L. 2025 Septic Relocation Letter
M. 2025 Updated Geotechnical Investigation
N. Transportation Assessment
O. 2022 Caltrans Comment Letter
P. 2023 Caltrans Comment Letter
Q. 2024 CCC Comment Letter
R. Exterior Materials, Colors, and Lighting
S. Visual Resources Simulation
T. Coastal Element Table 3.7-2
U. Coastal Element Appendix 10
V. 2026 Staff VAS Analysis
W. Visit Mendocino 2013-2022 Tourism Data
X. 2022 Biological Report (ONLINE ONLY)
Y. 2020 Geotechnical Investigation (ONLINE ONLY)
Z. 2022 Septic Site Evaluation (ONLINE ONLY)

RESOLUTION AND CONDITIONS OF APPROVAL (EXHIBIT A):

NEGATIVE DECLARATION AND INITIAL STUDY AVAILABLE ONLINE AT:
https://www.mendocinocounty.gov/government/planning-building-services/meeting-agendas



CASE: GP 2021-0002 / R 2021-0005
OWNER: Cally Dym
APN: 121-280-15
APLCT: Cally Dym
AGENT: Amy Wynn, Wynn Coastal Planning & Biology
ADDRESS: 7720 N Highway 1, Little River

Major Towns & Places
Highways
Major Roads

0 2,000 4,000 Feet
0 0.35 0.7 Miles
1:50,000

LOCATION MAP

MENDOCINO COUNTY PLANNING DEPARTMENT - 10/09/2021



CASE: GP 2021-0002 / R 2021-0005
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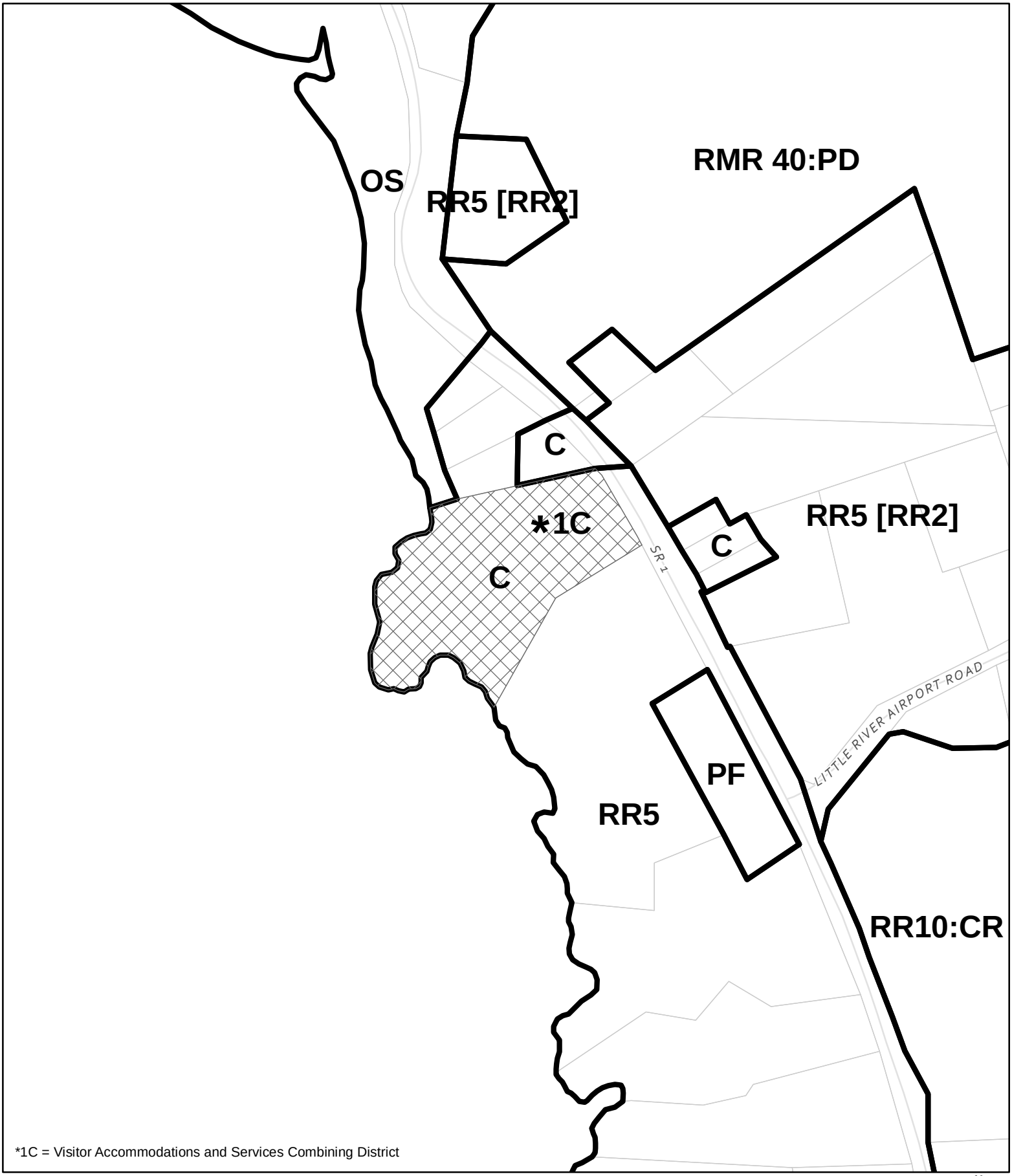
Public Roads

Private Roads

0 250 500 Feet
0 0.045 0.09 Miles
1:6,000

AERIAL IMAGERY

REVISED 10/07/2022 - MENDOCINO COUNTY PLANNING DEPARTMENT



*1C = Visitor Accommodations and Services Combining District

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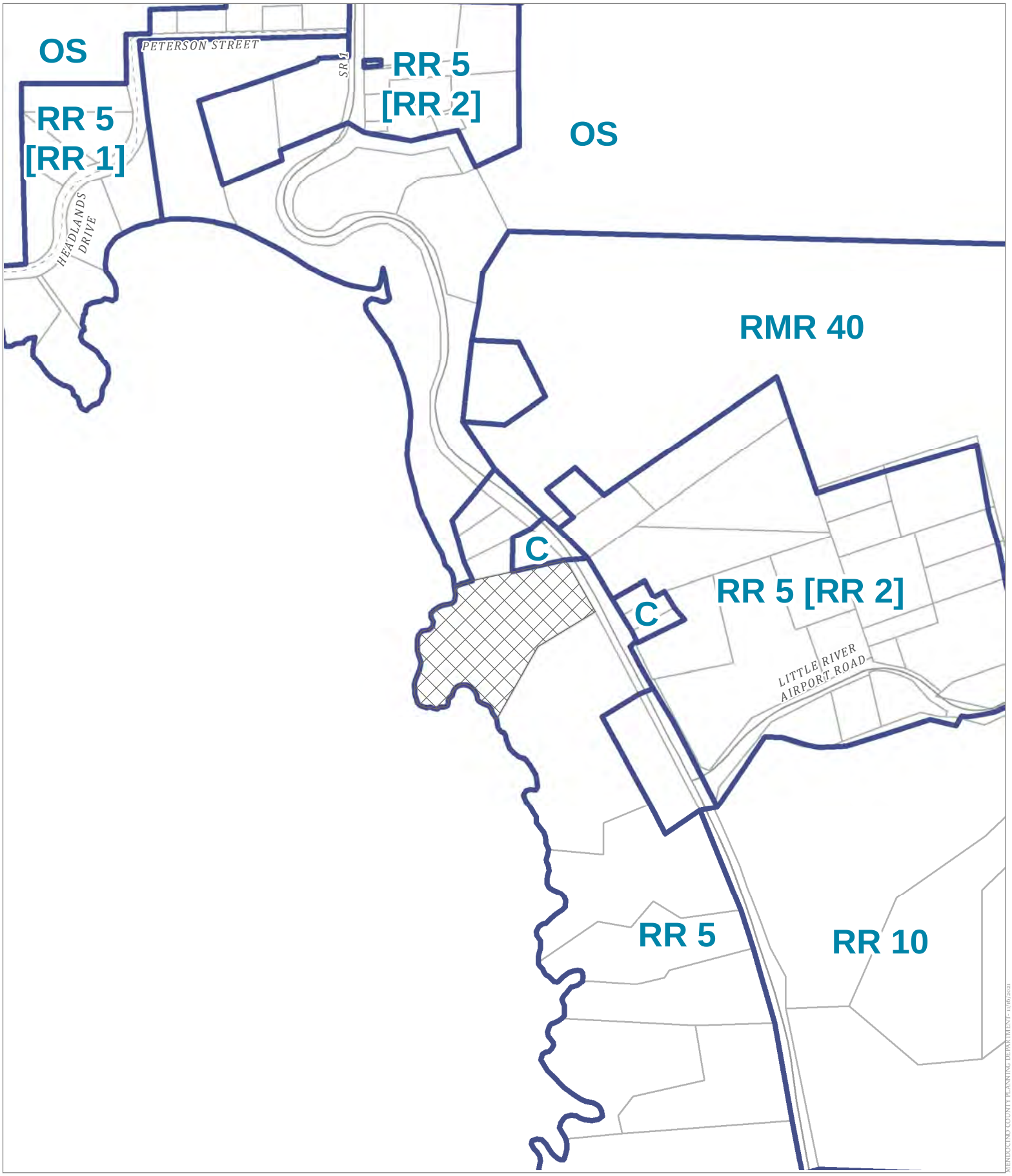
Zoning Districts
Public Roads
Assessors Parcels

0 180 360 Feet
0 0.03 0.06 Miles
1:4,000

N W E S

ZONING DISPLAY MAP

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



CASE: GP 2021-0002 / R 2021-0005
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General Plan Classes

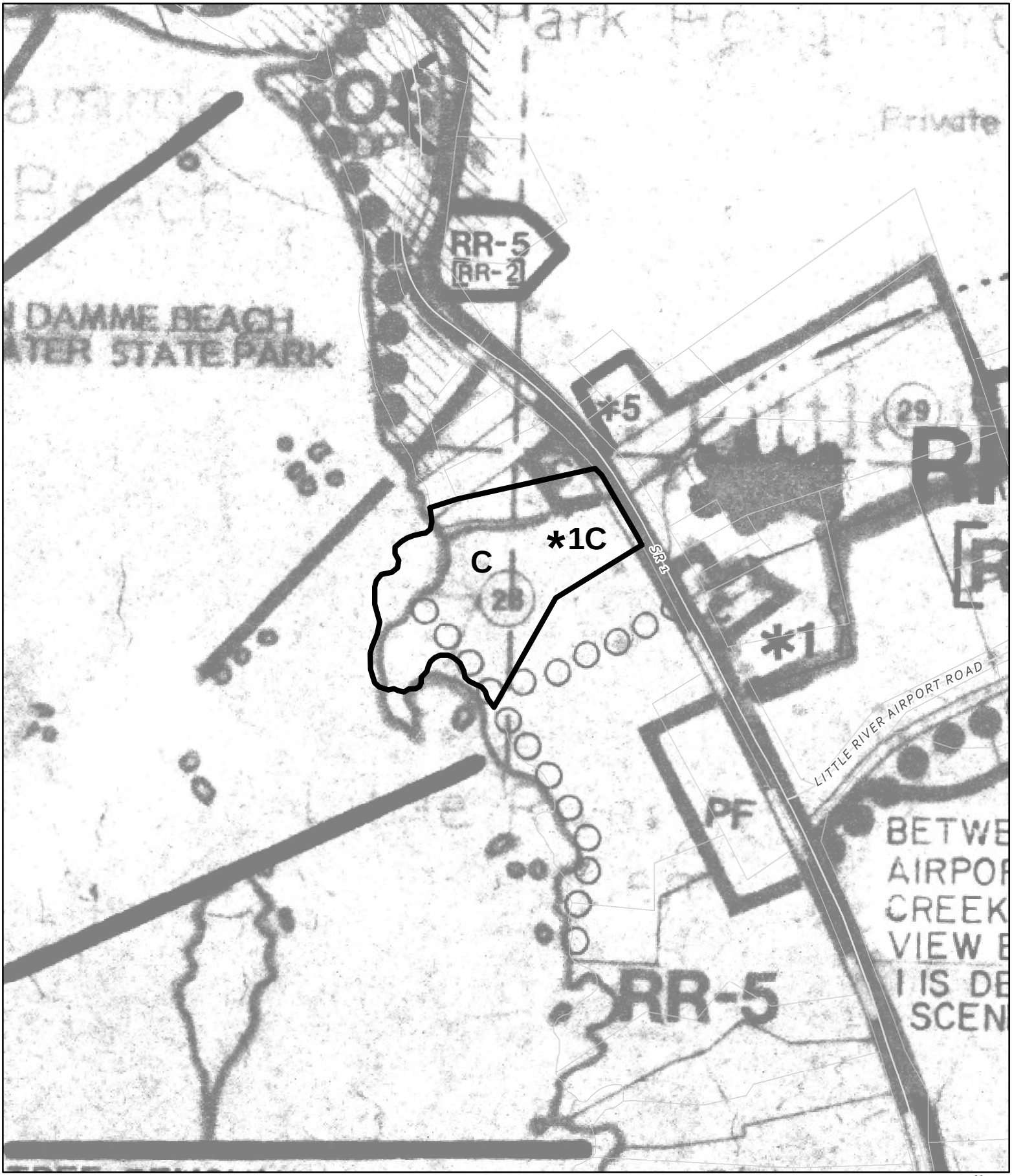
Public Roads

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1:6,000

N W E S

MENDOCINO COUNTY PLANNING DEPARTMENT - 10/07/2021

GENERAL PLAN CLASSIFICATIONS



CASE: GP 2021-0002 / R 2021-0005
OWNER: Cally Dym
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APLCT: Cally Dym
AGENT: Amy Wynn, Wynn Coastal Planning & Biology
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*1C = Visitor Accommodations and Services Combining District

Public Roads

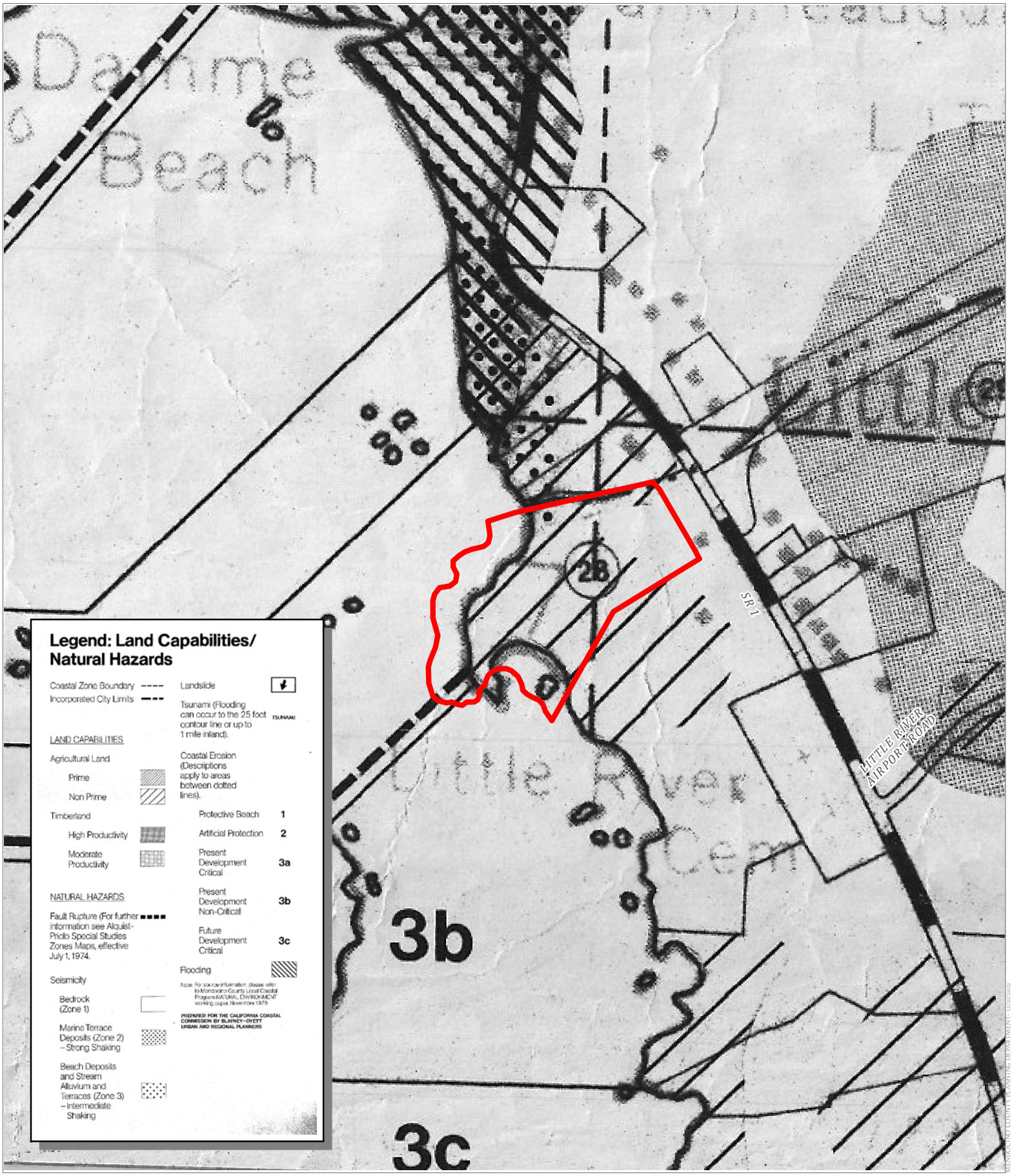
Assessors Parcels

0 180 360 Feet
0 0.03 0.06 Miles

1:4,000

LCP LAND USE MAP 17: MENDOCINO

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES

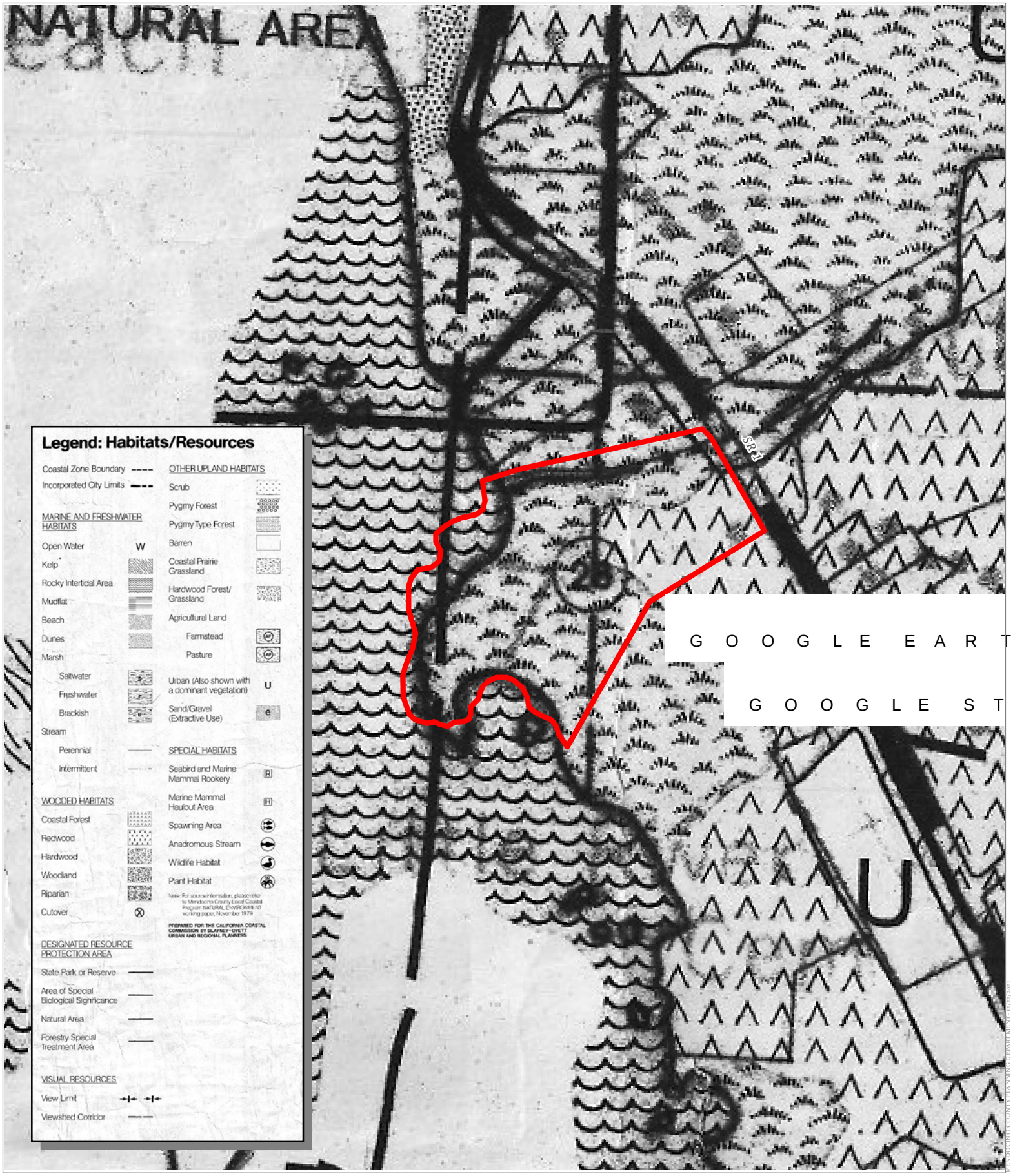


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APN: 121-280-15
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ADDRESS: 7720 N Highway 1, Little River

Public Roads

0 165 330 Feet
0 0.03 0.06 Miles
1:4,000

LCP LAND CAPABILITIES & NATURAL HAZARDS

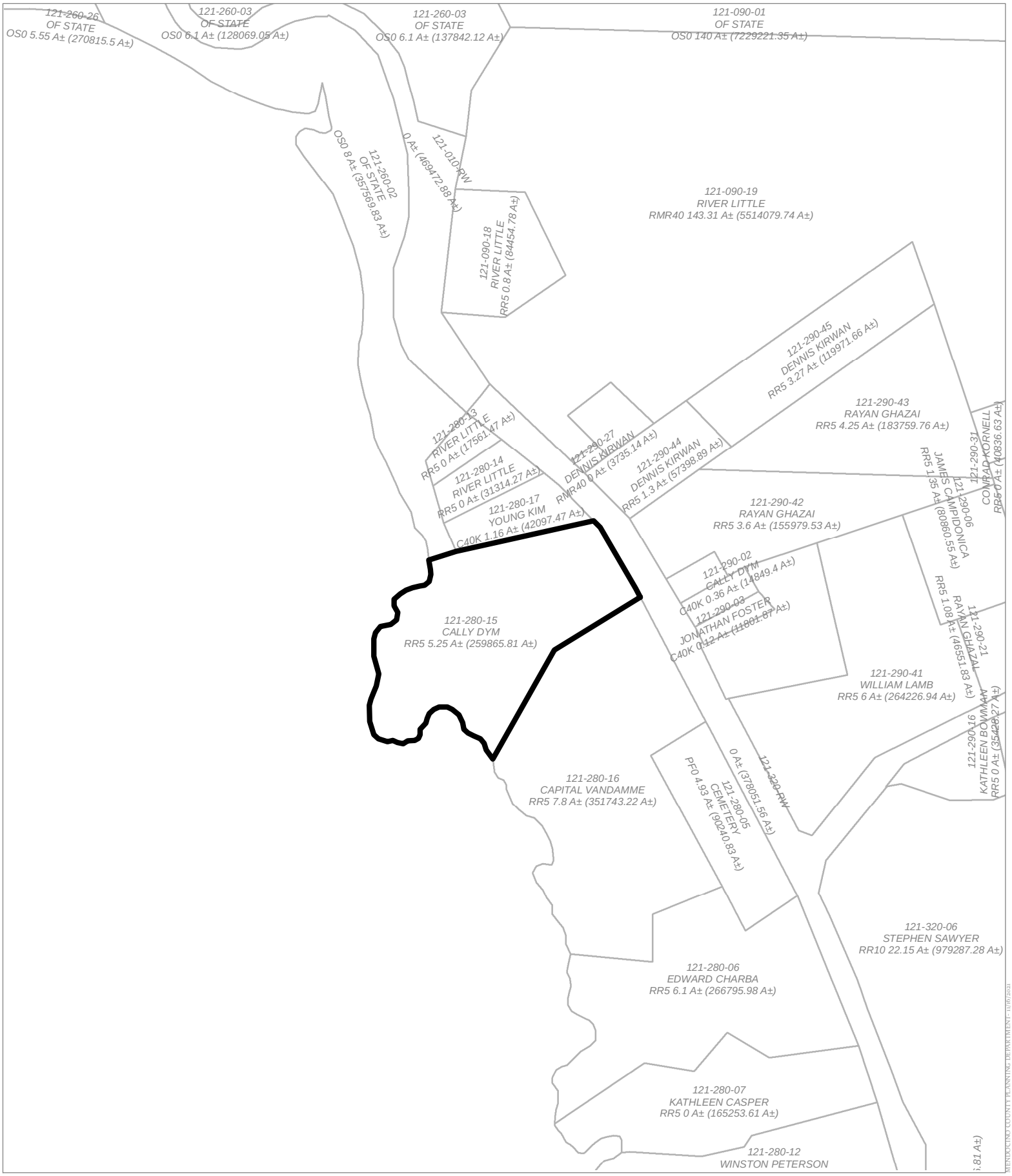


CASE: GP 2021-0002 / R 2021-0005
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Public Roads

0 125 250 Feet
0 0.02 0.04 Miles
1:3,000

LCP HABITATS & RESOURCES

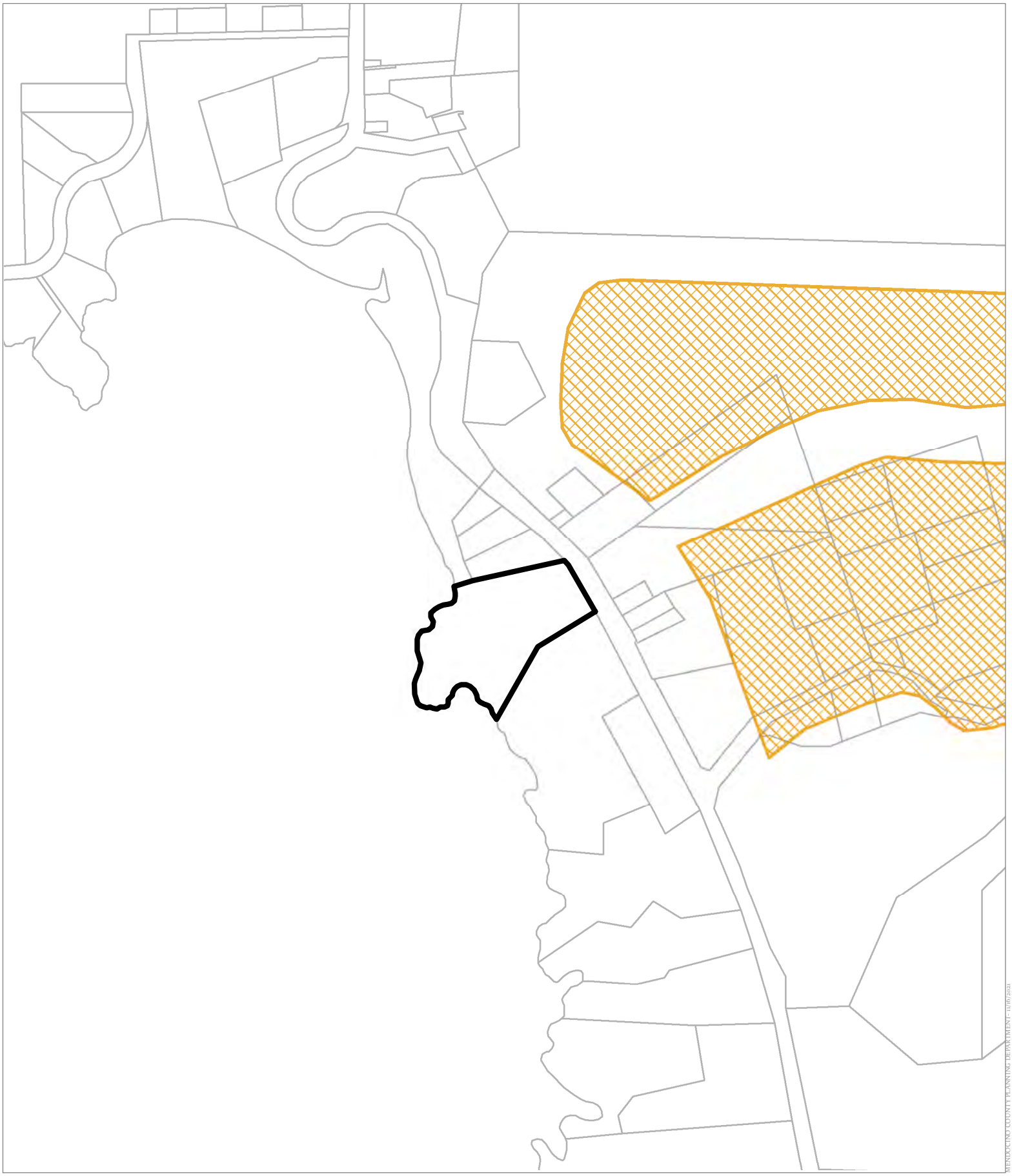


CASE: GP 2021-0002 / R 2021-0005
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0 165 330 Feet
0 0.03 0.06 Miles
1:4,000

ADJACENT PARCELS

MENDOCINO COUNTY PLANNING DEPARTMENT - 10/6/2021



CDP Exclusion Areas

0 250 500 Feet

0 0.0425 0.085 Miles

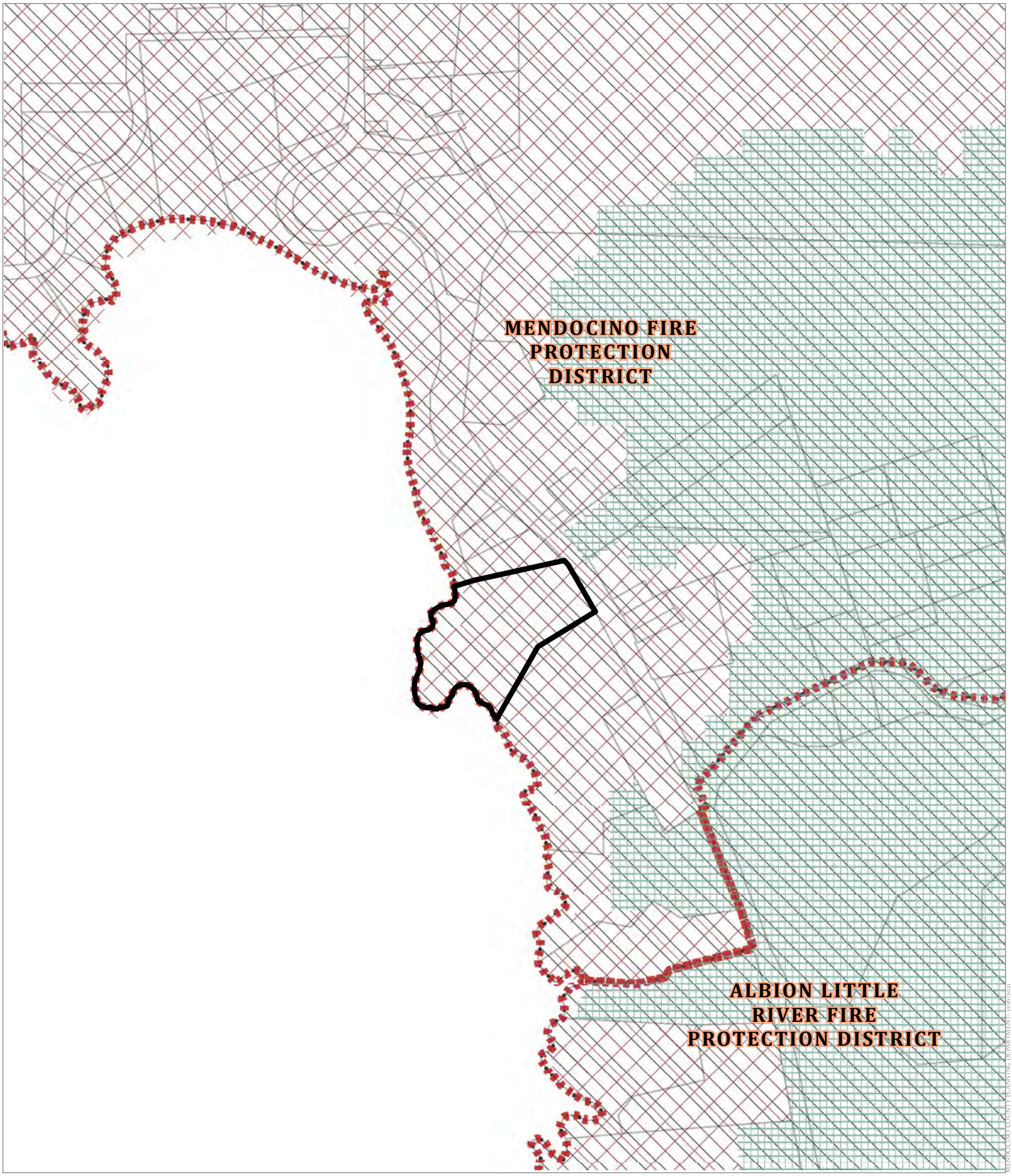
N W E S

1:6,000

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CDP EXCLUSION AREAS

MENDOCINO COUNTY PLANNING DEPARTMENT - 11/09/2021



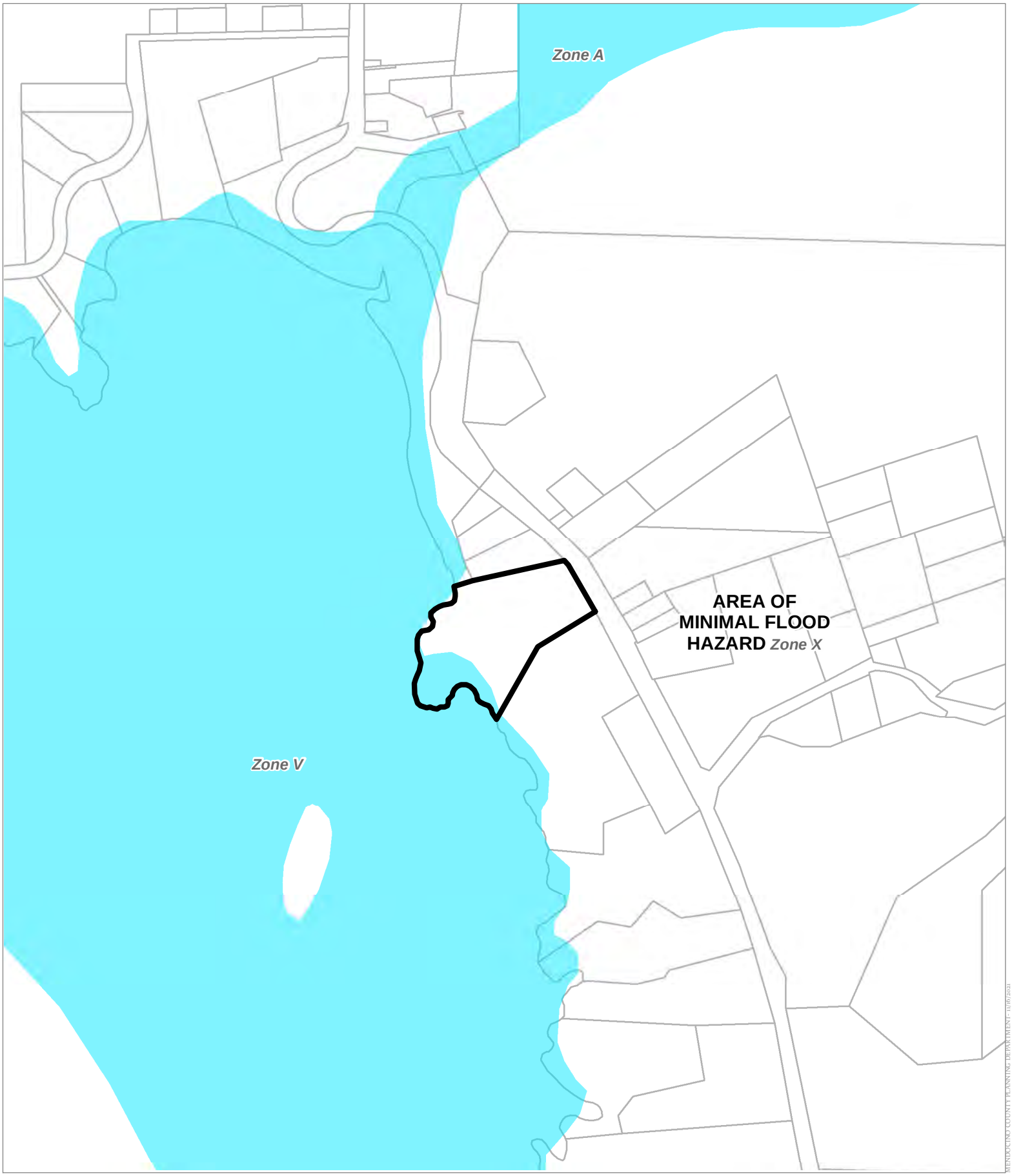
CASE: GP 2021-0002 / R 2021-0005
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High Fire Hazard
Moderate Fire Hazard
County Fire Districts

0 250 500 Feet
0 0.0425 0.085 Miles
1:6,000

FIRE HAZARD ZONES & RESPONSIBILITY AREAS

STATE RESPONSIBILITY AREA

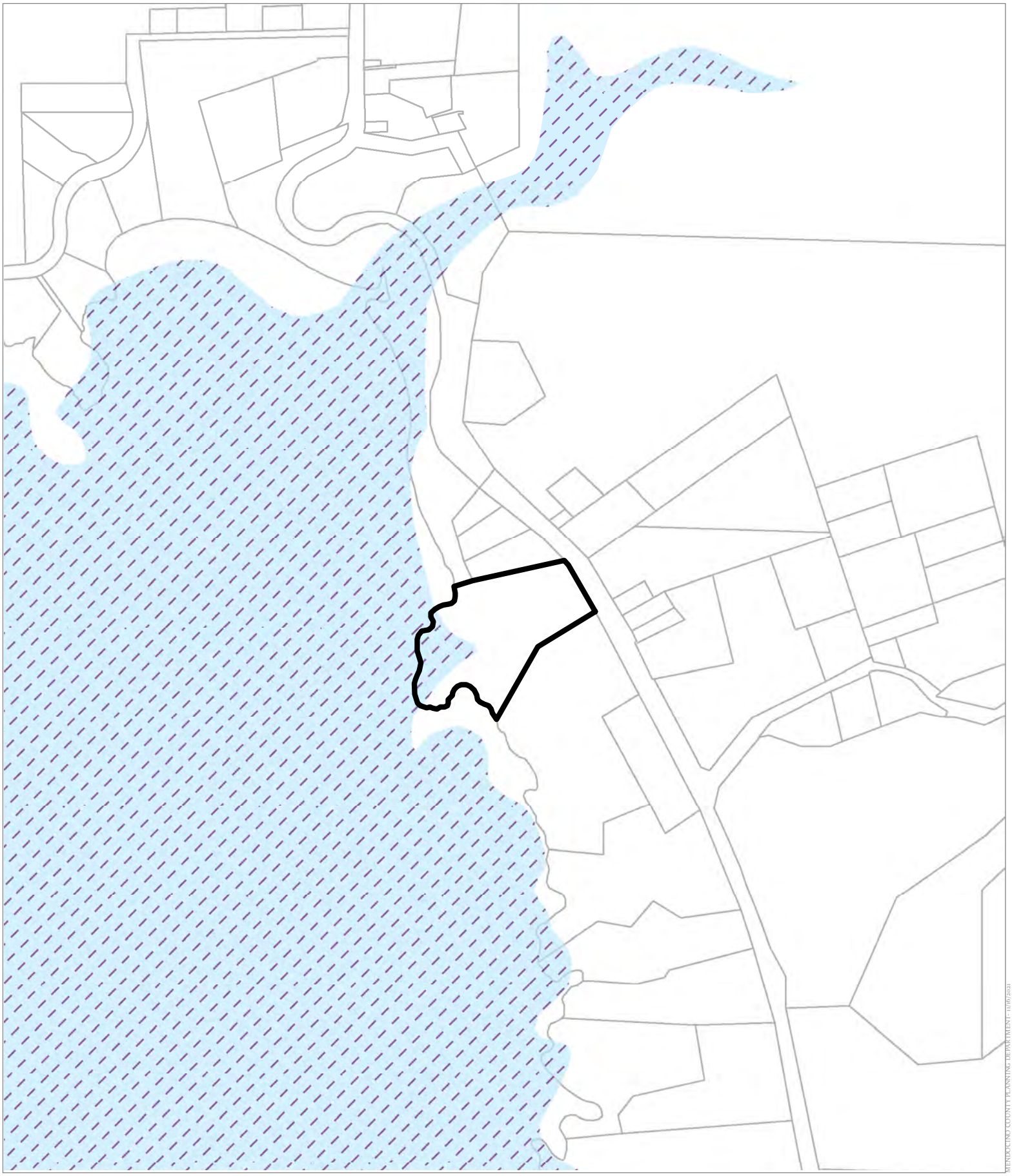


CASE: GP 2021-0002 / R 2021-0005
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0 250 500 Feet
0 0.0425 0.085 Miles
1:6,000

FLOOD ZONES

MENDOCINO COUNTY PLANNING DEPARTMENT - 11/09/2021



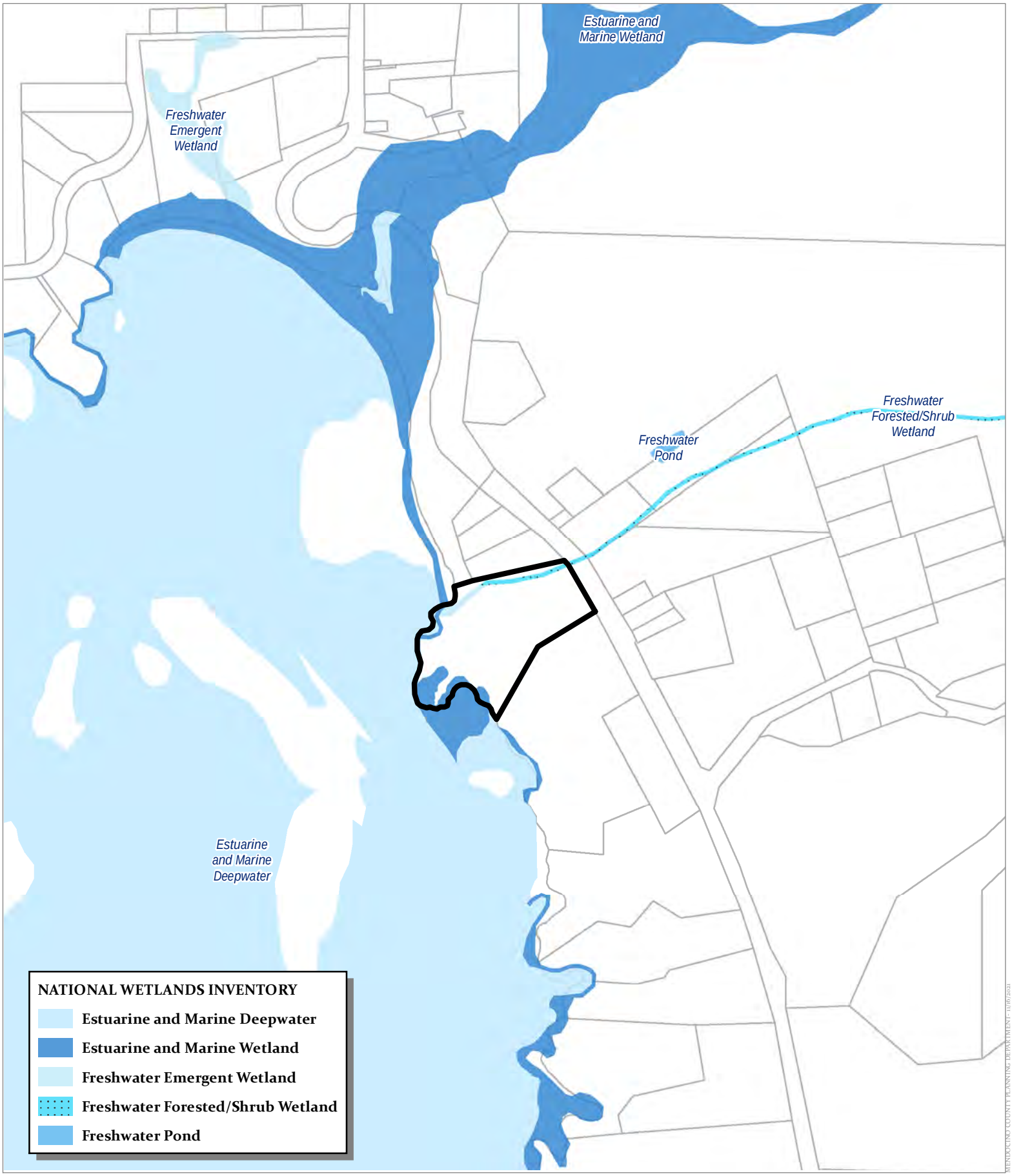
CASE: GP 2021-0002 / R 2021-0005
OWNER: Cally Dym
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AGENT: Amy Wynn, Wynn Coastal Planning & Biology
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Tsunami Inundation Zones

0 250 500 Feet
0 0.0425 0.085 Miles
1:6,000

TSUNAMI INUNDATION ZONES

MENDOCINO COUNTY PLANNING DEPARTMENT - 11/06/2021

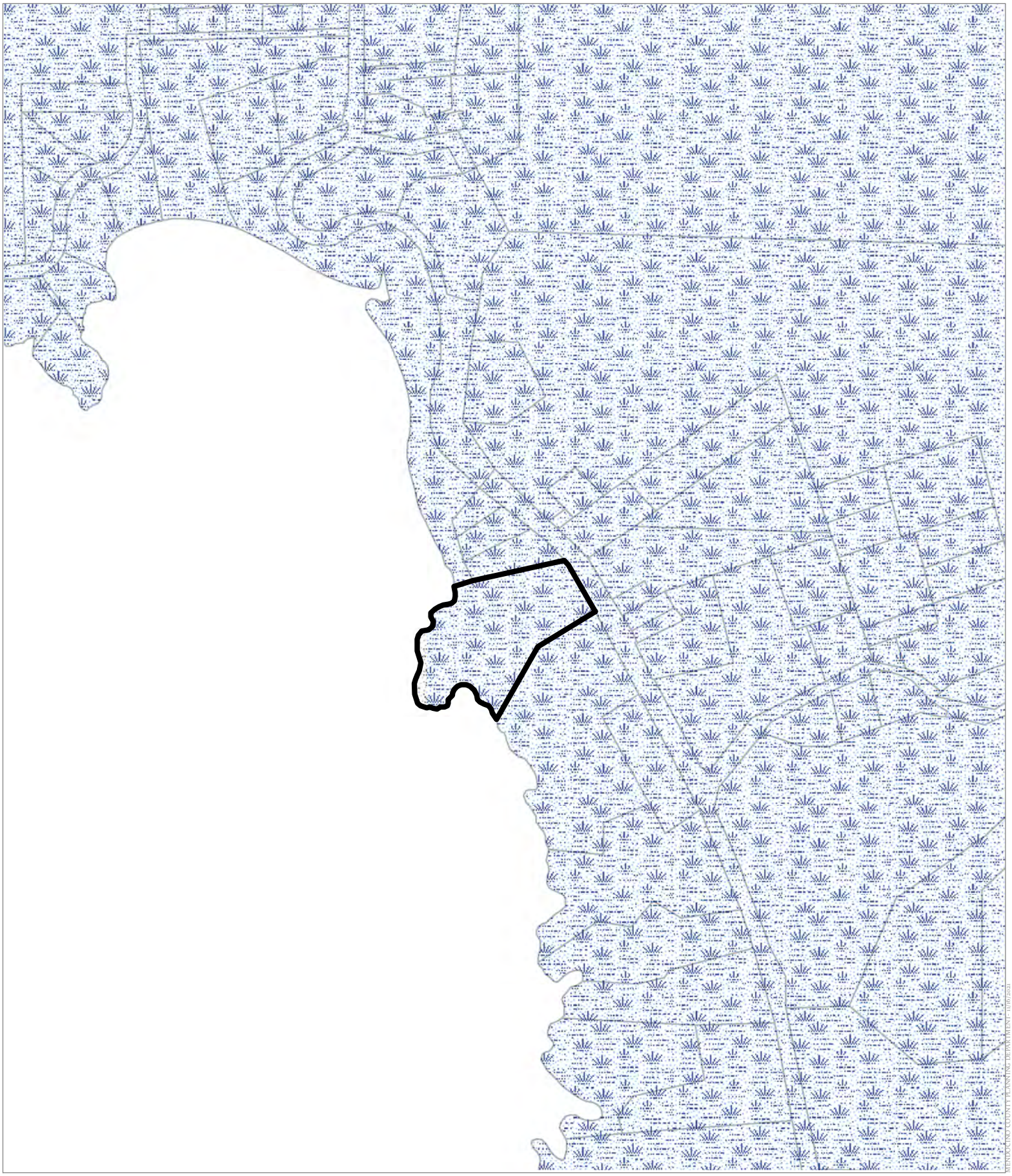


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0 250 500 Feet
0 0.0425 0.085 Miles
1:6,000

WETLANDS

MENDOCINO COUNTY PLANNING DEPARTMENT - 11/09/2021



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Marginal Water Resources

Coastal Ground Water Resource Areas

0 250 500 Feet

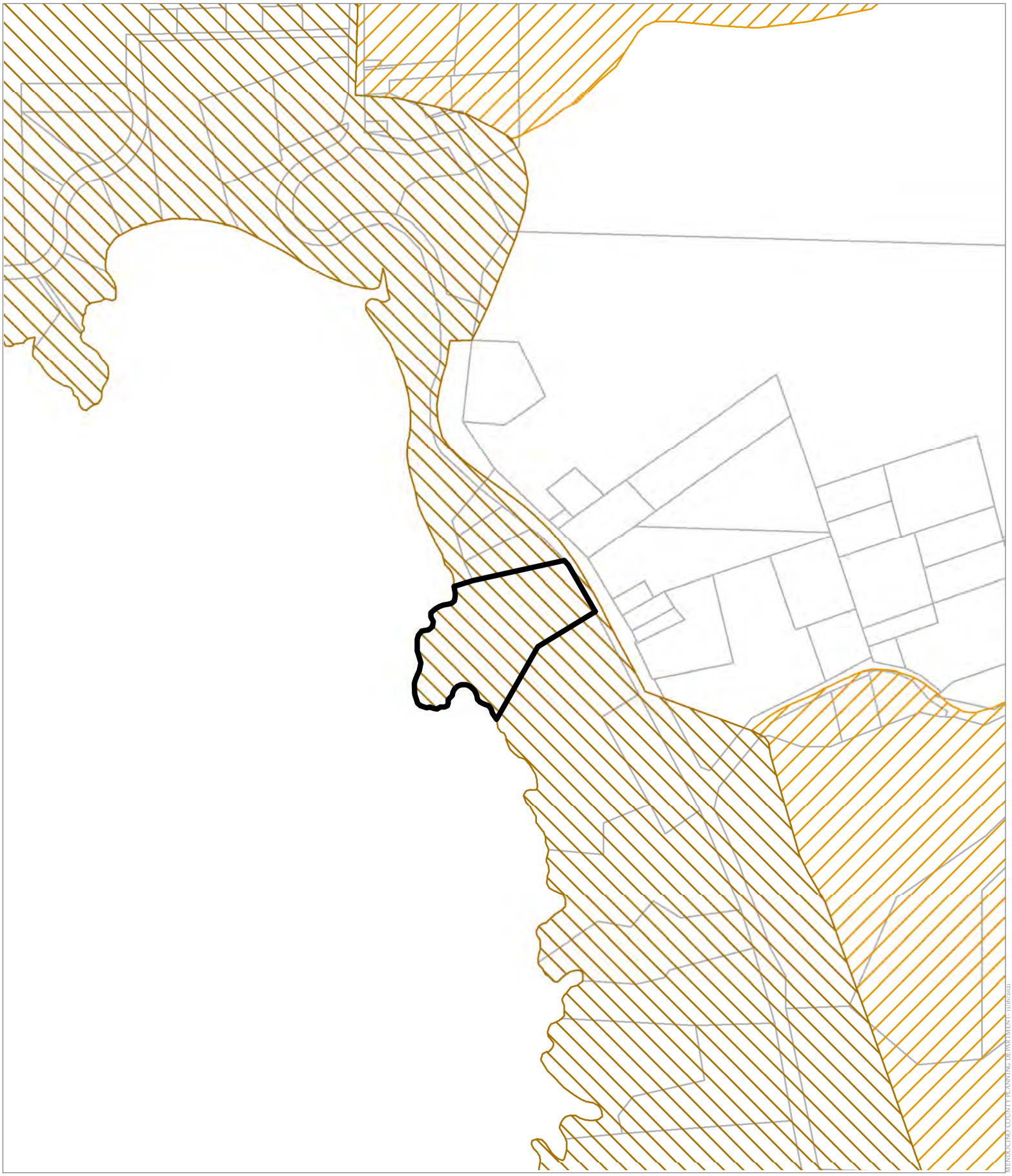
0 0.0425 0.085 Miles

N W E S

1:6,000

MENDOCINO COUNTY PLANNING DEPARTMENT | 7/8/2021

COASTAL GROUND WATER RESOURCE AREAS



CASE: GP 2021-0002 / R 2021-0005
OWNER: Cally Dym
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ADDRESS: 7720 N Highway 1, Little River

Highly Scenic Area

Highly Scenic Area (Conditional)

0 250 500 Feet

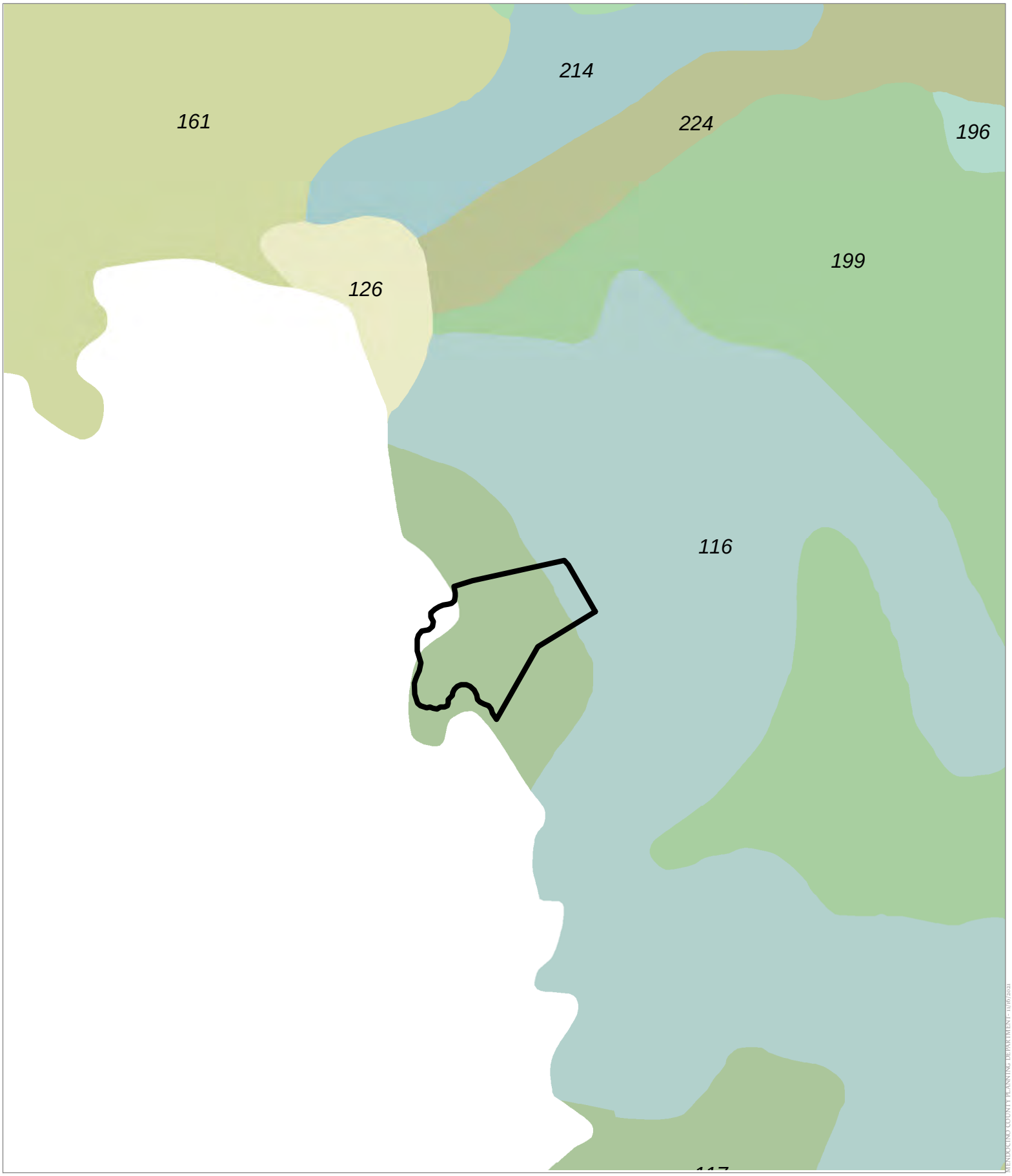
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N W E S

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MENDOCINO COUNTY PLANNING DEPARTMENT 10/07/2021

HIGHLY SCENIC AREA

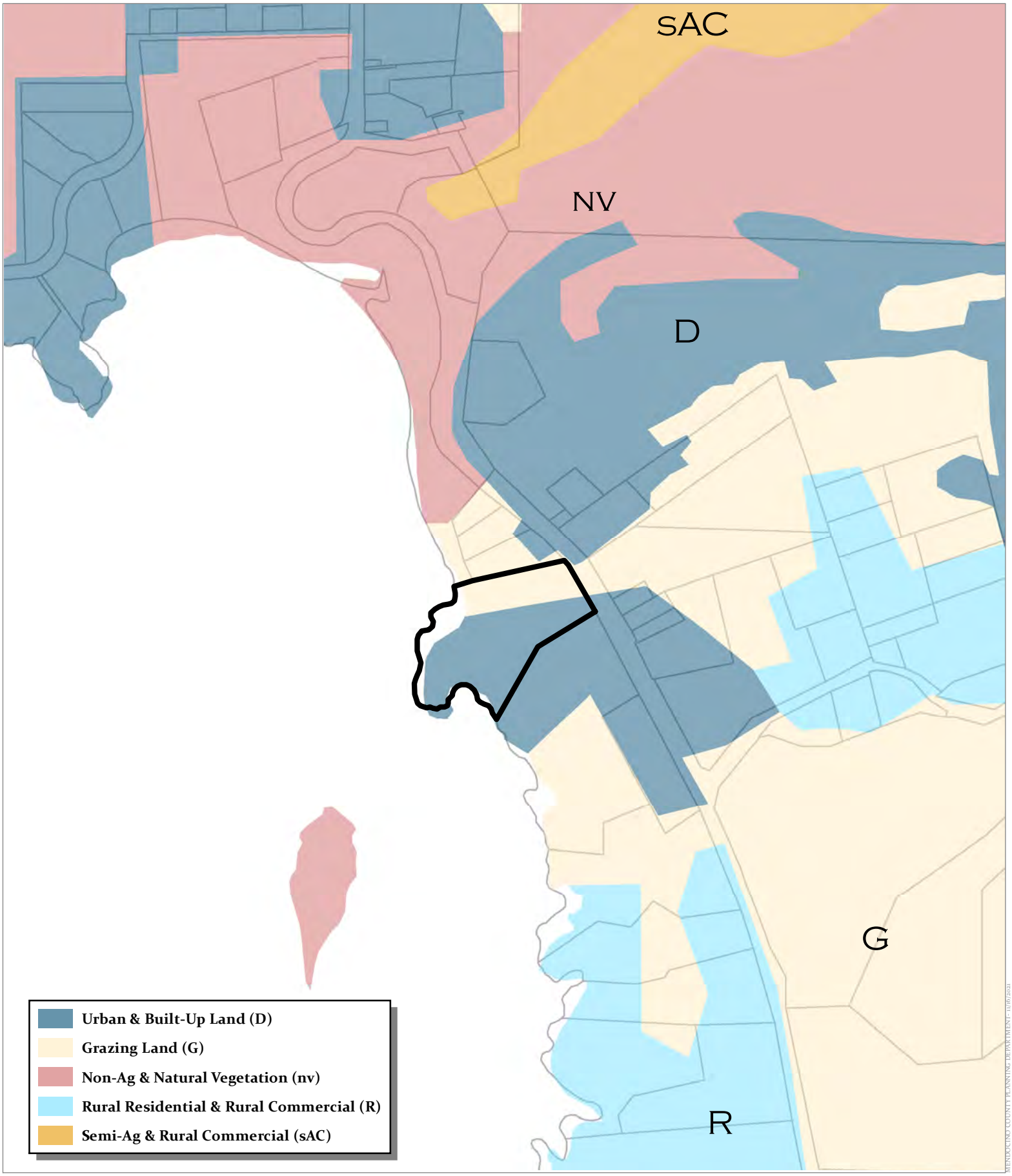


CASE: GP 2021-0002 / R 2021-0005
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APN: 121-280-15
APLCT: Cally Dym
AGENT: Amy Wynn, Wynn Coastal Planning & Biology
ADDRESS: 7720 N Highway 1, Little River

0 250 500 Feet
0 0.0425 0.085 Miles
1:6,000

MENDOCINO COUNTY PLANNING DEPARTMENT - 10/07/2021

WESTERN SOIL CLASSIFICATIONS



CASE: GP 2021-0002 / R 2021-0005
OWNER: Cally Dym
APN: 121-280-15
APLCT: Cally Dym
AGENT: Amy Wynn, Wynn Coastal Planning & Biology
ADDRESS: 7720 N Highway 1, Little River

0 250 500 Feet
0 0.0425 0.085 Miles
1:6,000

FARMLAND CLASSIFICATIONS

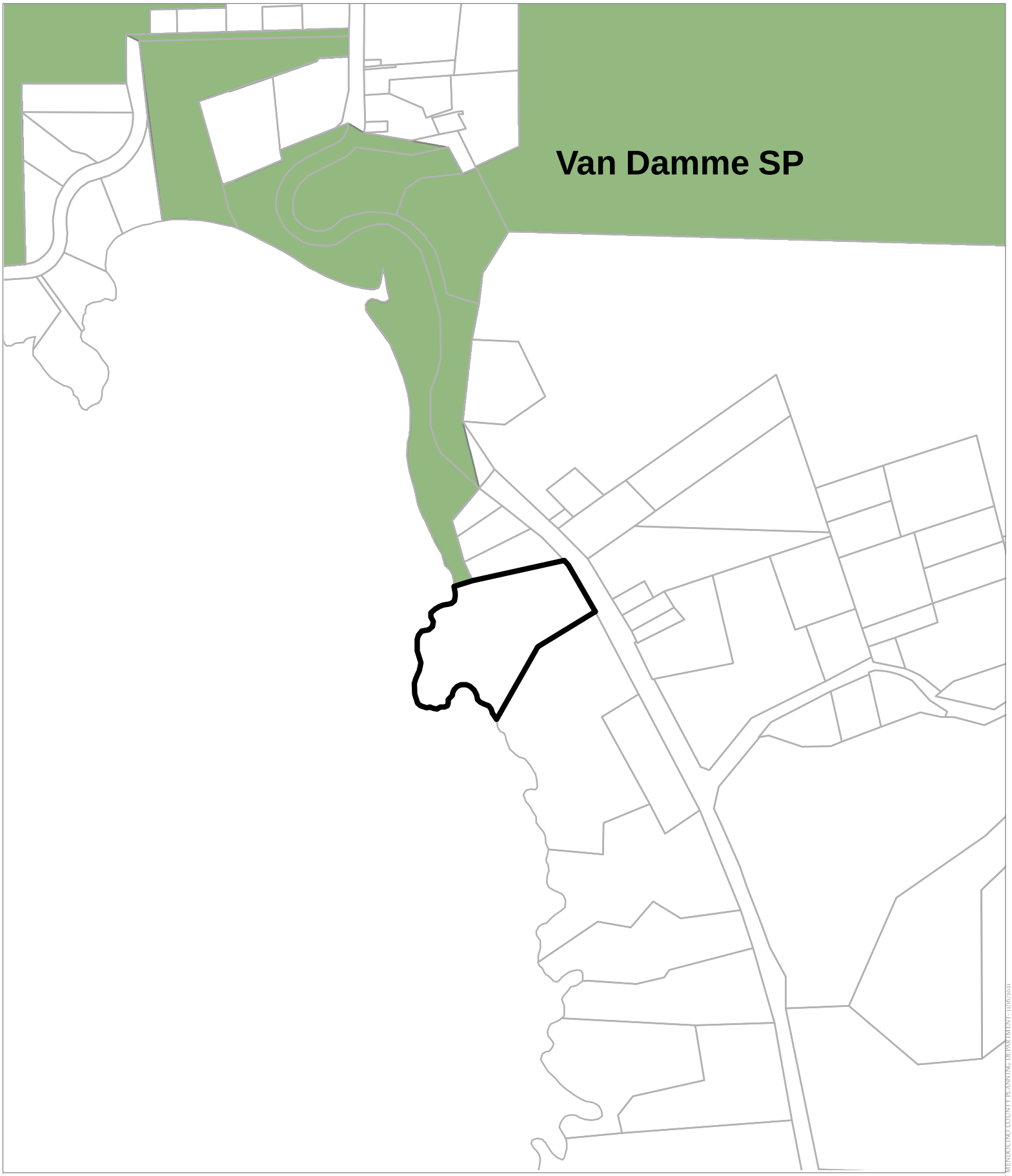
MENDOCINO COUNTY PLANNING DEPARTMENT - 10/06/2021



CASE: GP 2021-0002 / R 2021-0005
OWNER: Cally Dym
APN: 121-280-15
APLCT: Cally Dym
AGENT: Amy Wynn, Wynn Coastal Planning & Biology
ADDRESS: 7720 N Highway 1, Little River

AIRPORT ZONES

MENDOCINO COUNTY PLANNING DEPARTMENT - 10/6/2021



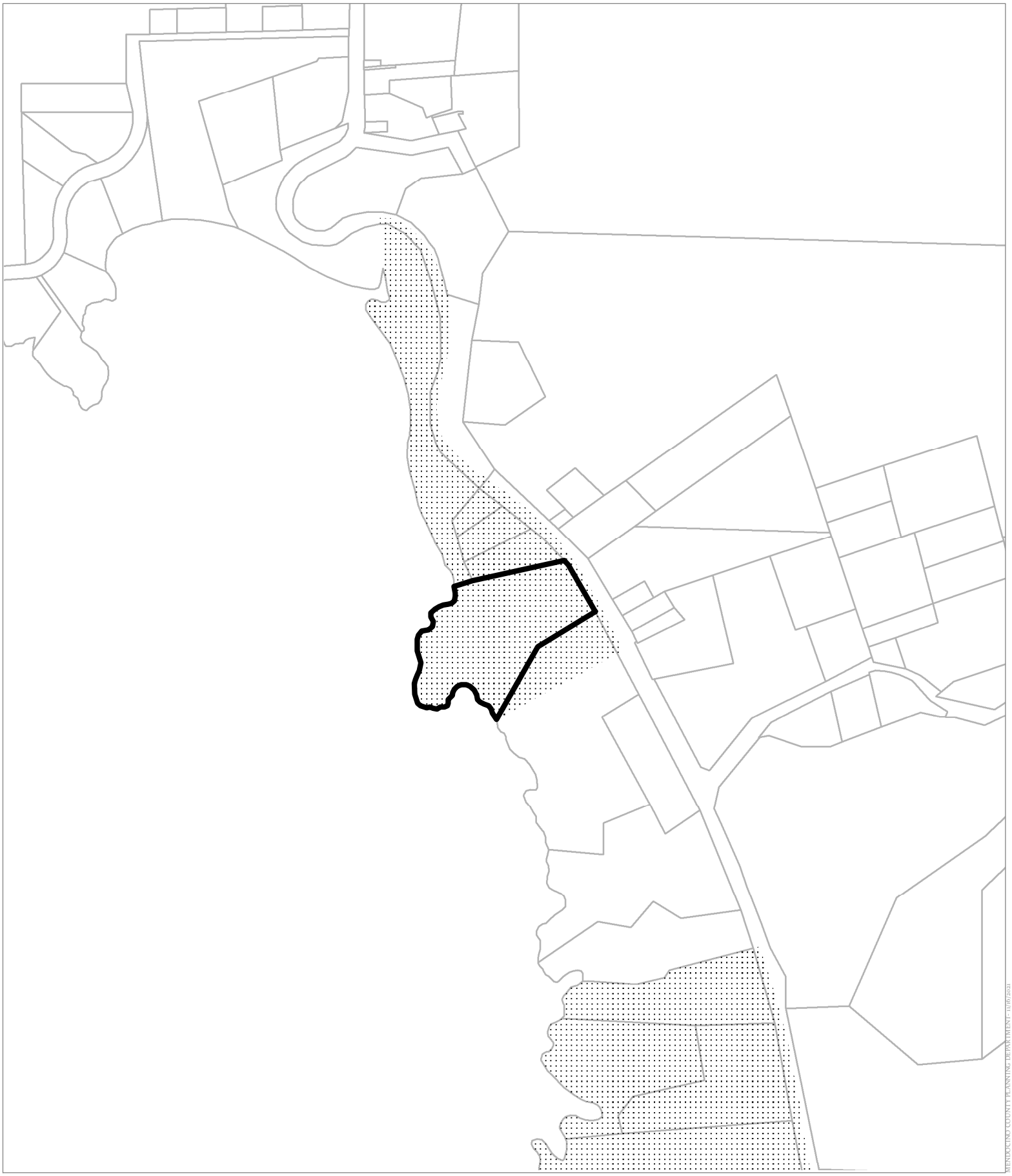
CASE: GP 2021-0002 / R 2021-0005
OWNER: Cally Dym
APN: 121-280-15
APLCT: Cally Dym
AGENT: Amy Wynn, Wynn Coastal Planning & Biology
ADDRESS: 7720 N Highway 1, Little River

State Parks

0 250 500 Feet
0 0.0425 0.085 Miles
1:6,000

STATE PARKS

MENDOCINO COUNTY PLANNING DEPARTMENT - 10/06/2021



CASE: GP 2021-0002 / R 2021-0005
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TREE REMOVAL AREA

MENDOCINO COUNTY PLANNING DEPARTMENT - 11/06/2021

ATTACHMENT B

Basis of Bearings

The bearing N.29°02'31"W. between found monuments as shown and delineated on that certain Record of Survey filed in Map Case 2, Drawer 3, Page 33, Mendocino County Records, was used as the basis of bearings shown hereon.

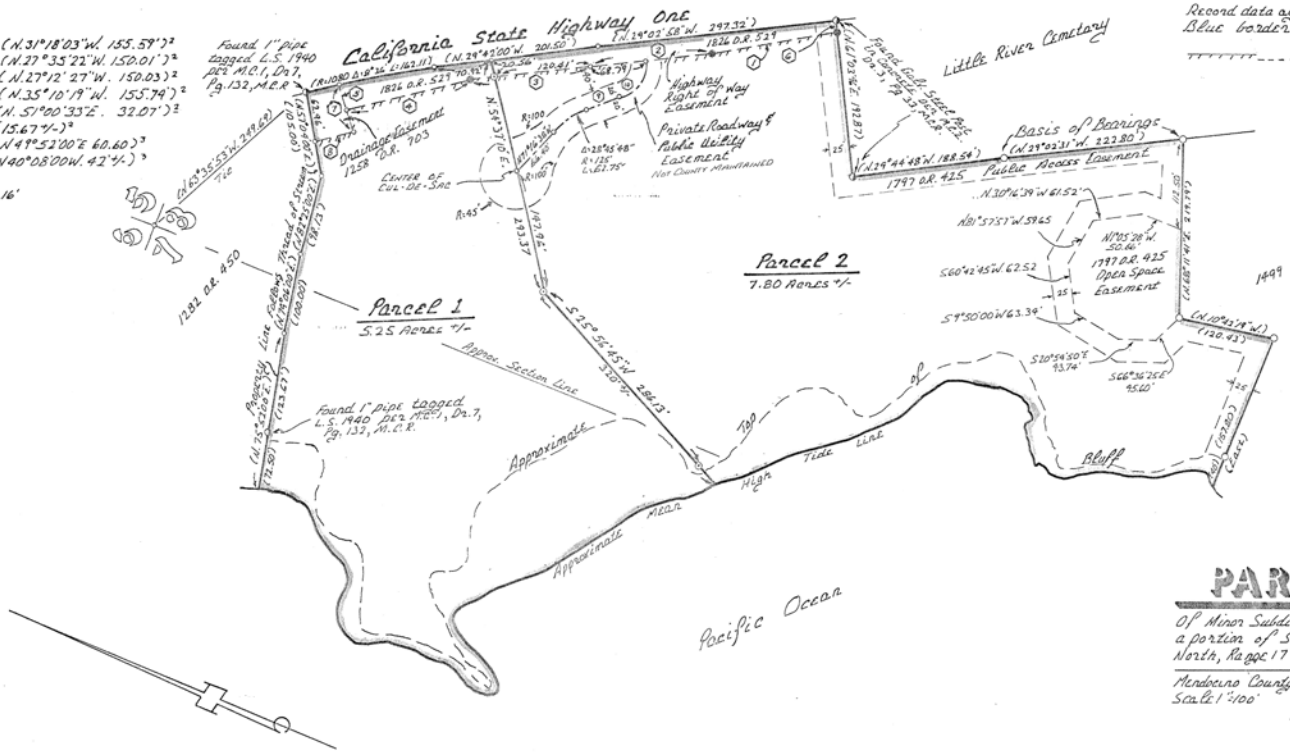
Legend

- ◦ ... Dimensional point only.
- ⊙ ... Set 3/4" rebar tagged L.S. 5121
- ○ ... Found 3/8" rebar tagged L.S. 3117 per M.C.2, Dr. 3, Pg. 33, M.C.R.
- ● ... Found 1" pipe w/ plastic plug marked Ca. D.O.T.
- ◑ ... Found monument as described
- ( ) ... Record data per M.C. 2, Dr. 3, Pg. 33, M.C.R.
- ( )² ... Record data per 1826 O.R. 529, M.C.R.
- ( )³ ... Record data per 1258 O.R. 703, M.C.R

Record data agrees with measured unless otherwise shown.
Blue border indicates limit of this division.

T T T T T T T T ... Restricted vehicular access

1. ... N.32°22'10"W. 155.44' (N.31°18'03"W. 155.59')²
2. ... N.28°39'29"W. 150.02' (N.27°35'22"W. 150.01')²
3. ... N.28°16'34"W. 150.04' (N.27°12'27"W. 150.03')²
4. ... N.36°19'26"W. 155.76' (N.35°10'19"W. 155.79')²
5. ... N.49°56'29"E. 32.07' (N.51°00'33"E. 32.07')²
6. ... N.61°03'46"E. 15.56' (15.67'+/-)³
7. ... N.49°56'29"E 60.60' (N49°52'00"E 60.60')³
8. ... N.40°05'33"W. 52.53' (N40°08'00W. 42'+/-)³
9. ... N.42°30'50"W. 41.81'
10. ... R.40', Δ.76°08'38", L.53.16'



PARCEL MAP

Of Minor Subdivision Number MS 1788, being a portion of Section 7 T. 8, Township 16 North, Range 17 West, Mount Diablo Meridian.

Mendocino County California
Scale 1"=100' April, 1990

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Wynn COASTAL PLANNING & BIOLOGY
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SUBMITTAL

October 28, 2021

Planning and Building Services
120 West Fir Street
Fort Bragg, CA 95437

RE: General Plan Amendment & Rezone Application

Owner: Cally Dym

Applicant: Cally & Marc Dym

Site: 7720 North Highway One
Little River, CA 95456
APN: 121-280-15-00

To Whom It May Concern:

Enclosed, please find a copy of our Application to the County of Mendocino for a General Plan Amendment and Rezone for the above parcel.

The following items are included in this submittal:

1. Application Form and Project Description Questionnaire (3 copies)
2. WCPB Site Plan (1 full sized, 3 reproducible)
3. Signed Certification and Site View Authorization Form (1 copy)
    a. As Agent for this project, as with all of our projects, we respectfully request to be present during all County and Stakeholder Agency site visits; one week's advance notice will be helpful to ensure our availability.
    b. Our presence during these site visits helps to ensure agencies' accurate understanding of the parcel, the parcel location, it's opportunities and constraints, and the project.
4. Signed Indemnification Agreement (1 copy)
5. Cost Recovery Form (1 copy)
6. Notice of Pending Permit (1 copy)
7. Proof of Applicant's Legal Interest in Property: Parcel Quest (1 copy)
8. Stamped, Legal Size Envelopes (8)
9. Mailing List (1 copy)
10. Proof of Water, Carl Rittiman and Associates, February 11, 2019 (1 copy)
11. Filing Fee, Check #102195

Please find our narrative regarding this application request on the following pages.

We look forward to your review of this project. Please let me know if you have any questions or comments.

Sincerely,

Amy Wynn, Principal Planner

Encl: per above

CC: Cally & Marc Dym (owners/applicants); file

ATTACHMENT C

In preparation for an application for a General Plan Amendment and Rezoning to add a Visitor Accommodating Services overlay zoning designation to the subject parcel, our team has reviewed the relevant policy and zoning codes. Our research concludes that the addition of a *1 Inn/Bed & Breakfast overlay on this property will not only be in accordance with current standards

1. **GENERAL PLAN & REZONE REQUEST**
    a. The request is for a General Plan Amendment and Rezone to add a Visitor Accommodating Services Overlay designation of *1 to APN 121-280-15-00.

2. **PROJECT BACKGROUND**
    a. The subject parcel is owned by Cally Dym, who also is owner and operator of the Little River Inn located east of Highway One, just north of the subject property. The Little River Inn is an established visitor service that provides a range of lodging units, from low-cost to high-end, while also providing a suite of amenities including: a restaurant, bar, spa, meeting rooms and golf course.
    b. As a lifelong innkeeper of a multigenerational innkeeping family that has owned and operated the Little River Inn for over 100 years, Ms. Dym recognizes the growing trend of her guests requesting bluff-top accommodations, specifically as a part of the Little River Inn experience. To meet that desire, following the adoption of the General Plan Amendment and Rezone request, the ultimate goal is to develop an intimate 5-7 unit Inn on the subject parcel.

3. LAND USE & ZONING
    a. The subject parcel is approximately 5.25acres, zoned Rural Residential 5-acre Minimum (RR5) and is generally vacant, save for a well and a small shed; at just over 5acres, the parcel is not divisible.
    b. Principally Permitted Uses in RR include Family Residential (SFR), Vacation Home Rental and Passive Recreation.
    c. Given the zoning of the parcel, theoretically, an application for a 5+ bedroom SFR could be made, which could then be rented out as a Vacation Home Rental.
    d. As the applicant is also owner/operator of the Little River Inn, the preference is to develop this parcel as a 5 to 7-unit Inn as an effective extension of the Little River Inn, benefiting by its management (reservations, permitting, etc.) and services (housecleaning, maintenance, amenities such as restaurant/spa/active recreation).
    e. The intensity of use for both residential and visitor accommodating services are based on standards established in the Mendocino County zoning regulations so that the developments will be "compatible with the natural setting and surrounding development". As a Rural Residential parcel of 5.25 acres with adequate water and septic capacity, a single-family residence of 6 bedrooms is a potentially approvable development. The property owners are proposing the development of a 5 to 7-unit Inn, and would therefore will not significantly increase the human footprint on the property by utilizing the parcel as a visitor accommodating service.

4. **VAS OVERLAY**
    a. It is typical for the VAS overlay zoning to be placed on parcels zoned Rural Residential. Within the immediate area, twelve of the fourteen parcels with VAS overlay are within Rural Residential Land Use and Zoning (RR5, RR2 and RR1); the remaining parcels are campground properties owned by California State Parks.
    b. Therefore, the VAS overlay zoning is consistent with its underlying zoning district and General Plan designation.
    c. At the time the Coastal Element of the County's General Plan was adopted, the tourist season as well as the number of tourists per year was predicted to increase over the next 20 years; consequently, the county noted that more VAS was necessary to support demand.
        i. *"On a peak summer weekend day, when all accommodation are filled there could be 2,600 visitor parties (90% stay the night). Tourism is projected to increase 3% per year for the next 20 years. Most of the available accommodation is full and booked through the summer months."*

        Mendocino County Coastal Element Chapter 3.7, Issues: Recreation and Visitor Serving Facilities
    d. Evidencing that demand, travel spending in Mendocino County has increased from $331M in 2010 to $484M in 2019, a 46% increase over 9 years. Of the $484M in total spending in 2019, 22% was spent on accommodations (~$106M).

ATTACHMENT C

Visit California; https://industry.visitcalifornia.com/research/economic-impact?sort=county&region=Mendocino; accessed 9.10.2021

5. **DISTRIBUTED VISITOR ACCOMMODATING SERVICES ALONG THE COAST**
   a. Regarding Coastal Element Policies 3.7-1 and 3.7-2, which state:

      3.7-1: The land use plan designates the existing visitor serving facilities and reserves appropriate sites for future or potential visitor serving facilities.

      3.7-2: *Because unrestricted development of visitor facilities would destroy those qualities that attract both residents and tourists, limitations on visitor facilities by type and location shall be as set by Policy 3.7-1 and illustrated by Table 3.7-2 which reflects a tabulation based on land use maps (see footnotes) to avoid highway congestion, degradation of special communities, and disruption of enjoyment of the coast.*

      i. There are a number of parcels having the VAS overlay distributed along the Mendocino coast that have had the lodging designation for decades (since 1983) and yet remain vacant. Our survey of VAS-designated parcels on LCP Maps 17 to 19 (Mendocino, Albion & Navarro), find that of the 28 properties with VAS, 5 remain vacant. In other words, 82% of the parcels having the VAS designation have been developed between the Town of Mendocino and Cavanaugh Gulch, just north of Elk. This connotes that demand for such accommodations along this stretch of the coast as a whole is exceeding supply.
      ii. Within the local service area of the subject parcel (Mendocino LCP Map), only 7% of the VAS designated parcels remain vacant.
      iii. As one progresses south from the Mendocino/Little River service area, the supply of VAS-designated parcels that remain vacant increases, from 7% to 50%.
      iv. Therefore, demand is outweighing supply in the Mendocino/Little River stretch of the Coast, while VAS parcels remain underutilized from Albion to Cavanaugh Gulch.

1.	Map 17 – Mendocino	93% developed (7% vacant parcels)
2.	Map 18 – Albion	80% developed (20% vacant parcels)
3.	Map 19 – Navarro	50% developed (50% vacant parcels)
	Maps 17 – 19	82% developed (18% vacant parcels)

      v. One might conclude that the demand for Inn/Hotel-type units appears to be in the areas of the coast that are served with additional amenities such as: state parks, beach access, rental equipment, shopping, food service and fuel. Consequently, the subject proposal serves to meet this demand for Inn units in an area that is close to the above-mentioned amenities.

   b. Within 600' to 1 mile of the proposed project site, Cally Dym operates the 55-unit Little River Inn, as well as the Mallory House Vacation Home Rental; with her mother, Ms. Dym co-owns and operates the 5-unit Van Damme House.
   c. As a lifelong innkeeper from a multigenerational innkeeping family that has operated the Little River Inn for 80 years, Ms. Dym knows intimately the demand for Inn-type accommodations along this portion of the coast. Were there to be an oversupply of lodging as the result of this project, her own properties would be among the first to suffer from reduced demand.
   d. Therefore, the proposed General Plan Amendment & Rezone, with anticipated development proposal for a 5 to 7-unit Inn on the subject parcel, will not be an impact to dispersed visitor accommodating services within the Central Coast CAC service area.

6. **LOW COST VISITOR ACCOMMODATING SERVICES**
   a. This parcel lies within the South-Central CAC (Citizen's Advisory Council) Area designated by the Mendocino County Coastal Element, which covers the coastal region from Jug Handle to Navarro River. In this area, as of the adoption of the Local Coastal Plan, there were 109 motel units, 401 campground sites (State Parks and Private), 104 Resort units, but only 52 Inn units (*Table 3.7-2 Mendocino County Coastal Element*). The subject parcel is within the hamlet of Little River, 3.3 miles south of the Town of Mendocino, and 13 miles south of the City of Fort Bragg, all of which provide additional access to a wide variety of accommodations. As a complement to the numerous campgrounds in the South-Central CAC area, Fort Bragg offers a large supply of low-cost visitor accommodating services, from motels and small inns to hotels.
   b. With the plethora of low-cost VAS in the area, from campgrounds to motels and hotels, along with a small selection of low-cost units within the existing Little River Inn offerings, the addition of the *1 VAS Inn overlay on this parcel will not impact the coastal element mandate to insure

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"accommodations of all price ranges, including lower cost ones such as campgrounds and hostels."

c. Therefore, the proposed General Plan Amendment & Rezone, with anticipated development proposal for a 5 to 7-unit Inn on the subject parcel, will not be an impact to low-cost visitor accommodating services within the Central Coast CAC service area.

7. SURROUNDING LAND USES AND ZONING

a. The subject parcel is located within the Village of Little River, surrounded almost entirely by non-residential uses, with a neighborhood market, restaurant, post office, public beach and state park campground to the north; the Little River Inn with restaurant, meeting rooms and golf course to the northeast; lodging and residential to the east; and lodging, cemetery and public access to the south.

b. The proposed zoning for a 10-unit inn is in scale and kind with the surrounding uses.

c. A residential use of the property could leave its inhabitants feeling out of place, with no sense of privacy, surrounded by visitors on all sides.

8. PUBLIC SERVICES

a. **Access:** direct access to Highway 1, shared with a 5-unit lodging unit (Van Damme House) to the south.

b. **Fire District:** Albion-Little River Volunteer Fire District, with closest station ~2.4 miles from the site.

c. **Water & Sewer:** The parcel is not in a water or sewer district; potential proposed development would be served by on-site well and septic.

9. PRELIMINARY CONSULTATION

a. Preliminarily consultation with Coastal Commission and County Planning Staff has indicated that this infill request could be regarded favorably, for many of the same reasons as noted above.

b. The ultimate project – to be described in a Coastal Development Permit application to follow – is currently planned to be a 5-unit inn, very similar in scale with the southerly-adjacent Van Damme House. Coastal Commission and County Planning Staff indicated support for this type and scale of project, pending CDP review.

10. HABITATS & NATURAL RESOURCES

a. A biological survey has been performed on the property, finding resources common to bluff top parcels in our County: ESHA along bluff edge; riparian ESHA along the northern property line; a small Coastal Act wetland likely the result of a leaking water tank; non-native trees (eucalyptus) and non-native grassland.

b. Based on the findings of the biological survey, it appears that the majority of structural development for the project may be able to accommodate a 100' ESHA buffer (which is atypical for coastal zone projects), with the remainder of the development (driveway, parking, septic, utility trenching) being able to accommodate a reduced 50' ESHA buffer. There is no anticipated need to propose development within 50' of ESHA.

11. HAZARDS

a. A geotechnical survey has been performed on this property, finding a total bluff retreat over a 75-year span to be approximately 12 feet.

b. With bluff edge ESHA requiring 50' buffers at a minimum, a 12-foot geotechnical setback can easily be accommodated.

12. GROUNDWATER RESOURCES

a. The existing well on the property is shared with the southerly adjacent 5-unit Van Damme House inn.

b. A Proof of Water Test (POW) was performed on the subject parcel on October 24, 2018, in consideration of a potential 6-bedroom residence on the subject parcel to determine if there is capacity for the well to serve both the Van Damme House lodging and the proposed project.

c. According to County water production requirements, the well production needs to demonstrate a minimum of 2,960 gallons per day (2.05 gallons per minute) in order to serve both the existing and proposed uses.

d. The POW proved that the well produces 3,168 gallons per day (2.2 gallons per minute).

e. Therefore, the well tested has been proven to meet the necessary potable water needs for the proposed project as well as the existing lodging use that shares the well.

13. TRANSPORTATION/CIRCULATION

a. Highway One Capacity:

i. While the proposed General Plan Amendment (GPA) and Rezone request will not result in an increase in traffic, it can be assumed that the anticipated Coastal Development Permit application for a 5-unit inn (which could conceivably in the future apply to expand to a 10-unit inn), will have some limited increase in traffic.

ii. Subdivisions within the Coastal Zone are becoming fewer and farther between, as the interpretation of what constitutes ESHA has been expanded to include special status plant communities: policy disallows approvals of land divisions that cannot fully accommodate 100' ESHA buffers. With the exponential expansion of the list of resources to avoid, very few division-eligible properties in the Coastal Zone can accommodate 100' ESHA buffers for two or more building envelopes, let alone one building envelope.

iii. Coupled with the high cost of installing the required road improvements and low water availability, the increased density anticipated by the Coastal Element has not been realized.

iv. The proposed GPA & Rezone to add a 10-unit inn VAS overlay can be considered as similar in density to 2 or 3 single-family homes. This may be considered the equivalent of subdividing a parcel into 2 or 3 lots.

v. Consequently, this GPA & Rezone request is balanced out by the reduction in new subdivisions being recorded.

vi. Therefore, we believe that Highway One capacity is not expected to be negatively impacted by the proposed project.

b. **Site Access:** is taken directly from Highway One, via a shared encroachment with the Van Damme House.

14. PUBLIC ACCESS

a. There is an abundance of public access in the Little River area, including the Little River Blowhole Trail on the southerly-adjacent Van Damme House property, which was extracted as a condition of approval of Coastal Development Permit 1-89-151, issued by the Coastal Commission approving the development aspect of the Minor Subdivision (MS 17-1988) that created the subject parcel.

15. VISUAL RESOURCES

a. The subject parcel has a notable knoll feature in the middle of the property. The potential proposed building envelope is on the westerly slope of that knoll, that further slopes towards the bluff edge. The result is that there is ample topography to hide a significant portion of a proposed inn structure.

b. Vegetation consisting of tall trees and shrubs exists along the northerly and easterly property lines, which further serves to screen potential proposed inn development from public view.

c. Therefore, we anticipate that an inn can be designed on the subject parcel without impacting public views.

Summary: Considering our analysis of the above resources, we believe that a General Plan Amendment and Rezone of the subject parcel to add a Visitor Accommodating Services overlay designation for a 10-unit Inn to accommodate a potential proposed 5 to 7-unit inn is consistent with the California Coastal Act and the County's Local Coastal Program. Therefore, we respectfully request approval of this request to add lodging that complements the existing resources in the Little River village area.

Wynn COASTAL PLANNING & BIOLOGY
703 North Main Street, Fort Bragg CA 95437
ph: 707-964-2537 fx: 707-964-2622 www.WCPlan.com

November 22, 2022

Matt Goines, Planner II
Planning and Building Services
860 North Bush Street
Ukiah, CA 95482

RE: General Plan Amendment & Rezone Application – Response to Request for Information
GP #2021-0002, R #2021-0005

Owner: Cally Dym

Applicant: Cally Dym

Site: 7720 North Highway One
Little River, CA 95456
APN: 121-280-15-00

Dear Matt,

Thanks for your continued attention to this project, as well as for forwarding to us the various referral agency communiques.

To assist you in your review of this project, please see our response to the agency comments on the following pages.

Following the response pages, please find the following supporting documentation which is referenced in our responses:

1. Proof of Water Test Results Letter from Carl Rittiman & Associates, Dated October 3, 2022
2. Visual Study prepared by Newberger & Associates, Dated October 7, 2022

Please let us know if you have any questions or comments.

Sincerely,

Amy Wynn
Principal Planner

Meghan Durbin
Assistant Planner

Encl: per above

CC: Cally & Marc Dym (owners/applicants); Todd Newberger, Newberger & Associates (architect); file

ATTACHMENT D

A. CALTRANS, Letter dated January 28, 2022, Jesse Robertson

1. **Access:** Access to the site is through a Private Roadway and Public Utility Easement on the property to the south, APN 121-280-15-00, the Van Damme House. This is illustrated on the site plan that accompanied the original application (WCPlan, 2021.10.26).

B. CALIFORNIA COASTAL COMMISSION, email dated April 26, 2022, Tatiana Garcia

1. **Project Description**

CCC:

"The submitted project referral packet reports an inconsistent amount of visitor serving facilities (VSFs) to be developed (5,6,7,10) following the proposed Visitor Accommodating Services (VAS) overlay. Please clarify the number of VSF units to be developed on the subject parcel, as the project's potential to impact coastal resources is partly dependent on the amount of VSFs developed."

WCPB Response:

The General Plan Amendment and Rezone request is to apply the *1 VAS Overlay to the subject property. The *1 VAS Overlay allows for applications for an Inn or Bed & Breakfast Accommodation of up to 10 units.

The GPA and Rezone does not approve specific development.

A Coastal Development Permit application will be submitted to the County that will conform to the *1 VAS overlay density requirements. The unit count for the specific project has varied over the course of project design development, ranging from a 6-bedroom Single Family Residence, to an Inn of varying sizes; the final unit count will not be determined until an application is ready to be submitted.

2. **VAS Overlay**

CCC:

*"Existing (*) and potential future (*C) Visitor Accommodating Service sites, as designated by LUP 3.7-1 and 3.7-2, have been determined to ensure sufficient distribution of VAS sites throughout Mendocino's coast, while protecting special communities and Highway 1 capacity limitations. The development of additional VAS units between Russian Gulch and the Navarro River is explicitly **discouraged** in Sec 3.7 of the County's LUP, which states, "However, meeting the sections of the Act that call for preservation of special communities and for limiting highway improvements result in allocating the increase in visitor accommodations to distribute a **higher proportion** of trips south of the Navarro River and a smaller share between Russian Gulch and the Navarro River." Applicants should demonstrate how the proposed development at this location complies with the LCP."* (emphasis added)

WCPB Response:

We recognize the Coastal Element Section that CCC staff cites. However, the citation is incomplete, as the Coastal Element narrative is preceded with the following sentence:

> *"Because the Act designates visitor serving facilities as a "priority use**", it logically follows that the plan must retain sufficient sites to meet projected demand**…."*

… and is followed by the following:

> *"Increases in visitor accommodations in the latter area must be curtailed, **but it remains to be seen how much of the demand can be shifted to the south coast.** More quality restaurants, more inns and more shoreline access are proposed to establish the south coast as a visitor destination area**-one that is closer to home for most potential patrons.***

ATTACHMENT D

> *"Both the large number of desirable sites for overnight accommodations and the difficulty of predicting and demand by type (inn, motel, campground) at a particular location* ***make any plan's compliance with the Act's intent uncertain****."*

There are a number of factors being raised here, including how to ensure that there is an adequate supply of visitor serving facilities while balancing visitor needs with those of non-visitor uses. The Coastal Element narrative begins "*increases in visitor accommodations* [between Russian Gulch and the Navarro River] *must be curtailed,"* but the narrative continues and astutely states that "***it remains to be seen how much of the demand can be shifted to the south coast****."*

We support the goal of ensuring that visitor designations are accessible to the greater public, and understand the original concept that perhaps the south coast of Mendocino County is "***closer to home for most potential patrons.****"* However, over four decades of visitor behavior has demonstrated that:

- Visitors come to the coast from all over the world and all parts of the west (Oregon; Nevada; Eureka, Redding, Chico, Sacramento), not just south of Mendocino County.

- There are no direct routes to the south coast from anywhere, including the Bay Area. Though Gualala is geographically the closest portion of our county to the Bay Area, there is still a 3-hour travel time, regardless of whether one drives the scenic though laborious route up Highway 1 from Sonoma County or if they take Highways 101 and 128. Travel time from San Francisco to Little River/Mendocino and Fort Bragg is 3.5 hours. Though it takes 30 minutes longer to reach the Little River/Mendocino/Fort Bragg region, it's much easier to reach these destinations because of higher speed limit and less windy highway travel, and there are many more associated services and activities for visitors along the northern Mendocino coast than there are on the south coast.

- Therefore, the Little River/Mendocino/Fort Bragg area is just as "close to home" as Gualala, as well as much easier to reach with more services.

Though the Plan states that "*more quality restaurants, more inns and more shoreline access are proposed to establish the south coast as a visitor destination area*," very few restaurants and inns have been developed south of the Navarro River since the certification of the Coastal Element. Even with the notable increase in shoreline access in that area over the past 40 years, there has been no correlating boon in the creation of new restaurants and lodging on the south coast.

As noted in Section 5 of our October 2021 submittal, there are four decades of landowner behavior demonstrating that there is minimal desire to develop visitor accommodating services on lands having VAS designations south of the Navarro River. If there was a desire and a market to develop lands zoned as VAS, it would have occurred through the several development booms that have occurred since 1982.

We recognize that development drawing visitors to the south coast is preferred by the LCP and has been codified with the language stating "*..development of additional VAS units between Russian Gulch and the Navarro River is explicitly discouraged..."*. However, the plan also states *"Because the Act designates visitor serving facilities as a "priority use", it logically follows that <u>the plan must retain sufficient sites to meet projected demand</u>…".* Considering these two passages together it appears that use of the term "discouraged" was intentional because the planners at the time knew that completely prohibiting development in the subject property region would be detrimental to all VAS, including that south of the Navarro River. Continuing to meet the demand in the areas with the highest levels, is crucial to encouraging VAS development down the coast. Carefully designed development north of the Navarro River does not negate the potential for future south coast development.

When the Coastal Element was penned in 1982, visitor volume was expected to increase by 60% in 20 years. Since then, only 41% of designated parcels that were <u>not</u> developed with VAS at the time have been developed with VAS since and remain active today. If we are to continue to thrive as a visitor destination and seek to cultivate that characteristic

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throughout our coast, we must also continue to fortify visitor accommodations and services where there is current demand, just as the plan states.

Our October 2021 submittal analyzed VAS parcels from Mendocino to Navarro. We have expanded our VAS analysis to include **all** areas of the Mendocino Coast, from Point No Pass to Gualala.

1.	Map 1 – Point No Pass	(no VAS designations)
2.	Map 2 – Bear Harbor	50% developed (50% vacant parcels)
3.	Map 3 – Mistake Point	100% developed (0% vacant parcels)
4.	Map 4 – Usal Creek	100% developed (0% vacant parcels)
5.	Map 5 – Williams Point	(no VAS designations)
6.	Map 6 – Rockport	0% developed (100% vacant parcels)
7.	Map 7 – Abalone Point	50% developed (25% vacant/25% residential)
8.	Map 8 – Westport*	0% developed (100% vacant parcels)
9.	Map 9 – Ten Mile River	0% developed (0% vacant/100% residential)
10.	Map 10 – Newport	100% developed (0% vacant parcels)
11.	Map 11 – Little Valley	(no VAS designations)
12.	Map 12 – Cleone*	60% developed (20% vacant/20% residential)
13.	Map 13 – Fort Bragg*	(no VAS designations)
14.	Map 14 – Beaver*	80% developed (20% vacant parcels)
15.	Map 15 – Caspar*	75% developed (25% vacant parcels)
16.	Map 16 – Van Damme	0% developed (0% vacant/100% residential)
17.	Map 17 – Mendocino*	93% developed (7% vacant parcels)
18.	Map 18 – Albion*	71% developed (19% vacant/10% residential)
19.	Map 19 – Navarro	50% developed (50% vacant parcels)
20.	Map 20 – Elk	100% developed (0% vacant parcels)
21.	Map 21 – Bridgeport Landing	(no VAS designations)
22.	Map 22 – Mallo Pass Creek	33% developed (33% vacant/33% residential)
23.	Map 23 – Manchester	67% developed (0% vacant/33% residential)
24.	Map 24 – Manchester	(no VAS designations)
25.	Map 25 – Point Arena*	0% developed (0% vacant/100% residential)
26.	Map 26 – Arena Cove*	100% developed (0% vacant parcels)
27.	Map 27 – Hall Gulch	(no VAS designations)
28.	Map 28 – Schooner Gulch	0% developed (100% vacant parcels)
29.	Map 29 – Signal Ridge	(no VAS designations)
30.	Map 30 – Anchor Bay	67% developed (0% vacant/33% residential)
31.	Map 31 – Gualala	43% developed (0% vacant/57% residential)

*[*excluding existing VAS located within RV zoning in Westport, Cleone, Caspar, Albion, Elk; City of Fort Bragg; Mendocino Town; City of Point Arena; Gualala Village]*

ALL OF MENDOCINO CO. CZ Maps 1–31…….....65% VAS (19% vacant/17% residential)
MENDOCINO thru ALBION Maps 17–19……79% VAS developed (18% vacant/4% residential)
ALL EXCEPT MENDO-ALB Maps 1-16 & 20-31...56% VAS developed (19% vacant/24% residential)
SOUTH OF NAVARRO RIVER Maps 20–31…...49% VAS developed (10% vacant/41% residential)

The data above demonstrates that, regardless of the distribution of VAS designated parcels along the Mendocino County coast, visitor demand determines where the development is a worthwhile undertaking. Notably, even though the area south of the Navarro River has the lowest percentage of VAS development, it also has the lowest percentage of remaining vacant parcels and highest percentage of parcels that have been developed residentially. Over the last 40 years demand for residential development has exceeded the demand for VAS development on property south of the Navarro River. The proportion of VAS between Russian Gulch and the Navarro River has maintained a high percentage of developed VAS, even with the curtailment established by the LCP, because visitor demand for services in that region has sustained through 40+ years of growth. This conclusion is based on the following data summaries:

- Two thirds (65%) of **all** designated parcels in Mendocino County's Coastal Zone are currently developed with VAS;
- excluding "the smaller share between Russian Gulch and the Navarro River" (i.e. Mendocino to Albion) where "development of additional VAS units...is explicitly

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discouraged", only slightly more than half (56%) of designated parcels are developed with VAS

- within "the smaller share between Russian Gulch and the Navarro River" (i.e. Mendocino to Albion); more than three quarters (79%) of the designated parcels are developed with VAS; and
- on the south coast, though only 10% of designated parcels are vacant, 41% have been developed residentially while only half (49%) have been developed with VAS i.e. the lowest percentage of regional VAS development when compared with the development of VAS designated parcels as whole and as separate regions.

Our survey of the LCP maps indicates there are 50 properties with the * or *C combining district designation that have existing VAS are in business today. The combining district is not used in the cities, RV (Rural Village) zoned and other special plan areas (Gualala). Collectively, in those areas there are 54 properties with VAS development today. Of those 54, 16 VAS properties are within the City of Fort Bragg and 21 are in the town of Mendocino. Clearly, the addition of the subject parcel as a VAS property does not add to the distribution of VAS south of the Navarro River; however neither does it compound the area of the densest concentration of VAS, which is found in Mendocino Town.

Additionally, the subject property is well suited for this combining district relative to the original logic applied in designating VAS properties, i.e. ".... site characteristics and compatibility with surrounding development." as stated at the end of Section 3.7. Site characteristics on the subject property include existing utilities (water, power), proximity to a wide range of local attractions, and design concepts that provide ocean views for guests without obstructing ocean views for the public. The proposed development is compatible with surrounding uses logistically due to ease of access for both guests and service providers. It is also compatible aesthetically as set within view to and from the historic Little River Inn and proximity to other lodging facilities, which conversely is not attractive for the current permissible use of residential development. Furthermore, even with optimal site characteristics and compatible surrounding uses development is not created by spontaneous combustion. There must be a spark, i.e., willing and able developers. The applicants are prominently active in the local visitor serving industry and have decades of experience at one of the most successful local establishments with impressive longevity.

The original projections about shifting demand to the south coast were framed by the acknowledgement that what would actually happen "...remained to be seen.". Forty years down the road what we see the reality of real estate investment and development within the laws of economics. The viability of fortifying the south coast VAS is directly tied to encouraging selective continued development in parts further north until the overflow naturally fills the south coast. The proposed development complies with the LCP directly because it respects the premise under which the LCP was written and constitutes a building block for driving more demand south of the Navarro River when the time comes that there is the demand to support it. Were the Coastal Element to be updated today, the narrative regarding Visitor Accommodating Services would most certainly be changed to reflect past and desired future behavior.

3. Low-cost Visitor Services Assessment

CCC:

"The application sites VSFs in the cities of Mendocino and Fort Bragg as documented in 1982, as providing adequate low-cost visitor services. However, VSFs available in 1982 do not accurately reflect the current amount of low-cost VSF available in the area. The applicant should site the current amount of low-cost VSF available in the area and justify why it is not feasible to include low-cost VSF in the development as required in LCP Policy 3.7-5, which states "Lower-cost visitor and recreational facilities for persons and families of low and moderate income shall be protected, encouraged and, where feasible, provided."

WCPB Response:

a. Current amount of low-cost VSF available in the area:

ATTACHMENT D

- The organization Visit Mendocino, aka the Mendocino County Tourism Commission, is compiling current data on the number of existing overnight units. Unfortunately, that work is not complete or published yet. The data cited from 1982 is the most reliable data available. Table 3.7.2 of the Coastal Element notes that at the time, in the South Central CAC Area (Jug Handle to Navarro River) there were 401 campground sites (private + public).
- The Little River Inn, located east of the proposed rezone parcel, currently offers market rate rooms from $300 to $634/night. The Inn provides four rooms at a lower cost of $150 to $165/night.
- Within a ten-minute drive, there are no fewer than six campgrounds (private and state-owned) offering upwards of 426 tent and RV camp sites.

b. Feasibility of Providing low-cost VSF:

- This can be explored at the time a specific development application is submitted to the County for approval. Any potential future design proposal will need to consider the financial feasibility of return on investment from lodging of various rates with the cost of obtaining entitlement permits and subsequent buildout.

4. Existing Services

CCC:

"Provided Item #10 of the referral packet, POW, suggests the existing well could supply 6 units. Please confirm that the on-site water system will be adequate to supply all future permitted development. Additionally, the proposed development will increase the intensity of use at the project site and cause traffic along Highway 1 to increase within the immediate area. A traffic study should be provided to demonstrate that the project will not cause traffic flow to diminish to an unacceptable level of service (LOS F)."

WCPB Response:

a. Demonstration of Adequate Water

- The General Plan Amendment and Rezone request is to apply the *1 VAS Overlay to the subject property. The *1 VAS Overlay allows for applications for an Inn or Bed & Breakfast Accommodation of up to 10 units.
- The GPA and Rezone does not approve specific development.
- A Coastal Development Permit application will be submitted to the County that will demonstrate adequate water supply exists to support the proposed development.
- The Proof of Water letter previously submitted has been updated by the soil scientist who performed the test, to address whether or not the supply will be adequate for 5 Visitor Serving Units. The data and calculations referenced assert that the supply is more than adequate. (enclosed)

b. Traffic Study

- It is our understanding that the County will not be requiring a Traffic Study for this project due to the limited potential for increase in traffic.

- **Woods Traffic Study:**
  In 2008, WCPB commissioned a Traffic Impact Study for a project outside the Coastal Zone, up Little River Airport Road. The project was withdrawn due to the recession and other factors, but the application submitted to the County was to add 18 mobile homes to The Woods, which is a manufactured home park for elderly. Significantly, the Study, prepared by W-Trans dated November 10, 2008, included addressing the existing and future conditions using Level of Service of the intersection of Little River Airport Road and Highway 1.

  The Study concluded that the Existing intersection at the time of the study was operating at LOS A. The Existing plus Project Conditions were expected to continue operating at LOS A during peak hours, with an increase in the average delay of less than ½ second. Factoring Future plus Project

ATTACHMENT D

Conditions, the addition of the Woods-related project traffic, the intersection was expected to continue operating at LOS A overall.

- **W-Trans Comment**
  WCPB requested a Scope of Work from W-Trans for a Traffic Study for the proposed General Plan Amendment and Rezone to add a *1 VAS overlay to the subject site, W-Trans Principal Dalene Whitlock responded:

  " A 10-room hotel would generate 2-5 peak hour trips and 80 daily trips, so would reasonably fall below the level at which any kind of traffic study would be reasonable, except maybe to look at site access. It would also screen out as a small project for which VMT can be presumed to be LTS."

  To commission even a simple Study would cost upwards of $6,000. If the traffic engineer who has performed work in the area believes that the project is too small to have a potential impact, then we'd prefer not to have to commission such a study.

- **WCPB Application Narrative, October 28, 2021**
  a. While the proposed General Plan Amendment (GPA) and Rezone request will not result in an increase in traffic, it can be assumed that the anticipated Coastal Development Permit application for a 5-unit inn (which could conceivably in the future apply to expand to a 10-unit inn), will have some limited increase in traffic.
  b. Subdivisions within the Coastal Zone are becoming fewer and farther between, as the interpretation of what constitutes ESHA has been expanded to include special status plant communities: policy disallows approvals of land divisions that cannot fully accommodate 100' ESHA buffers. With the exponential expansion of the list of resources to avoid, very few division-eligible properties in the Coastal Zone can accommodate 100' ESHA buffers for two or more building envelopes, let alone one building envelope.
  c. Coupled with the high cost of installing the required road improvements and low water availability, the increased density anticipated by the Coastal Element has not been realized.
  d. The proposed GPA & Rezone to add a 10-unit inn VAS overlay can be considered as similar in density to 2 or 3 single-family homes. This may be considered the equivalent of subdividing a parcel into 2 or 3 lots.
  e. Consequently, this GPA & Rezone request is balanced out by the reduction in new subdivisions being recorded.
  f. Therefore, we believe that Highway One capacity is not expected to be negatively impacted by the proposed project.
-

5. Visual Resources

CCC:

"The project is designated highly scenic per the County's certified LCP. The application states the existing vegetation to the north and east of the property will screen future development, however the area is also within in an LUP-designated tree removal location, where future development on the parcel is contingent upon removal of existing trees. The visual resource analysis should be updated to reflect the future removal of trees."

WCPB Response:

20.504.015 C(9) states:

*"In specific areas, as designated on the Land Use Maps and other circumstances **in which <u>concentrations of trees unreasonably obstruct views</u> to and along the ocean** and scenic coastal areas, tree thinning or removal shall be made a condition of permit approval."*

ATTACHMENT D

While the property is within a Tree Removal Area, future development does not have to remove all existing trees. Rather, per 20.504.015 C(9), cited above, only concentration of trees that unreasonably obstruct views to and along the ocean shall be removed. Therefore, not all trees on the property should be conditioned for removal upon issuance of an entitlement permit.

The parcel hosts a combination of dense stands of trees as well as smaller groupings of specimen trees. While the dense stand of eucalyptus trees adjacent to and partially within the riparian area along the northern property line can be determined to "unreasonably obstruct views" to and along the ocean, the small sweep of conifers on the knoll do not perform the same obstruction. Therefore, a future applicant could propose a nuanced tree thinning and removal plan to ensure compliance with 20.504.015 C(9) while retaining certain desirable landscape features that do not unreasonably obstruct views to and along the coast and scenic coastal areas.

The applicant team is working on the development proposal in preparation for submitting a CDP application if the GPA is approved. While a number of details are undetermined until a decision is made on the GPA, we do have a draft visual study for the project including a photographic rendering showing removal of the dense stand of eucalyptus trees. Please see "LRI_VS.1_10-07-2022" by Newberger & Associates dated October 7, 2022 (enclosed).

6. ESHA

CCC:

"The submittal notes the presence of ESHA on the subject parcel. A Biological Report should be prepared and provided so the County can evaluate whether the property can be developed for the proposed use consistent with all ESHA protection policies."

WCPB Response:

- The General Plan Amendment and Rezone request is to apply the *1 VAS Overlay to the subject property. The *1 VAS Overlay allows for applications for an Inn or Bed & Breakfast Accommodation of up to 10 units.
- The GPA and Rezone does not approve specific development.
- A Coastal Development Permit application will be submitted to the County that will include a Biological Report and a design proposal that will conform to the ESHA protection policies.

ATTACHMENT D

ATTACHMENT E

CARL RITTIMAN & ASSOCIATES, INC.

Certified Professional Soil Scientist
PO Box 590 • Mendocino CA 95460

Marc Dym
P.O. Drawer B
Little River, CA 95456

Date: October 3rd, 2022

Re: 7720 Highway 1, Little River
Proof of water test

Marc,

You contacted our office to assist you with the water production aspect of the planned development of a residence on this parcel. The parcel currently supports a shed and a well and is otherwise undeveloped. The existing well currently serves an adjacent parcel, 7700 Hwy. 1, which is owned by the Little River Inn Inc. The existing uses on 7700 Hwy 1 consist of 5 visitor serving units. The 5 VSU's will be assigned a total wastewater production of 600 gallons per day (gpd) (120 gpd/room). In addition to the projected indoor water flows (600 gpd), it is also recognized that an additional 100 gpd may occur for outdoor water use (irrigating, etc). As such, a total of 700 gpd of water would ne needed to serve the existing uses on 7700 Hwy 1, from the well located on 7720 Hwy 1. This parcel (7700) has Planning Department restrictions which limit the development to its current size and as such, no increased water demands are anticipated.

At this time, plans for 7720 Hwy. 1 will be for the development of 5 Visitor Serving Units (VSU's). The wastewater flow from these units will also be 600 gpd. In addition, a flow of 50 gpd will be assigned for potential waster generated at a proposed patio. We will also allow for an additional 100 gpd of outdoor water use. As such, the total water needs for this parcel will be 750 gpd.

The total combined water needs for the 2 parcels is:

700 gpd (7700 N. Hwy. 1) + 750 gpd (7720 N. Hwy. 1) = 1,450 gpd

Our office was contacted to conduct a Proof of Water Test to determine whether the existing well has a sufficient amount of production to continue to support the uses on 7700 Hwy. 1, in addition to the proposed uses on 7720 Hwy. 1.

Attached are all drawdown and recovery data for the Proof of Water Test, conducted during the County identified dry season testing period.

Phone 707-937-0804 • Fax 707-937-0575 • e-mail andy.carlrittiman@gmail.com

ATTACHMENT E

The type of test procedure used to determine a wells' production is referred to as a sustained yield test. The aim of this test is to try to stabilize the water level within the well. This indicates that the flow of water being pumped out of the well is equal to the amount of water entering the well. The results of the test are as follows:

Well 'A'

The well tested is a drilled well, cased with 5" diameter PVC casing. The total depth of the well is 100 feet. The well is currently plumbed and the existing pump was utilized for this test. The pump inlet is assumed to be set at 95 feet. The test was started at 10:20 A.M., on 10/24/18. The static water level in the well was 29' 7" at the start of the test. The water level stabilized in the well near the depth of 73' 7", 340 minutes into the test, while pumping at a flow rate of 2.2 gallons per minute. The water level remained fairly stable for the remaining 680 minutes of the test.

The recovery of this well was monitored for 1,060 minutes following pump shut off. In that time, the total drawdown of 43' recovered 35' 2" for a 82% recovery of the total drawdown.

Minimum County water production requirements for the creation of a parcel and for second residential units is typically 1.6 times the assigned daily use. The total combined water needs for the parcels is 1,450 gpd.

As such, the well production needs to be demonstrated to make a minimum of 2,320 gpd, or 1.6 gallons per minute:

The well has been proven to make 2.2 gallons per minute, or 3,168 gallons per day.

The well tested has been proven to meet the necessary potable water needs for the proposed project on the parcel as well as the visitor serving uses on the neighboring parcel.

If you have any questions regarding the information included in this report, please feel free to contact our office. Thank you.

Sincerely,

Andrew Kawczak
Associate

AQUIFER TEST DATA SHEET

ATTACHMENT E

Date 10.24.18

Page 1 of 2

PROJECT DYM

Well Designation 'A'

Type of Test 12 HR PROOF OF WATER

Total Depth 100'

Well Diameter (I.D.) 5" PVC

Pump Inlet Depth 95'

clock time	elapsed time	△ t	depth to water	speed rate to:	slow rate to:	seconds per gallon
10:20	0	0	29' 7"			5.91
10:25	5	5	39' 2"			5.70
10:30	5	10	44' 6"			5.78
10:40	10	20	49' 10"			6.47
10:50	10	30	54' 8.5"			6.40
11:00	10	40	59' 2"		7.60	6.36
11:10	10	50	62' 2.5"			7.56
11:20	10	60	64' 11.5"			7.78
11:30	10	70	67' 1"		9.60	7.61
11:50 AM / PM	20	90	68' 11"			9.54
12:00	10	100	70' 4"			9.61
12:10	10	110	71' 6"			9.82
12:30	20	130	71' 10"		16.42	17.0
1:00	30	160	72' 2.5"			17.28
1:30	30	190	72' 6.5"			18.47
2:00	30	220	72' 10"			18.75
2:30	30	250	73' 2"		23.69	19.43
3:00	30	280	73' 4"			23.75
3:30	30	310	73' 6.5"		26.87	24.01
4:00	30	340	73' 7"			26.99
5:00	60	400	73' 7.25"			27.18
6:00	60	460	73' 7"			27.11
7:00 7:20	60	520	73' 7"			27.16
8:00	60	580	73' 7.25"			27.02
10:00	120	700	73' 7"			27.21
12:00	120	820	73' 7"			27.14

AQUIFER TEST DATA SHEET

ATTACHMENT E

Date 10-24-18

Page 2 of 2

PROJECT DYM

Well Designation 'A'

Type of Test 17 HR PROOF OF WATER

Total Depth 100'

Well Diameter (I.D.) 5" PVC

Pump Inlet Depth 95' ASSUMED

clock time	elapsed time	△ t	depth to water	speed rate to:	slow rate to:	seconds per gallon
2:00	120	940	73'7"			27.12
3:20	80	1020	73'7"			27.20
RECOVERY						
3:20	⊖	⊖	73'7"			
3:25	5	5	72'7"			
3:30	5	10	72'4"			
3:35	5	15	72'1"			
3:40	5	20	71'10"			
3:50	10	30	71'5"			
AM 6:00	130	160	67'1"			
PM 12:00	360	520	63'10"			
6:00	360	880	48'6"			
9:00	180	1060	38'5"			

ATTACHMENT F

Wynn COASTAL PLANNING & BIOLOGY
703 North Main Street, Fort Bragg CA 95437
ph: 707-964-2537 fx: 707-964-2622 www.WCPlan.com

November 3, 2025

Liam Crowley
Planning and Building Services
860 North Bush Street
Ukiah, CA 95482

RE: General Plan Amendment (GP_2021-0002)
Rezone Application (R_2021-0005)
Response to Discussion Points of 2/14/25 Meeting

Applicant: Cally Dym

Site: 7720 North Highway One
Little River, CA 95456
APN: 121-280-15-00

Dear Liam,

Thank you for your continued attention to this project. The following pages include additional project information and revisions as related to topics discussed during the virtual meeting on February 14th, 2025 between you, CCC staff, and Wynn Coastal Planning staff.

Enclosed with our response are the following supplemental documents:

1. Septic Relocation Feasibility Letter Regarding Adjacent Parcel 7700 N Hwy One (April 9th, 2025)
2. Updated Site Plan by Newberger & Associates (April 28th, 2025)
3. Updated Visual Study by Newberger & Associates (April 28th, 2025)
4. Geotechnical Investigation Report Update by Brunsing & Associates (April 24th, 2025)
5. Traffic Analysis Memo by Fehr & Peers (October 3rd, 2025)

Please let us know if you have any questions or comments.

Sincerely,

Meghan Durbin
Senior Planner

Encl: per above

CC: Cally Dym (owner/applicant); Todd Newberger, Newberger & Associates (architect); file

1) All Development Located Outside of 50-foot ESHA Buffers

A cornerstone of the conversation during our meeting on February 14th was in relation to whether or not the driveway could be shifted out of the 50-foot ESHA buffer from the delineated wetland in the eastern area of the parcel. The driveway location was constrained by both the buffer and the septic system on the adjacent parcel to the south. Relocation of the septic system was the only plausible solution for the driveway shift, hence the adjacent property owner and septic engineer were consulted.

Being another property with 5 visitor units operated as part of the Little River Inn for many years, the subject project applicant is a co-owner of the adjacent parcel to the south, known as Van Damme House. The ownership partners are amenable to proceeding with the septic relocation project as the existing septic system is likely nearing the end of its useful life. Installation of a new leachfield under modern standards in the relatively near future is timely and would be beneficial for all involved.

The enclosed letter from Carl Rittiman & Associates details their professional opinion that based on previous exploratory work the existing septic system at 7700 North Highway One can be relocated on site. Because the adjacent property is also a blufftop parcel, we recognize a CDP will be required for the septic relocation.

The enclosed 10-unit buildout site plan has been updated to illustrate the driveway route location outside of the 50-foot ESHA buffer.

2) Updated Visual Study

The enclosed visual study has been updated to illustrate the visual character of the 10-unit buildout scenario. As with the originally submitted visual study, this rendering also depicts the visual impact of removal of the Eucalyptus tree grove, as this is a “tree removal area” per the Mendocino County certified LCP maps.

3) Geotechnical Investigation Report Update

Geotechnical consultant Brunsing & Associates revisited the site to analyze the current proposal for an inn. Their scope of work involved an overall review and update to their previous report, as needed. CCC staff specifically requested that they evaluate the size and location of the proposed septic system, particularly in consideration of the system proximity to the previously identified landslide area. A geotechnical investigation report update is enclosed with this submittal.

Brunsing & Associates found their previously determined 36-foot bluff setback remains valid, and that the full buildout septic system is not a concern, nor its location. In summary the geotechnical report update states “The [proposed] development should remain unaffected by bluff retreat for the next 75 years, or more.”

4) Traffic Impact Analysis

Traffic consulting firm Fehr & Peers analyzed the project under CEQA in relation to Vehicle Miles Traveled (VMT) and Transportation Impacts. In both aspects they found that the project would result in less-than-significant impacts. The enclosed Fehr & Peers memo details the analyses.

5) Low-Cost Visitor Units

Consideration for if and how the proposed project may impact the availability of low-cost overnight accommodations (LCOA) has been a topic of note throughout the processing of this general plan amendment and rezone application.

Due to a lack of standardized, up-to-date, regional data about available visitor accommodating service (VAS) unit information, we offer the following detail on The Little River Inn (LRI) properties. The data includes LRI unit quantities/locations, Average Daily Rates (ADRs), and occupancy/vacancy rates. Also included therein is a note about typical rates of other nearby accommodations, compiled from online resources and direct knowledge.

# of Rooms	ADR	Occupancy %	Vacancy %
Little River Inn Main Property & Van Damme House (*across Hwy One + adjacent to Subject*)			
3	$155	51	49
24	$265	66	34
4	$290	70	30
4	$295	75	25
8	$320	74	26
6	$340	76	24
3	$534	70	30
1	$569	81	19
Mallory House (One Mile South)			
1	$534	58	42
2	$569	63	37

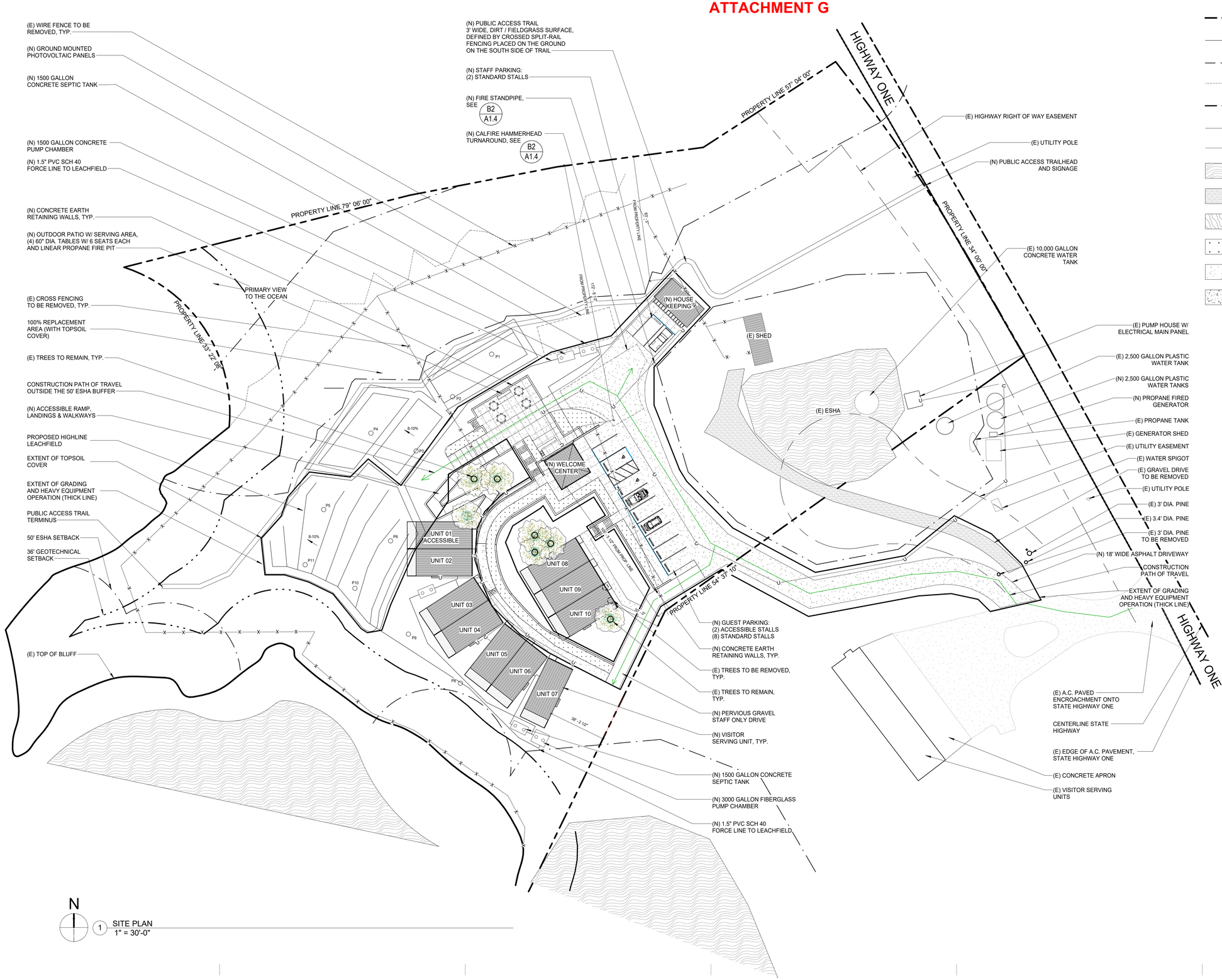
Other Rates in Little River		
Andiron Inn	$296-414	6051 N Hwy One
Seafoam Lodge	$179	6751 N Hwy One
Inn at Schoolhouse Creek	$144-169	7051 N Hwy One
Cottages at Little River Cove	$200-240	7533 N Hwy One
SCP Inn & Farm	$220-390	8211 N Hwy One

We understand that as a mitigation measure to ensure the availability of LCOA on the coast, CCC typically requires the provision of an amount of additional LCOA units equal to 25% of the number of new, higher-cost units. Additionally, on-site LCOA units are preferred, but off-site units are also acceptable when on-site units are not feasible. The property owner/applicant is willing to designate the applicable number of units as low cost. Though there wouldn't be sufficient space for those units on the subject parcel, units on the main Little River Inn property can be designated low cost and considered as on-site accommodations.

The Little River Inn was established as a visitor accommodation on the Mendocino Coast in 1939. Far prior to the ratification of the Coastal Act the property offered lodging units on more than just the original LRI property, including units on the parcel to the south of the project site,

Van Damme House. During the creation of Mendocino County's LCP, the existing Little River Inn was designated with a *5 which memorialized its character as a resort property. Per MCC Sec. 20.332.065 "*Resort sites located within the Coastal Zone encompass a **dispersed type of Visitor Accommodations and Services**...".* This designation is appropriate due to the dispersed nature of Little River Inn VAS dating back many decades. The proposed general plan amendment and rezone match this character. Hence, the Little River Inn properties as a collection can be considered one resort site and therefore low-cost units on a different parcel than the subject fit the meaning of "on-site".

ATTACHMENT G



1 SITE PLAN
1" = 30'-0"

PROPERTY LINE
EASEMENT
50' ESHA BUFFER
EDGE OF RIPARIAN ESHA
36' GEOTECHNICAL SETBACK
(E) WIRE FENCE
(N) UTILITY LINES
(E) WETLAND
(E) PERVIOUS GRAVEL TO BE REMOVED
(E) COASTAL SILK TASSEL SCRUB
(N) PLANTING
(N) ASPHALT
(N) CONCRETE

NEWBERGER & ASSOCIATES
TODD NEWBERGER
ARCHITECT · CA LIC. C-31047
707-357-0615
100 E Manzanita St, Ste. C
Fort Bragg, CA 95437
todd@newberger-architect.com
NEWBERGER-ARCHITECT.COM

SITE PLAN

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE
REVISIONS
△

DRAWN	TN
CHECKED	TN
DATE	09.03.2026
SCALE	1" = 30'-0"

SHEET
A1.2
OF SHEET

9/3/2026 11:27:55 AM

ATTACHMENT H

NEW VISITOR SERVING UNITS FOR:

LITTLE RIVER INN EXPANSION

7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

SYMBOLS

DETAIL REFERENCE
DETAIL NUMBER
SHEET NUMBER

ELEVATION
DETAIL NUMBER
SHEET NUMBER

BUILDING SECTION
DETAIL NUMBER
SHEET NUMBER

DETAIL REFERENCE
DETAIL NUMBER
SHEET NUMBER

KEYED NOTE DESIGNATION
KEY NOTE NUMBER

ELEVATION SYMBOL
ELEVATION DESCRIPTION
ELEVATION ABOVE DATUM

DOOR DESIGNATION
DOOR NUMBER

WINDOW DESIGNATION
WINDOW TYPE

ROOM DESIGNATION
ROOM NAME
ROOM NUMBER

LUMBER THRU MEMBER
LUMBER BLOCKING
FINISH LUMBER
CONCRETE
INSULATION
EARTH

VICINITY MAP



ABBREVIATIONS

A.B.	ANCHOR BOLT	JT.	JOINT
A.C.	ASPHALTIC CONC.	L. OR LAV.	LAVATORY
BLK.	BLOCK	LAM. PLAS.	LAMINATED PLASTIC
BM.	BEAM	MET.	METAL
BN.	BOUNDRY NAILING	MIN.	MINIMUM
CAB.	CABINET	M.T.	METAL THRESHOLD
C.J.	CONTROL JOINT	MTD.	MOUNTED
C.L.	CENTER LINE	N.I.C.	NOT IN CONTRACT
CLR.	CLEAR	N.T.S.	NOT TO SCALE
COL.	COLUMN	O/	OVER
CONC.	CONCRETE	O.C.	ON CENTER
CONT.	CONTINUOUS	PEN.	PLYWOOD EDGE NAILING
DET.	DETAIL	P.L.	PLATE
D.F.	DOUGLAS FIR	PLAST.	PLASTER
DR.	DOOR	P.T.	PRESSURE TREATED
D.S.	DOWNSPOUT	R.D.	ROOF DRAIN
E.J.	EXPANSION JOINT	RDWD.	REDWOOD
EN	EDGE NAILING	R.W.L.	RAIN WATER LEADER
EQ.	EQUAL/EQUIVALENT	SAD.	SEE ARCHITECTURAL DRAWINGS
EXIST (E)	EXISTING	SED.	SEE ENGINEERING DRAWINGS
F.D.	FLOOR DRAIN	S.C.	SOLID CORE
F.E.	FIRE EXTINGUISHER	SHT.	SHEET
FIN. FLR.	FINISH FLOOR	S.S.	STAINLESS STEEL
FN	FIELD NAILING	T.C.	TOP OF CURB
F.O.C.	FACE OF CONCRETE	TYP.	TYPICAL
F.O.M.	FACE OF MASONRY	U.N.O.	UNLESS NOTED OTHERWISE
F.O.S.	FACE OF STUD	V.G.D.F.	VERTICAL GRAIN DOUGLAS FIR
GA.	GAUGE	W/	WITH
G.I.	GALVANIZED IRON	W.C.	WATER CLOSET
GYP.BD	GYPSUM BOARD	WD.	WOOD
H.B.	HOSE BIBB	W.I.	WROUGHT IRON
H.C.	HOLLOW CORE	W.W.F.	WELDED WIRE FABRIC

DRAWING INDEX

A1.1	TITLE SHEET
A1.2	SITE PLAN
A1.3	GRADING PLAN
A1.4	SITE DETAILS
A2.1	WELCOME CENTER
A2.2	HOUSE KEEPING
A2.3	VISITOR SEVING UNIT
A5.1	SITE SECTION
AP1.0	OVERALL PERPECTIVE
E1.1	EXTERIOR LIGHTING PLAN
VS.1	VISUAL STUDIES

CODE ANALYSIS

NEW VISITOR SERVING UNITS:	7720 NORTH HIGHWAY 1 LITTLE RIVER, CALIFORNIA
ASSESSORS PARCEL:	No. 121-280-15
CODE AUTHORITY:	COUNTY OF MENDOCINO
APPLICABLE CODES:	2019 CBC, CPC, CEC, CMC, CFC, CRC; 2019 CA. GREEN BLDG. STANDARDS; 2019 CA. BLDG. ENERGY EFFICIENCY STDS.
OCCUPANCY GROUP:	B (BUSINESS)
CONSTRUCTION TYPE:	TYPE V-B
ZONING:	RR-5
PARCEL SIZE:	5.25 ACRE (228,690 SF)
COUNTY SETBACKS:	30' ALL SIZES
CDF SETBACKS:	30' ALL SIZES
HEIGHT LIMIT:	16'
MAXIMUM LOT COVERAGE:	15%

AREA ANALYSIS:

AREAS:	TOTAL
WELCOME CENTER	256 SQ. FT.
HOUSE KEEPING / STORAGE:	312 SQ. FT.
ACCESSIBLE BATHROOM	64 SQ. FT.
VISITOR SERVING UNITS:	549 X 5 = 2,745 SQ. FT.
TOTAL GROSS SQ. FT.	3,377 SQ. FT.

CALCULATED AREAS SHOWN ARE FOR THE BUILDING DEPARTMENT USE ONLY. THE FIGURES ARE NOT TO BE CONSTRUED AS A BINDING AREA OR FOR TAX CONSIDERATION.

LOT COVERAGE ANALYSIS:

ASPHALT PAVING:	6,975 SQ. FT.
CONCRETE WALKWAYS AND PATIOS:	4,485 SQ. FT.
RETAINING WALL:	685 SQ. FT.
RAISED DECKS AT UNITS: 180 X 5	900 SQ. FT.
WELCOME CENTER, RESTROOM, HOUSE KEEPING & VISITOR UNITS	3,377 SQ. FT.
(E) PUMP HOUSE	100 SQ. FT.
(E) SHED	411 SQ. FT.
TOTAL LOT COVERAGE SQ. FT.:	16,933 SQ. FT.
LOT AREA SQ. FT.:	5.25 ACRE / 228,690 SQ. FT.
TOTAL LOT COVERAGE PERCENTAGE:	7.4%



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TITLE SHEET

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

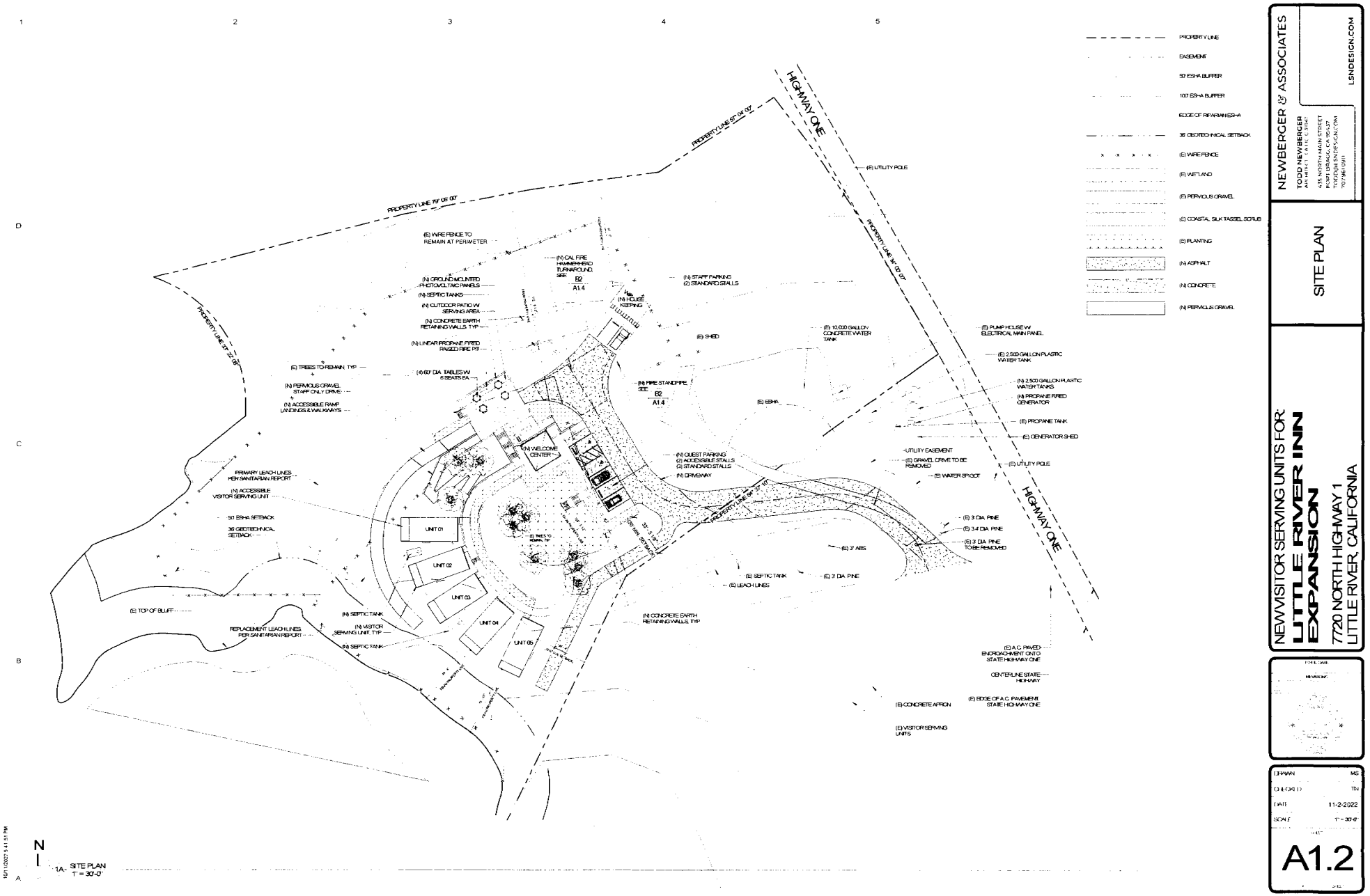
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REVISIONS

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CHECKED: TN
DATE: 11-2-2022

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ATTACHMENT H



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NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

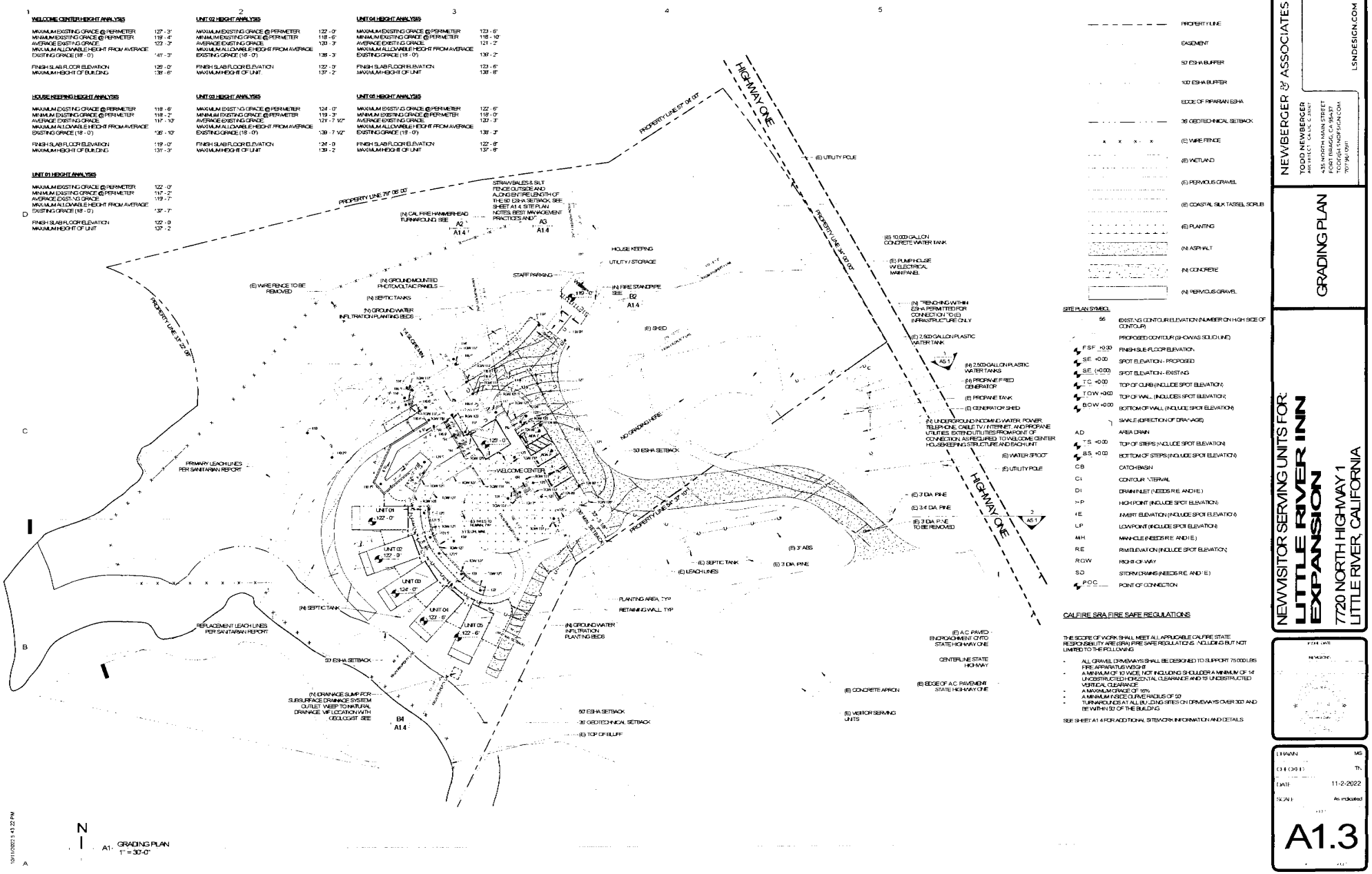
SITE PLAN

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DATE	11-2-2022
SCALE	1" = 30'-0"

A1.2

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ATTACHMENT H



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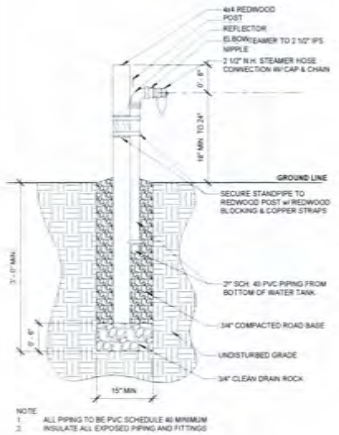
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LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

GRADING PLAN

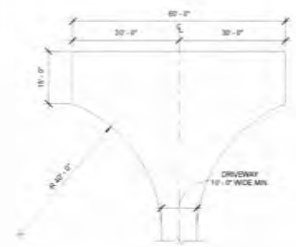
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A1.3

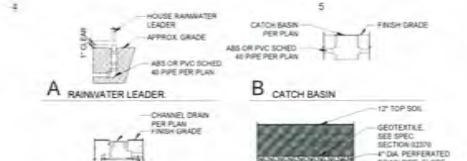
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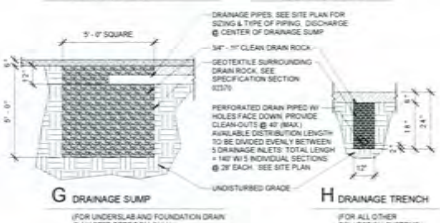


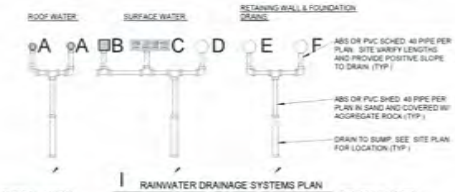
B2 FIRE STAND PIPE DETAIL
1" = 1'-0"



A2 HAMMERHEAD TURNAROUND
1/16" = 1'-0"



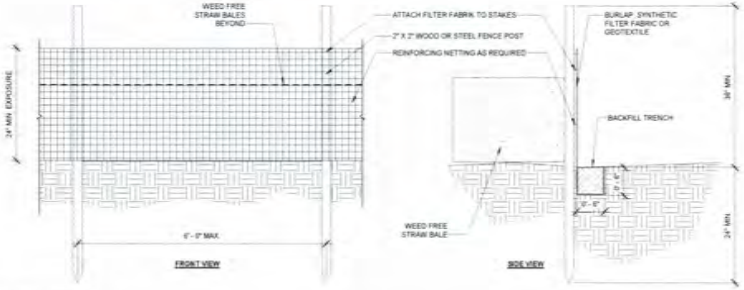




GENERAL SPECS:
CATCH BASINS, GRATES, ADAPTERS SHALL BE ONE PIECE INJECTION MOLDED BY NDS (NATIONAL DIVERSIFIED SALES) THEY SHALL BE UNIFORM IN QUALITY, FREE FROM FLASHING, SHRINKAGE, DISTORTION, AND OTHER DEFECTS. COMPONENT PARTS SHALL FIT TOGETHER AS PER MANUFACTURER'S INSTALLATION INSTRUCTIONS. PROVIDE ALL FITTINGS, FASTENERS, ADHESIVES, GASKETS AND ANY OTHER MATERIALS AND ALL LABOR NECESSARY FOR A COMPLETE AND PROPER INSTALLATION. PROVIDE CLEAN-OUTS AS REQUIRED PER

GENERAL NOTES:
PROJECT INCLUDES THREE DRAINAGE SYSTEMS. KEEP ALL SYSTEMS SEPARATED SEE SITE PLAN

B4 RAINWATER DRAINAGE SYSTEM
3/8" = 1'-0"



A3 SILT FENCE DETAIL
1" = 1'-0"

GRADING NOTES

CUT / FILL ANALYSIS

CUT: 1,240 CU YDS.
FILL: 990 CU YDS.
EXPORT: 250 CU YDS. SOILS MAY BE SUITABLE FOR EARTHEN WALL CONSTRUCTION. VIF

FILL SHALL BE 90% COMPACTED AND NO ORGANIC MATERIAL NOR ROCK OR SIMILAR IRREDUCIBLE MATERIAL WITH A MAXIMUM DIMENSION GREATER THAN 4" SHALL BE BURRIED OR PLACED IN FILL. ORGANIC MATERIALS AND MATERIALS UNSUITABLE FOR FILL SHALL BE OFF HAULED FROM SITE.

PREPARE GRADE FOR FILL BY REMOVING EXISTING VEGETATION, TOPSOIL AND OTHER UNSUITABLE MATERIALS AND SCARIFY SURFACE OF REMAINING GRADE TO PROVIDE A BOND BETWEEN NEW FILL AND EXISTING GRADE.

GRADING SHALL COMPLY WITH ALL REQUIREMENTS IN THE GEOTECHNICAL INVESTIGATION REPORT PREPARED BY BRUNSING ASSOCIATES, DATED MAY 4TH 2020. SEE REPORT FOR ADDITIONAL INFO.

SITE PLAN NOTES

1. REMOVE ALL EXCAVATED SOIL AND EXCESS CONCRETE GENERATED BY FOUNDATION WORK AND GRADE ALL AROUND STRUCTURE USING CLEAN TOPSOIL. GRADING SHALL ACHIEVE A 1/2" PER FOOT MINIMUM SLOPE AWAY FROM BUILDING FOR A DISTANCE OF 5'-0" (MIN.) IN ALL DIRECTIONS.
2. DIRECT ALL SURFACE DRAINAGE AWAY FROM STRUCTURES TOWARD THE DIRECTION OF NATURAL FALL AWAY FROM THE STRUCTURE OR INTO DRAINAGE SWALES. ALL DRAINAGE SWALES SHALL SLOPE AT 1/2" PER FT.(MIN.) AWAY FROM STRUCTURES TOWARD THE DIRECTION OF NATURAL FALL OR AS SHOWN ON THE DRAWINGS.
3. ALL GRADING AND ROADWORK SHALL CONFORM TO THE LATEST EDITION OF THE STANDARD SPECIFICATIONS OF THE CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS).
4. ROADWAY ENCROACHMENT ONTO STATE HIGHWAY SHALL COMPLY WITH THE REQUIREMENTS OF THE STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION.
5. FOR WATER SYSTEMS, SEPTIC SYSTEMS AND HOOKUPS TO UTILITY SYSTEMS, COMPLY WITH ALL REQUIREMENTS OF UTILITY SUPPLIERS AND ALL REQUIREMENTS OF GOVERNMENTAL AGENCIES HAVING JURISDICTION OVER THE WORK.
6. ALL CONCENTRATED RAINWATER FLOWS FROM ROOF DOWNSPOUTS, CATCH BASINS, CHANNEL DRAINS, PLANTING AREA DRAINS, RETAINING WALL DRAINS AND FOUNDATION DRAINS SHALL BE COLLECTED IN CLOSED PIPE DRAINAGE SYSTEMS AND DISCHARGED INTO A FUNCTIONING REMOTE DRAINAGE SUMP FILLED WITH 5 CUBIC YARDS OF 3/4" CLEAN DRAIN ROCK (MIN.), AT LOCATIONS SHOWN ON PLANS, WHICH WEEPS INTO A NATURAL DRAINAGE AREA WELL AWAY FROM THE BLUFF TOP. BUILDING AREAS AND ESHA. SEE GRADING PLAN AND SITE DETAILS. PROVIDE DRAINAGE PIPES FOR OUTLETS OF ALL DOWNSPOUTS FROM GUTTERS OR ROOF DRAINS INDICATED ON PLANS. WHERE DRAINAGE SYSTEM INLETS OCCUR, PROVIDE VERTICAL "T" IN PIPE AT DOWNSPOUT LOCATION. "T" SHALL EXTEND 3" ABOVE GRADE. ALLOW A 1" GAP BETWEEN "T" AND DOWNSPOUT. "T" SHALL BE 1" LARGER THAN THE WIDEST DIMENSION OF DOWNSPOUT (MIN.).
7. VEGETATION AT THE SITE SHALL BE MAINTAINED TO THE MAXIMUM EXTENT POSSIBLE AND ANY DISTURBED AREAS SHALL BE SEEDED WITH WITH 1 LB. PER 1000 SQ.FT. OF CALIFORNIA NATIVE HOLD FAST SEED MIX, CONSISTING OF BLUE WILD RYE, CA. BROME, 3 WEEKS FESCUE, CA POPPY AND LUPINE. "HOLDFAST" IS AVAILABLE FROM LIBALUSTERS SEED CO. LOCATED IN SEBASTOPOL, CA AT 707-526-6733. FOLLOW SEEDING WITH A MULCHING OF WEED FREE WHEAT STRAW (ENOUGH TO COVER SOIL SURFACE, 1" THICK.)
8. EXCAVATED TOPSOILS SHALL BE STOCKPILED AND USED ON-SITE FOR FINISH GRADING. SUITABLE EXCAVATED SUB-SOILS SHALL BE USED FOR ROUGH GRADING. EXCAVATED CLAY AND ROCK SHALL BE OFF-HAULED FROM SITE AND DISPOSED OF IN A COUNTY APPROVED LANDFILL. MEASURES SHOULD BE INCLUDED TO ENSURE THAT STOCKPILES ARE STABLE AND COVERED TO PREVENT EROSION AND SEDIMENTATION.
9. ALL WORK SHALL MEET CALFIRE FIRE SAFE REGULATIONS APPLICATION "CONDITIONS OF APPROVAL".
10. BEST MANAGEMENT PRACTICES & CONSTRUCTION RESPONSIBILITIES:
    - A. ANY AND ALL EXCESS EXCAVATED MATERIAL RESULTING FROM CONSTRUCTION ACTIVITIES SHALL BE REMOVED AND DISPOSED OF AT A DISPOSAL SITE OUTSIDE THE COASTAL ZONE OR PLACED WITHIN THE COASTAL ZONE PURSUANT TO A VALID COASTAL DEVELOPMENT PERMIT.
    - B. STRAW BAILS, COIR ROLLS, OR SILT FENCING STRUCTURES SHALL BE INSTALLED PRIOR TO AND MAINTAINED THROUGHOUT THE CONSTRUCTION PERIOD TO CONTAIN RUNNOFF FROM CONSTRUCTION AREAS, TRAP ENTRAINED SEDIMENT AND OTHER POLLUTANTS, AND PREVENT DISCHARGE OF SEDIMENT AND POLLUTANTS DOWN SLOPE.
    - C. ON-SITE VEGETATION SHALL BE MAINTAINED TO THE MAXIMUM EXTENT FEASIBLE DURING CONSTRUCTION ACTIVITIES.
    - D. ANY DISTURBED AREAS SHALL BE REPLANTED OR SEEDED AND IF NECESSARY MULCHED AS SOON AS FEASIBLE FOLLOWING COMPLETION OF CONSTRUCTION, BUT IN ANY EVENT NO LATER THAN MAY 1ST OF THE NEXT SPRING SEASON.
    - E. ALL ON-SITE STOCKPILES OF CONSTRUCTION DEBRIS SHALL BE COVERED AND CONTAINED AT ALL TIMES TO PREVENT POLLUTED WATER RUNOFF.
    - F. THE CANOPY AND ROOT ZONES OF EXISTING LIVING TREES ON SITE SHALL BE PROTECTED THROUGH TEMPORARY FENCING OR SCREENING DURING CONSTRUCTION.
11. PLANT MATERIAL USED IN PLANTING AREAS SHALL BE DROUGHT TOLERANT AND SUITED FOR THE COASTAL CLIMATE. MANY PLANTS THAT ARE APPROPRIATE ARE LISTED IN THE PUBLICATION "LOCAL NATIVE PLANTS FOR COAST LANDSCAPES - MENDOCINO COUNTY" COMPILED BY CA. NATIVE PLANT SOCIETY, DORTHY KING YOUNG CHAPTER. PHONE 707-882-1895. PLANTS SHALL BE WATERED BY A DRIP IRRIGATION SYSTEM FOR A MINIMUM OF THREE YEARS AND RECEIVE 3" FIR BARK MULCH. PLANTING SHALL BE MAINTAINED AND PLANTS REPLACED IN KIND IF THEY DIE OR DECLINE.
12. SILT FENCE REQUIREMENTS (SEE DETAIL A3 / A1.4)
    - A. THE HEIGHT OF A SILT FENCE SHOULD BE 36" MIN.
    - B. TO AVOID THE USE OF JOINTS, THE FILTER FABRIC SHOULD BE PURCHASED IN A CONTINUOUS ROLL AND CUT TO THE LENGTH OF THE BARRIER.
    - C. EXCAVATE A TRENCH APPROXIMATELY 6" WIDE BY 6" DEEP ALONG THE STAKES AND ON THE UPSLOPE OF THE BARRIER.
    - D. WHEN STANDARD STRENGTH FILTER FABRIC IS USED APPLY A REINFORCINGNETTING TO SUPPORT THE FABRIC. FASTEN THE REINFORCING NETTING SECURELY TO THE UPSLOPE SIDE OF THE POSTS USING HEAVY-DUTY WIRE STAPLES OR TIE WIRES. ATTACH THE FILTER FABRIC TO THE UPSLOPE SIDE OF THE NETTING USING TIE WIRE OR PLASTIC ZIP STRAPS.
    - E. WHEN EXTRA STRENGTH FILTER FABRIC AND CLOSER POST SPACING ARE USED, THE REINFORCING NETTING MAY BE ELIMINATED. IN SUCH CASES THE FILTER FABRIC IS STAPLED OR WIRED DIRECTLY TO THE POSTS.
    - F. THE TRENCH IS THEN BACKFILLED AND SOIL COMPACTED OVER THE FILTER FABRIC, SECURING IT IN PLACE.
    - G. REGULAR INSPECTIONS SHOULD BE CONDUCTED WEEKLY TO ENSURE THE FENCE IS INTACT AND THE DEBRIS AND SEDIMENT HAS NOT ACCUMULATED AT THE BOTTOM. REMOVE ANY DEPOSITS AT THE BOTTOM. REMOVE ANY DEPOSITES WHEN THE REACH ONE-HALF THE FENCE HEIGHT.
    - H. SILT FENCES AND BARRIERS MAY BE REMOVED WHEN THE UPSLOPE AREA HAS BEEN PERMANENTLY STABILIZED.

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SITE DETAILS

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE:
REVISIONS:
1

DRAWN: MB
CHECKED: TN
DATE: 11-2-2022
SCALE: As indicated

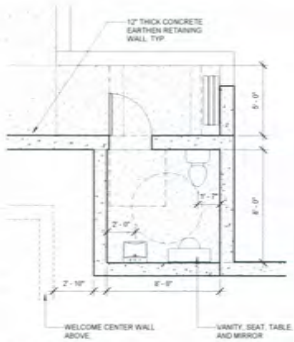
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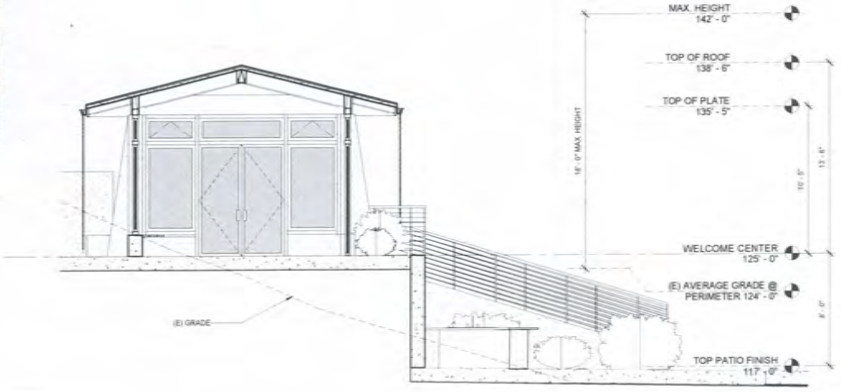
D2 WELCOME CENTER



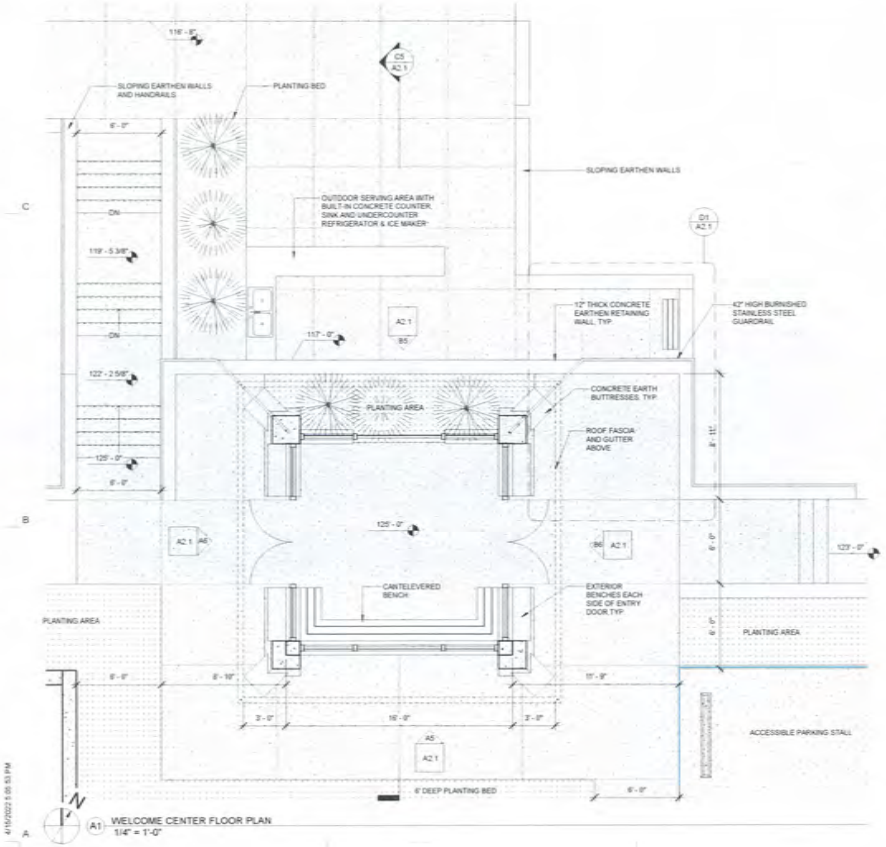
D1 ADA BATHROOM @ PATIO
1/4" = 1'-0"

EXTERIOR MATERIAL LIST

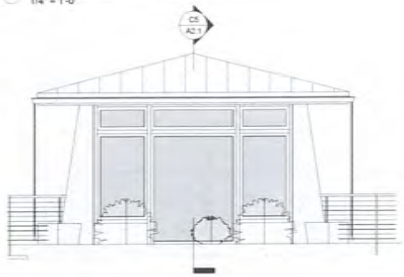
WALLS:	CAST-IN-PLACE, BOARD FORMED, CONCRETE / EARTH WALLS, VARIEGATED, HORIZONTALLY STRIATED, COLOR: BROWN TONES
EXTERIOR CASING AND TRIM FINISH:	ONE PRIME COAT AND TWO COATS EXTERIOR LATEX PAINT
CASINGS:	HARDIETRIM "5/4 SMOOTH", 1" X 3.5", UNLESS NOTED OTHERWIZE, RIP TO FIT AT MULLIONS
CORNER TRIM & MULLIONS:	1 X 4 "A" CLEAR V.G. WESTERN RED CEDAR, RIPPED TO SIZE, PAINTED
WINDOWS:	ALUMINUM SASH W/ DARK ANODIZED FINISH
SLIDING DOORS:	ALUMINUM SASH W/ ANODIZED FINISH
DOORS:	ALUMINUM SASH W/ ANODIZED FINISH
ROOFING:	ZINCALUME STANDING SEAM METAL ROOF, COLOR: WEATHERING COPPER
FLASHING:	16 OZ. COPPER OR STAINLESS STEEL
GUTTERS:	16 OZ. COPPER OR ALUMINUM, FASCIA STYLE
DOWN SPOUTS:	16 OZ. COPPER OR ALUMINUM, 3" SQUARE
NAILING:	ALL EXPOSED NAILING TO BE STAINLESS STEEL RING SHANK TYPE
FOUNDATION:	CAST IN PLACE CONCRETE WITH SKIM-COAT FINISH
CONCRETE FLATWORK:	CAST IN PLACE INTEGRALLY COLORED CONCRETE W/ BROOM FINISH, COLOR TO MATCH SIDING



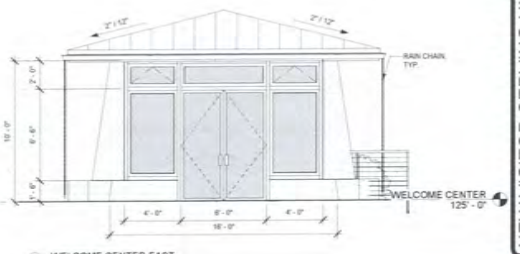
C5 WELCOME CENTER SECTION
1/4" = 1'-0"



A1 WELCOME CENTER FLOOR PLAN
1/4" = 1'-0"



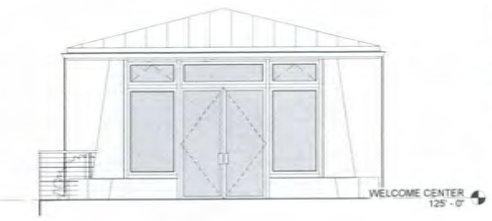
B5 WELCOME CENTER NORTH
1/4" = 1'-0"



B6 WELCOME CENTER EAST
1/4" = 1'-0"



A5 WELCOME CENTER SOUTH
1/4" = 1'-0"



A6 WELCOME CENTER WEST
1/4" = 1'-0"

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WELCOME CENTER

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE
NO ISSUING
A

C - 31947
6/30/2023
REGISTERED ARCHITECT
STATE OF CALIFORNIA

DRAWN	MS
CHECKED	TN
DATE	11-2-2022
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SHEET
A2.1
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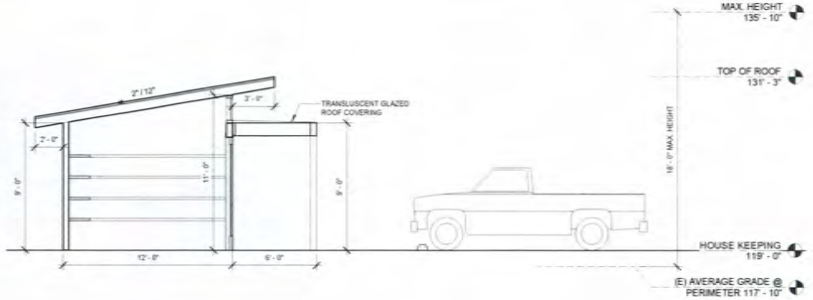
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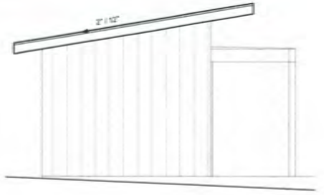
C1 HOUSE KEEPING

EXTERIOR MATERIAL LIST

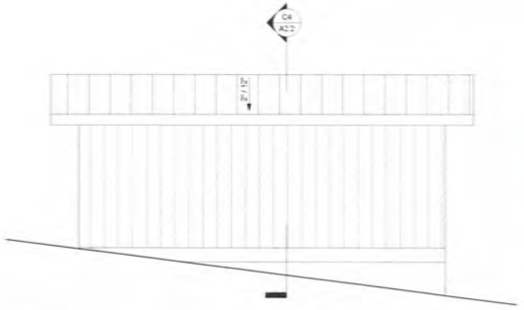
WALLS:	FIBERCEMENT 6" VERTICAL LAP SIDING, 5" EXPOSURE
EXTERIOR FINISH:	ONE PRIME COAT AND TWO COATS EXTERIOR LATEX PAINT
CASINGS, CORNER TRIMS & MULLIONS:	HARDIETRIM "5/4 SMOOTH", 1" X 3.5", UNLESS NOTED OTHERWIZE, RIP TO FIT AT MULLIONS
FASCIAS:	HARDIE 5/4 X 12 (11" X 11.25") SMOOTH FIBERCEMENT BOARD
SIFFITS:	HARDIE FIBERCEMENT SMOOTH PANEL, NON-VENTED WITH FIBERCEMENT BATTENS, 3/4" X 2.5", FACTORY PRIMED.
WINDOWS:	ALUMINUM SASH W/ BLACK ANODIZED FINISH
SLIDING DOORS:	ALUMINUM SASH W/ BLACK ANODIZED FINISH
DOORS:	ALUMINUM SASH W/ BLACK ANODIZED FINISH
ROOFING:	ZINCALUME STANDING SEAM METAL ROOF, COLOR: WEATHERING COPPER
FLASHING:	16 OZ. COPPER OR STAINLESS STEEL
GUTTERS:	16 OZ. COPPER OR ALUMINUM, FASCIA STYLE
DOWN SPOUTS:	16 OZ. COPPER OR ALUMINUM, 3" SQUARE
NAILING:	ALL EXPOSED NAILING TO BE STAINLESS STEEL RING SHANK TYPE
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CONCRETE FLATWORK:	CAST IN PLACE INTEGRALLY COLORED CONCRETE W/ BROOM FINISH, COLOR TO MATCH SIDING



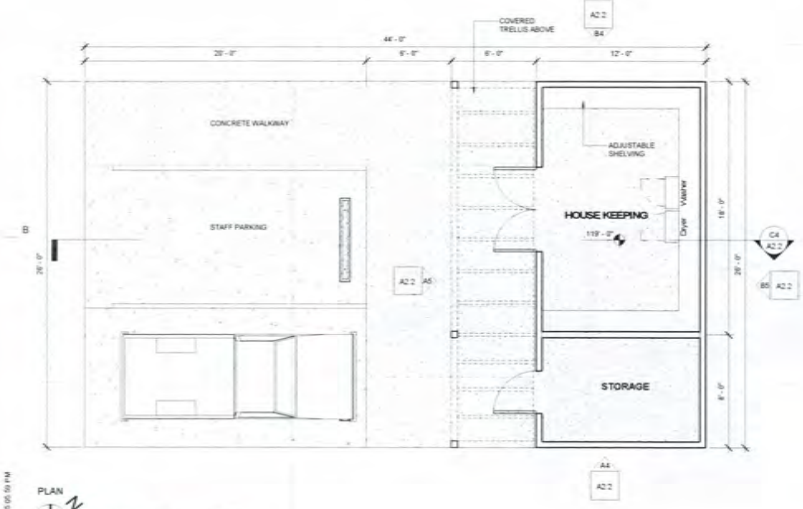
C4 HOUSE KEEPING SECTION
1/4" = 1'-0"



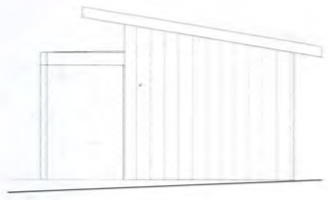
B4 HOUSE KEEPING NORTH ELEVATION
1/4" = 1'-0"



B5 HOUSE KEEPING EAST ELEVATION
1/4" = 1'-0"



A1 HOUSE KEEPING FLOOR PLAN
1/4" = 1'-0"



A4 HOUSE KEEPING SOUTH ELEVATION
1/4" = 1'-0"



A5 HOUSE KEEPING WEST ELEVATION
1/4" = 1'-0"

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HOUSE KEEPING

NEW VISITOR SERVING UNITS FOR:
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7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

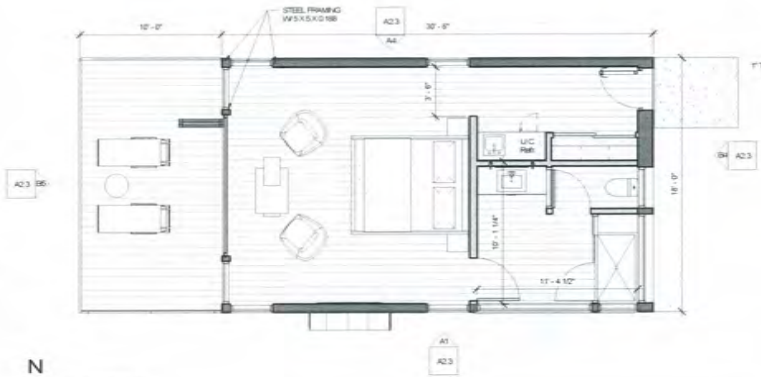
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C - 31047
11-2-2022
Renewal Date
CALIFORNIA

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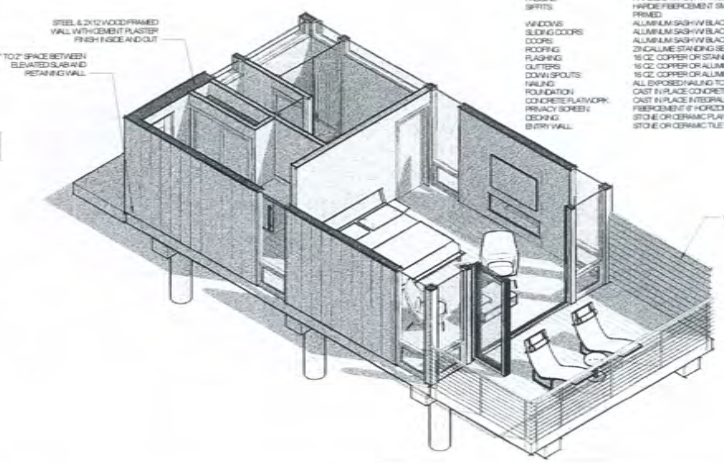
ATTACHMENT H



C1 FLOOR PLAN
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B1 ACCESSIBLE UNIT FLOOR PLAN
1/4" = 1'-0"



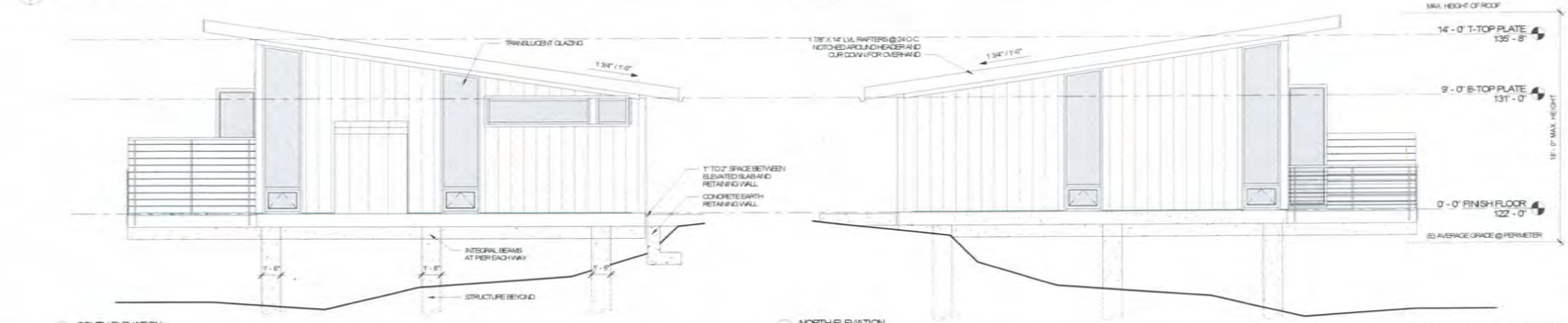
EXTERIOR MATERIAL LIST

WALLS:	FIBERCEMENT 6" VERTICAL LAP SIDING, 5" EXPOSURE
EXTERIOR FINISH:	ONE PRIME COAT AND TWO COATS EXTERIOR LATEX PAINT
CASINGS, CORNER TRIMS & MULLIONS:	HARDIETRIM "SH SMOOTH", 1" X 3.5", UNLESS NOTED OTHERWISE, RIP TO FIT AT MULLIONS
FASCIAS:	HARDIE SHX 1(1)"X 11.25") SMOOTH FIBERCEMENT BOARD
SOFFITS:	HARDIE FIBERCEMENT SMOOTH PANEL, NOT-VENTED WITH FIBERCEMENT BATTENS, 3/4" X 2.5" FACTORY PRIMED
WINDOWS:	ALUMINUM SASH W/ BLACK ANODIZED FINISH
SLIDING DOORS:	ALUMINUM SASH W/ BLACK ANODIZED FINISH
DOORS:	ALUMINUM SASH W/ BLACK ANODIZED FINISH
ROOFING:	22 GAUGE STANDING SEAM METAL ROOF, COLOR: WEATHERING COPPER
FLASHING:	16 OZ. COPPER OR STAINLESS STEEL
GUTTERS:	16 OZ. COPPER OR ALUMINUM, FASCIA STYLE
DOWN SPOUTS:	16 OZ. COPPER OR ALUMINUM, 3" SQUARE
NAILING:	ALL EXPOSED NAILING TO BE STAINLESS STEEL RING SHANK TYPE
FOUNDATION:	CAST IN PLACE CONCRETE WITH SKIM COAT FINISH
CONCRETE FLATWORK:	CAST IN PLACE INTEGRALLY COLORED CONCRETE W/ BROOM FINISH, COLOR TO MATCH SIDING
PRIVACY SCREEN:	FIBERCEMENT 6" HORIZONTAL BOARDS WITH 1/2" GAP BETWEEN EACH
DECKING:	STONE OR CERAMIC PLANK TILE FLOORING
ENTRY WALL:	STONE OR CERAMIC TILE WALL COVERING



B4 EAST ELEVATION
1/4" = 1'-0"

B5 WEST ELEVATION
1/4" = 1'-0"



A1 SOUTH ELEVATION
1/4" = 1'-0"

A4 NORTH ELEVATION
1/4" = 1'-0"

10/19/2022 2:47:09 PM

NEWBERGER & ASSOCIATES
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ARCHITECT C-31047
435 NORTH MAIN STREET
FORT BRAGG, CA 95437
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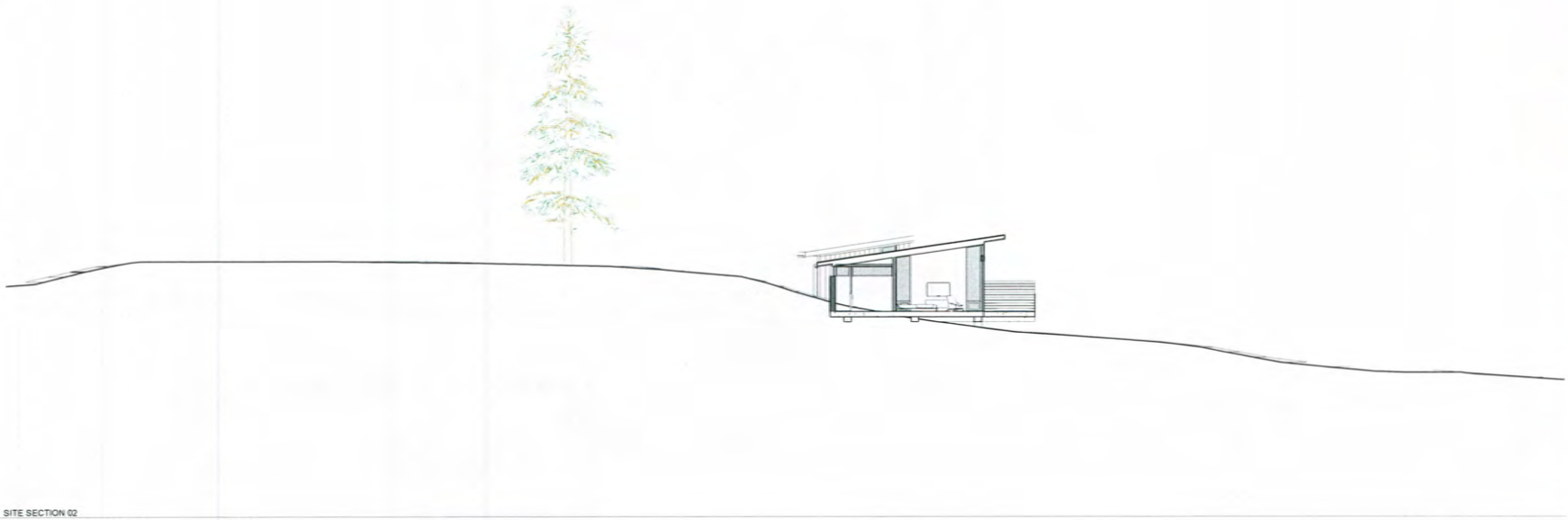
NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

VISITOR SERVING UNIT

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CHECKED	TN
DATE	11-2-2022
SCALE	1/4" = 1'-0"

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ATTACHMENT H



SITE SECTION 02



SITE SECTION 01

NEWBERGER & ASSOCIATES
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ARCHITECT CA LIC #12680
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SITE SECTION

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE
REVISIONS
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DATE 11-2-2022
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ATTACHMENT H



EXTERIOR PERSPECTIVE



EXTERIOR PERSPECTIVE

NEWBERGER & ASSOCIATES
TODD NEWBERGER
ARCHITECT - LA UC C 13541
436 NORTH MAIN STREET
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OVERALL PERPECTIVE

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE
REVISIONS
△

REGISTERED ARCHITECT
TODD NEWBERGER
C-31041
6/31/2023
STATE OF CALIFORNIA

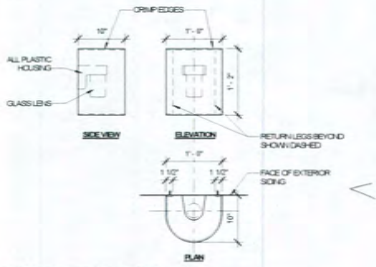
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ATTACHMENT H

EXTERIOR LIGHTING FIXTURE SCHEDULE

SYM	FUNCTION	MANUFACTURER	MODEL #	TRIM / COLOR	LAMP	REMARKS
1	WALL SCONCE	SUPERIOR	SAWAABBL119QEVA-K	16 OZ. COPPER	18 W CRI,	COPPER SURROUND SEE DETAIL 1
2	WALL SCONCE	SEA GULL	CRITTENDEN SMALL 94888EN3-12	BLACK	9 W CRI,	
3	RECESSED CAN	HALO	H4RICAT1E	TL412SN REFLECTOR W/ FROSTED GLASS LENS, BAFFLE, SATIN NICKLE (SN) - TRIM: SN	560 LUMEN LED 3000 K,	UL LISTED FOR WET LOCATIONS WITH ELADE LIGHT ENGINE
A	PATH LIGHT	FX LUMINAIRE	DN-30 DELMARE	COPPER	20W T4 XENON	FX LUMINAIRE POTTED 24 VDC VOLT TO 12V TRANSFORMER W/ PHOTOCONTROL SWITCH, OR EQUAL MANUFACTURER, SIZE AND LOCATION TO BE SELECTED BY ELECTRICIAN AND FIELD VERIFIED W/ ARCHITECT
B	STEP LIGHT	FX LUMINAIRE	PD	ANTIQUE BRONZE	2 LED 4.2 W	
C	LEDGE LIGHT	FX LUMINAIRE	C-LL	ANTIQUE BRONZE	LED 151 LUMEN	



C1 EXTERIOR LIGHT W/ COPPER SURROUND
1" = 1'-0"



A1 SITE LIGHTING PLAN
1" = 30'-0"

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NEWBERGER & ASSOCIATES
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LSNDESIGN.COM

EXTERIOR LIGHTING PLAN

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE
REVISIONS

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DATE 11-2-2022
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ATTACHMENT H



VIEW 02 W/ TREE REMOVAL COMPARISON

BEFORE



AFTER



KEY SITE PLAN



VIEW 03 W/ TREE REMOVAL COMPARISON

BEFORE



AFTER



VIEW 01

NEWBERGER & ASSOCIATES

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707.961.0191
LSNDESIGN.COM

VISUAL STUDIES

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE
REVISIONS
NO.

C-39047
5/31/2023
REGISTERED ARCHITECT
STATE OF CALIFORNIA

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ATTACHMENT I

Wynn COASTAL PLANNING & BIOLOGY

703 North Main Street, Fort Bragg CA 95437
ph: 707-964-2537 fx: 707-964-2622 www.WCPlan.com

SUBMITTAL

December 6, 2022

Planning and Building Services
120 West Fir Street
Fort Bragg, CA 95437

RE: Coastal Development Permit Application for 5-Unit Inn

Owner/Applicant: Cally Dym

Site: 7720 North Highway One
Little River, CA 95456
APN: 121-280-15-00

To Whom It May Concern:

Enclosed, please find a copy of our application to the County of Mendocino for a Coastal Development Permit on the parcel noted above.

The following items are organized per the Coastal Development Permit Project Intake Checklist and are included in this submittal:

1. 2 Copies Each
    a. Application Form and Project Description Questionnaire
    b. Location Map
    c. Architectural Plan Set from Newberger & Associates including Site Plan, Floor Plans, Elevations, Exterior Lighting Plan, Lighting Schedule and Exterior Material Schedule
2. Architectural Plans including Site Plan (1 copy, full size)
3. Signed Certification & Site View Authorization (included with each copy of the Application Form)
    a. As Agent for this project, as with all of our projects, we respectfully request to be present during all County and Stakeholder Agency site visits; one week's advance notice will be helpful to ensure our availability.
    b. Our presence during these site visits helps to ensure agencies' accurate understanding of the parcel, the parcel location, it's opportunities and constraints, and the project.
4. Signed Declaration of Posting (1 copy)
5. Signed Indemnification Agreement (1 copy)
6. Proof of Applicant's Legal Interest in Property: Parcel Quest (1 copy)
7. Stamped Envelopes for Each Address on Mailing List (14 envelopes)
8. Mailing List (1 copy)
9. Cal Fire Clearance ***to be obtained at a later date per Cal Fire preference/direction***
10. Filing Fee (Check #105285) & Application Fee Estimate EST_2022-0231 (1 copy)
11. Signed Cost Recovery Form (1 copy)
12. Exterior Finish & Lighting Schedules ***included in items 1c & 2***

- Additional Information from Professional Reports & Surveys
    - Biological Report by Wynn Coastal Biology (1 copy)
    - Archaeological Report by ALTA Archaeological Consulting (1 copy)
    - Geotechnical Report by Brunsing & Associates (1 copy)

We look forward to your review of this project. Please let us know if you have any questions or comments.

Sincerely,

Amy Wynn, Principal Planner

Sincerely,

Meghan Durbin, Assistant Planner

Encl: per above

CC: Cally Dym (owner/applicant); file

ATTACHMENT I

CARL RITTIMAN & ASSOCIATES, INC.

Certified Professional Soil Scientist
PO Box 590 • Mendocino CA 95460

Marc and Cally Dym
PO Box 595
Little River, CA 95456

re: 7720 S. Hwy. One; expansion of proposed development

Date: May 30th, 2024

Marc and Cally,

Our office prepared an on-site sewage disposal system design for your above referenced site on 10/3/2022. The design was sized for a proposed development of 5 Visitor Serving Units (VSU) on the parcel. Our design (County Environmental Health Department approved) outlined the development of a primary and replacement leachfield for the proposed development. The proposed leachfield was a shallow trench Highline configuration and would be fed by gravity flow from the septic tanks. The replacement area was also a shallow trench Highline configuration.

You contacted our office to determine if the site had leachfield capacity to serve a larger development, which would potentially increase to a total of 10 VSU's. I conducted a review of the site/soils work which has been conducted on the parcel by our office and determined that yes, a design proposal could be prepared which would accommodate 10 units. To accomplish this, the system configurations (both primary and replacement) would change:

• The primary leachfield would be come a pressurized system, allowing for additional gravel to be placed in each leachline (creating more surface area).

• The total leachline in the primary field would increase, from 300 feet to 475 feet. This would include the the original primary leachline locations as well as several of the previously identified replacement leachlines.

• The replacement leachfield location and configuration would change. The replacement area would extend east to include the area around Soil Profiles P1, P2 and P3. The replacement area design would become more complex (based on the soil conditions within those profiles) and would consist of several At-Grade leach beds. Secondary effluent treatment (i.e. aerobic treatment) would also be incorporated into the replacement area design.

If the time allows, it is recommended that additional winter site/soils testing be conducted within the proposed leachfield areas. If the actual measured winter groundwater levels are found to be lower than those assumed (based on soil morphology), then the proposed trench depths could potentially be increased, creating more vertical surface area. If wet weather percolation tests are conducted within the leachfield area, it is likely that the obtained measured soil acceptance rate of water will allow for a design application rate that is higher than the rate assigned to the soil, based on the laboratory analyses of the soil samples. A higher allowable soil application rate would allow for the need for less leachfield surface area to be created; i.e. less leachline length required

Phone 707-937-0804 • e-mail andy.carlrittiman@gmail.com

In conclusion, our review of the work which has been conducted, allows us to make the following statements:

• A revised on-site sewage disposal system design can be prepared at this time which accommodates the increase in the number of VSU's from 5 to 10 (based on the 4/11/24 tentative revised site map).

• If wet weather soil testing (groundwater monitoring and percolation testing) is successfully completed, it may result in the current disposal system design being sufficient to accommodate the proposed increased number of VSU's, up to 10, with only minimal changes.

In addition to designing the on-site sewage disposal system, our office also addressed the water well production needs for the proposed development. The well which was used to demonstrate adequate water supply serves the subject parcel and the development to the south (7700 N.Hwy. One). The new water use flow for the project site would be:

1,200 gpd (10 VSU's) + 50 gpd (patio wastewater) + 100 gpd (outdoor use) = 1,350 gpd

With the proposed expansion of uses, the assigned water needs for both the parcels would be as follow:

700 gpd (7700 N.Hwy.One) + 1,350 gpd (7720 N.Hwy.One) = 2,050 gpd

Our previous calculations suggested that a County EH figure of requiring that well production be 1.6 times greater than the assigned daily water use:

2,050 total gpd x 1.6 = 3,280 gpd required calculated well production

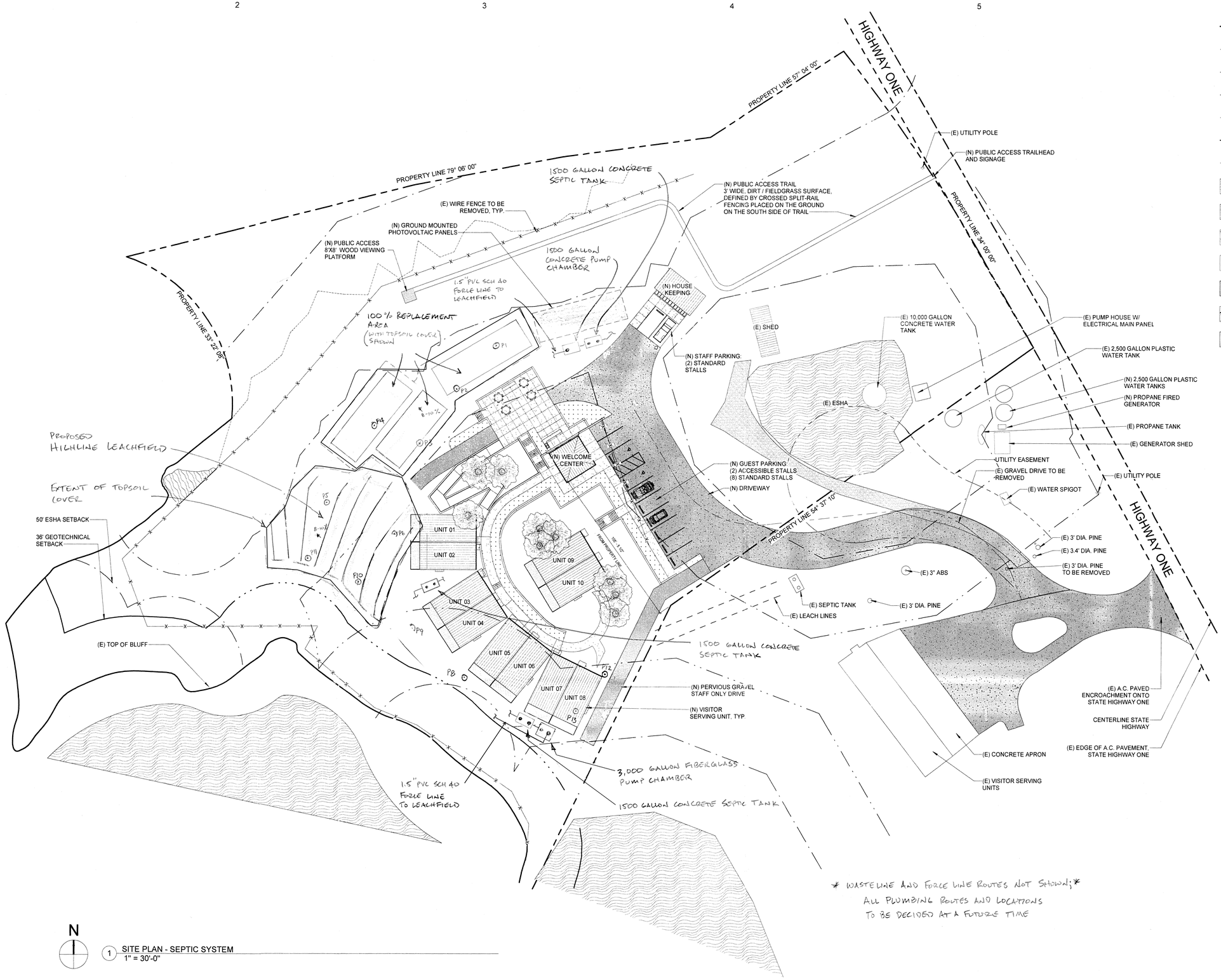
The existing well was tested at a sustained dry season flow rate of 2.2 gallons per minute or 3,168 gallons per day. The well provides approximately 96.5% of the required calculated well production and 154% of the actual anticipated daily water requirements for the two parcels that it serves. The site currently has 12,500 gallons of water storage. An additional 5,000 gallons of storage is proposed for a total holding capacity of 17,500 gallons or 8.5 times the actual assigned daily water flows. It is our assertion that the existing well, in combination with the existing and proposed water storage, has the production capacity to serve the expanded development of 10 VSU's

If any questions arise in regards to the on-site sewage disposal system or the water production, please feel free to contact our office. Thank you

Sincerely,

Andrew Kawczak
Associate

ATTACHMENT J



* WASTELINE AND FORCE LINE ROUTES NOT SHOWN; *
ALL PLUMBING ROUTES AND LOCATIONS TO BE DECIDED AT A FUTURE TIME

N

1 SITE PLAN - SEPTIC SYSTEM
1" = 30'-0"

- PROPERTY LINE
- EASEMENT
- 50' ESHA BUFFER
- 100' ESHA BUFFER
- EDGE OF RIPARIAN ESHA
- 36' GEOTECHNICAL SETBACK
- (E) WIRE FENCE
- (E) WETLAND
- (E) PERVIOUS GRAVEL
- (E) COASTAL SILK TASSEL SCRUB
- (E) PLANTING
- (N) ASPHALT
- (N) CONCRETE
- (N) PERVIOUS GRAVEL

NEWBERGER & ASSOCIATES
TODD NEWBERGER
ARCHITECT - CA LIC. C-31047
707-357-0615
100 E Manzanita St. Ste. C
Fort Bragg, CA 95437
todd@newberger-architect.com
NEWBERGER-ARCHITECT.COM

SITE PLAN
SEPTIC SYSTEM

PERMITS FOR:
NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE
REVISIONS
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LICENSED ARCHITECT TODD NEWBERGER C-31047 5/31/2025 Renewal Date STATE OF CALIFORNIA

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SCALE	1" = 30'-0"

SHEET
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SEPTIC SYSTEM

7/10/2024 10:57:02 AM

ATTACHMENT K

Wynn COASTAL PLANNING & BIOLOGY
703 North Main Street, Fort Bragg CA 95437
ph: 707-964-2537 fx: 707-964-2622 www.WCPlan.com

November 14, 2024

Liam Crowley, Planner
County of Mendocino, Planning & Building Services
Fort Bragg, CA 95437

RE: Update biological site observations CDP_2022-0040

Owner: Cally Dym
41425 Little Lake Road
Mendocino, CA 95460

Site: 7720 North Highway One
Little River, CA 95456
APN: 121-280-15-00

Mr. Crowley:

A Biological Scoping, Wetland Delineation, and Botanical Survey Report prepared by Asa Spade, senior biologist for Wynn Coastal Planning & Biology, was published November 7, 2022 to provide natural resources background information for a Coastal Development Permit application (CDP_2022-0040 [DYM]) to build a 5-unit inn, ancillary to the Little River Inn at 7720 North Highway One. (APN: 121-280-15-00).

Wynn Coastal Planning and Biology (WCPB) Senior Biologist, Asa B. Spade, conducted additional recent site visits on May 17, June 25, and August 8, 2024. Mr. Spade has been to the site several times over the past years and is familiar with existing conditions; site visits were made throughout the floristic bloom window to ensure thorough results. No significant changes to vegetation or site conditions have occurred since the publication of the 2022 report. Site conditions were consistent with those reported in the previous WCPB report and biology work should be considered up to date through the 2024 season.

Please let us know if you have any questions.

Sincerely,

Asa B. Spade
Senior Biologist
Wynn Coastal Planning & Biology

ATTACHMENT L

CARL RITTIMAN & ASSOCIATES, INC.

Certified Professional Soil Scientist
PO Box 590 • Mendocino CA 95460

Wynn Coastal Planning
Meghan Durbin
703 North Main Street
Fort Bragg, CA 95437

Date: April 9th, 2025

Re: 7700 N. Hwy. One, Van Damme House on-site sewage disposal system re-location

Meghan,

You have been in contact with our office regarding the proposed development of 7720 N. Hwy.One. During the review of the initial development plan, it is my understanding that the Coastal Commission proposed that the planned driveway be re-configured to remain out of the ESHA buffer. In order to accomplish this re-configuration, it wold be necessary to re-locate the leachfield which serves the Van Damme House at 7700 N. Hwy. One. You posed the question to our office of whether or not this is feasible.

In 1992, our office conducted a Site Evaluation on 770 N. Hwy. One. The purpose of the evaluation was to design a leachfield area for a possible expansion of uses on the parcel. Our office conducted; soil profiling, groundwater monitoring and wet weather percolation testing. Following the completion of the testing, a design proposal for an expansion of uses was prepared. The tested area was west of the existing Visitor Units on the parcel.

Based on the previous site work, we can say with assurance, that a new leachfield area could be designed and installed on 7700 N. Hwy. One, to serve the existing uses, which meets the County Environmental Health Department codes. The new disposal system design would include the installation of a new leachfield, west of the development and would also likely entail the abandonment and relocation of the septic tanks as well as the building wasteline(s). It is understood that the final new disposal system design would need to include an updated soils evaluation and will need to take into account any ESHA setback areas including any other Planning Department considerations.

If you require any further information, please feel free to contact our office. Thank you.

Sincerely,

Andrew Kawczak
Associate

Phone 707-937-0804 • e-mail andy.carlrittiman@gmail.com

ATTACHMENT M

Brunsing Associates, Inc.

5468 Skylane Blvd., Suite 201
Santa Rosa, CA 95403
707-528-6108
www.brunsing.com

April 24, 2025 12934.02

Ms. Cally Dym
41425 Little Lake Road
Mendocino, CA 95460

Geotechnical Report Update, Little River Inn Expansion, 7720 North Highway 1, Little River, Mendocino County, California.

Brunsing Associates, Inc. (BAI) is pleased to present this update to our previous geotechnical investigation report for a single family residence at the site, dated May 4, 2020. The current project is for planned expansion for Little River Inn at the property. BAI understands that the planned expansion will include ten rental units (five duplexes), welcome center building, house keeping building, retaining walls and asphalt paved driveway and parking areas. The planned improvements are shown on the Site Plan, Plate 1.

Previous Investigation

BAI previously performed subsurface exploration at the site on May 13, 2019. Our field exploration consisted of drilling, logging and sampling three auger test borings from 14.5 to 17.5 feet in depth at the locations shown on Plate 1. Laboratory testing performed on select sample obtained from our test borings consisted of moisture content, density and strength. The test data is presented in our previous 2020 geotechnical investigation report.

Field Reconnaissance

On April 9, 2025, BAI's principal geotechnical engineer and engineering geologist performed a site reconnaissance of the planned expansion areas. They photographed the site and observed existing conditions. It was too windy at the time to fly a drone to photograph the bluff face.

Updated Recommendations

Our previous report recommendations for grading, foundations, retaining walls and site drainage remain valid and suitable for design, with the following updated recommendations for seismic design, bluff setback and tsunami hazard.

Seismic Design Criteria

The structures should be designed and/or constructed to resist the effects of strong ground shaking (on the order of Modified Mercalli Intensity IX) in accordance with current building codes. The California Building Code (CBC) 2019 edition indicates that the site classification for the property is Site Class F, due to the potential of liquefaction. BAI is anticipating that the fundamental period

of vibration will be equal to or less than 0.5 seconds, for which a site-response analysis is not required in accordance with ASCE 7-16. However, if the structural engineer determines that the fundamental period of vibration is greater than 0.5 seconds, BAI will need to re-evaluate the site and may need to perform a site response analysis. Based on a site response analysis not being required, BAI is using Site Class D for design. Accordingly, CBC indicates that the following seismic design parameters are appropriate for the site:

Table 1: Seismic Design Parameters

Site Class	=	D
Mapped Spectral Response Acceleration at 0.2 sec	Ss =	1.945g
Mapped Spectral Response Acceleration at 1.0 sec	S_1 =	0.801g
Modified Spectral Response Acceleration at 0.2 sec	S_{MS} =	1.945g
Modified Spectral Response Acceleration at 1.0 sec	S_{M1} =	1.362g
Design Spectral Response Acceleration at 0.2 sec	S_{DS} =	1.297g
Design Spectral Response Acceleration at 1.0 sec	S_{D1} =	0.908g
Site Coefficient	F_a =	1.0
Site Coefficient	F_v =	1.7
Long Period Transition Period	T_L=	12
Seismic Design Category	=	E

Bluff Retreat

For our analysis, we used qualitative comparisons of the 1942 through 2024 vertical aerial photographs as well as the 1972 through 2024 oblique aerial photographs. Our qualitative comparison of the vertical and oblique aerial photographs shows minor changes to the bluff edges at the site, due to erosion and rock falls. Our site reconnaissance and quantitative review of aerial photographs indicate an average bluff retreat (erosion) rate along the ocean bluffs of approximately one inch per year.

BAI's estimated erosion rate is significantly less than the rate given in Open File Report 2007-1133 (approximately 16 inches per year) for this region. If the USGS rate were accurate, the bluff edge would have retreated over 109 feet in the last 82 years (1942 to 2024, our earliest aerial photograph up to the most current). One hundred and nine feet of bluff loss would be easily visible in the aerial photographs that we reviewed for this project, which clearly is not the case.

Sea Level Rise Effects on Bluff Retreat

Rapid sea-level rise of approximately 400 to 450 feet occurred between 18,000 and 8,000 years before present, according to "Rising Seas in California", Griggs, et al, 2017. Sea levels have remained relatively constant since that time. However, sea levels have started rising again. The California Coastal Commission (CCC) recently adopted the Science Update, dated November 7, 2018, to the 2015 Interpretive Guidelines for addressing Sea Level Rise in Local Coastal Programs and Coastal Development permits.

The Science Update provides sea-level rise projections for the San Francisco coastal area, as follows in Table 2:

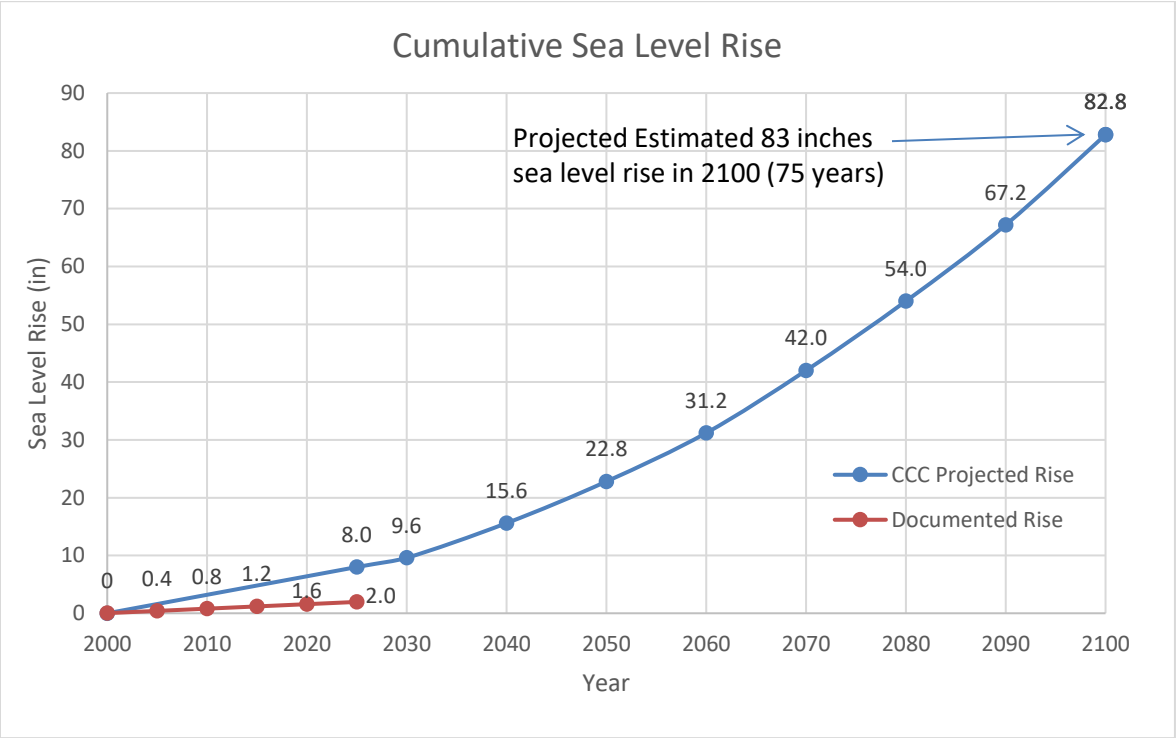
Table 2: Sea Level Rise Projections*

(Medium-High Risk Aversion)			Documented Rise	Likely Rise***
Time Period	Sea Level Rise (Feet)	Inches	Inches	Inches
2000	0	0		
2025**	0.7	8.0	2.0	
2030	0.8	9.6		2.4
2040	1.3	15.6		3.1
2050	1.9	22.8		3.9
2060	2.6	31.2		
2070	3.5	42.0		
2080	4.5	54.0		
2090	5.6	67.2		
2100	6.9	82.8		

*California Coastal Commission, Sea Level Rise Policy Guidance, 2018
**BAI interpolated
***Likely rise based on documented rise.

Recent sea level rise projections by the California Coastal Commission show that by 2100, the sea level will be as much as 82.8 inches higher than the baseline of 2000. However, according to the National Oceanic and Atmospheric Administration (NOAA) San Francisco tide gauge, sea level rise of just 2.0 inches has occurred since 2000, rather than the 8.0 inches, projected.

Based upon historic aerial photographs and site observations, the current historic, average bluff retreat rate appears to be an inch per year. The hard bedrock within the lower bluffs is very erosion resistant. Even with a 23-inch sea level rise by 2050, the ocean wave erosion will still be resisted by hard bedrock. The current bluff retreat rate should continue until at least 2045, then slowly increase thereafter.



Based upon historic aerial photographs and site observations, the current historic, average bluff retreat rate appears to be less than one inch per year, which we are rounding up to 1.0 inch per year. Although the bluff toe will still be partially protected by the sandy beach, the retreat rate should increase to approximately 2.5 inches per year after 2075 as the bluff toe is continually subject to strong wave activity.

Cumulative sea level rise is from 2000. Table 3 sums up the amount of projected retreat using estimated retreat rates over a 75-year span from a 2025 construction time. This results in a total bluff retreat of approximately 12 feet.

Table 3: Bluff Retreat Rate

Years	Span (years)	Cumulative Sea Level Rise (inches)	Retreat Rate (inches per year)	Amount of Retreat (inches)
2025-2045	20	19	1.0	20.0
2045-2060	15	31	1.5	22.5
2060-2075	15	48	2.0	30.0
2075-2090	15	66	2.5	37.5
2090-2100	10	83	3.0	30.0
				140.0” = 11.7’

Bluff Setback

The nearest ocean bluff to the development area at the property is approximately 45-feet in height. The ocean bluff is above a sandy beach at the back of a small cove. The planned building areas are at or above approximately 50 feet mean sea level (MSL). Our previously determined bluff retreat rate of less than one inch per year is confirmed. Therefore, our recommended bluff setback of 36 feet remains valid.

We are updating our setback recommendations for the small landslide southwest of the development area, shown on Plate 1. Structures and leach fields should be a minimum of 50 feet from the small bluff landslide. Since the planned leach currently is 50 feet or more from this landslide, its location conforms with our recommendation.

Tsunami Hazard

As is typical of the Mendocino County coastal area, the site could be subject to large storm waves or tsunami waves. Damage from Tsunami waves, historically, has been limited to moored boats and docks in area coves and harbors. However, in February 1960, the Point Cabrillo Light House, located approximately 7 miles north of the subject property, was damaged by an approximately 65 feet high storm wave (meteorological tsunami, or "meteotsunami"). No such waves are recorded at the light house from 1909, the year it was built, to 1960.

The light house was hit again by large storm waves on January 5, 2023. The back doors of the building were broken, and seawater flooded the interior by a couple of feet. The storm waves overtopped the light station preserve bluffs throwing rocks and debris from the lower bluffs onto the terraces above. Evidence of further bluff "over-topping" was observed by BAI on project sites from north of Bodega Bay to Westport. BAI is aware of a blufftop residence, approximately one-half mile south of the project site, at approximate elevation 40 feet MSL, that was damaged by a large wave during the same January 2023, storm event. At that location, the storm waves ran up a moderately-sloping bluff, then over a terrace level to the residence, damaging the structure siding and windows and the interior flooring.

The Little River Inn expansion area bluffs near vertical, not sloping toward the development area. Since the bluffs are approximately 45 feet in vertical height, future impact or inundation from a rare, severe storm surge or tsunami event is considered a real, but realistically, a low risk for this site.

Conclusions

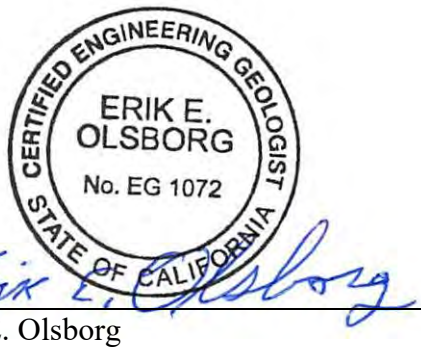
The bluff near the project area is presently stable and is not currently undergoing severe erosion or landsliding except for the small slide. The lower bluffs above the beach are mostly composed of hard bedrock that is generally resistant to wave erosion, except for erosion along the weaker fracture zones and drainage channels. The development should remain unaffected by bluff retreat for the next 75 years, or more.

Limitations

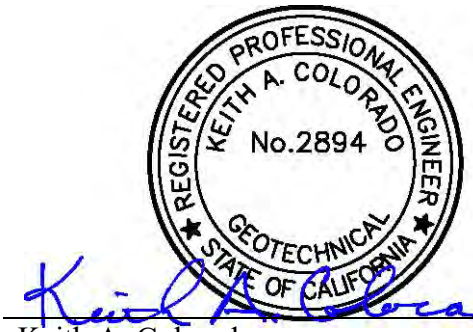
This geotechnical report update was performed in accordance with the usual and current standards of the profession, as they relate to this and similar localities. No other warranty, expressed or implied, is provided as to the conclusions and professional advice presented in this report. Our conclusions are based upon reasonable geological and engineering interpretation of available data.

Changes in the condition of a site can occur with the passage of time, whether they are due to natural events or to human activities on this, or adjacent sites. In addition, changes in applicable or appropriate codes and standards may occur, whether they result from legislation or the broadening of knowledge. Accordingly, this report may become invalidated wholly or partially by changes outside of our control.

Respectfully submitted,



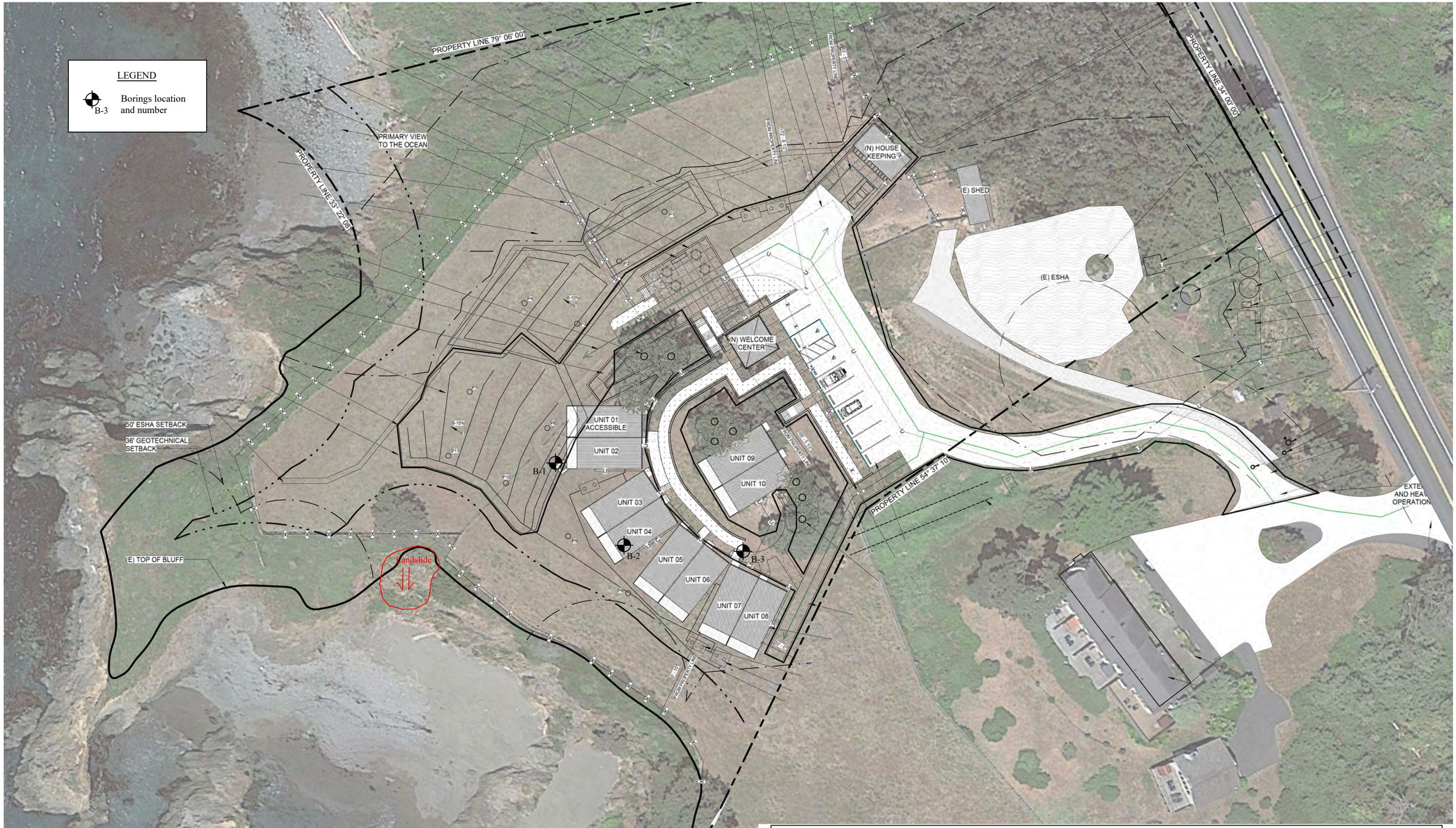
Erik E. Olsborg
Engineering Geologist – 1072
eolsborg@brunsing.com



Keith A. Colorado
Geotechnical Engineer - 2894
kcolorado@brunsing.com

Attachment: Plate1

ATTACHMENT M



REFERENCE:
Google Earth dated June 2, 2021 and Site Plan, sheet A1.2, dated 01.16.2025, prepared by Newberger & Associates

NORTH

APPROXIMATE SCALE (FEET)
0 25 50 100

Brunsing Associates, Inc.
5468 Skylane Blvd., Suite 201
Santa Rosa, California 95403
Tel: (707) 528-6108

Job No.: 12934.02
Appr.: EEO
Date: 04/24/25

SITE MAP
LITTLE RIVER INN EXPANSION
7720 North Highway 1
Little River, California

PLATE 1

ATTACHMENT N

Fehr & Peers

Memorandum

Date: October 3, 2025

To: Meghan Durbin, Wynn Coastal Planning & Biology

From: Ian Barnes, P.E., Fehr & Peers

Subject: Transportation Assessment for Little River Inn Expansion

---

This technical memorandum presents the transportation assessment for the proposed expansion of the Little River Inn in Little River, California. The project includes a General Plan Amendment and rezone to Mendocino County's *1C combining district, which would allow for 5–10 lodging units at 7720 North Highway 1 in unincorporated Mendocino County. Access to and from the site will be taken via an existing access point along Highway 1.

This assessment includes a review of the project's effect on vehicle-miles traveled (VMT), and a review of the 10-unit conceptual site plan (dated April 28, 2025), which is attached as **Appendix A**.

Vehicle-Miles Traveled (VMT) Analysis

The location of the proposed project is along the coastline of Mendocino County where there already is a substantial number of lodging rooms available to the public. Typically, new lodging land uses result in a redistribution of lodging demand, similar to other retail/goods and services land uses; if this is the case, then the trips to and from the proposed project are not new vehicle trips – rather, they are trips that would have been made regardless of the project and thus the project would have no effect on VMT (i.e., a less-than-significant impact). As a first step to confirm this presumption, Fehr & Peers reviewed data from Smith Travel Research (STR), which samples hotels to obtain a number of lodging facility characteristics, including room occupancy by month.

The STR report (included in **Appendix B**) for the Mendocino Coast region included reporting from 11 properties from Albion in the south to Fort Bragg in the north from 2018 through 2024. Occupancy data for these 11 properties indicate that the highest observed occupancy over any month was 66.9 percent of rooms occupied in December 2021. Excluding 2020 due to the effects of COVID-19, the average occupancy rate of rooms at the 11 properties was about 60 percent. The occupancy data indicates that throughout the course of the year, as well as even in peak months, substantial additional lodging capacity exists along the Mendocino County coast, such that the proposed Little River Inn expansion project would tend to not induce new vehicle trips; rather, the proposed project would redistribute lodging demand.

A review of overall lodging available along the Mendocino County coast indicates that there is substantial lodging supply in the vicinity of the Little River Inn, particularly in the area in and around

the community of Mendocino. It is expected that the new lodging at Little River Inn would predominately shift demand from these more proximate locations.

Data from the Replica database for Fall 2024 (the latest period of available data) was reviewed to establish trip length information for lodging uses in the Little River and Mendocino areas. The average trip length for lodging uses represents the average distance traveled for each one-way trip with a trip start point or trip end point at a lodging location within the community being studied. A summary of the average trip length data is provided below in **Table 1**.

Table 1. Average Trip Lengths for Lodging Uses in Mendocino and Little River

Lodging Location	Average Trip Length for Lodging Uses
Community of Mendocino	30.6 miles
Little River	17.0 miles

Source: Fall 2025 Replica Database.

The data in **Table 1** indicates that lodging uses in Little River tend to generate shorter trips than in the community of Mendocino. Therefore, the shift in lodging demand to the proposed project site may result in shorter trips as well (or, more broadly, the redistributed trips would not get longer).

Based on the data from the STR report and the Replica trip length data, it can be concluded that the proposed project would not generate net new regional trips, and the trips coming to/from the project site would tend to be the same length or shorter than they otherwise would be. Therefore, the project's effect on VMT is expected to be a net reduction in VMT at the regional level, and the project's VMT impact is ***less-than-significant.***

Site Plan Review

The proposed site plan for the project was reviewed for site access and multimodal circulation. The following recommendations have been developed to enhance the site plan, as well as provide context for further site design:

- **Recommendation 1** – Sight Distance: The proposed project will take access to and from Highway 1 via an existing driveway. As part of final design and coordination with Caltrans District 1, the site distance at the access point should be confirmed.
- **Recommendation 2** – Public Trail Connection: The site plan notes a new public access trailhead along Highway 1 to the north of the existing access point. The access to the trailhead along Highway 1 should be clarified to ensure the safety of trail users accessing the trailhead along Highway 1.
- **Recommendation 3** – Multimodal Connection: The public access trail connection to Highway 1 is located near the existing Little River Market convenience store. It is likely that the public may desire to walk between the trailhead and the market, which would need to take place within the State right-of-way. Given the lack of pedestrian facilities, it is recommended that that project applicant work with the County and Caltrans to establish a more formal connection between compatible land uses to ensure the safe and efficient circulation of nonmotorized travelers.

The proposed project does not appear to conflict with plans, programs or policies related to the pedestrian, bicycle and public transit modes. The proposed project would not introduce new hazardous features or new incompatible uses, nor would it provide inadequate emergency vehicle access. Therefore, the project's CEQA Transportation impacts in these areas are ***less-than-significant*.**

This concludes our analysis. If you have any questions or comments regarding this memorandum, please contact Ian Barnes at 925.357.3388.

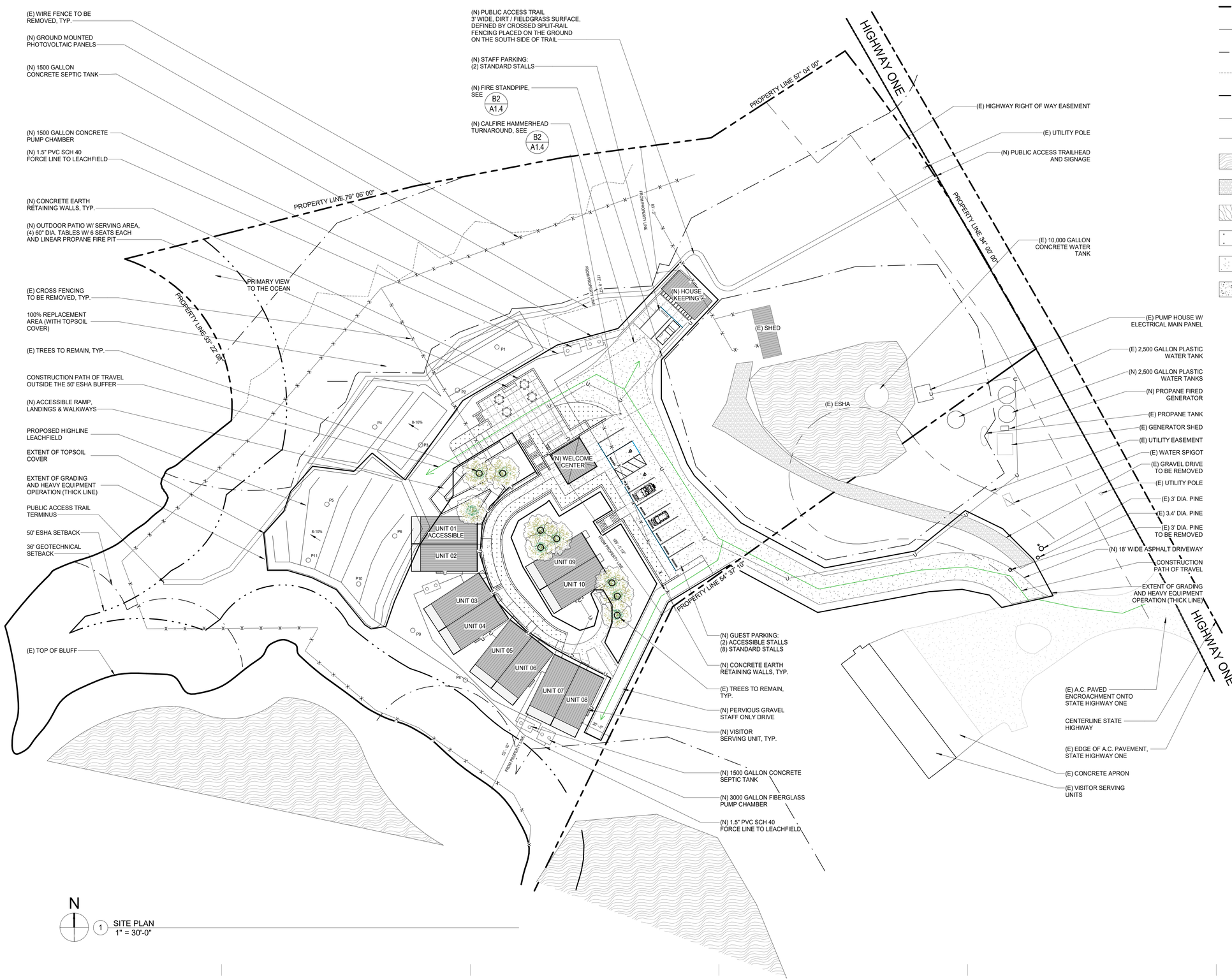
Appendices

Appendix A April 28, 2025 Site Plan

Appendix B STR Occupancy Data Table

Appendix A:
April 28, 2025 Site Plan

ATTACHMENT N



1 SITE PLAN
1" = 30'-0"

4/28/2025 12:30:14 PM

NEWBERGER & ASSOCIATES
TODD NEWBERGER
ARCHITECT - CA LIC. C-31047
707-357-0615
101 Alhambra St, Ste. C
Fort Bragg, CA 95437
todd@newberger-architect.com
NEWBERGER-ARCHITECT.COM

SITE PLAN

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE

REVISIONS

△

LICENSED ARCHITECT
TODD NEWBERGER
C-31047
8/31/2025
Renewal Date
STATE OF CALIFORNIA

DRAWN	TN
CHECKED	TN
DATE	04.28.2025
SCALE	1" = 30'-0"

SHEET
A1.2
OF SHEET

Appendix B:
STR Occupancy Data Table

ATTACHMENT N

Tab 5 - Twelve Month Moving Average

Little River, CA Area Selected Properties

Job Number: 1574779_SADIM Staff: MB Created: June 24, 2025

Occupancy (%)												
	January	February	March	April	May	June	July	August	September	October	November	December
2018	60.1	60.4	60.5	60.2	60.0	60.0	60.2	60.0	59.7	59.4	60.1	60.9
2019	61.4	61.3	61.2	61.8	62.2	62.4	62.5	62.8	63.4	63.8	63.6	62.9
2020	63.0	64.2	62.6	59.7	56.9	55.1	53.8	53.3	53.1	53.4	53.2	52.4
2021	52.4	52.1	54.6	58.0	61.1	63.3	64.9	65.7	66.0	65.6	66.0	66.9
2022	66.6	66.5	66.1	65.4	64.8	64.5	64.2	63.6	63.4	63.3	62.6	62.2
2023	61.5	60.4	58.8	57.7	56.9	56.3	56.1	55.6	54.9	54.0	53.4	52.9
2024	52.5	52.6	53.9	53.9	54.1	54.2	54.5	54.7	54.5	54.7	55.1	55.3
2025	56.0	55.7	54.6	54.7	54.3							

ATTACHMENT O

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 1
P.O. BOX 3700 | EUREKA, CA 95502–3700
(707) 445-6600 | FAX (707) 441-6314 TTY 711
www.dot.ca.gov

January 28, 2022

1-MEN-1- 47.627
GP 2021-0002
APN: 121-280-15

Mr. Matt Goines
Planning & Building Services
County of Mendocino
860 North Bush Street
Ukiah, CA 95482

Dear Mr. Goines:

Thank you for giving Caltrans the opportunity to comment on the proposed Local Coastal Program Amendment to add a Visitor Accommodations and Services (VAS) combining district to the underlying zoning of Rural Residential (RR-5) for the subject parcel to permit an Inn/Bed and Breakfast. The project is located on the west side of State Route 1 at 7720 N highway 1, in Little River. Please note that the project referral describes the location off of Route 1 as being 700(+/-) miles northwest of its intersection with Little River airport road (CR 404). We have the following comments:

As a General Plan/ Local Coastal Program Amendment and Rezone, there are no proposed changes to the existing site for us to review. The subject parcel appears to be undeveloped and has no established access to the public right of way. There is a two-way left turn lane on Route 1 that transitions to a double-yellow centerline across the parcel frontage, which would be expected to affect the development of a new road approach (driveway), if one is desired. Caltrans requests the opportunity to comment on any future development that may occur on this parcel in the future to ensure that access to State Route 1 will meet State standards. At that time, Caltrans will require additional details regarding ingress/egress, expected guest occupancy, hours of operation, etc.

Any work within Caltrans right of way, including new driveway construction, will require an encroachment permit. Any proposed ingress/egress to Route 1 must meet Caltrans minimum standards. The encroachment permit application will require a set of plans that have been stamped by a licensed engineer. For future consideration, the Caltrans Encroachment Permit Manual and Standard Application is available online at: <https://dot.ca.gov/programs/traffic-operations/ep>.

Please contact me with questions or for further assistance at: (707) 684-6879 or by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,

Jesse G. Robertson

Jesse Robertson
Transportation Planning
Caltrans District 1

c: Heidi Quintrell, Chief, Caltrans District 1 Encroachment Permits Office

ATTACHMENT P

California Department of Transportation

DISTRICT 1
P.O. BOX 3700 | EUREKA, CA 95502–3700
(707) 445-6600 | FAX (707) 441-6314 TTY 711
www.dot.ca.gov

April 7, 2023

1-MEN-1-47.63
CDP 2022-0040
APN: 121-280-15

Mr. Matt Goines
Planning and Building Services
County of Mendocino
120 West Fir Street
Fort Bragg, CA 95437

Dear Mr. Goines:

Thank you for giving Caltrans the opportunity to comment on the Coastal Development Permit for a proposed five (5)-unit inn with one guest welcome center, an event patio, one housekeeping structure, and parking. The project is located on the west side of State Route 1 at 7720 N highway 1, in the unincorporated community of Little River. We have the following comments:

The site plan for the project shows a driveway connection on the adjacent parcel as the primary access for the proposed project. The District does not support a new access to the applicant's parcel primarily due to sight distance requirements being difficult to meet along the subject parcel's frontage. The proposed driveway on the adjacent property currently meets Caltrans minimum standards for a commercial road approach. Attached is a permit from 2016 for the repaving of that access.

Caltrans requests that the applicant obtain an encroachment permit to recognize (shared) ownership and future maintenance responsibility of the existing access. In order to approve the application, Caltrans requires proof from the adjacent property owner who owns the encroachment, authorizes the applicant to use the existing driveway for their proposed development. These types of record keeping permits are no longer fee exempt and will be charged one hour of time based on this fee schedule: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/shr-flyer-a11y.pdf>.

As previously noted in our letter from January 28, 2022, any work within Caltrans right of way will require an encroachment permit. The Caltrans Encroachment

ATTACHMENT P

Permit Manual and Standard Application are available online at: <https://dot.ca.gov/programs/traffic-operations/ep>.

Please contact me with questions or for further assistance at: (707) 684-6879 or by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,

Jesse G. Robertson

Jesse Robertson
Transportation Planning
Caltrans District 1

c: Heidi Quintrell, Chief, Caltrans District 1 Encroachment Permits Office

ATTACHMENT Q

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY GAVIN NEWSOM, *GOVERNOR*

CALIFORNIA COASTAL COMMISSION
NORTH COAST DISTRICT OFFICE
1385 EIGHTH STREET • SUITE 130
ARCATA, CA 95521
VOICE (707) 826-8950

March 15, 2024

Steven Switzer, Planner
Mendocino County Department of Planning & Building
860 North Bush Street
Fort Bragg, CA 95437

SUBJECT: Comments for Proposed Rezone of Property located at 7720 N Highway 1, Little River (APN 121-280-15)

Dear Steven:

Thank you for meeting with us via Zoom on January 30th, 2024. We understand that the applicant, Cally Dym of the Little River Inn "wishes to amend the Coastal Land Use Map No. 17 (Mendocino) and Coastal Zoning Map to establish a Visitor Accommodations and Services (VAS) Inn/Bed and Breakfast Accommodation (*1C) combining district to the existing subject parcel zoned Rural Residential (RR5)". Pending results of the proposed rezone, a Coastal Development Permit application for a 5-unit Inn addition to the Little River Inn will be considered by the County. The Coastal Act and the County's certified local coastal program (LCP) place a priority on the use of private lands suitable for visitor-serving commercial recreational facilities,[1] and we appreciate the applicant's interest in developing the subject property to support visitor-serving uses.

According to the submitted project referrals and our records, the subject 5.25-acre parcel is a blufftop site in the town of Little River, lying on the western side of Highway 1. The site is surrounded by Rural Residential, Open Space, and Coastal Commercial uses. A portion of the site is currently developed with a 10,000-gallon concrete water storage tank, well, 400± square foot shed, and wire fencing to contain goats used for on-site vegetation management. The site is predominately grasslands, however, a number of ESHAs are present, including Mendocino coast paintbrush, headland wallflower, wetland, stream, and riparian areas. A single shared driveway to the south of the property is proposed to be used for ingress and egress.

As you know, the proposed rezoning of the property would trigger the need to apply to our office for an amendment to the Implementation Plan (IP) portion of the County's certified LCP. The standard of review for any proposed zoning change would be whether the zoning ordinances, zoning district maps, or other implementing actions conform with, and are adequate to carry out, the provisions of the Land Use Plan (LUP) portion of the Mendocino County certified LCP. For an amendment to the LUP, the

[1] Coastal Act Sections 30221 and 30222 as reflected in Mendocino County LCP polices including but not limited to LCP section 3.7.

standard of review would be whether the LUP as amended is internally consistent and conforms with the Coastal Act.

We offer the following preliminary observations and comments for your and the applicant's consideration in planning any land use and/or zoning changes at the subject site and in preparing an LCP amendment application for submittal to the Commission.

A. Visitor Serving Uses (Coastal Act Sections 30213, 30222, and 30250)

The Mendocino County LUP specifically "designates the existing visitor serving facilities [within the County] and reserves appropriate sites for future or potential visitor serving facilities." These lands are depicted in LUP Maps and LUP Table 3.7-2. In relation to this project, the Mendocino County LUP describes the Little River area as containing most of the larger visitor-serving inns on the Mendocino coast, totaling approximately 250 rooms.

As indicated above, the applicant is considering the development of a 5-unit Inn following potential rezoning of the subject site with a Visitor Accommodations and Services (VAS) combining district designation of *1C. Lands with the *1C designation could support up to 10 Inn units or up to 4 Bed & Breakfast units. We appreciate the applicant's interest in developing the subject property to support visitor-serving uses, as the Coastal Act places a priority on the use of private lands suitable for visitor-serving commercial recreational facilities. In particular, and as reflected in LUP policy 3.7-5, the Coastal Act requires that *lower cost* visitor and recreational facilities be protected, encouraged, and, where feasible, provided.

As indicated above, any proposal to rezone the property to support visitor-serving uses must demonstrate that the zoning ordinances, zoning district maps, or other implementing actions, conform with, and are adequate to carry out, the provisions of the certified LUP. If the land use and zoning at the site are changed to a visitor serving classification, then the references to number of rooms within the Little River Planning Area contained within the LUP and Table 3.7-2. should be updated accordingly to ensure internal consistency.

The County's staff report analysis of the proposed LCP amendment should also address the feasibility of providing a range of visitor-serving and recreational opportunities at the subject site, including but not limited to lower cost visitor-serving facilities, taking into account the other coastal resource issues described in this letter. Although the applicants have planned to develop the site with a 5-unit Inn, the County should analyze for full build out of the site, namely 10 Inn units or 4 Bed & Breakfast units, and for the potential of the site to support lower cost visitor serving units under a full build out scenario.[2]

[2] The Commission has typically focused on three (3) primary methods to facilitate lower-cost accommodations as part of proposed development of overnight accommodations: (1) ensure lower-cost accommodations are provided onsite as some portion of the proposed project; (2) ensure an equivalent

Finally, any proposal to amend the LCP to support visitor serving uses should also address whether the range of permissible development types at the subject site would be limited to only those that serve and support coastal visitation.

B. Consideration of Full Potential Build Out Scenario

Although it is the current applicant's intent is to develop a 5-unit Inn on the subject site following redesignation, the *1C-designation could allow for development of either a 10-unit Inn or 4-unit Bed & Breakfast. Because the County's approval of the redesignation of the site cannot be contingent upon development that is less than the *1C-designation would allow, to accurately evaluate whether redesignation of the subject site could be supported consistent with the Coastal Act, the County should evaluate the potential effects of full build out of the site. In particular, the County's evaluation should detail the effects of full build out of site on ESHA, public services, Highway 1 capacity, and visual resources as outlined below.

Environmentally Sensitive Habitat Areas (Coastal Act sec. 30240)

The subject property contains known environmentally sensitive habitat areas (ESHAs) including Mendocino coast paintbrush, headland wallflower, wetland, stream, and riparian areas. As reflected in and incorporated by reference, section 30240 of the Coastal Act requires the protection of natural resources and the prevention of development which would significantly disrupt sensitive habitats and their adjacent buffers. Any proposed changes to the land use designation of the subject property must be consistent with the natural resource protection policies of the Coastal Act and LUP.

The current evaluation of the proposed project analyzes potential impacts to ESHA assuming a 5-unit Inn will be developed, however, to evaluate whether redesignation of the subject site could be supported consistent with the Coastal Act, the County should evaluate the potential effects of full build out of the site. As previously stated, the *1C-designation could allow for development of either a 10-unit Inn or 4-unit Bed & Breakfast. An updated wetland delineation and biological scoping survey demonstrating that the site could support full build out of the 5.25-acre parcel without encroaching into minimum 100-foot-wide ESHA buffers, consistent with the resource protection policies of the Coastal Act and LUP, may be needed to support the County's evaluation.

---

number of lower-cost units are created off-site; or (3) ensure "in lieu" funds are paid to create an equivalent amount of new lower-cost accommodations to be constructed elsewhere. In past actions, the Commission has required 25% of the number of new high-cost rooms to be provided at a lower cost rate through one or a combination of the above methods. As part of their CDP application, the applicant should provide a feasibility study addressing whether providing the 25% lower cost rooms on-site is or is not feasible, which is usually done through an analysis of land value, development costs, estimated annual revenue based on projected ADRs and occupancy rates, and estimated operating costs.

This information will be essential to enable the County and the Commission to fully evaluate the effects of the proposed LCP amendment may have on identified ESHA and its consistency with the relevant LCP and Coastal Act policies.

New Development and Public Services (Coastal Act Sections 30250, 30252, 30254)

The Coastal Act requires new development to be served by adequate public services, including water, sewer, and traffic and be located within, contiguous with, or in close proximity to existing developed areas able to accommodate it. Section 30250(c) in particular requires that visitor-serving facilities be located in existing developed areas or when infeasible to do so, located in existing isolated developments, or at selected points of attraction for visitors. Thus, it will be important to demonstrate how the site could accommodate development of a 10-unit Inn or 4-unit Bed & Breakfast in a manner that ensures the protection of coastal resources as required by the Coastal Act.

Water and Sewer

It is our understanding that the subject property is currently served by an onsite well and 10,000-gallon water storage tank and that a 17-hour well test performed on the site confirmed the well produces 2.2 gallons per minute. Although 2.2 gallons per minute of potable water was found to be sufficient in the County's staff report to serve the proposed development of a 5-unit Inn/Bed and Breakfast, it would not likely support a 10-unit Inn. Therefore, as part of any LCP amendment application, please explain how there will be adequate water supply and wastewater treatment available to support the potential uses approved under the proposed rezone of the property. Further environmental review and testing by qualified professionals may be necessary to demonstrate adequacy of water and sewer capacity.

Traffic and Circulation

As reinforced by LUP policy 3.5-1, Section 30254 of the Coastal Act mandates that State Highway Route 1 remain a scenic two-lane road in rural areas of the coastal zone. Additionally, with regard to development of visitor serving accommodations, the LCP states in section 4.8 that substantial expansion of inns and hostels in the Little River area would indicate that improvements to Highway 1 are necessary or desirable.

Thus, traffic analyses may be necessary to demonstrate, amongst other things, what range of additional traffic could be generated as a result of the proposed density increase from the current zoning of RR to *1C. Additionally, because the single point of ingress and egress to the subject property would intersect a long stretch of Highway 1 uninterrupted by traffic signals or other traffic calming measures, it will be especially important to address how vehicular, bicycle, and pedestrian activity to and from the subject site could be accommodated without adversely impacting traffic and circulation. Because Highway 1 consists of only two lanes in this location, the County should specify how left-turn movements against oncoming traffic along the highway can occur without compromising safety, traffic flow, and circulation. Finally, the traffic analysis should identify any required roadway improvements or traffic calming measures needed to accommodate the proposed rezone within this LCPA.

Scenic and Visual Resources (Coastal Act Section 30251)

Section 30251 of the Coastal Act requires in part that the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance, and that permitted development shall be sited and designed to: (a) protect views to and along the coast, (b) minimize the alteration of natural landforms, and (c) be visually compatible with the character of the surrounding area. The LCP states that the existing approximately 250 inn-units in the Little River area have thus far been successful in remaining subordinate to the natural setting, although they are amongst the largest found in the County.

The site is west of Highway 1 within an identified Tree Removal Area. Nonnative cypress trees bordering to the east currently separate the subject site from the highway. The County's staff report analysis of the proposed LCP amendment should address how the eventual removal of the cypress trees and opening of the viewshed will be consistent with visual resource protection policies, under the full build out scenario. Please also indicate whether the proposed LCP amendment would include any building height and/or signage limitations for any envisioned development on the subject property.

Thank you again for the opportunity to provide feedback at this early stage in the planning process. If you have any questions, please don't hesitate to contact me at (707) 826-8950, extension 208.

Sincerely,

Tatiana Garcia

Tatiana Garcia
Coastal Program Analyst

Cc: Cally Dym

ATTACHMENT R

EXTERIOR COLORS

New Visitor Serving Units for:

Little River Inn Expansion

7720 North Highway 1
Little River, CA 95456

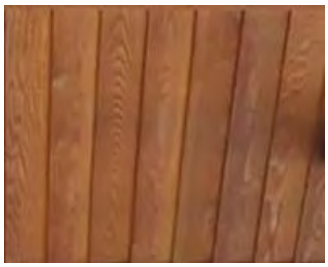
Prepared by:
NEWBERGER & ASSOCIATES
435 N. Main Street
Fort Bragg, CA 95437
Tel: (707) 961-0911
Fax: (707) 961-0912
www.lsndesign.com

Date of Issue:
April 14, 2022

Project: New Visitor Serving Units for
Little River Inn Expansion
7720 North Highway 1
Little River, California

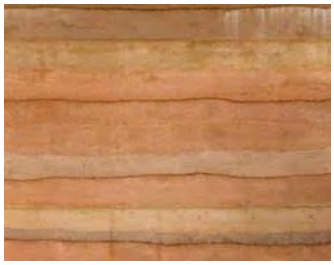
Coastal Development Permit Color Samples:

A. Siding and trim: Vertical fibercement siding; Aspyre collection by James Hardie, Artisan shiplap, factory primed, 10.25” (9” exposure), smooth surface. Painted color: cedartone. Trim: fibercement, painted color: Cedertone.
B. Roofing: Aluminum standing seam with factory paint finish, Color: Weathering copper
C. Entry door: Anodized aluminum; frames and glass; Frame color: black; Glazing: Dark gray translucent.
D. Sliding glass doors, Windows and light fixtures: Anodized aluminum; Color: Black.
E. Retaining walls: Cast-in-place, board formed, concrete / earth walls; Color: Variegated horizontally striated, brown tones.
F. Flat work: Concrete cast-in-place; Color: Brown tones.
G. Glazing: Dark gray non-reflective tint.


A


B


C&D


E


F


G

ATTACHMENT R

EXTERIOR LIGHTING FIXTURES

New Visitor Serving Units for:

Little River Inn Expansion

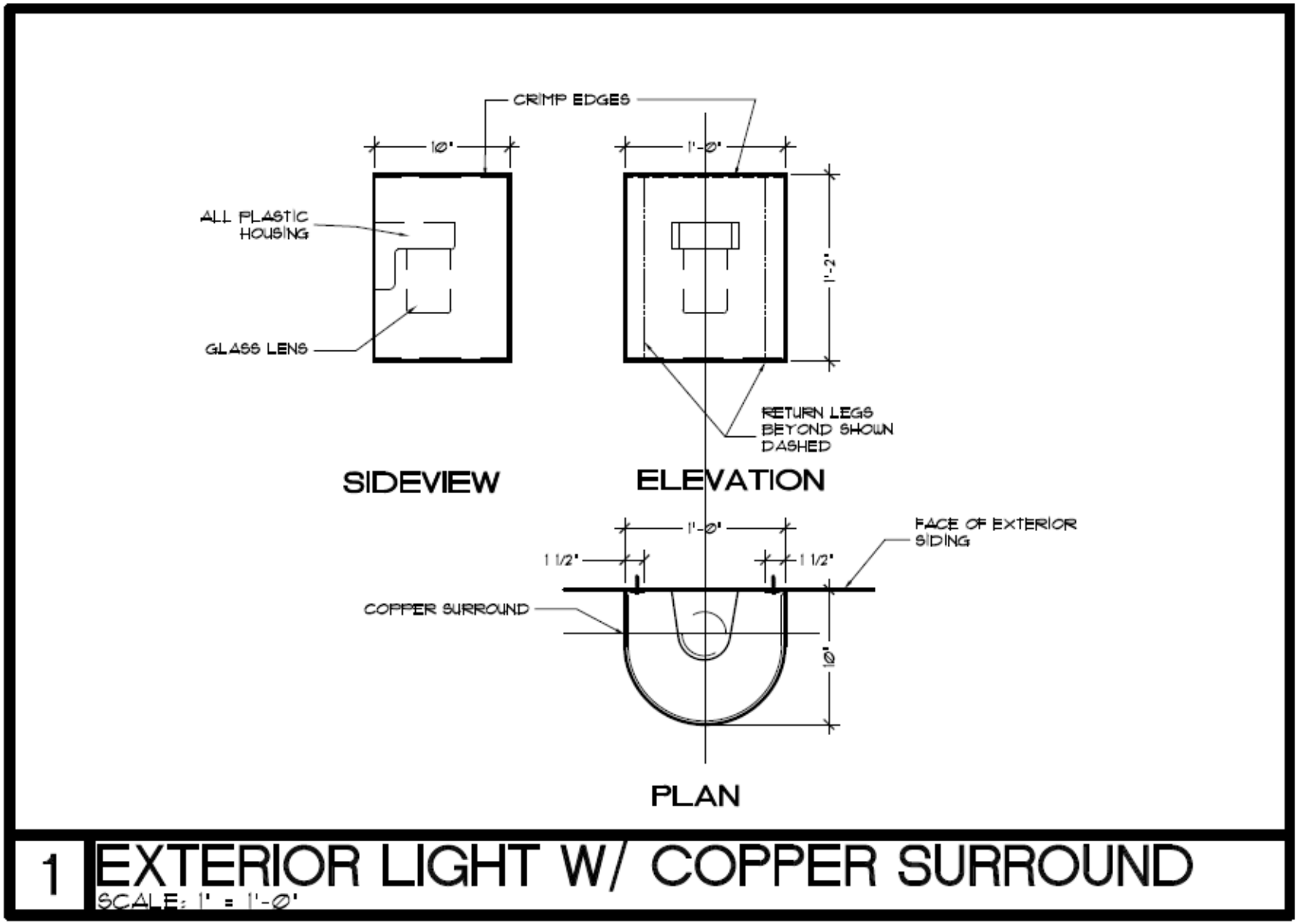
7720 North Highway 1
Little River, CA 95456

Prepared by:
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435 N. Main Street
Fort Bragg, CA 95437
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Fax: (707) 961-0912
www.lsndesign.com

Date of Issue:
April 14, 2022

ATTACHMENT R

FIXTURE 1



1 EXTERIOR LIGHT W/ COPPER SURROUND

SCALE: 1" = 1'-0"

ATTACHMENT R

FIXTURE 1

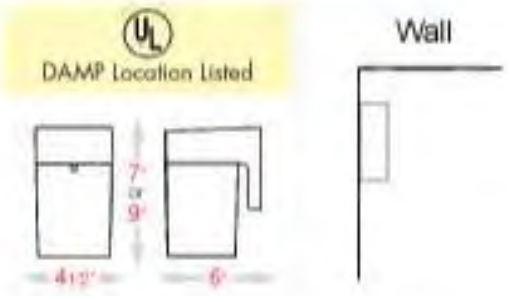
Superior Lighting Co.

FLUORESCENT FIXTURE WALL 8 IN WHITE ACRYLIC CYLINDER LENS BLACK LEXAN (POLYCARBONATE) FINISH 1 13W	

Specifications:	
Lens:	CYL WHITE ACRYLIC
Finish:	BLACK PLAST
Watts Per Bulb:	13
Total Bulb Wattage:	13
Volts:	120
Bulbs Per Fixture:	1
Bulb Type:	(1) 13W COMPACT FLUORESCENT BULB
Base Type:	GX23
Lumens:	820
Height:	09 IN
Width:	04.500 IN (4-1/2 IN)
Depth:	06 IN

Order Information:	
Item Code:	5418WA8BL113-K
Our Price Each:	1 to 11 $19.84 ea. 12 to 24 $19.16 ea. 25 to 49 $18.74 ea. 50 or more $18.47 ea.
Box Qty:	1
$ $ $ BUY MORE & SAVE MORE $ $ $	
24pcs [In Stock]	





ATTACHMENT R

FIXTURE 2

HALO®

HALO LED H4 Series - 2nd Generation

The Halo H4 LED is a family of 4" aperture recessed downlight H457 series of housings designed for exclusive use with Halo EL406, ELG406, ELSG406 Series LED Light Engines and compatible 4" TL4 and TLS4 LED trims. Halo H4 LED housings have integral LED drivers that offer dimming as a standard feature.

This is an insulated ceiling* AIR-TITE™ housing offering 120 volt dimming capability. The H4 LED series offers high quality down-lighting along with high efficacy – the result being great lighting and significant energy savings.

Catalog #		Type
Project		
Comments		Date
Prepared by		

DESIGN FEATURES

MECHANICAL

Housings
- Enclosure of formed aluminum construction.
- Openings are gasketed AIR-TITE.
- Designed for insulated ceilings in direct contact with insulation.* (May also be installed in non-insulated ceilings.)

Plaster Frame
- Galvanized steel die-formed construction.
- The collar can be removed from plaster frame to provide access to the junction box.
- Collar adjusts for ceilings up to 1-1/2" thick.
- Plaster frame features include:
  - Patented regressed locking screw positioned for securing hanger bars from below the ceiling.
  - Cutouts for easily crimping hanger bars in position.
  - AIR-TITE aperture gasket is pre-installed.
  - HALO identity embossed on plaster frame.

GOT NAIL! Pass -N-Thru™ Bar Hangers
- Pre-installed nail easily installs in regular lumber, engineered lumber and laminated beams.
- Safety and guidance system prevents snagging, ensures smooth straight nail penetration and allows bar hangers to be easily removed if necessary.
- Automatic leveling flange aligns the housing and lets you hold the housing in place with one hand while driving nails.
- Housing can be positioned at any point within 24" joist span.
- Pass-N-Thru™ feature allows bar hangers to be shortened without removing from plaster frame.
- Score lines allow "tooless" shortening for 12" joists.
- Bar hangers may be repositioned 90°.
- Integral T-bar clip snaps onto T-bars - no additional clips required.

Slide-N-Side™ Junction Box
- Positioned to accommodate straight conduit runs
- Seven 1/2" trade size conduit knockouts with true pry-out slots
- Slide-N-Side™ wire traps allow non-metallic sheathed cable to be installed without tools and without removing knockouts.
- Accepts a wide range of non-metallic (type NM) sheathed cables - the standard cable types used in lighting in both U.S. and Canada.
  - Allows wiring connections to be made outside the junction box
  - Simply insert the cable directly into the trap after connections are made.
  - Accommodates the following standard non-metallic sheathed cable sizes:
    (US) #14/2, #14/3, #12/2, #12/3
    (Canada) #14/2, #14/3, #12/2

LED Light Engine Connection
- LED connector is a non-screw base connector offering easy installation with the H4 LED 2nd Generation EL406, ELG406, ELSG406 Series LED Light Engines.
- LED connector meets high-efficacy luminaire requirement for a non-screw base socket, and where required to qualify as a high-efficacy luminaire. (California Title-24)

LED Driver
- LED dimmable driver mounts to the housing.
- Driver is a120 Volt, high efficiency, electronic power supply providing low voltage power to EL Series LED Light Engines.
- Driver meets FCC EMI/RFI Consumer Level limits for use in residential and commercial installations.
- Driver features high power factor and low THD and has integral thermal protection in the event of over temperature or internal failure.
- Driver is specifically designed for compatibility with EL406 LED Light Engines, and ELG406, ELSG406 Adjustable Gimbal Light Engine / Trims.
- If dimming is not required the fixture can be operated from a standard wall switch.

Dimming
- The HALO H4 LED luminaire is designed for dimming capability to 10% in normal operation with most 120V leading edge (LE) and trailing edge (TE) phase control dimmers. H4 LED may also dim to 5% using dimmers with low end trim adjustment. (Consult dimmer manufacturer for application/compatibility/ loading. Note, some dimmers require a neutral in the wallbox).

Warranty
Cooper Lighting provides a five year limited warranty on Halo LED Luminaires which includes the LED Recessed Housing, LED Light Engine, and LED trims.

Labels
- UL/cUL Listed 1598 Luminaire
- UL/cUL Listed for Damp Location
- UL/cUL Listed for Wet Location, covered ceiling - with select trims
- UL/cUL listed for Direct Contact with insulation and combustible material*

Qualifications
- Use with designated LED light engines and trims for ENERGY STAR® qualification.**
- Can be used for State of California Title 24 high efficacy luminaire compliance**
- Can be used for Washington State Energy Code (WSEC) and International Energy Conservaction Code (IECC) high efficacy luminaire compliance

IC and AIR-TITE™
Certified under ASTM-E283 and listed UL/cUL 1598. May be used to meet insulated ceiling and restricted air-flow requirements such as:
- Washington State Energy Code (WSEC)
- International Energy Conservation Code (IECC)
- New York State Energy Conservation Construction Code (NY-ECCC)
- State of California Title 24 "Recessed Luminaires in Insulated Ceilings."



H457ICAT1E

4-Inch LED Recessed Housing New Construction Insulated Ceiling

High Efficacy LED Housing-Dimmable

FOR USE IN INSULATED CEILINGS FOR DIRECT CONTACT WITH INSULATION*

ALSO SUITABLE FOR NON-IC APPLICATIONS

H4 Series LED Energy Data:

(Values at non-dimming line voltage.)
Minimum Starting Temp: -30°C (-22°F)
EMI/RFI: FCC Title 47 CFR, Part 18 (Consumer)
Sound Rating: Class A standards
Input Voltage: 120V
Power Factor: >0.90
Input Frequency: 50/60Hz
THD: <20%
Input Power: 13W
Input Current: 121mA
Driver Compliance: UL6950, LPS rated
Maximum IC (Insulated Ceiling) Ambient Continuous Operating Room Temperature: 25°C (77°F)
Maximum Non-IC (Non-Insulated Ceiling) Ambient Continuous Operating Room Temperature: 40°C (104°F)

*Not for use with housings in direct contact with spray foam insulation.

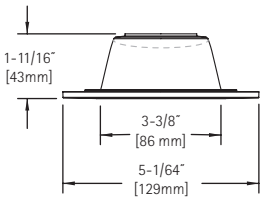
**Refer to ENERGY STAR® Qualified Products List and CEC (T24) Appliance Database for listings.

COOPER Lighting
www.cooperlighting.com

ADV131740
December 16, 2013 10:36 AM

REFLECTOR AND BAFFLE TRIMS WITH DIFFUSE DOME POLYMER LENS

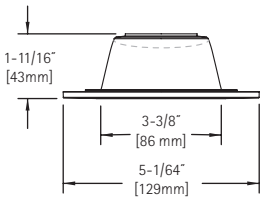




TL410SC

Specular Clear Reflector, Diffuse Dome (polymer) Lens, White Ring

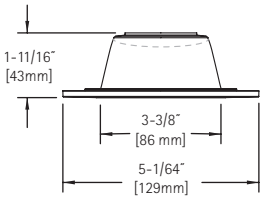




TL410H

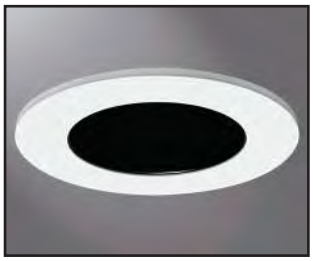
Haze Reflector, Diffuse Dome (polymer) Lens, White Ring

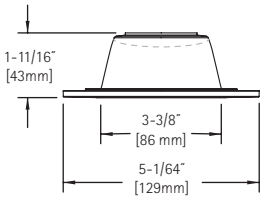




TL410WH

White Reflector, Diffuse Dome (polymer) Lens, White Ring

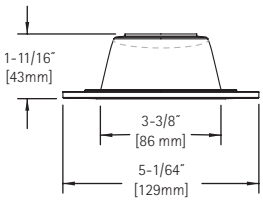




TL410SBK

Specular Black Reflector, Diffuse Dome (polymer) Lens, White Ring

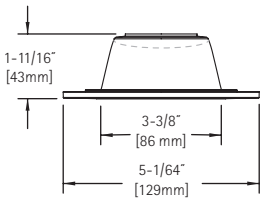




TL410SN

Satin Nickel Reflector, Diffuse Dome (polymer) Lens, Satin Nickel Ring

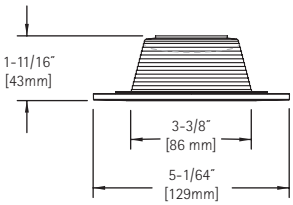




TL410TBZ

Tuscan Bronze Reflector, Diffuse Dome (polymer) Lens, Tuscan Bronze Ring

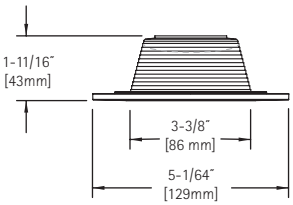




TL411WB

White Baffle, Diffuse Dome (polymer) Lens, White Ring





TL411BB

Black Baffle, Diffuse Dome (polymer) Lens, White Ring

ATTACHMENT R

FIXTURE 3



Crittenden Small One Light Outdoor Wall Lantern

Item # 8438501EN3-12

Designer: Sea Gull

Specifications
Width: 8"
Height: 7.625"
Backplate: D:5" DP:0.875" OB UP:2.5" Round
Socket: ~~1 - Medium - A19~~ LED
Rating: Wet Rated

Available Finishes
12 - Black

Features
Dark Sky Compliant
ENERGY STAR COMPLIANT
Available in LED
California Title 24 Compliant



PROJECT

CATALOG #

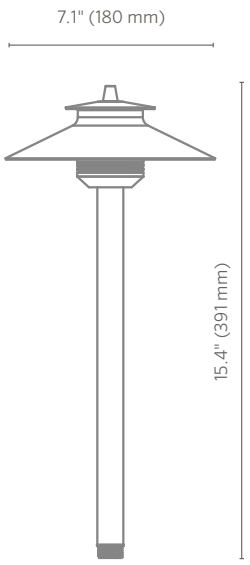
TYPE

NOTES

DM Path Light

STANDARD PREMIUM

Combining simplicity, elegance, and modesty, the timeless design influences of the DM are smartly captured in both shape and function. Available in aluminum or copper/brass construction.



Quick Facts

- Copper/brass or aluminum construction
- G4 bi-pin lamp base
- Natural, powder coated, or antiqued finishes
- Compatible with Luxor® technology
- Phase dimmable
- Input voltage: 10-15V

ATTACHMENT R

FIXTURE A

DM Path Light SPECIFICATIONS

Output	LED20W
Total Lumens†	41
Input Voltage	11 to 15V
Input Power (W)	1.2
VA	1.7
Efficacy (Lumens/Watt)	36
Color Rendering Index (CRI)	84
Max Candela	12
Dimming	Phase*
Luxor Compatibility	
ZD Option	Use Luxor Cube (LCM-LV)
Minimum Rated Life (L70)	33,000 Hrs

** For optimal performance, use a trailing-edge, phase-cut dimmer.*

FX Luminaire
FX Luminaire is an industry-leading manufacturer of landscape and architectural lighting products with a focus on the advancement of LED technology and digital lighting control with zoning, dimming, and color adjustment capabilities. We offer a full spectrum of specification-driven lighting fixtures that can be used to create elegant landscape lighting systems for commercial or residential applications. Our products are available exclusively via our extensive professional distributor network.

Materials
Machined C360 brass cap and reducer with stainless hardware. Spun C110 copper top/shade and extruded C110 copper riser. 6061 aluminum is used on "A" version.

Lamp
G4 lamp base. Preinstalled T3 LED lamp option with G4 base offers a warm 2,700K color temperature with a minimum rated life (L70) 33,000 hours.

Lens
Frosted glass lens with sandblasted softening feature.

Socket
Socket contains MoistureBlock™ technology, preventing moisture from wicking up into sealed areas of the fixture.

Power
Input 110–15 VAC/VDC, 50/60 Hz. Remote transformer required (specify separately).

Finish
Options of natural copper/brass finish or TGIC powder coat. Brass reducer on stem remains natural (not powder coated) for powder coated finishes on the version with copper/brass base metals..

Weight
2.0 lbs. (0.9 kg)

Hardware
½"-14 (13 mm) NPS threads

Ambient Operating Temperature
0°F to 140°F (-18°C to 60°C)

Wiring
18 AWG (1 mm); SPT-1W; 220°F (105°C); 300V; 10' (3 m) length.

International Compliance
Compliant per IEC 60598-1 and IEC 60598-2-7 when used with ground mount ("GM-XX") accessory, or alternate mount greater than or equal to IP65.

Control
Luxor zoning and dimming technology with use of Luxor Cube (LCM-LV). Luxor technology allows up to 250 groups, dimmable in 1% increments between 0 and 100%.

Sustainability
Innovation meets conservation in the design and manufacturing of our products. Where we can, we use recycled materials while maintaining superior functionality. Our LED products provide high-quality light at optimal energy efficiency, lifespan, and durability.

Installation Requirements
Designed for installation in the downward lighting direction only.

ISO
9001:2015 certified facility

Warranty
10-year limited warranty on fixture; 5-year limited warranty on preinstalled FX Luminaire LED lamp; no warranty on incandescent or halogen lamp.

Listings

c UL us LISTED
3YJ8

RoHS COMPLIANT

CE

IP 65

PD LED STEP Light **DESIGNER** PREMIUM



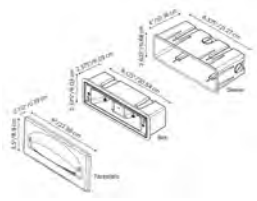
PROJECT

CATALOG #

TYPE

NOTES

With the same organic look as the UN, the PD offers a higher level of illumination. The LevelX system assures that the faceplates of these permanently mounted fixtures will remain perfectly level upon completion of any installation. Use the PD alone or install in conjunction with UN to maintain consistent lighting design style.



Note: Faceplate width with louver is 1.13”

Quick Facts

- Die-cast brass construction
- Natural, powder coated, or antiqued brass
- Compatible with Luxor® technology
- Input voltage: 10-15V
- Cree® Integrated LEDs
- Color temperature options
- Phase and PWM dimmable

Number of LEDs	2
Halogen Lumen Output Equivalent	10 Watt
Useful LED Life (L70)	50,000 hrs avg
Input Voltage	10 to 15V
VA Total (Use this number to size the transformer)	4.5
Watts Used	4.2
Lumens per Watt (Efficacy)	7
Max Lumens	26
CRI (Ra)	80
CCT	
Amber Filter	2700K



PROJECT

CATALOG #

TYPE

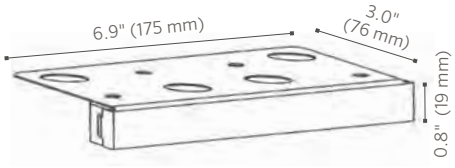
NOTES

C-LL **STANDARD** PLUS

The compact C-LL ledge light is a perfect addition to lighting projects for clients with modest budgets. Because of its corrosion-resistant construction, the fixture is especially at home in coastal regions.

Quick Facts

- Midgrade brass construction
- Corrosion-resistant design
- Attractive antique bronze finish
- Integrated LED
- Input voltage: 10–15V



ATTACHMENT R

FIXTURE C

C-LL Ledge Light SPECIFICATIONS

Output	Integrated LED
Total Lumens	151
Input Voltage	10 to 15V
Input Power (W)	4.0
VA	4.2
Efficacy (Lumens/Watt)	37
Color Rendering Index (CRI)	80+
Center Beam Candlepower	--
Dimming	PWM, Phase
RGBW Available	No
Luxor Compatibility	
Default	--
ZD Option	--
ZDC Option	--
Minimum Rated Life (L70)	33,000 Hrs

FX Luminaire
FX Luminaire is an industry-leading manufacturer of landscape and architectural lighting products with a focus on the advancement of LED technology and digital lighting control with zoning, dimming, and color adjustment capabilities. We offer a full spectrum of specification-driven lighting fixtures that can be utilized to create elegant, cutting-edge landscape lighting systems for commercial or residential applications. Our products are available exclusively via our extensive professional distributor network.

Materials
Die-cast midgrade brass housing with stainless steel mounting brackets

Wiring
18 AWG (1 mm); SVT; 220°F (105°C); 300V; 10' (3 m) length

Weight
2 lbs. (0.9 kg)

Ambient Operating Temperature
-30°F to 140°F (-34°F to 60°F)

Lamp
Integrated LED module

Power
Input 10-15 VAC/VDC, 50/60 Hz. Remote transformer required (specify separately).

Housing
Midgrade brass

Warranty
5-year limited warranty on luminaire

Manufacturing
9001:2015 certified facility

Lens
Tempered glass lens with shock resistance and high tolerance for thermal expansion and stress

Finish
Antiqued finish with brushed effect

Control
Remote transformer

Sustainability
Innovation meets conservation in the design and manufacturing of our products. Where we can, we use recycled materials while maintaining superior functionality. Our LED products provide high-quality light at optimal energy efficiency, lifespan, and durability.

Listings

c UL us LISTED 3YJ8

RoHS COMPLIANT





VIEW 02 W/ TREE REMOVAL COMPARISON

BEFORE



AFTER



KEY SITE PLAN



VIEW 03 W/ TREE REMOVAL COMPARISON

BEFORE



AFTER



VIEW 01

NEWBERGER & ASSOCIATES
TODD NEWBERGER
ARCHITECT - CA LIC. C-31047
435 NORTH MAIN STREET
FORT BRAGG, CA 95437
TODD@LSNDESIGN.COM
7073610911
LSNDESIGN.COM

VISUAL STUDIES

NEW VISITOR SERVING UNITS FOR:
LITTLE RIVER INN EXPANSION
7720 NORTH HIGHWAY 1
LITTLE RIVER, CALIFORNIA

ISSUE DATE

REVISIONS

△

LICENSED ARCHITECT
TODD M. NEWBERGER
C-31047
8/31/2023
Renewal Date
STATE OF CALIFORNIA

DRAWN	MA
CHECKED	TN
DATE	06.14.2022
SCALE	As indicated

SHEET

VS.1

OF SHEET

6/14/2022 10:22:53 AM

TABLE 3.7-2 TABULATION OF EXISTING AND PROPOSED VISITOR ACCOMMODATIONS ILLUSTRATED ON LAND USE MAPS [1, 9]

FOR ILLUSTRATION PURPOSES ONLY

CAC Area	Motels (Rooms)		Inns (Rooms)		State Park Campgrounds (Spaces)		Private Campgrounds (Spaces)		Resort (Rooms)		Total Visitor Accommodations		
	Existing *2	Add'l[10] *2C	Existing *1	Add' l[10] *1C	Existing *3	Add' l[10] *3C	Existing *3	Add' l[10] *3C	Existing *5	Add'l *5C	Existing *	Add'l *C	Total
North Coast CAC Area	0	20	20	50	--	140	250	160	7	0	277	370	647
North Central[3] CAC Area	159	0	0	0	143	40	464	40	0	0	766	80	846
South Central [4] CAC Area	109	0	52	50	104	80	292	80	104	0	661	210	871
South Coast [5] CAC Area	42	60	56	40	47	0	345	120	12	0	502	220	722
Total	310	80	128	140	294	260	1351	400	123	0	2206	880	3086

1. Private residences used as vacation rentals have not been included.
2. Group camps at State Parks have not been included.
3. Excluding the City of Fort Bragg.
4. Excluding the Town of Mendocino.
5. Excluding the City of Point Arena.
6. All open camping at Sinkyone Wilderness State Park.
7. Approximate number. All open camping at Wage's Creek Beach Campground.
8. Excluding group camp at Jug Handle Farm.
9. Tabulation does not include visitor serving facilities with RV, FV and Commercial land use classifications. See Appendix 10 for listing of privately owned visitor accommodations.
10. Projected from Planning Commission recommendation based on the following assumption of potential units per land use designation on the map.

Motel	20 units
Inn	10 units
Inn, Bed and Breakfast	4 units
Campground	40 units

APPENDIX 10

LIST OF EXISTING PRIVATE VISITOR ACCOMMODATIONS IN THE COASTAL ZONE OF MENDOCINO COUNTY AS OF AUGUST, 1982			
Name	**LCP Designations**	**Assessor's Parcel Nos.**	**Number of Overnight Units**
Howard Creek Ranch	*5, RMR-20	13-850-03	7
DeHaven Valley Farm	*1, RMR-20	13-890-02	7
Wage's Creek Beach Campground	*3, RMR-20	13-240-34	250
Westport Inn	RV	13-280-14	6
Cobweb Palance Inn	RV	13-300-16	7
Cleone Lodge	RV	69-152-13	9
Cleone Grocery and Campground	RV	69-153-20	30
Greenacres	RR-2	69-161-15	61
Hi-Seas Motel	C	69-241-05	14
Oceanview Lodging	C	69-241-06	12
Beachcomber Motel	C	69-241-09	22
Anchor Lodge	FV	18-140-12	14
Salmon Inn	FV	18-140-18	6
Dolphin Cove Marina	FV	18-330-02	56
Harbor Trailer Park	C	18-440-20	49
Shoreline Motel	C	17-140-13	11
Hidden Pines Campground	C	17-140-14	60
Coast Motel	C	17-140-15	20
Pomo Campground	*3, RR-2	17-160-75	104
Woodside Trailer Park	*3, SR-MH	17-080-22	104
Pine Beach Inn	*2, RR-1	17-360-03/04/07	51
Jug Handle Farm	*1,*3, RMR-20	17-250-32	12
Caspar Beach Trailer Park	*3, RR-1	118-120-03	89
Point Cabrillo Cottages and Campground	*2,3C,RR-5-PD	118-160-18	16
Ames Lodge	*1, FL	119-480-04	6
Blackberry Inn	*2, RR-5	119-010-19	13
Big River Lodge	*2, RR-5	119-300-05	23
Mendocino Campground	*3, RR-5	119-310-02/03/04	60
Glendeven Inn	*1, RR-2	121-260-28	6
Little River Inn	*5, RR-2	121-090-12/13, 121-280-01/02, 121-290-09/26	42
Fools Rush Inn	*2, RR-2	121-290-04	9
The Victorian Farmhouse	*1,4, RMR-20	121-020-03	4
School House Creek Inn	*1,4 RMR-20	121-020-02	12
Sea Foam Lodge	*1, RR-5	121-050-10	30
Andiron Lodge	*1, RR-5	121-040-21/24	12
Heritage House	*5, RR-2	121-130-08/09/10/11/13/14, 123-010-02/03/04/05/16/18	62
Albion River Inn	*2, RMR-20	123-050-02	6
Albion Flat RV Campground	FV	123-170-01	101

LIST OF EXISTING PRIVATE VISITOR ACCOMMODATIONS IN THE COASTAL ZONE OF MENDOCINO COUNTY AS OF AUGUST, 1982			
Name	**LCP Designations**	**Assessor's Parcel Nos.**	**Number of Overnight Units**
Schooner's Landing	FV	123-060-14	12
Mendocino Christian Camp	*3, FL	123-020-17	30
Navarro Ridge Inn**	*1, RR-10	123-320-04	12
Sandpiper Guest House	RV	127-160-06	5
Harbor House Inn	RV	127-170-08	9
Greenwood Lodge	RV	127-181-06	6
Elk Cove Inn	RV	127-240-03/04	3
Greenwood Pier	RV	127-181-08/10	5
Green Dolphin Inn	RV	127-232-04	2
Manchester Beach, KOA Campground	*3, RR-2	133-010-08	97
Point Arena Campground	*3, RR-5	27-010-12	30
Anchor Bay Campground	C	144-020-03	76
Mar Vista Motel	*5, RR-1	144-010-13	12
Whale Watch	*1, RR-5	144-011-14/15	5
Serenisea Motel	*2, RR-10	144-100-13	4
Re-Newell Center	*2, RR-2	144-130-34	7
St. Orres	*1, RR-2	144-130-05	11
Old Milano Hotel	*1	145-262-24	9
Gualala River Redwood Park	*3	145-270-29	142
Surf Motel	C	145-262-22	17
Gualala Hotel	C	145-262-03	15

(Revised 5-10-2005; Resolution 05-065)

ADDITIONAL EXISTING VISITOR FACILITIES DESIGNATED WITH *4

Name

Stone Painting Museum
Catch a Canoe
The Ledford House
Gregory's Restaurant
The Sea Urchin

** Now known as Fensalden Inn, this site was reclassified from an *1 to an *2C in 1990, limited to twelve units maximum. Development of the site with more than twelve visitor units will require an amendment to the Coastal Element.

ATTACHMENT V

South Central CAC Visitor Accommodation Data as of 09/18/2026									
2005 Name	2026 Name	Land Use	2005 Combining District	2026 Combining District	2005 APNs	2026 APNs	2005 Total Units	2026 Total VAS Units	Source
Jug Handle Farm	Jug Handle Creek Nature Center	RMR-20	1, 3	None†	017-250-32	017-250-32	12	12	CDPM_2023-0001
Not Listed*	Fortunate Farm	AG-60	Not Listed*	3C	Not Listed*	118-020-30	Not Listed*	0	CDU 12-2005
Caspar Beach Trailer Park	Caspar Beach RV Park and Camp Ground	RR-1	3	3	118-120-03	118-120-26	89	125	U 40-85
Point Cabrillo Cottages and Campground	Point Cabrillo Highlands	RR-5-PD	2, 3C	2C, 3C	118-160-18	118-160-18	16	19	CDP_2021-0041
Not Listed*	Russian Gulch State Park	OS	Not Listed*	3, 3C	Not Listed*	118-280-01 et al.	Not Listed*	31	State Parks Website
Blackberry Inn	Mendo Bungalow	RR-5	2	2	119-010-19	119-010-19	13	16	BL_2022-0089
Not Listed*	Agate Cove Inn	RR-5	Not Listed*	1C	Not Listed*	119-030-10	Not Listed*	10	CDU 6-2002
Not Listed*	Sea Rock Inn	RR-5	Not Listed*	2	Not Listed*	119-030-13	Not Listed*	14	CDP 53-96
Ames Lodge	Ames Lodge	FL	1	1	119-480-04	119-480-04	6	6	No records found
Big River Lodge	Stanford Inn	RR-5	2	5C	119-300-05	119-300-02, -08	23	33	CDP 1-85-107-A3
Mendocino Campground	Mendocino Grove	RR-5	3	5C	119-310-02, -03, -04	119-310-02, -03, -04, -10, 119-320-07	60	60	N/A‡
Not Listed*	Mendocino Headlands State Park	OS	Not Listed*	3C	Not Listed*	119-410-09	Not Listed*	0	State Parks Website
Not Listed*	Mendocino Farmhouse	RR-5	Not Listed*	1	Not Listed*	119-450-10	Not Listed*	4	CDP 1-84-218
Not Listed*	Brewery Gulch Inn & Spa	RR-5	Not Listed*	1C	Not Listed*	119-320-11	Not Listed*	10	UM 36-88/99
Not Listed*	Van Damme State Park	OS	Not Listed*	3	Not Listed*	121-090-07 et al.	Not Listed*	74	State Parks Website
Glendeven Inn	SCP Mendocino Inn & Farm	RR-2	1	1, 2C	121-260-28	121-010-13, 121-010-11	6	10	UM_2017-0002
Not Listed*	Inn at Cobbler's Walk	RR-5	Not Listed*	1	Not Listed*	121-260-22	Not Listed*	9	CDP 3-99
Little River Inn	Little River Inn	RR-2	5	5	121-090-12, -13, 121-280-01, -02, 121-290-09, -26	121-090-18, -19, 121-290-09, -13, -14, 121-290-26, 121-310-17	42	54	Little River Inn Website
Fools Rush Inn	Cottages at Little River Cove	RR-2	2	1	121-290-04	121-290-04	9	9	CDP 02-01
School House Creek Inn	Inn at Schoolhouse Creek	RMR-20	1, 4	2C, 4	121-020-02	121-020-21	12	17	CDUM 17-99 (2007)
The Victorian Farmhouse	Dennen's Victorian Farmhouse	RMR-20	1, 4	1	121-020-03	121-020-03	4	10	CDP 106-99
Sea Foam Lodge	Seafoam Lodge	RR-5	1	2	121-050-10	121-050-10	30	21	BL_2019-0167
Andiron Lodge	The Andiron Seaside Inn & Cabins	RR-5	1	2	121-040-21, -24	121-040-21	12	12	PAC 08-01
Heritage House	The Heritage House Resort & Spa	RR-2	5	5	121-130-08, -09, -10, -11, -12, -13, -14, 123-010-02, -03, -04, -05, -16, -18	121-130-06, -13, -14, -33, 123-010-18, -31, -32, -33, 121-130-34	62	77	CDP 69-93
Mendocino Christian Camp	Spirit Camp Retreat Center	FL	3	3C	123-020-17	123-020-17	30	30	UR_2018-0001
Schooner's Landing	Schooner's Landing	FV	None	None	123-060-14	123-060-14	12	12	N/A‡
Not Listed*	None	RMR-20	Not Listed*	1C	Not Listed*	123-030-09	Not Listed*	0	CDPM_2020-0002
Albion River Inn	SCP Mendocino Coast Lodge	RMR-20	2	2	123-050-02	123-040-06	6	20	BF_2018-0877
Albion Flat RV Campground	Albion River Campground and Marina	FV	None	None	123-170-01	123-170-01	101	101	N/A‡
Not Listed*	Ledford House	RR-5	Not Listed*	4	Not Listed*	123-330-09	Not Listed*	0	None
Not Listed*	None	RR-5	Not Listed*	1C	Not Listed*	123-330-02	Not Listed*	0	NCR-78-CC-768
Navarro Ridge Inn	The Fensalden	RR-10	2C	2C	123-320-04	123-320-11	12	12	CDU 10-93
Not Listed**	None	RR-5	Not Listed*	1	Not Listed*	126-010-05	Not Listed*	0	Vacant Lot

Not Listed*: These properties were not listed in Appendix 10 of the Coastal Element.

None†: Listed with VAS Combining District in Appendix 10, but Combining District not shown on County maps

N/A‡: Properties excluded from analysis because they are not Motels, Inns, or Resorts. # of VAS units assumed to be same as in Appendix 10.

Designation	2005 Total	2026 Total	% Change
*1 or *1C only	82	80	-2%
*2 or *2C only	79	141	78%
*3 or *3C only	207	291	41%
*5 or *5C only	104	224	115%
Total	557	808	45%

ATTACHMENT V

South Coast CAC Visitor Accommodation Data as of 09/18/2026									
2005 Name	2026 Name	Land Use	2005 Combining District	2026 Combining District	2005 APNs	2026 APNs	2005 Total Units	2026 Total VAS Units	Source
Not Listed*	Navarro-By-The-Sea	RR-5	Not Listed*	1C	Not Listed*	126-070-02	Not Listed*	0	CDP 3-2010
Not Listed*	None	RR-10	Not Listed*	4C	Not Listed*	126-060-14	Not Listed*	0	No Permits, restaurant
Not Listed*	None	RR-10	Not Listed*	2C	Not Listed*	126-080-06	Not Listed*	0	No Permits
Sandpiper Guest House	Sandpiper House Inn	RV	N/A	N/A	127-160-06	127-160-06	5	5	BL_2023-0271
Harbor House Inn	Harbor House Inn	RV	N/A	N/A	127-170-08	127-170-08	9	10	CDPM 25-2008 (2014)
Greenwood Lodge/Greenwood Pier	Sacred Rock Inn/Greenwood Pier Inn	RV	N/A	N/A	127-181-06, 127-181-08, 127-181-10	127-181-05, 127-181-06, 127-181-12, 127-181-14	11	19	CDP_2015-0025
Green Dolphin Inn	Green Dolphin Inn	RV	N/A	N/A	127-232-04	127-232-04	2	2	U 93-81
Elk Cove Inn	Elk Cove Inn	RV	N/A	N/A	127-240-03, 127-240-04	127-240-04, 127-240-07	3	10	CDU 20-94 (expired)
Not Listed*	Beacon By the Sea	RL	Not Listed*	2C, 4C	Not Listed*	127-290-02	Not Listed*	0	No Permits
Not Listed*	None	RL	Not Listed*	2C	Not Listed*	131-110-04	Not Listed*	0	U 8-91 (expired)
Not Listed*	Victorian Gardens at Mallo Pass Farms	RL	Not Listed*	1C	Not Listed*	131-110-13	Not Listed*	4	LCP 92-57, CDP 1-85-142
Not Listed*	None	RL	Not Listed*	2C	Not Listed*	132-170-03	Not Listed*	2	BL_2020-0144, CDP_2023-0034
Not Listed*	Manchester State Beach	OS	Not Listed*	3	Not Listed*	133-010-03 et al.	Not Listed*	40	State Parks Website
Manchester Beach, KOA Campground	Manchester Beach/Mendocino Coast KOA Journey	RL	3	3	133-010-08	133-010-08	97	115	CDUM 55-71/97
Not Listed*	None	RL	Not Listed*	2C	Not Listed*	133-040-04	Not Listed*	0	3 Units approved by U 30-88, but no longer in use
Not Listed*	Point Arena Lighthouse	OS	Not Listed*	None	Not Listed*	133-030-01	Not Listed*	9	UM_2024-0005
Point Arena Campground	Lighthouse Pointe Resort	RR-5	3	3	027-010-12	027-011-12	30	40	UM_2024-0003
Not Listed*	None	RL	Not Listed*	2C	Not Listed*	027-341-04	Not Listed*	0	No Permits
Not Listed*	None	RL	Not Listed*	3C	Not Listed*	027-511-33	Not Listed*	0	No Permits
Not Listed*	Rendezvous Mendocino	RR-5	Not Listed*	1C	Not Listed*	144-012-07	Not Listed*	6	CDU 25-96
Mar Vista Motel	Mar Vista Farm + Cottages	RR-5	5	5	144-010-13	144-012-13	12	11	BL_2020-0130
Whale Watch	Whale Watch Inn	RR-5	1	1	144-011-14, 144-011-15	144-011-17	5	18	BL_2015-0366, CDP 1-83-117
Anchor Bay Campground	Anchor Bay Campground	C	N/A	N/A	144-020-03	144-022-09	76	76	None
Not Listed*	None	RR-5	Not Listed*	1C	Not Listed*	144-070-20	Not Listed*	0	No Permits
Not Listed*	None	RR-10	Not Listed*	1C	Not Listed*	144-100-22	Not Listed*	3	BL_2022-0184, U 30-91, CDP 1-91-161
Serenisea Motel	Serenisea	RR-5	2	2	144-100-13	144-100-13	4	4	U 13-84, Serenisea Website
Re-Newell Center	St. Orres Inn & Restaurant	RR-5	2	2	144-130-34	144-130-34 et al.	7	6	St. Orres Website, CDP 70-99
St. Orres	St. Orres Inn & Restaurant	RR-5	1	1	144-130-05	144-130-31 et al.	11	16	St. Orres Website
Not Listed*	None	RR-5	Not Listed*	2	Not Listed*	144-170-11	Not Listed*	0	No Permits
Old Milano Hotel	None	RR-5	1	1	145-262-24	145-122-05	9	0	Burned 2001, not opened since
Gualala Hotel	The Gualala Hotel	GVMU	N/A	N/A	145-262-03	145-262-22	15	15	BL_2026-0190
Not Listed*	Seacliff Motel	GVMU	Not Listed*	None	Not Listed*	145-261-11	Not Listed*	32	CDP 1-86-002
Surf Motel	Surf Inn	GVMU	N/A	N/A	145-262-22	145-261-12	17	20	CDU 24-96
Not Listed*	Hotel Breakers	GVMU	Not Listed*	None	Not Listed*	145-261-14	Not Listed*	24	CDUM 25-87/2001
Not Listed*	Gualala Country Inn	GVMU	Not Listed*	None	Not Listed*	145-262-15	Not Listed*	19	Travelocity, Kayak websites
Gualala River Redwood Park	Gualala River Redwood Park	RMR-40, RR-5	3	3	145-270-29	145-240-11, 145-240-08, 145-240-11	142	149	CDU 33-99

Not Listed*: These properties were not listed in Appendix 10 of the Coastal Element.

Designation	2005 Total	2026 Total	% Change
*1 or *1C only	25	47	88%
*2 or *2C only	11	12	9%
*3 or *3C only	269	344	28%
*5 or *5C only	12	11	-8%
Total	438	655	50%

ATTACHMENT W

APPENDIX 3

Mendocino County / Detail Trend

Direct Travel Impacts 2013-2022p

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2021-2022
Direct Travel Spending ($Million)											
Destination Spending	349.0	365.9	384.3	421.8	451.6	435.2	466.8	294.1	496.7	455.0	▼ -8.4%
Other Travel*	16.1	16.2	14.4	12.8	14.4	16.5	17.2	6.2	9.9	14.0	▲ 41.2%
TOTAL	365.1	382.1	398.7	434.6	465.9	451.7	484.0	300.2	506.5	468.9	▼ -7.4%
Visitor Spending by Type of Traveler Accommodation ($Million)											
Hotel, Motel, STVR	200.1	214.6	233.7	267.2	289.3	267.4	286.3	188.6	337.4	249.5	▼ -26.1%
Private Home	46.3	46.6	43.6	44.1	46.8	49.0	54.2	17.8	54.7	60.2	▲ 10.1%
Campground	40.0	40.8	41.5	41.9	44.0	46.2	49.8	41.8	52.1	66.8	▲ 28.1%
2nd Home	13.5	13.7	14.1	14.4	15.2	16.6	17.0	28.1	25.1	31.5	▲ 25.3%
Day Travel	49.1	50.2	51.4	54.1	56.2	56.1	59.5	17.7	27.3	47.0	▲ 72.3%
TOTAL	349.0	365.9	384.3	421.8	451.6	435.2	466.8	294.1	496.7	455.0	▼ -8.4%
Visitor Spending by Commodity Purchased ($Million)											
Accommodations	85.1	93.9	104.2	121.4	130.6	123.0	134.3	109.2	170.2	156.9	▼ -7.8%
Food Service	103.5	106.9	114.8	127.7	136.4	130.1	139.0	80.2	144.2	121.1	▼ -16.0%
Food Stores	20.8	21.4	22.4	23.0	23.3	22.8	24.1	16.2	27.9	32.2	▲ 15.4%
Local Tran. & Gas	45.4	46.8	43.8	42.2	47.1	50.0	53.4	25.0	44.3	48.2	▲ 8.8%
Arts, Ent. & Rec.	52.5	54.3	56.9	61.9	64.5	60.4	62.8	35.1	59.3	50.2	▼ -15.3%
Retail Sales	41.6	42.7	42.1	45.5	49.6	48.9	53.2	28.4	50.8	46.4	▼ -8.7%
TOTAL	349.0	365.9	384.3	421.8	451.6	435.2	466.8	294.1	496.7	455.0	▼ -8.4%
	2013	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2021-2022**
Travel Industry Earnings ($MIllion)											
Accom. & Food Serv.	111.8	120.7	129.0	149.2	162.1	161.8	177.8	136.6	169.5	187.5	▲ 10.6%
Arts, Ent. & Rec.	33.7	36.9	34.4	35.6	37.8	26.5	28.4	15.9	18.5	24.5	▲ 32.4%
Retail**	9.4	9.9	10.2	11.1	11.6	11.3	12.0	12.5	13.5	14.5	▲ 7.4%
Ground Tran.	4.0	4.2	4.6	5.4	6.4	8.4	9.3	3.6	3.7	2.9	▼ -23.6%
Other Travel*	0.8	0.8	0.9	1.0	1.1	1.2	1.2	1.0	1.0	1.5	▲ 48.8%
TOTAL	159.7	172.5	179.1	202.3	219.0	209.1	228.6	169.5	206.3	230.8	▲ 11.9%
Travel Industry Employment (Jobs)											
Accom. & Food Serv.	3,490	3,560	3,560	3,880	4,120	3,920	4,160	3,210	3,610	3,930	▲ 8.9%
Arts, Ent. & Rec.	2,430	2,670	2,480	2,680	2,590	1,740	1,700	860	970	1,290	▲ 33.5%
Retail**	300	310	310	320	330	310	320	310	320	330	▲ 3.4%
Ground Tran.	110	110	120	130	140	160	180	170	180	160	▼ -11.4%
Other Travel*	20	30	30	30	30	30	30	20	20	30	▲ 41.6%
TOTAL	6,360	6,690	6,490	7,040	7,200	6,170	6,400	4,570	5,100	5,740	▲ 12.6%
	2013	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2021-2022**
Tax Receipts Generated by Travel Spending ($Millions)											
Local Tax Receipts	15.0	16.2	17.5	18.5	20.1	22.3	24.3	19.6	28.8	26.5	▼ -8.1%
State Tax Receipts	18.6	19.5	19.5	20.3	20.9	20.5	22.2	14.7	21.9	20.8	▼ -5.1%
TOTAL	33.6	35.7	37.0	38.8	41.0	42.7	46.4	34.3	50.7	47.3	▼ -6.8%
Local Tax Receipts Generated by Travel Spending ($Millions)											
Visitor	9.7	10.6	11.6	12.2	13.5	15.6	17.0	12.4	20.0	17.9	▼ -10.3%
Business or Employee	5.4	5.7	5.8	6.3	6.6	6.7	7.3	7.2	8.8	8.5	▼ -3.2%
TOTAL	15.0	16.2	17.5	18.5	20.1	22.3	24.3	19.6	28.8	26.5	▼ -8.1%
State Tax Receipts Generated by Travel Spending ($Millions)											
Visitor	13.2	13.7	13.6	14.0	14.6	15.2	16.4	9.1	14.9	13.9	▼ -6.7%
Business or Employee	5.4	5.8	5.9	6.3	6.3	5.3	5.8	5.5	7.0	6.9	▼ -1.9%
TOTAL	18.6	19.5	19.5	20.3	20.9	20.5	22.2	14.7	21.9	20.8	▼ -5.1%