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## Memorandum

**Date:** MARCH 14, 2024  
**TO:** COASTAL PERMIT ADMINISTRATOR  
**FROM:** KEITH GRONENDYKE PLANNER III *KG*  
**SUBJECT:** COASTAL DEVELOPMENT PERMIT APPLICATION, CDP\_2023-0018 AND CDP\_2023-0019

This memo is regarding the above noted Coastal Development Permit application to construct a new 1,198 square foot accessory dwelling unit consisting of one bedroom and a bathroom along with a 476 square foot detached garage. Additional improvements include 829 square feet of decking and stairs, an eighty-two square foot porch, 113 square feet of concrete slabs and add new french doors to the existing single-family-residence, located at 15361 Seadrift Ave. in Caspar CA.

The applicant's agent has submitted comments and proposed revisions to the staff report. Responses are noted below:

### CDP\_2023-0018

1. (CPA 3) Comment from Agent Sam Waldman: *"The Sherwood Band of Pomo Indians did respond to Alta Archaeological with the requirement that they be notified should artifacts be discovered during construction. This is recognized in Condition 21."* On page 3 of the staff report under Referral Agency Comments, the referral agency request from the Sherwood Band of Pomo Indians indicates that there was no response. Actually, the Sherwood Valley Band of Pomo Indians did respond, but to Nicholas Radkey, Senior Archaeologist with Alta Archaeological Consulting with a letter stating: *" This correspondence will serve as formal response from the Sherwood Valley Tribe regarding the above-named project.*

*The Sherwood Valley Tribe is in receipt of the Arch. Survey dated October 12, 2022, and at this time have no further cultural resource information to add. The Tribe is requesting to be kept informed of project status and contacted if any cultural resources are uncovered, threatened or compromised. Sherwood Valley is the MLD's of the area.*

*The tribal contact is Valerie Stanley, THPO. Thank You."*

Staff acknowledges that the Sherwood Valley Band of Pomo Indians did comment on the project, and this is reflected in Conditions of approval numbers 20 and 21.

2. (CPA 5) Comment from Agent Sam Waldman: *Hazard Management-The setback required by Brunsing and Assoc. is 50'.*" On page 5 of the staff report, the report does say that the new ADU will be located at least 55 feet from the bluff top edge, while the submitted site plan does show that the nearest edge of the proposed ADU will be a minimum of fifty feet from the bluff top, as written in the Brunsing Associates Inc. Geotechnical Investigation. Staff acknowledges this minor discrepancy.

3. (CPA 6) Comment from Agent Sam Waldman: “*Archaeological-...conditions 19 and 21...*” In the report under Archaeological/Cultural Resources, the last sentence reads: “Staff has added conditions 19 an to satisfy the Archaeological Commission’s requirements.” A portion of this sentence did not get added to the report. The entire sentence should read: “ Staff has added conditions **20 and 21** to satisfy the Archaeological Commission’s requirements.”

4. Agent Sam Waldman states: “*Will the added material alternates-redwood B&B modified bitumen-be published?*” Staff prepared a memo to the Coastal Permit Administrator submitting the modified bitumen sample for the roof of the pop out window.

5. Agent Sam Waldman states: “*Coastal Administrator is misspelled throughout.*” Not sure what this is, but the correct wording, Coastal Permit Administrator is written within the staff report.

Wynn Coastal Planning and Biology principal, Amy Wynn has additional comments, with a few being minor corrections, and other slightly more substantial as detailed below:

**Pg CPA 4, Visual Resources, last paragraph:** “As proposed CDP\_2023-00198, the ~~test well~~ ADU and garage project would be subordinate to the...”

**Pg CPA 5, Archaeological/Cultural Resources:** FYI, the application packet included our Archaeological Survey and Historical Evaluation, prepared by Alta Archaeological Consulting on March 17, 2023.

“At the ~~March 17~~ August 9, 2023 Commission meeting, the study was approved with a special condition stating...”

**Pg CPA 5, Habitats and Natural Resources, first and third paragraphs:** “The survey does offer proposed project ~~modification~~ avoidance and mitigation measures have been included in both projects’ conditions of approval.”

“Comments received from CDFW agree with the proposed ~~modification~~ avoidance and mitigation measures from WCPB, which have been added to conditions of approval.”

Because the Biological Scoping Survey prepared by WCPB did not identify any potential impacts to rare plants by the project, staff decided to alter the words avoidance and mitigation to project modifications, as mitigation measures imply that some possible impacts that could be significant can only be lessened to a less than significant level with mitigations, as detailed in the CEQA checklist.

“At the ~~March 17~~ August 9, 2023, Commission meeting the study was approved with a special condition stating...”

**Pg CPA 6, Groundwater Resources, second to last sentence:** “On August 4, 202~~2~~3, our office received comments...” (I could be mistaken, but I assume they received comments in August 2023, after submittal of our application, rather than the year prior to submittal of our application).

**Pg CPA 6, Environmental Determination:** “modification” measures again. Should do a search for “modification” measures and replace with “avoidance and mitigation” measures.

**Pg CPA 5, Related applications on site:** *Related applications* ~~On-Site~~.” These applications are all off site.

**Pg CPA 5, Habitats and Natural Resources, first and third paragraphs:** *“The survey does offer proposed project modification avoidance and mitigation measures have been included in both projects’ conditions of approval.”*

*“Comments received from CDFW agree with the proposed modification avoidance and mitigation measures from WCPB, which have been added to conditions of approval.”* Because the Biological Scoping Survey prepared by WCPB did not identify any potential impacts to rare plants by the project, staff decided to alter the words avoidance and mitigation to project modifications, as mitigation measures imply that some possible impacts that could be significant can only be lessened to a less than significant level with mitigations, as detailed in the CEQA checklist.

**Pg CPA 5, Archaeological/Cultural Resources:** FYI, the application packet included our Archaeological Survey Report and Historical Evaluation, prepared by Alta Archaeological Consulting on March 17, 2023.

*“At the March 17 August 9, 2023, Commission meeting the study was approved with a special condition stating...”*

**Pg CPA 9, Condition #20:** inserted a new paragraph, resulting in the latter portion of C20 being separated into a new condition (C21). Numbering of conditions following 20 are therefore off.