



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT

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Hearing Date: December 16, 2021

To: Humboldt County Planning Commission

From: John H. Ford, Director of Planning and Building Department

Subject: **Ocean West Manufactured Home Park Expansion**
Application Number 14268
Case Numbers CUP-18-034, SP-18-040, NOM-18-012
Assessor Parcel Numbers 510-171-039, -040, and -060
1000 and 1010 Murray Road, McKinleyville area

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Please contact Rebecca Jacobson, Planner, at (707) 268-3727 or email rjacobson@co.humboldt.ca.us if you have any questions about the scheduled public hearing item.

AGENDA ITEM TRANSMITTAL

Hearing Date December 16, 2021	Subject Conditional Use Permit, Special Permit and Notice of Merger	Contact Rebecca Jacobson
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Project Description: A Conditional Use Permit, Special Permit and Notice of Merger to facilitate a proposed expansion of Ocean West Manufactured Home Park. The expansion will add 25 spaces for a total of 155 units. The Lot Merger portion of the proposed project consists of the merging of two vacant 4.5 acre and 0.57-acre parcels into the 25.32 acre developed manufactured home park for a total of 30.4 acres. Twenty-two (22) spaces are proposed on the western parcel and 3 spaces are proposed on the eastern parcel. The Conditional Use Permit is required to operate a manufactured home park in the C-1 Neighborhood Commercial zoning district. There is a previously approved Conditional Use Permit (CUP-37-77) for the existing 25.33-acre portion of Ocean West. The proposed road connecting the proposed western expansion to the rest of the park and a proposed recreation path along the creek will result in approximately 209 sq ft of a one-parameter wetland being filled and 4,261 square feet of encroachment into the Streamside Management Area (SMA). The Special Permit is required for development within the SMA protective buffer of Widow White Creek, resulting in temporary and permanent impacts to the riparian habitat and associated wetlands. Mitigation measures will be required to reduce the potentially significant impact to wetlands, the SMA, water quality, and to sensitive habitats on-site.

Project Location: The project is located in the McKinleyville area, on the south side of Murray Road, east of US 101. The western expansion portion of the project is adjacent to the US 101 North off-ramp exit of Murray Road. The eastern portion of the project is approximately 200 feet south from the intersection of McKinleyville Avenue and Murray Road. The project is located on the property known as 1000 and 1010 Murray Road.

Present Plan Land Use Designation: (CS,AP) Commercial Services (CS), Airport Land Use Compatibility Zone (AP), Density: N/A; (RL1-7,AP) Residential/Low Density (RL1-7), Airport Land Use Compatibility Zone (AP), Density: 1 to 7 dwelling units per acre; (RM,AP) Residential/Medium Density (RM), Airport Land Use Compatibility Zone (AP), Density: 7 to 30 dwelling units per acre; Slope Stability: Relatively Stable (0)

Present Zoning: (C-1-AP-N-WR) Neighborhood Commercial (C-1), Airport Safety Review (AP), Noise Impact (N), Streamside Management Areas and Wetlands (WR); (R-3-D-AP-N-WR) Residential Multiple Family (R-3), Design Control (D), Airport Safety Review (AP), Noise Impact (N), Streamside Management Areas and Wetlands (WR); (R-1-N) Residential One-Family (R-1), Noise Impact (N).

Application Number: PLN-14268-CUP

Case Numbers: CUP-18-034, SP-18-040, NOM-18-012

Assessor Parcel Number: 510-171-039, 510-171-040, 510-171-060

Applicant Sun Ocean West Expansion, LLC 27777 Franklin Rd., Ste. 200 Southfield, MI 48034	Owner(s) Sun Ocean West Expansion, LLC	Agent Omsberg & Preston 434 7 th Street, Suite B Eureka CA 95501
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Environmental Review: Project requires environmental review. Pursuant to section 15073 of the CEQA Guidelines an Initial Study and Mitigated Negative Declaration (IS/MND) was prepared and circulated for public and agency comment from February 17 to March 17, 2020 (State Clearinghouse Number 2020029032)

Major Issues: Wetland disturbance and encroachment in Streamside Management Area; Concerns and opposition from current Ocean West residents

State Appeal Status: Project is not appealable to the California Coastal Commission.

Ocean West Manufactured Home Park Expansion
Case Numbers CUP-18-034, SP-18-040, NOM-18-012
Assessor Parcel Numbers 510-171-039, -040, and -060

RECOMMENDED COMMISSION ACTION:

1. Describe the application as a public hearing.
2. Allow the staff to present the project.
3. Open the public hearing and receive testimony,
4. Consider the Comments to the IS/MND (SCH #2020029032),
5. Close the public hearing and adopt the Resolution to:

1) Find that there is no substantial evidence that the project will have a significant impact on the environment and adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program and substituted mitigation measure pursuant to Section 15074, 15074.1, and 15097 of the CEQA Guidelines, 2) make all of the required findings for approval of the Ocean West Manufactured Home Park Expansion, and 3) approve the project subject to the recommended conditions.

EXECUTIVE SUMMARY:

Expansion: The applicant is proposing a 5.06-acre expansion of Ocean West Manufactured Home Park. Specifically, the project proposal is to expand at the western boundary (4.50-acres) and eastern boundary (0.56-acre) of the existing mobile home park. The western expansion proposes twenty-two (22) new home spaces and the eastern expansion proposes three (3) new home spaces. The total number of spaces within the park would increase from 130 to 155.

History: In 1976 a mobile home sales lot on the 4.5-acre expansion area was approved under Conditional Use Permit CUP-34-76. In 1977, Phase I of Ocean West was proposed on the north side of Widow White Creek and approved in 1978 under Conditional Use Permit CUP-37-77. In 1980 Phase II of Ocean West (located on the south side of Widow White Creek) was applied for and approved under Conditional Use Permit CUP-68-80.

Notice of Merger: The expansion involves the merger of two vacant parcels, a 4.5-acre parcel (APN 510-171-039) and a 0.56-acre parcel (APN 510-171-060) with the existing 25.32-acre (APN 510-171-040) Ocean West parcel.

Eastern Expansion Area:

Baseline Conditions: The eastern expansion area is a 0.56-acre vacant parcel, located at the northeast corner of the existing park. McKinleyville Ave is abutting the parcel to the east, a Dollar General is located to the north, and the existing park is on the west and south sides of the parcel. It is comprised of grassland. This parcel is also zoned Neighborhood Commercial (C-1), Airport Safety Review (AP), and Noise Impact (N). It is not in the Streamside Management Areas and Wetlands (WR) zone.

Proposed Development: The applicant is proposing to build three (3) new manufactured home pads within the eastern expansion area, with three off-street parking spaces per home. The existing street will be extended for the three new homes, and will be a dead-end road.

Western Expansion Area:

Baseline Conditions: The western expansion parcel is 4.5 acres, currently vacant, and comprised of trees and grassland. Highway 101 Northbound and the Murray Road off-ramp bounds the parcel to the west, and Murray Road is to the north. The existing Ocean West Park is located on the south and east sides of the parcel.

The parcel is zoned Neighborhood Commercial (C-1), which comprises uses that provide convenient sales and service facilities to residential neighborhoods. It is also zoned Airport Safety Review (AP). It is zoned Noise Impact (N) due to its proximity to US Highway 101, Murray Road, and McKinleyville Avenue. It is also zoned Streamside Management Areas and Wetlands (WR) due to the location of Widow White Creek within the northeast portion of the parcel.

The western expansion area is situated at a 97-foot elevation above mean sea level in the Widow White Creek drainage system. Adjacent zoning and land uses include Residential Multiple Family (R-3), Neighborhood Commercial (C-1), and Single Family Residential (R-1).

Wetland and Habitat Protection Policies

The east side of the western expansion parcel contains the Streamside Management Area (SMA) of Widow White Creek, a class 1 perennial stream that flows into Norton Creek which flows into the Mad River near its confluence with the Pacific Ocean. Widow White Creek has been impacted by surrounding development and the natural conditions along the stream course have been completely altered or eliminated. Historically, Widow White Creek has been habitat to the Federally Threatened Coast Cutthroat Trout but due to impacts of surrounding development, their presence in Widow White Creek has not been documented within the last 40 years (CNDDDB).

The McKinleyville Community Plan defines the setback from a perennial stream within the Urban Development Area as 50 feet from the stream transition line on either side of the creek. The McKinleyville Community Plan defines the Stream Transition Line as that line closest to a stream where riparian vegetation is permanently established. The 50-foot setback is referred to as the "buffer" throughout this report. The Streamside Management Area is defined as the area up to the edge of riparian dripline on either side of the creek. The SMA of Widow White Creek within the expansion area covers a total of approximately 1 acre of riparian vegetation. The SMA is dominated by non-native planted trees and shrubs, non-native herbaceous species with low cover reflecting past disturbance and shaded conditions. The west side of the creek has approximately 4,228 square feet of one (1) and three (3) parameter wetland located within the SMA. The wetland and riparian habitat on the west side of the creek has been degraded due to the adjacent development of Ocean West and the installation of landscaping that stretches to the stream transition line.

Proposed Development: The applicant is proposing to build twenty-two (22) new manufactured home pads within the western expansion area, with three off-street parking spaces per home. To connect this expansion area to the rest of the park, and for the expansion area to have access to the entrance/exit onto Murray Road, the applicant is proposing to extend an existing road. The road would result in approximately 209 sq ft of a one-parameter wetland being filled and 4,261 square feet of encroachment into the Streamside Management Area (SMA). This is discussed further below.

Road Proposed within Streamside Management Area and Wetlands

The applicant requests approval to develop the access road and part of the recreation trail within the Streamside Management Area buffer zone, filling approximately 209 square feet of one-parameter wetland area and converting approximately 4,261 square feet of Streamside Management Area. The County may grant approval to this request if it determines, based on factual findings that *it will not result in a significant adverse impact to fish, wildlife, riparian habitat, or soil stability*". The MCCP (titled *Wetland Areas*, section 14 on pg. 49) allows for development within wetlands for parcels created before the MCCP was adopted by the Board of Supervisors in 2002. This particular parcel was created in the early 1980's. This section of the MCCP also requires that the applicant conduct an alternatives analysis to report on what the least environmentally damaging alternative would be. The applicant provided an analysis of three (3) alternatives (Attachment 2):

- Alternative 1: Road alignment encroaching further into the delineated wetland and SMA
- Alternative 2: Road alignment shifted away from Widow White Creek and closer to an existing home (#64)
- Alternative 3: Bridge over Widow White Creek extending Seawood Cove Drive to the western expansion area

Alternative 1 would result in approximately 332 square feet of impacts to one-parameter wetlands, 3,000 square feet of wetland buffer, and 3,231 square feet of the SMA. The channel itself would not be impacted by this alignment.

Alternative 2 would result in approximately 82 square feet of impacts to one-parameter wetlands, 2,700 square feet of wetland buffer, and 3,049 square feet of the SMA. The channel itself would not be impacted by this alignment.

Alternative 3 would not require fill of wetland, but would impact more SMA overall compared with the other two alternatives due to the need of armoring the active channel of the Creek with riprap or other hard surface to prevent erosion and destabilization of the bridge. It would require alteration of the active stream channel of Widow White Creek, cut and fill to create a suitable grade, and large footings for bridge abutments. It would impact 2,962 square feet of wetland buffer, 3,802 square feet of SMA, and 351 square feet to the Widow White Creek channel.

Overall, alternative 2 was found to have the least relative impact, therefore this alternative was chosen for the proposed road alignment. After revising the plans to allow for more recreational space to meet the requirements of 1,500 square feet of recreational space per acre for manufactured home park expansions, the applicant revised the Riparian and Wetland Mitigation Plan in May 2021. Adding the additional trail to the plan resulted in 127 square feet of additional filled wetland, 1,270 square feet of additional construction within the wetland buffer, and 1,212 square feet of impacted SMA over what Alternative 2 details above.

The majority of the 4,261 square feet of Streamside Management Area proposed for conversion is degraded habitat due to incremental development over the years including a manicured lawn, non-native planted landscaping trees and other landscaping features such as a gravel path and small foot bridge. The applicant proposes to mitigate for the loss of 209 square feet of one-parameter wetland and 4,261 square feet of Streamside Management Area by restoring 630 square feet of three-parameter wetland and 18,750 square feet of riparian habitat which will include removal of all non-native species and replacement with native species. In addition to restoration of the Streamside Management Area, the applicant proposes a split rail fence to cordon off this delicate area from foot traffic. A bench will be placed just outside the newly restored area for viewing and observation by park residents.

Proposed Changes to the Entirety of the Ocean West Park Site:

Design Review/Control

The existing parcel (-040) has a Design Control (D) Combining Zone, and the project is consistent with the Design Control standards (314-19.1). The height, bulk, and area of buildings within the expansion area are to be consistent with the existing buildings. All setbacks from property lines of the expansion should be consistent with the existing setbacks. The external colors, textures, and materials of the proposed homes within the expansion area should be consistent with the existing homes, as well as the type, pitch, and material of roofs. The type, size, and location of signs should be consistent with the existing signs in the park. Some of the landscaping in the existing park will be altered for the Proposed Mitigation Measures, Monitoring, and Reporting Program. The required consistency between the design of the existing park and the design of the expansion areas are included in condition of approval #12.

Circulation: There is one driveway, 50 feet wide for ingress and egress to the existing Ocean West parcel off of the public right of way, Murray Road. A proposed emergency vehicle access point is located on Murray Road approximately 100 feet from the end of the offramp from Highway 101 onto Murray Road. A second ingress/egress for emergency access is located off of McKinleyville Avenue at the southeastern corner of the existing park (-040). The proposed emergency exits on both Murray Road and McKinleyville Ave will be ADA compliant, included in the conditions of approval. The eastern expansion requires the extension of an existing park road (Blue Water Cove), which will be 32 feet wide. Within the proposed expansion areas, the roads are 32 feet from curb to curb for all proposed streets, except for the portion of the road extension through the Streamside Management Area (SMA), which will be 24 feet wide. The western expansion does not have access via Murray Road, and requires that a new roadway is constructed for ingress/egress off the Ocean West Drive. This 24 foot (24') wide road is proposed to be placed within the protective riparian and wetland buffer of Widow White Creek. In addition, construction of the road and the proposed recreation trail at this location would require the filling of approximately 209 square feet of wetland habitat.

Recreation Area

Zoning Ordinance Section 314-107.1.2 (Ord. 1086, Sec. 19, 7/13/76) requires a “minimum recreation area of 1,500 net square feet per acre of manufactured home park that shall be provided and improved in conjunction with the development”. This means that the thirty (30.38) acre mobile home park would require a total of 45,570 square feet of recreation space. The previously approved Conditional Use Permit (CUP-37-77) required that a recreation building or clubhouse be constructed as part of the community. The tables below itemize each recreation feature currently existing that will be kept, and proposed features in the community. These numbers are from the Ocean West Expansion Landscape and Site Amenities Master Plan (within the Revised Ocean West Expansion Site Plans), dated August 2021.

List of existing recreational spaces that will be kept:

5,223 sq. ft	Existing trail
1,198 sq. ft	Existing overlooks and benches
6,150 sq. ft	Existing clubhouse
12,571 sq. ft	Total Existing Recreational Space

List of proposed recreational spaces:

4,889.2 sq. ft	Completion of loop trail
2,452.4 sq. ft	New Creek Trail and Overlooks
2,561.1 sq. ft	Cypress trail
7,782.8 sq. ft	Trailside Buffer Plantings
97.6 sq. ft	Pine Avenue Overlook
4,953.3 sq. ft	Dog park
922.2 sq. ft	Dog park LID plantings
4,917.3 sq. ft	Community Garden and Orchard
1,222.9 sq. ft	Park Walkway
2,959.7 sq. ft	Picnic Areas
32,758.5 sq. ft	Total Proposed Recreational Space
45,329.5 sq. ft	Total existing and proposed recreational space

Parking

Section 314-107.1.5 of the zoning ordinance requires two (2) spaces per homesite and one (1) guest parking space for every two (2) home sites, accomplished through parking bays containing at least four (4) parking spaces per bay. Such bays shall be located no more than 200 feet (200') apart. Curbside parking is also allowed provided the streets meet the minimum width of either 32 or 40 feet. Streets within the expansion areas are proposed to be 32 feet, except in the street connecting to Ocean West Drive, part of which is within the Streamside Management Area, which will be 24 feet wide. 32 feet street width can accommodate one side of curbside parking. No

parking signs will be installed on the new proposed connection street and other streets less than 32 feet wide. 24 feet street width does not accommodate curbside parking. The streets in the previously approved portion of the park are approximately 32 feet in width allowing for curb parking on one side of the street. The applicant proposes to meet the guest parking requirement by adding an extra parking space on each home site space for a total of three (3) spaces on each homesite. The total count of guest parking spaces would be 25 on home sites, which exceeds the minimum number required, but these spaces are not accessible as parking on demand within parking bays. There are also 3 additional proposed curbside parking spaces on the eastern expansion, and 11 additional proposed curbside parking spaces on the western expansion.

Noise

Both parcels proposed for expansion are subject to MCCP section 3240 Noise, and the Noise Impact (N) combining zone for the purpose of addressing the potential effects of noise on public health, safety, and welfare. The primary and permanent sources of noise to the project area will come from US Highway 101, Murray Road, and McKinleyville Avenue. On the western boundary of the project area, the parcel begins approximately 25 feet from Murray Road offramp and approximately 57 feet from the nearest travel lane of Highway 101 North. At approximately 106 feet from the centerline on Highway 101 at Postmile 94.2 (which is approximately 2.4 miles north of the project location), the outdoor Community Noise Equivalent Level (CNEL) is 69.6 dBA. The standard for Acceptable CNEL and Day-Night Level (Ldn) is 55 dBA for outdoor noise and 45 dBA for indoor noise level within a residential area. To achieve acceptable levels of indoor and outdoor CNEL in both expansion areas, 6' feet perimeter fencing has been constructed along the western perimeter of the entire manufactured home park. An acoustic analysis study was completed by Veneklasen Associates in May 2021 after construction of the fence. The study demonstrates outdoor noise levels do not exceed CNEL of 61 dBA within the park. With the filling of the air gaps between the planks and between the bottom of the fence and the ground, the fence should attenuate noise to at or below CNEL 60 dBA. Typical construction attenuates noise by 15 dBA, therefore indoor noise levels should be below CNEL 45 dBA throughout the park.

The project area is approximately 1 mile from the California Redwood Coast – Humboldt County Airport and located within compatibility Zone D. Noise impacts associated with the airport are not anticipated to be excessive, however, **condition of approval #5** will require the property owner to disclose to all prospective park tenants that there is potential for some overflight noise. Noises generated by the proposed project will result in a temporary increase during construction because the proposed project may require the use of heavy equipment (excavator, grader, loader and backhoe). The construction does not include equipment that would result in ground borne vibration.

Drainage/Low Impact Development (LID): Because both expansion areas would result in more than 5,000 square feet of impervious surface, it is required to comply with the County's Stormwater Permit (also called the MS4 program). A preliminary drainage report was prepared by Omsberg and Preston and reviewed by Department of Public Works Land Use Division and North Coast Regional Water Quality Control Board. Condition of approval #7 requires that the applicant submit a complete stormwater management plan for approval. In addition, the project will comply with Section 3310.5 of the McKinleyville Community Plan which states: "Development shall only be allowed in such a manner that the downstream peak flows will not be increased." This means that the project shall be designed to retain and filter stormwater before it is slowly released into Widow White Creek. In order to be in compliance with the MS4 program and the McKinleyville Community Plan, the applicant has proposed Low Impact Development techniques and the project will be required to be modified as necessary in order to ensure compliance. The project is proposed to have bioretention basins for stormwater catchment and filtration. The County is required to ensure the development is compliant with the State Water Quality Control Board MS4 Storm Water Program. Prior to the issuance of a grading permit, the applicant is required to submit a Stormwater Management Plan to the Department for approval. The Stormwater Management Plan will be

evaluated for the adequacy of Low Impact Development techniques and the types and quality of controls used for the purification of stormwater runoff and to limit downstream peak flow in Widow White Creek.

General Plan and McKinleyville Community Plan

The site is within a developed part of McKinleyville. Land use designations on adjacent and nearby properties include a combination of low density and medium density residential along with some neighborhood commercial. The proposed expansion road within the 100-year flood zone will be graded roughly two feet above the calculated 100-year base flood elevation. Emergency access is proposed near the Highway 101 offramp on Murray Road. A Cultural Resources Survey was completed in 2021 which demonstrated that no cultural resources would be impacted by the proposed project and the County engaged with local tribes to ensure. A six-foot (6') wooden fence was built to reduce noise from Highway 101 to acceptable levels inside and outside of homes within the park.

The project is consistent with the Humboldt County General Plan, the McKinleyville Community Plan, and the Humboldt County Zoning Ordinance. The project proposes infill development and use of the property as a manufactured home park, which is conditionally permitted in the Neighborhood Commercial (C-1) zone with the approval of the Conditional Use Permit and the applicant has submitted evidence identifying that the findings for approving the Conditional use Permit, Special Permit and Notice of Merger can be made.

Public Comments

Public comments were received, reviewed, and addressed. All public comments are addressed in this staff report and in the revised site plan, which has a reduction of proposed new homes from 30 in the original proposal and MND, to 25 proposed new homes. Most, if not all, public comments received were from current residents of Ocean West.

There was a public meeting held at the McKinleyville High School Gymnasium on Thursday, March 12th, 2020 at 6pm to provide attendees an overview of the project, describe the permit process to date, gather public input and answer questions, and review the next steps in the decision-making process.

There was a second public meeting held virtually on Zoom on Wednesday, August 18, 2021, at 5:30pm to provide the public an overview of the new site plans and gather public comments and questions.

The comments received via email and verbally during both community meetings were compiled and are summarized below.

- Tree removal was a common concern for residents. Residents said that the trees to be removed, specifically those on the southern portion of the western expansion (-039) are of concern due to their use for carbon sequestration, wind breaks, aesthetic value, and habitat for birds. These trees will not be removed and will be kept so they can continue to provide these services for residents. There will be 27 trees to be removed for the proposed access road and recreation path. 24 trees will be removed for restoration of riparian habitat alongside Widow White Creek. The tree removal report lists the types of trees and condition/health of each tree proposed for removal. 51 trees in total are proposed to be removed for the project. Both the Riparian and Wetland Mitigation Plan, prepared by SHN, and the Mitigation Measures, Monitoring, and Reporting Plan detail the tree re-planting plan. 185 trees will be planted to reforest the mitigation area following tree removal.
- Multiple residents expressed their support of more affordable housing in Humboldt County, especially for seniors.

- Concerns for lack of adequate recreation space were raised however these are addressed through the recreation space plan. Currently, there is approximately 12,571 square feet of recreational space in the park. Multiple segments of trails, a dog park, picnic and orchard area, and a community garden are proposed in the Landscape and Site Amenities Master Plan for a combined total of 45,330 square feet of recreation space throughout the park.
- Concerns about emergency access were raised by community members. Residents expressed concerns about the lack of ADA-compliant access (existing stairs) and locked gates at both existing emergency exits. The emergency exit located on the northwestern side of the western expansion on Murray Road will be ADA-compliant for pedestrian access, with a Knox box for emergency personnel to provide emergency vehicle access. The emergency exit at the southeastern corner of the existing park onto McKinleyville Ave will be maintained, ADA compliant for pedestrian access, and have a Knox box for emergency vehicle access. These are addressed in the site plan and conditions of approval.
- Concerns were raised about the proposed access road to the western expansion being located in the 100-year FEMA flood zone. These concerns have been addressed through the site plan and preliminary drainage report. The road will be graded to be 2 feet above the calculated 100-year base flood elevation. This fill will not impact the base flood elevation, nor will it impact any adjacent improvements.
- Concerns about drainage issues of the newest two homes (#118 and #122) were raised however these issues have been corrected on-site.
- Residents wanted to know if there is an alternative access point to avoid the access road going through the SMA. Some residents expressed that a bridge would be less impactful over the long term than the proposed road alignment. An alternative analysis was conducted by SHN, in which the proposed road alignment was found to be the less impactful option- less impactful than a bridge. The access road is necessary due to the potential access point from the western expansion point on Murray Road not being feasible to be used as a regular entrance/exit due to its proximity to the on and offramp of Highway 101.
- Residents asked if the applicant could buy out lot #64 to build the road through this area, which would avoid impacts to the SMA. The applicant has stated that they generally try to not relocate residents.
- Residents expressed concern about the existing entrance/exit in the park on Murray Road. They said there are safety issues at this point, and that this is the only entrance/exit of the park. The park is only required to have one entrance/exit by County zoning ordinance, and the applicant has stated that they generally only have one entrance/exit point in their parks to reduce through traffic throughout the park, for a quieter experience within the park. Additionally, the County Public Works Department encourages less openings onto arterial roads and any new openings in the western expansion area would present a hazard condition due to the proximity to the Highway 101 off-ramp.
- Residents expressed concerns over the rents for the expansion areas. The current homes are rent controlled through County Measure V. The new homes will initially not be subject to Measure V.

- Concerns about too many homes and density were raised and resulted in the applicant revising the original site plan and reducing the proposed number of new homes from 30 to 25.
- Residents expressed concerns during the March 2020 community meeting that the permit process seemed rushed with the meeting occurring during the IS/MND circulation public comment period. The applicant has revised the plans since that meeting, and a second community meeting was held to introduce residents to the new, updated plans and receive their comments about them. The applicant submitted the original application in July 2018.
- Concerns about lack of street signs. These concerns are addressed through condition of approval #19. Residents have said that lack of street signs throughout the park make navigating the park confusing for guests and emergency personnel. The applicant will install street signs on each internal street corner.
- Concerns about narrow streets and lack of guest parking. Residents have expressed concerns about lack of guest parking for care givers who are frequent visitors of the park due to the residents being 55 years old and over. There is currently a gravel parking lot that provides parking for guests and overflow parking for residents in the location of the proposed dog park and orchard area. Seven parking spots are proposed for this recreation space that can be utilized for guests or residents. Each new proposed home will have three parking spaces in their driveway (two for residents and one for guest). The western expansion will have eleven (11) curbside parking spots for guests, and the eastern expansion will have three (3) curbside parking spots for guests. All streets within the western and eastern expansion areas will be 32' wide from curb to curb, except for the proposed access road that will be built within the Streamside Management Area which will be 24' wide. Curbside parking on one side of the street is permitted for streets 32' wide. The original site plan had 24' streets for all expansion areas, therefore the new site plan addresses these concerns for parking and street width. The site plan also shows 82 curbside parking spaces in the existing park, where streets are 32' wide.
- Concerns about the new parking plan blocking mailboxes. These concerns are addressed through the condition of approval #21 requiring either the installation of neighborhood box units instead of individual mailboxes, or postal workers would need to deliver primarily by foot throughout the park instead of driving between each individual mailbox. Both methods are common in other neighborhoods.
- Concerns about wildlife within the Streamside Management Area were raised and are addressed in the Riparian and Wetland Mitigation Plan, and the Proposed Mitigation Measures, Monitoring, and Reporting Program which are included in the conditions of approval. Residents said they have seen raptors, fox, great blue herons, and cutthroat trout in the park and Widow White Creek. As required in the Mitigation Measures and the Monitoring Program, brush clearing and tree removal will not be within the bird breeding season unless the applicant preemptively consults with CDFW to assess the potential for take of active bird nests. There are no listed mammal species with moderate or high potential to occur within the project area. Historically, Widow White Creek has been habitat to the state-identified sensitive and vulnerable Coastal Cutthroat Trout but due to impacts of surrounding development, their presence in Widow White Creek has not been documented within the last 40 years (CNDDDB). The potential of occurrence is low however to protect fish in Widow White Creek, erosion control measures are included as condition of approval #28. The restoration plan includes restoring the SMA of the creek by removing some unhealthy and non-native trees and re-planting native trees.

- Concerns of the eastern expansion were expressed, specifically the loss of open space, grade differences, proximity to existing homes, and drainage. The recreation plan addresses the loss of open space with more trails, a garden, and other amenities. Open space is not a requirement for manufactured home parks. The drainage and grade differences will be considered in construction and grading plans.
- Concerns about existing utilities were expressed. Residents said that the infrastructure is inadequate to serve more homes, and that the PG&E transformer needs to be replaced due to occasional park-wide power outages. The proposed homes will be served by community water and sewer provided by the McKinleyville Community Services District, which has recommended conditional approval of the project. The District requires approval of water and sewer mainline design and inspection during installation. The new homes will be connected to PG&E separately from the existing homes. The proposed homes will not impact the existing utilities or public services to existing homes and residents.
- Concern has been raised over the potential inadequacy of the wooden fence along the western property boundary to sufficiently provide sound mitigation from Highway 101. The applicant submitted a 24-hour noise study prepared by an acoustical engineer demonstrating that the wooden fence mitigated noise at or below the level considered acceptable in the county's general plan (60 db CNEL). The study showed that the fence mitigated noise to an acceptable level within a residential zone provided that gaps in and under the fence were filled. Staff verified that these gaps were closed.
- Residents expressed concern about runoff of pollutants from the proposed access road into Widow White Creek. Because both expansion areas would result in more than 5,000 square feet of impervious surface, it is required to comply with the County's Stormwater Permit (also called the MS4 program). The applicant is required to submit a Stormwater Management Plan which will be evaluated for the adequacy of Low Impact Development techniques and the types and quality of controls used for the purification of stormwater runoff and to limit downstream peak flow in Widow White Creek. Residents expressed concern about the pervious pavement, the need for maintenance of the pervious pavement, and questioned who will be responsible for ensuring that the park complies with a regular maintenance schedule of maintaining the pavement. NCRWQCB also expressed concern about this issue- commenting that pervious asphalt has very high failure rates due to lack of or poor maintenance, and that the park needs to show that they have the ability and the funding to maintain the pervious asphalt long-term. The applicant has submitted a maintenance plan for the pavement. **Condition of approval #10** states that the applicant shall follow the provided maintenance plan for all pervious pavement, and if the pavement becomes clogged and ineffective, the applicant shall replace it.
- Residents expressed concern about ground water monitoring, drainage, and the infiltration rate. These concerns are addressed through the Preliminary Stormwater Control Plan. Bioretention basins are proposed in order to comply with MS4 permit requirements. The infiltration rate and drainage are discussed in further detail below.
- Residents expressed concern of proposed trails in the setback area of Widow White Creek. These concerns have been addressed through the mitigation monitoring plan, specifically erosion control measures. Erosion control measures contained in the Sensitive and Critical Habitat Standards of the General Plan (Chapter 10 Standard BR-S9- Erosion Control) will be followed and are included in the conditions of approval. To reduce the impact to the SMA from the existing and proposed trails, condition of approval #29 is included which requires the applicant to have marked trails with short fencing to clearly demarcate trails. Signs will be posted to stay on the trail to reduce impacts to native plants.

- There was concern over the impact to the privacy of residents located along the proposed trail, and for this reason the applicant is proposing to keep the fencing in its current locations.
- Residents wanted to ensure that the existing greenbelts were kept, and with the exception of the road connection to the eastern lots, the greenbelts are remaining.
- Residents expressed concern over the removal of the existing gazebo. The gazebo will be removed, but various other recreational areas will be added and improved. Sitting areas include 7 existing benches throughout the trail areas, and 4 proposed benches and 3 picnic areas with benches/tables.
- Residents want the culture, aesthetics and neighborhood feeling of the Park to be maintained and believe the new additions should be designed to blend into the existing environment rather than looking like a last minute add-on to an existing and well-established Park. The existing park is in the Design Control zone, meaning the new homes should be consistent with the height, bulk, and area of buildings within the existing park.

PUBLIC AGENCY REFERRAL: The project was referred to relevant public agencies in late 2018 and early 2019, and any comments were considered in preparation of the IS. The IS/MND was circulated to relevant public agencies in February and March 2020. The project was re-referred with changes in proposed plans to relevant agencies in mid-2021.

The North Coast Regional Water Quality Control Board (NCRWQCB) sent comments which are addressed with a revised Preliminary Stormwater Control Plan by Omsberg & Preston dated September 2021. To obtain a 401 Water Quality Certification and a Stormwater Permit, the Stormwater Control Plan must meet the treatment standards of the LID Design Standards of Stormwater Provisions. The original proposal was for infiltration basins, but the applicant revised the proposal to meet treatment standards by having bioretention basins instead. The proposed 2:1 slopes were revised to address comments that the basins were too steep, and are now proposed as 3:1 slopes. The NCRWQCB suggested fencing around the basins for public safety reasons, and while this was not addressed in the Preliminary Stormwater Control Plan, it is included in the conditions of approval. The design of the bioretention basins should reduce drawdown time to reduce standing water and therefore reduce vectors being drawn to the basins in order to be compliant with local Vector Control District requirements, which is included in the conditions of approval. Comments regarding potential erosion to the basin and Widow White Creek from potential for large storms surpassing the 100-year storm are addressed in the Preliminary Stormwater Control Plan. All bioretention basins will be designed to have an additional 0.5 feet of freeboard to any critical features and given the depth of seasonal groundwater and well infiltrating soils, it is unlikely the basins will overflow during storm events exceeding the 100-year event. To address comments of potentially high groundwater, the Preliminary Stormwater Control Plan includes groundwater tests through four monitoring wells (one on the eastern expansion site and three on the western site) installed from 10.1 feet below ground surface to 8.7 feet below ground surface. These four wells were measured on February 12, March 18, and March 26, 2020, and all tests on all wells were dry and no water was detected. These tests address comments of potentially high groundwater. The NCRWQCB commented that pervious asphalt needs to be well maintained to ensure that it does not clog and become ineffective in infiltrating stormwater. The applicant has provided a maintenance checklist and schedule that will be followed, as conditioned in the conditions of approval. If pervious pavement becomes clogged, replacement of the clogged pavement is necessary. Sediment should not be deposited onto the pavement. Regular maintenance of pervious pavement is included in the conditions of approval. This is included in the 401 water quality certification process by Regional Water Board staff. NCRWQCB commented that construction impacts to the water quality of Widow White Creek is possible due

to the proximity of the creek to the proposed road. The applicant must identify measures to avoid and minimize potential construction-stage impacts to the creek by reducing the temporary disturbance envelope as much as possible to minimize intrusion into the riparian area, and stage construction so that construction of this road will only occur during dry season. These measures are outlined in the conditions of approval. Prior to the issuance of a grading permit, the applicant shall submit 2 copies of a storm water control plan demonstrating compliance with the County's Storm Water Permit for post-construction storm water runoff.

CDFW commented that by proposing off-channel riparian revegetation and invasive removal, the project would not need an LSAA (Lake and Streambed Alteration Agreement). Because the habitat is not connected to the stream, it would not require an LSAA. The original Riparian and Wetland Mitigation Plan, dated February 2019, proposed "Large Woody Debris (LWD) consisting of a log, approximately 15 feet long, will be placed at the downstream entrance of the channel, so as to minimize bank erosion and to promote water movement into the channel to prevent sedimentation." However, after receiving CDFW comments on in-stream alteration or work needing an LSAA, the Report was revised in February 2020 to only perform off-channel alterations and mitigations.

Public Works sent a referral letter, which is attached. All recommendations are included in the conditions of approval, including the need for ADA compliant emergency exits and sidewalk.

The Arcata Fire Protection District commented that a separate access for emergency vehicles onto McKinleyville Avenue should be maintained at the southeastern corner of the existing parcel (-040). Vegetation clearing, pavement connecting the end of the internal road and McKinleyville Ave, a knox box, and ADA compliance of this emergency exit are included in the conditions of approval.

CEQA

This project is subject to the California Environmental Quality Act (CEQA) and an Initial Study (IS) was prepared. There is no substantial evidence that the project as revised will have a significant effect on the environment, and therefore an Initial Study and Mitigated Negative Declaration (IS/MND) was prepared and circulated for public review (SCH #2020029032) from February 17 to March 17, 2020. All mitigation measures are identified in the Mitigation Monitoring and Reporting Program attached as Attachment 1B to this staff report. After consideration of public and agency comments received on the IS/MND, staff finds that there is no substantial evidence that the project would have any significant adverse impacts on the environment.

After the project's design was slightly revised, the applicant submitted a revised Riparian and Wetland Mitigation Plan- Revision 2, in May 2021. The Mitigation Monitoring and Reporting Program (Attachment 1B) was revised to reflect the updated mitigation measure. This is consistent with Section 15074.1 of the CEQA Guidelines because the mitigation measure that is being replaced is being replaced with a mitigation measure that will be equal or more effective. The substituted mitigation measure will mitigate for the loss of 209 square feet of one-parameter wetland and 4,261 square feet of Streamside Management Area by restoring 630 square feet of three-parameter wetland and 18,750 square feet of riparian habitat which will include removal of all non-native species and replacement with native species. The original mitigation measure that is being substituted required 350 square feet of wetland habitat and 15,000 square feet of riparian habitat to be restored and enhanced in order to compensate for 82 square feet of wetland and 3,006 of wetland buffer being disturbed from the project. While the revision in the project results in some additional wetland and wetland buffer disturbance the additional area that would be required to be enhanced and restored by this substituted mitigation measure is a larger area and the result will be more high-quality wetland and riparian habitat than under the original mitigation measure.

Prior to deleting the original mitigation measure and substituting it, the County is: 1) holding a public hearing on the matter and 2) adopting a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

Invitation for AB 52 consultation was initiated in July 2021 and completed in October 2021, and no tribes responded requesting consultation.

STAFF RECOMMENDATION: Based upon the on-site inspection, a review of Planning Division reference sources, comments from all involved referral agencies, public comments, and conditions of approval, Planning staff finds that the project will not result in a significant impact on the environment if mitigation measures are incorporated and conditions of approval are met. The applicant has submitted evidence in support of making all of the required findings for approval. Staff recommends conditional approval of the project.

ALTERNATIVES: The Planning Commission could elect not to approve the project, or to require the applicant to submit further evidence, or modify the project. Modifications may cause potentially significant impacts, additional CEQA analysis and findings may be required. These alternatives could be implemented if the Commission is unable to make all of the required findings.

Staff prepared an environmental analysis which included the preparation of an IS/MND pursuant to the CEQA Statute (Public Resources Code 21000–21189) and Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387). The Commission could also decide the project may have environmental impacts that would require further environmental review pursuant to CEQA. Staff did not identify any potentially significant unmitigable impacts.

**RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT
Resolution Number 21-
Case Numbers CUP-18-034, SP-18-040, NOM-18-012
Assessor Parcel Numbers 510-171-039, -040, and -060**

Resolution by the Planning Commission of the County of Humboldt certifying compliance with the California Environmental Quality Act and conditionally approving the and conditionally approves the Ocean West Expansion Conditional Use Permit, Special Permit and Notice of Merger.

WHEREAS, Ocean West submitted an application and evidence in support of approving a Conditional Use Permit, Special Permit, Notice of Merger to allow for the expansion, development and operation of the Ocean West Manufactured Home Park Expansion; and

WHEREAS, the Planning Division, the lead agency, prepared an Initial Study/Mitigated Negative Declaration for the subject proposal in accordance with the California Environmental Quality Act (CEQA). The public comment period was from February 17 to March 17, 2020; and

WHEREAS, the agent Omsberg and Preston submitted an application and evidence in support of approving a Special Permit for conversion of 4,261 square feet of Streamside Management Area and 209 square feet of filled one-parameter wetland area for an access road and recreational trail into the 4.5 acre portion of the expansion; and

WHEREAS, the agent submitted an application and evidence in support of a Conditional Use Permit for the operation of a mobile home park in a Commercial Neighborhood Zone; and

WHEREAS, the agent Omsberg and Preston submitted an application and evidence in support of approving a Notice of Merger to merge parcels 510-171-040, 510-171-039, and 510-171-060; and

WHEREAS, Attachment 2 in the Planning Division staff report includes evidence in support of making all of the required findings for approving the proposed Conditional Use Permit, Special Permit, and Merger (Case Numbers: CUP-18-034, SP-18-040, NOM-18-012); and

WHEREAS, the Humboldt County Planning Commission held a duly noticed public hearing on **December 16, 2021**; reviewed, considered, and discussed the application for a Conditional Use Permit, Special Permit, and Merger; and reviewed and considered all evidence and testimony presented at the hearing.

Now, THEREFORE BE IT RESOLVED, that the Planning Commission makes all the following findings:

- 1. FINDING:** **Project Description:** The application is for a Conditional Use Permit (CUP), Special Permit, and Notice of Merger to allow for the expansion of Ocean West manufactured home park. The Lot Merger portion of the proposed project consists of the merging of two vacant 4.5 acre and 0.57-acre parcels into the 25.33 acre developed manufactured home park for a total of 30.4 acres. The merger would allow for the expansion of 25 spaces for a total of 155 units. The Conditional Use Permit is required to operate a manufactured home park in the C-1 Neighborhood Commercial zoning district. There is a previously approved Conditional Use Permit (CUP-37-77) for the existing 25.33-acre portion of Ocean West. The Special Permit is required for the development of an internal road (extension of Ocean West Drive) within the Streamside Management Area (SMA) protective buffer of Widow White Creek,

resulting in temporary and permanent impacts to the riparian habitat and associated wetlands. The implementation of a Mitigation and Monitoring Plan will involve 630 square feet of three-parameter wetland restoration (equivalent to 3:1 mitigation), and 18,750 sq. ft. of riparian habitat restoration. Any adverse impacts to, or loss of, natural or constructed wetlands and their beneficial uses due to development and construction activities must be fully mitigated and permitted by the Regional Water Board.

EVIDENCE:

- a) Project File: PLN-14268-CUP
- b) Ocean West Expansion-CUP Site Plan, including Landscape and Site Amenities Master Plan and Electrical Plans by Omsberg & Preston, Wilding Design Studio, and James W. Rankins, PE, respectively, dated September 2021.
- c) *Initial Study/Mitigated Negative Declaration, including Proposed Mitigation Measures, Monitoring, and Reporting Program* prepared by Humboldt County Planning Division dated February 2020.
- d) *Riparian and Wetland Mitigation Plan - Revision 2: Ocean West Properties* prepared by SHN dated January 2020, and revised May 2021.
- e) *Natural Resources Assessment: Ocean West Properties* prepared by SHN dated June 2018.
- f) *Tree Removal Map and Table* by SHN dated August 2021.
- g) *Tree Removal Plan: Ocean West Expansion* prepared by SHN dated February 2019.
- h) *One-Parameter Wetland and Other Waters Delineation Report APN 510-171-039* prepared by SHN dated January 2019.
- i) *Ocean West Access Road Alternatives Analysis* prepared by SHN dated October 2019.
- j) *Preliminary Stormwater Control Plan for Ocean West Expansion (Job No. 18-2015)* prepared by Omsberg & Preston dated November 2019, and revised December 2020 and September 2021.
- k) *Acoustic Study for Ocean West (Project No. 7670-001)* by Veneklasen Associates dated May 2021.
- l) *Draft Pervious Pavement Maintenance Plan* by Omsberg and Preston dated October 2021.

2. FINDING:

CEQA. The requirements of the California Environmental Quality Act have been met. The Humboldt County Planning Division has prepared an Initial Study/Mitigated Negative Declaration, which was circulated and open for public comment from February 17 to March 17, 2020. All potentially significant impacts are to be lessened to below significant with mitigation measures implemented. Mitigation Measure #10 is substituted for a revised Mitigation Measure #10, consistent with Section 15074.1 of the CEQA Guidelines. The Planning Commission considers the comments on the IS/MND. The Initial Study/Mitigated Negative Declaration (SCH #2020029032) and findings reflect the independent judgment of the County. The substitution mitigation measure is equally effective and does not in itself cause any significant adverse impacts on the environment.

EVIDENCE:

- a) Environmental review for the proposed project included the preparation of an Initial Study/Mitigated Negative Declaration (IS/MND) pursuant to the California Environmental Quality Act (CEQA) Statute (Public Resources Code 21000-21189) and Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387).
- b) The IS/MND was circulated from February 17, 2020, to March 17, 2020 at the State Clearinghouse.
- c) Due to comments received from the North Coast Regional Water Quality Control Board (NCRWQCB) during the circulation period, the applicant submitted a revised Preliminary Stormwater Drainage Report which included the use of bioretention basins instead of the originally proposed biofiltration basins to address NCRWQCB comments. The plan also revised the proposed 2:1 slopes of the basins to address NCRWQCB comments that the basins were too steep, and are now proposed as 3:1 slopes. To address NCRWQCB's comments about concerns of the use of and maintenance of permeable pavement, the applicant provided a permeable pavement maintenance plan. Following the plan is included as a condition of approval.
- d) The Initial Study/Mitigated Negative Declaration (Attachment 3) included 12 mitigation measures which have been incorporated into a Mitigation Monitoring and Reporting Plan, which is included as Attachment 1B, and complying with it is a condition of approval.
- e) Mitigation Measure #10 (MM#10) from the Mitigation Monitoring and Reporting Plan will be deleted and replaced, consistent with Section 15074.1. During circulation of the IS/MND, MM#10 stated: "Post development, implementation the approved Wetland and Riparian Mitigation Plan prepared by SHN dated January 2020. The plan proposes to restore 350 square feet of wetland habitat and 15,000 square feet of riparian woodland. Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period." MM#10 will be updated, therefore deleting it and replacing it with the following: "Post development, implementation of the approved Wetland and Riparian Mitigation Plan- Revision 2 prepared by SHN dated May 2021. The plan proposes to restore 630 square feet of wetland habitat and 18,750 square feet of riparian restoration. Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area is required. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period." The substitution is consistent with Section 15074.1 as follows: The new measure is equivalent or more effective in mitigating potential significant effects, and the mitigation measure itself will not cause any potentially significant effect on the environment. The quantitative amount of wetland restoration is 280 square feet

greater, and the amount of riparian restoration is 3,750 square feet greater, than that of the original MM#10.

- f) The Planning Commission has considered the mitigated negative declaration together with comments received during the public review process. Through reviewing the whole record of the project file (including the Initial Study/Mitigated Negative Declaration and all comments received), the Planning Commission finds that there is no substantial evidence that the project will have a significant effect on the environment and that the Mitigated Negative Declaration reflects the Planning Division's independent judgment and analysis. The Initial Study/Mitigated Negative Declaration (IS/MND) is attached (Attachment 3). Public comments received during the review period are attached. The potentially significant impacts unless mitigations incorporated sections in the MND are in the following categories: biological resources, cultural resources, hydrology and water quality, and mandatory findings of significance. All of these impacts will be mitigated to less than significant through the Proposed Mitigation Measures, Monitoring, and Reporting Program, included in the conditions of approval, as well as other conditions of approval. AB 52 consultation was initiated in July 2021 and formally ended in October 2021.

3. FINDING: ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT- NO MITIGATION REQUIRED. The following impacts have been found to be less than significant and mitigation is not required to reduce project related impacts: aesthetics, agriculture and forestry resources, air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire.

EVIDENCE:

a) There is no evidence of an impact to any of the above reference potential impact areas based on the project as proposed at this proposed location.

b) The Initial Study/Mitigated Negative Declaration was circulated for public review from February 17, 2020, to March 17, 2020.

4. FINDING: ENVIRONMENTAL IMPACTS MITIGATED TO LESS THAN SIGNIFICANT – The Initial Study identified potentially significant impacts to biological resources, cultural resources, hydrology and water quality, and mandatory findings of significance, which could result from the project as it were originally submitted.

EVIDENCE:

a) **Biological Resources:** Potentially significant impacts will be mitigated to a less than significant level with the implementation of the following mitigation measures for biological resources:

i. Post development, implementation of the Wetland and Riparian Mitigation Plan prepared by SHN dated January 2020, and revised in May 2021. The plan proposes to restore 630 sq ft of wetland, and 18,750 sq ft of riparian restoration. Fifty-one trees are proposed for removal and 232 trees will be planted.

Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period.

- ii. A second seasonally appropriate botanical and wildlife survey and impact analysis shall be conducted prior to finalization of project design, issuance of grading permit and approval of development plan. The project design shall be modified first to avoid special status species or second minimize impacts to special status species if avoidance is not possible. Should impacts occur to special status species, the applicant shall develop a mitigation and monitoring plan to be approved by the Department in consultation with CDFW.
- iii. Retaining snags unless felling is required by CAL-OSHA, or by California Department of Forestry forest and fire protection regulations, or for public health and safety reasons, approved by the Planning and Building Director. Felled snags shall be left on the ground if consistent with fire protection regulations and the required treatment of slash or fuels.
- iv. Retain live trees with visible evidence of current or historical use as nesting sites by hawks, owls, eagles, osprey, herons, kites or egrets.
- v. Any brush clearing or tree removal must be conducted outside of the bird breeding season (March 1 – August 15) in order to avoid a "take" as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 et seq.). If any brush or trees must be removed within the breeding season, the Project proponent shall consult with CDFW prior to removal in order to assess the potential for take of active bird nests. The Grading and Development Plan shall include the following language: "Tree removal and vegetation clearing associated with the Project should be conducted outside of the bird breeding season (the nesting season is generally considered to be March 1 – August 15) in order to avoid 'take' as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 et seq.). If work must be conducted during the bird nesting season, a qualified ornithologist (someone who is able to identify Northern California birds, and who has experience in nest-searching for passerines and raptors) should thoroughly survey the area no more than seven days prior to tree/vegetation removal to determine whether active nests (nests containing eggs or nestlings) are present. If active nests are found, appropriate buffers should be developed in consultation with CDFW to avoid take."
- vi. Replanting of disturbed areas with riparian vegetation (including alders, cottonwoods, willows, sitka spruce, etc.) if natural regeneration does not occur within two years of the completion of the development project.
- vii. Performing erosion control measures contained in the Sensitive and Critical Habitat Standards of the General Plan (Chapter 10 Standard BR-S9- Erosion Control).

- viii. Maximum feasible retention of overstory canopy in riparian corridors.
 - ix. Project construction related noise levels shall be minimized so that sound levels are below 50 decibels at 100 feet from the source.
 - x. High visibility construction fencing shall demarcate the boundaries of all Environmentally Sensitive Habitat prohibiting encroachment of construction work and equipment. Grading and development plans shall show the location of this fencing.
- b) **Cultural Resources:** Potentially significant impacts will be mitigated to a less than significant level with the implementation of the following mitigation measures for cultural resources:
- i. AB 52 consultation was completed, a cultural resource study was completed, and all THPOs involved agreed that the below conditions of approval are appropriate.
 - ii. The following note shall be placed on the Grading or Development Plan and carried throughout project implementation: "If suspected archaeological resources are encountered during the project: 1. Stop work within 100 feet of the find; 2. Call a professional archaeologist, the representatives from the Blue Lake Rancheria, Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe, the Calfire project representative (if applicable) and the County Planning and Building Department; 3. The professional historic resource consultant, Tribes and Calfire officials will coordinate and provide an assessment of the find and determine the significance and recommend next steps. "If human remains are encountered: 1. All work shall stop and per CA Health and Safety Code Section 7050.5: 2. Call the Humboldt County Coroner at (707) 445-7242; 3. The Coroner will determine if the remains are of prehistoric/historic Native American origin. If the remains are Native American Heritage Commission within 24 hours. 5. The NAHC is responsible under CA PRC 5097.98. (a) for identifying the most likely descendent (MLD) immediately and providing contact information. The MLD may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The applicant is ultimately responsible for ensuring compliance with this condition.
 - iii. The applicant shall contact THPOs from Blue Lake Rancheria, the Wiyot Tribe, and the Bear River Band of the Rohnerville Rancheria to give them opportunities to salvage native strawberry plants prior to any ground disturbing work, including restoration work.
- c) **Hydrology and Water Quality:** Potentially significant impacts will be mitigated to a less than significant level with the

implementation of the following mitigation measures for hydrology and water quality:

- i. Grading Plans shall show optimization of the site layout in accordance with Stormwater Permit section. E 12.d and E.12.e. Source Control and Low Impact Development (LID) Design Standards pages 51-55 (attachment 2), and Humboldt County Low Impact Development Stormwater Manual Sections 5.0 and 6.0 (attachment 3).
 - ii. The applicant shall submit a stormwater management plan demonstrating compliance with the County's Storm Water Permit for post-construction storm water runoff. This plan should address North Coast Regional Water Quality Control Board's comments that were not addressed in the preliminary plan, specifically it should demonstrate how stormwater from the proposed access road would enter Widow White Creek without causing erosion to Widow White Creek.
 - iii. Applicant shall incorporate Low Impact Design (LID) into the project by complying with County's MS4 (storm water quality) permit requirements set forth in County Code Section 337-1 et seq.
 - iv. Prior to issuance of a grading permit, the applicant must have a 401 Certification from the Regional Water Quality Control Board.
 - v. Permeable pavement must be regularly maintained according to the maintenance schedule included with the applicant's evidence titled Pervious Paving Maintenance Plan. If the pavement is clogged and cannot be repaired, it must be replaced.
 - vi. Construction will be staged so that the road access construction will only occur during the dry season.
- d) **Mandatory Findings of Significance:** Potentially significant impacts will be mitigated to a less than significant level with the implementation of the following mitigation measures for mandatory findings of significance:
- i) The project will not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Nor will it have impacts that are individually limited, but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

FINDING:

Substitute Mitigation Measure #10 is more effective in mitigating potential impacts to wetland and riparian habitat because the amount of wetland restoration is 280 square feet greater, and the amount of riparian restoration is 3,750 square feet greater, than that of the original MM#10. Therefore, it is more effective than the original MM#10 which was included in the IS/MND during circulation. The mitigation measure itself will not cause any potentially significant effect on the environment.

EVIDENCE:

a) After circulation of the IS/MND, the project's design was revised which included the addition of a recreation trail adjacent to the proposed access road within the SMA of Widow White Creek that would result in 127 square feet of additional wetland fill, 1,212 square feet of additional impact to the Streamside Management Area of Widow White Creek, and 1,266 square feet of additional encroachment into the wetland buffer. MM #10 is being substituted to mitigate for the increased impact to wetland, SMA, and wetland buffer. MM #10 will result in an additional 280 square feet of three-parameter wetland restoration, and an additional 3,750 square feet of riparian restoration, than that of the original MM#10.

b) The applicant submitted a revised Riparian and Wetland Mitigation Plan- Revision 2, in May 2021. The Mitigation Monitoring and Reporting Program (Attachment 1B) was revised to reflect the updated mitigation measure. This is consistent with Section 15074.1, because the mitigation measure that is being replaced is being replaced with a mitigation measure that will be equal or more effective pursuant to Section 15074.1.

c) During circulation of the IS/MND, MM#10 stated: "Post development, implementation the approved Wetland and Riparian Mitigation Plan prepared by SHN dated January 2020. The plan proposes to restore 350 square feet of wetland habitat and 15,000 square feet of riparian woodland. Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period."

d) MM#10 will be updated, therefore deleting it and replacing it with the following: "Post development, implementation of the approved Wetland and Riparian Mitigation Plan- Revision 2 prepared by SHN dated May 2021. The plan proposes to restore 630 square feet of wetland habitat and 18,750 square feet of riparian restoration. Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area is required. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period."

5. FINDING:

CEQA Public Comments. There have been many comments from the public on the project and the Mitigated Negative Declaration. These comments have been considered and none of these comments change the conclusions of the Mitigated Negative Declaration. The following comments have been grouped together by category:

EVIDENCE:

a) Tree removal was a common concern for residents. Residents said that the trees to be removed, specifically those on the southern portion of the western expansion (-039) are of concern due to their use for carbon sequestration, wind breaks, aesthetic value, and habitat for birds. These trees on the southern edge of the western expansion

parcel will not be removed and will be kept so they can continue to provide these services for residents. There will be 27 trees to be removed for the proposed access road and recreation path. 24 trees will be removed for restoration of riparian habitat alongside Widow White Creek. The tree removal report lists the types of trees and condition/health of each tree proposed for removal. 51 trees in total are proposed to be removed for the project. The majority of the trees to be removed are not native and unhealthy. Both the Riparian and Wetland Mitigation Plan, prepared by SHN, and the Mitigation Measures, Monitoring, and Reporting Plan detail the tree re-planting plan. 185 trees will be planted to reforest the mitigation area following tree removal.

- b) Residents are concerned that the creek is currently not maintained, and with the expansion road and more homes, the creek will be negatively impacted. To mitigate for the loss of 209 square feet of one-parameter wetlands and 4,261 square feet of SMA, as well as encroachment into wetland buffer areas, the project proponent is proposing to restore 630 square feet of three-parameter wetland and restore 18,750 square feet of riparian habitat along Widow White Creek immediately downstream from the proposed access road. A mix of non-native tree and shrub removal, native tree planting, and three-parameter wetland restoration will be used to restore habitat along Widow White Creek and mitigate for impacts to wetlands and riparian habitat associated with this project. Native plant screening and wildlife-friendly fencing will be used to prevent human encroachment into existing and restored habitat following completion of the project. The planting of the wetland restoration area will be done concurrently with the planting of the riparian restoration. The riparian woodland plants will be planted to complement the restored wetland habitat to create functional self-sustaining riparian habitat. A total of 232 trees will be needed to reforest the mitigation area following removal of the non-native trees. Once the newly planted vegetation begins to become established, structural complexity within the mitigation area will increase, allowing for the development of a mosaic of native vegetation that will support diverse assemblages of plant and animal communities. Monitoring of the mitigation areas will record the success of the development of habitat within the mitigation areas.
- c) Concerns about emergency access were raised by community members. Residents expressed concerns about the lack of ADA-compliant access (existing stairs) and locked gates at both existing emergency exits. The emergency exit located on the northwestern side of the western expansion on Murray Road will be ADA-compliant for pedestrian access, with a Knox box for emergency personnel to provide emergency vehicle access. The emergency exit at the southeastern corner of the existing park onto McKinleyville Ave will be maintained, ADA compliant for pedestrian access, and have a Knox box for emergency vehicle access. These are addressed in the site plan and conditions of approval.
- d) Concerns were raised about the proposed access road to the western expansion being located in the 100-year FEMA flood

zone.

The road will be graded to be 2 feet above the calculated 100-year base flood elevation. This fill will not impact the base flood elevation, nor will it impact any adjacent improvements.

- e) Concerns about drainage issues of the newest two homes (#118 and #122) were raised. These issues have been corrected on-site and are separate from this project.
- f) Residents wanted to know if there is an alternative access point to avoid the access road going through the SMA. Some residents expressed that a bridge would be less impactful over the long term than the proposed road alignment. An alternative analysis was conducted by SHN, in which the proposed road alignment was found to be the less impactful option- less impactful than a bridge. The access road is necessary due to the potential access point from the western expansion point on Murray Road not being feasible to be used as a regular entrance/exit due to its proximity to the on and offramp of Highway 101.
- g) Residents asked if the applicant could buy out lot #64 to build the road through this area, which would avoid impacts to the SMA.
The applicant has stated that they generally try to not relocate residents. This alternative was not studied in the alternative analysis.
- h) Residents expressed concern about the existing entrance/exit in the park on Murray Road. They said there are safety issues at this point, and that this is the only entrance/exit of the park. The park is only required to have one entrance/exit by County zoning ordinance, and the applicant has stated that they generally only have one entrance/exit point in their parks to reduce through traffic throughout the park, for a quieter experience within the park. Additionally, the County Public Works Department encourages less openings onto arterial roads and any new openings in the western expansion area would present a hazard condition due to the proximity to the Highway 101 off-ramp.
- i) Concerns about too many homes and density were raised. These concerns resulted in the applicant revising the original site plan and reducing the proposed number of new homes from 30 to 25.
- j) Residents expressed concerns during the March 2020 community meeting that the permit process seemed rushed with the meeting occurring during the IS/MND circulation public comment period.
The applicant has revised the plans since that meeting, and a second community meeting was held to introduce residents to the new, updated plans and receive their comments about them.
- k) Concerns about lack of street signs. Residents have said that lack of street signs throughout the park make navigating the park confusing for guests and emergency personnel. The applicant will install street signs on each internal street corner.

- l) Concerns about narrow streets and lack of guest parking. Residents have expressed concerns about lack of guest parking for care givers who are frequent visitors of the park due to the residents being 55 years old and over. There is currently a gravel parking lot that provides parking for guests and overflow parking for residents in the location of the proposed dog park and orchard area. Seven parking spots are proposed for this recreation space that can be utilized for guests or residents. Each new proposed home will have three parking spaces in their driveway (two for residents and one for guest). The western expansion will have eleven (11) curbside parking spots for guests, and the eastern expansion will have three (3) curbside parking spots for guests. All streets within the western and eastern expansion areas will be 32' wide from curb to curb, except for the proposed access road that will be built within the Streamside Management Area which will be 24' wide. Curbside parking on one side of the street is permitted for streets 32' wide. The original site plan had 24' streets for all expansion areas, therefore the new site plan addresses these concerns for parking and street width. The site plan also shows 82 curbside parking spaces in the existing park, where streets are 32' wide.
- m) Concerns about the reduction in SMA and buffer negatively impacting the quality of the creek, and negatively impacting wildlife within the Streamside Management Area. Residents said they have seen raptors, fox, great blue herons, and cutthroat trout in the park and Widow White Creek. Residents have said they observed fish spawning in the creek and want the creek to be protected, and that it is currently not maintained by Sun. They said: "if the County does not conduct routine and regular inspections of Sun's care of Widow White Creek within Ocean West, history indicated that the creek will continue to suffer damage. Sun's existing maintenance of the creek seldom takes into consideration what is native vegetation versus what is noxious vegetation, and has often undertaken indiscriminate vegetation removal and clear-cutting. Spawning trout need native vegetation for protection." A resident said: "In a very short distance downstream, along the Hammond Trail off of Murray Road, Widow White Creek has signs describing its role in salmon habitat, and ongoing efforts to restore and maintain the creek." These concerns are addressed in the Riparian and Wetland Mitigation Plan, and the Proposed Mitigation Measures, Monitoring, and Reporting Program which are included in the conditions of approval. Raptors are not identified as special status species. However, identified in the Mitigation Measures and Monitoring program, brush clearing and tree removal should not be within the bird breeding season, and if it is, the applicant shall consult with CDFW to assess the potential for take of active bird nests. There are no listed mammal species with moderate or high potential to occur within the project area. Historically, Widow White Creek has been habitat to the state-identified sensitive and vulnerable Coastal Cutthroat Trout but due to impacts of surrounding development, their presence in Widow White Creek has not been documented within the last 40 years (CNDDDB). Therefore, the potential of occurrence is low. To protect fish in Widow White Creek, erosion control measures are

included as condition of approval #28. The restoration plan includes restoring the SMA of the creek by removing unhealthy and non-native trees and re-planting native vegetation and trees. The Plan details the required 85% success rate of planted vegetation and re-planting if the success rate is not met, and required annual reports and subsequent maintenance by a biologist for five years to meet the 85% success rate.

- n) Concerns of the eastern expansion were expressed, specifically the loss of open space, grade differences, proximity to existing homes, and drainage. The recreation plan addresses the loss of open space with more trails, a garden, and other amenities. Open space is not a requirement for manufactured home parks. The drainage and grade differences will be considered in construction and grading plans.
- o) Concerns about existing utilities were expressed. Residents said that the infrastructure is inadequate to serve more homes, and that the PG&E transformer needs to be replaced due to occasional park-wide power outages. The proposed homes will be served by community water and sewer provided by the McKinleyville Community Services District, which has recommended conditional approval of the project. The District requires approval of water and sewer mainline design and inspection during installation. The new homes will be connected to PG&E separately from the existing homes. The proposed homes will not impact the existing utilities or public services to existing homes and residents.
- p) Concern has been raised over the potential inadequacy of the wooden fence along the western property boundary to sufficiently provide sound mitigation from Highway 101. The applicant submitted a 24-hour noise study prepared by an acoustical engineer demonstrating that the wooden fence mitigated noise at or below the level considered acceptable in the county's general plan (60 db CNEL). The study showed that the fence mitigated noise to an acceptable level within a residential zone provided that gaps in and under the fence were filled. Staff verified that these gaps were closed.
- q) Residents expressed concern about runoff of pollutants from the proposed access road into Widow White Creek. Residents expressed concern about the pervious pavement, the need for maintenance of the pervious pavement, and questioned who will be responsible for ensuring that the park complies with a regular maintenance schedule of maintaining the pavement. NCRWQCB also expressed concern about this issue—commenting that pervious asphalt has very high failure rates due to lack of or poor maintenance, and that the park needs to show that they have the ability and the funding to maintain the pervious asphalt long-term. Because both expansion areas would result in more than 5,000 square feet of impervious surface, it is required to comply with the County's Stormwater Permit (also called the MS4 program). The applicant is required to submit a Stormwater Management Plan which will be evaluated for the adequacy of Low Impact Development techniques and the types and quality of controls used for the purification of stormwater runoff and to limit

downstream peak flow in Widow White Creek. The applicant has submitted a maintenance plan for the pavement. Condition of approval #10 states that the applicant shall follow the provided maintenance plan for all pervious pavement, and if the pavement becomes clogged and ineffective, the applicant shall replace it.

- r) Residents expressed concern about ground water monitoring, drainage, and the infiltration rate. They said that "existing stormwater drainage issues within the park have not been sufficiently addressed. There are several stormwater runoff locations draining into the northeast common area of Widow White Creek (behind homes located on Creekside Drive) that render that area unusable due to marshy conditions. The proposed north side 26-home site and the east side 4-home site are each at a higher elevation than the neighboring areas of the park which would add to the on-going problem of drainage and could severely impact homes that are directly on the perimeter of the two proposed expansions. There are existing drainage issues behind the homes adjacent to the proposed 4-home site area, as well as the Dollar General side, affecting the existing home closest to that area." These concerns are addressed through the Preliminary Stormwater Control Plan. Bioretention basins are proposed in order to comply with MS4 permit requirements.
- s) Residents expressed concern of proposed trails in the SMA of Widow White Creek. These concerns have been addressed through the mitigation monitoring plan, specifically erosion control measures. Erosion control measures contained in the Sensitive and Critical Habitat Standards of the General Plan (Chapter 10 Standard BR-S9-Erosion Control) will be followed and are included in the conditions of approval. To reduce the impact to the SMA from the existing and proposed trails, condition of approval #29 is included which requires the applicant to have marked trails with short fencing to clearly demarcate trails. Signs will be posted to stay on the trail to reduce impacts to native plants. The Riparian and Wetland Mitigation Plan details the required success rate of 85% for planted native vegetation, required maintenance, and annual surveys for 5 years to ensure the native plantings are well established. The Plan also states that "As part of the maintenance program, erosion and slope stability of the west bank of Widow White Creek and within the restored wetland will be monitored and maintained. This will include noting any new erosion features and reporting any new erosion within the mitigation area. Erosion maintenance will be conducted by the project proponent, and any large-scale erosion control or repair will be the responsibility of the project proponent during the years of monitoring."
- t) Comment: "Sun Communities holds a Special Senior Park Permit from the California Department of Housing and Community Services (HCD) but has not taken responsibility to provide even basic minimum safety requirements for the existing senior residents of the park, including: Sun has not been trimming the trees in the back of the park, since

they took over Ocean West at the end of September 2017. This negligence affects the health and welfare of all seniors living in the park. Sun is unable to keep the park in a hazard free and healthy and safe condition for us seniors now." Comment: "If an emergency egress onto Murray Road from the northwest onto Murray Road from the northwest corner of the new development is proposed, there may well be a conflict with the planned stormwater retention pond in the same area that's to mitigate the runoff from the new home sites." Sun Communities, as the park management, is required to maintain the park in a safe condition for the public, including maintaining and trimming trees per Code 798.37.5 of the 2021 Mobile Home Residency Law. The bioretention basin located near the emergency exit on Murray Road will not physically conflict with the emergency exit. All bioretention basins will be designed to have an additional 0.5 feet of freeboard to any critical features and given the depth of seasonal groundwater and well infiltrating soils, it is unlikely the basins will overflow during storm events exceeding the 100-year event.

- 6. FINDING:** The proposed development is consistent with the zoning designations of each parcel, and conforms with all applicable standards and requirements of these regulations.

Western expansion (-039) = (C-1, AP, N, WR) Neighborhood Commercial (C-1), Airport Safety Review (AP), Noise Impact (N), Streamside Management Areas and Wetlands (WR)

Current parcel (-040) = (R-3, D, AP, N, WR; R-1, N) Residential Multiple Family (R-3), Design Control (D), Airport Safety Review (AP), Noise Impact (N), Streamside Management Areas and Wetlands (WR); Residential One-Family (R-1), Noise Impact (N)

Eastern expansion (-060) = (C-1, AP, N) Neighborhood Commercial (C-1), Airport Safety Review (AP), Noise Impact (N)

- EVIDENCE:** a) The western expansion parcel (APN 510-171-039) and the eastern expansion parcel (APN 510-171-060) will be merged with the existing Ocean West parcel (APN 510-171-040) for a total of 30.38 acres.

APN 510-171-039: The parcel is a legal parcel identified as Parcel 1 of Parcel Map No. 1540 Book 13 of Parcel Maps, Page 87.

APN 510-171-060: The parcel is a legal parcel identified as Parcel 3 of Parcel Map No. 3182 Book 29 of Parcel Maps, Page 144.

APN 510-171-040: The parcel is a legal parcel identified as Parcel 2 of Parcel Map No. 1540 Book 13 of Parcel Maps, Page 87.

The parcel is consistent with §312-1.1.2 Legal Lot Requirement and compliant with the provisions of the Subdivision Map Act.

- b) Neighborhood Commercial Zone: The proposed development (western expansion -039 and eastern expansion -060) is consistent with the C-1 Zone as manufactured home parks are permitted in the C-1 zone with a use permit.
- c) Noise Impact Combining Zone: All three parcels are in the N Combining Zone due to potential for noise impact from Highway 101. The proposed development is consistent with the N combining zone as noise levels should be reduced to 45 dB CNEL-Ldn in all habitable rooms within the park with the proposed fence installed along the western boundary of the manufactured home park. Condition of approval #7 states that the applicant shall fill all gaps of the fence along the entire western boundary of the park to attenuate outdoor noise to 60 CNEL-Ldn and indoor noise in all habitable rooms to 45 dB CNEL-Ldn. Noises generated by the proposed project will result in a temporary increase during construction because the proposed project may require the use of heavy equipment (excavator, grader, loader, and backhoe). The construction does not include equipment that would result in ground borne vibration.
- d) Airport Safety Review Combining Zone: All three parcels are in the AP combining zone. The project is consistent with the AP combining zone as it is compliant with the Airport Land Use Compatibility Plan (ALUCP). It is located within airport compatibility zone D, an area identified as having negligible risk and potential annoyance from overflights (Humboldt County General Plan table 14-A). A Deed Notice is required in addition to disclosure to prospective residents about the potential noise impacts related to overflight, which is condition of approval #5.
- e) Streamside Management Areas and Wetlands Combining Zone: The western expansion is consistent with WR zone with a Special Permit for development within an SMA for the development of a road to connect the western expansion area to Ocean West Drive for access to Murray Road. Applicable required mitigation measures for development within SMAs under 314-61.1.10 include replanting disturbed areas with riparian vegetation, development of new riparian and wetland habitat of an equal area to that of the impacted area, and erosion control measures. These measures are included in the Proposed Mitigation Measures, Monitoring, and Reporting Program (Attachment 3) and is conditions of approval #1 for the project.
- f) Wetland impacts: Approximately 209 sq. feet of one-parameter wetland will be permanently impacted and filled for road construction and recreational trails. Currently, the impacted area is characterized by non-native landscaping trees and non-native herbaceous species. Widow White Creek has been impacted by surrounding development and the natural conditions along the stream course have been completely altered or eliminated. A total of 630 sq feet of three-parameter wetlands along Widow White Creek will be restored to mitigate for the impacts to wetlands. Restoration will consist of removal of weed mat, abandoned pedestrian path, and non-native vegetation, and will include the planting of native wetland plants within the area of restoration. Approximately 3,049 sq. feet of SMA will be impacted by road construction, and 1,212 square feet of SMA will be impacted by development of recreational trails adjacent to the road. The area is characterized by non-native trees, non-native herbaceous plants, and well-manicured lawn. Approximately 18,750 sq feet of riparian habitat along Widow White Creek immediately downstream from the proposed access road will be restored through non-native tree and shrub removal,

native tree planting, and three-parameter wetland restoration to restore habitat along Widow White Creek and mitigate for impacts to wetlands and riparian habitat associated with this project. Native plant screening and wildlife-friendly fencing will be used to prevent human encroachment into existing and restored habitat following completion of the project. These measures will improve habitat for salmonids, amphibians, native plants, and other species that rely on intact riparian habitat.

- g) Development Standards: The project complies with all development standards for C-1, including the 15 feet rear yard setback, 25 foot minimum lot widths, 45 foot maximum structure heights, and 2,000 sq. feet minimum parcel size.
- h) Setbacks: The project complies with the minimum 20 feet yards around manufactured home parks.
- i) Recreation Area: The project complies with the requirements for manufactured home parks, including the required recreation area. Zoning Ordinance Section 314-107.1.2 requiring a "minimum recreation area of 1,500 net square feet per acre of manufactured home park that shall be provided and improved in conjunction with the development." This means that the thirty (30.38) acre park would require a total of 45,570 square feet of recreation space. The previously approved Conditional Use Permit (CUP-37-77) required that a recreation building or clubhouse be constructed as part of the community. There is approximately 13,313 square feet of recreation area that will be retained. The project proposal includes an additional 32,101 square feet of recreation area, including a dog park, community garden, additional walking paths, and a picnic area. There will be approximately 45,330 sq. feet of recreation space for the whole park. These numbers are from the Ocean West Expansion Landscape and Site Amenities Master Plan (within the Revised Ocean West Expansion Site Plans), dated August 2021.
- j) Parking and Access Requirements: The project complies with the requirements for manufactured home parks, including the required road widths and number of parking spaces. Each proposed road will be 32' feet from curb to curb, except for the access road connecting to Ocean West Drive which will be the minimum allowable width of 24 feet width from curb to curb. Section 314-107.1.5 of the zoning ordinance requires two (2) spaces per homesite and one (1) guest parking space for every two (2) home sites, accomplished through parking bays containing at least four (4) parking spaces per bay. Such bays shall be located no more than 200 feet (200') apart. Curbside parking is also allowed provided the streets meet the minimum width of either 32 or 40 feet. Streets within the expansion areas are proposed to be 32 feet, except in the street connecting to Ocean West Drive, part of which is within the Streamside Management Area, which will be 24 feet wide. 32 feet street width can accommodate one side of curbside parking. No parking signs will be installed on the new proposed connection street and other streets less than 32 feet wide. 24 feet street width does not accommodate curbside parking. The streets in the previously approved portion of the park are approximately 32 feet in width allowing for curb parking on one side of the street. The applicant proposes to meet the guest parking requirement by adding an extra parking space on each new home site space for a total of three (3) spaces on each new homesite. The total count of guest parking spaces would be 25 on home sites, which exceeds the minimum number required, but these spaces are not accessible

as parking on demand within parking bays. There are also 3 additional proposed curbside parking spaces on the eastern expansion, and 11 additional proposed curbside parking spaces on the western expansion. These curbside spaces meet the parking requirements of one guest parking space for every two home sites. The applicant has shown that there are at least 84 curbside guest parking spaces throughout the rest of the park (for 130 homes), which meets the parking requirement. Although these curbside parking spots are not in parking bays, they still meet the quantity of parking spots required. The Hearing Officer may modify the requirements of the Manufactured Home Parks Section of the Code (314-107.1) for an existing substandard park proposed to be enlarged or extended provided that the modifications are limited to the extent that an overall improvement in the design or standards of such existing park will result. Although the parking lot will be removed and replaced with recreation amenities, there is enough curbside parking throughout the park to meet the parking requirements. The recreation improvements will improve the design of the park.

- k) Design Control: The existing parcel (-040) has a Design Control (D) Combining Zone, and the project is consistent with the Design Control standards (314-19.1). The height, bulk, and area of buildings within the expansion area are to be consistent with the existing buildings. All setbacks from property lines of the expansion should be consistent with the existing setbacks. The external colors, textures, and materials of the proposed homes within the expansion area should be consistent with the existing homes, as well as the type, pitch, and material of roofs. The type, size, and location of signs should be consistent with the existing signs in the park. Some of the landscaping in the existing parcel will be altered for the Proposed Mitigation Measures, Monitoring, and Reporting Program. The required consistency between the design of the existing park and the design of the expansions are included in the conditions of approval #12.

7. FINDING: The proposed development and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare or materially injurious to properties or improvements in the vicinity.

EVIDENCE: Based upon the technical information provided by the applicant for the project, the Department finds the proposed wetland fill of 209 sq. feet and tree removal may be detrimental to the public welfare by negatively impacting the existing residents' scenery and existing environmental setting. However, the mitigation measures and other conditions of approval will mitigate the potentially negative impacts to less than significant. As conditioned, the project will not be detrimental to public health safety or welfare to properties in the vicinity. All reviewing referral agencies approved or conditionally approved the project. Staff believes that the proposed use is compatible with the commercial land use and zoning allowed in the associated General Plan, M CCP, and zone regulations. Filling 209 square feet of one-parameter wetlands is necessary to connect the twenty-two new homes in the western expansion area to the rest of the park, and to enter and exit the park via the existing driveway on Murray Road. Alternatives were studied and the proposed road has the least impact on wetlands and SMA than the alternatives. The proposed project will not cause adverse impacts to public safety, health, or welfare.

8. FINDING: The proposed development does not reduce the residential density for any parcel below that utilized by the Department of Housing and Community

Development in determining compliance with housing element law.

EVIDENCE: Twenty-five (25) manufactured homes will be located on the site. The project will not conflict with any provisions of the County Housing Element, and will add twenty-five additional units of homes to the County's housing stock.

9. FINDING: Humboldt County Code 327.5-18: A merger pursuant to the provisions of this section shall not be approved unless the Advisory Agency determines that the parcel resulting from the merger meets applicable health, building, and zoning requirements and that approving the merger would create health and safety problems. The merger would authorize development across three contiguous parcels.

EVIDENCE: There is no evidence that the merger will create any health or safety problems. An Initial Study and Mitigated Negative Declaration was prepared which demonstrates that there will be no significant impacts on the environment from the project.

DECISION

NOW, THEREFORE, based on the above findings and evidence, the Humboldt County Planning Commission does hereby:

- Adopts the Mitigated Negative Declaration prepared for the Ocean Park Mobile Home Expansion project (SCH No. 2020029032); and
- Adopt the Mitigation Monitoring and Reporting Program for the Ocean West Mobile Home Expansion project with the substitution Mitigation Measure #10; and
- Adopt the findings set forth in this resolution; and
- Conditionally approves the Ocean West Mobile Home Park Expansion Conditional Use Permit, Special Permit, and Notice of Merger based upon the Findings and Evidence and subject to the conditions of approval attached hereto as Attachment 1 and incorporated herein by reference; and

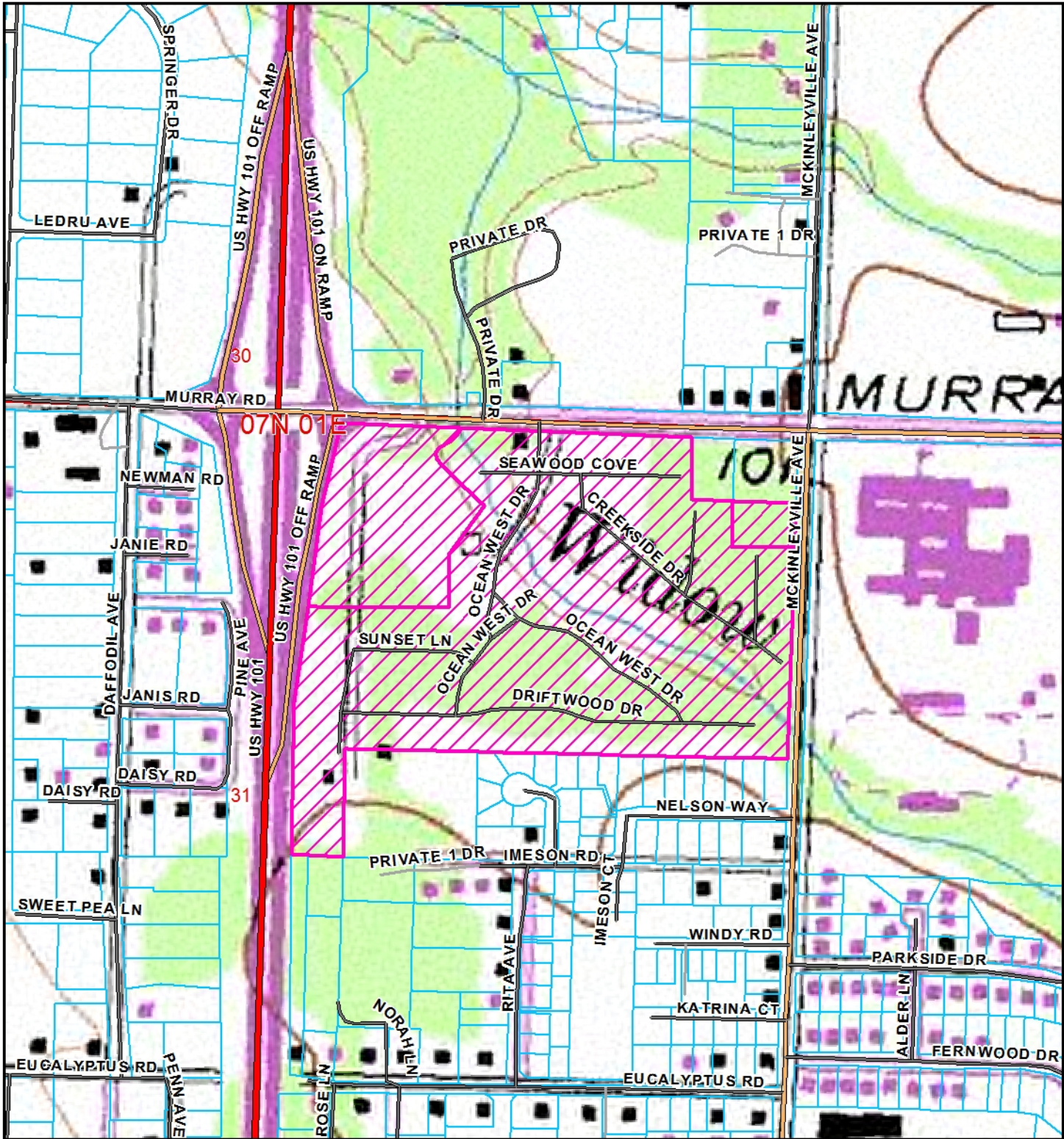
Adopted after review and consideration of all the evidence on **December 16, 2021**.

The motion was made by COMMISSIONER _____ and second by COMMISSIONER _____ and the following ROLL CALL vote:

AYES: COMMISSIONERS:
 NOES: COMMISSIONERS:
 ABSENT: COMMISSIONERS:
 ABSTAIN: COMMISSIONERS:
 DECISION:

I, John H. Ford, Zoning Administrator of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above entitled matter by said Zoning Administrator at a meeting held on the date noted above.


 John H. Ford, Director
 Planning and Building Department



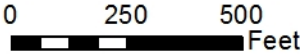
TOPO MAP

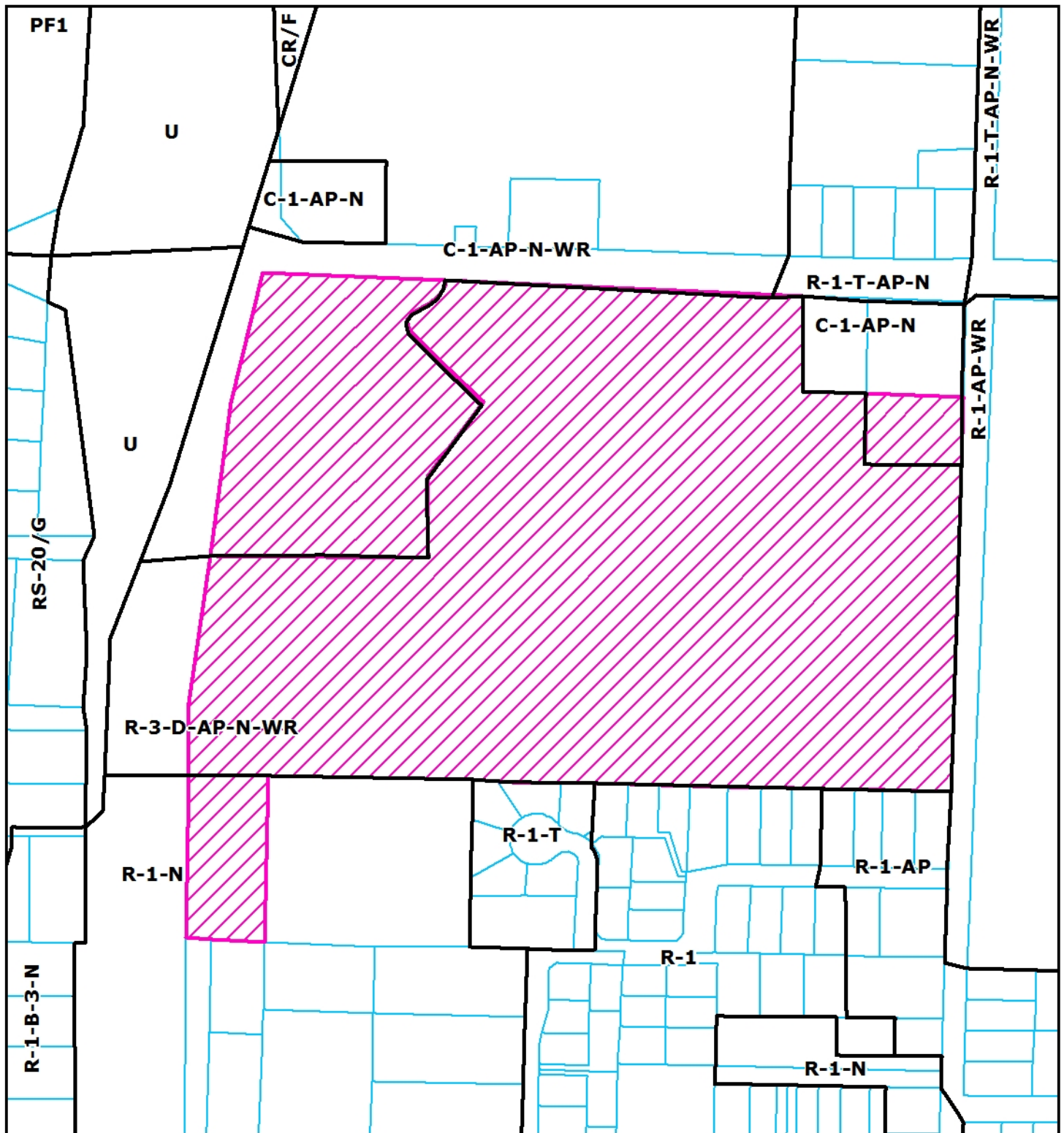
**PROPOSED SUN OCEAN WEST EXPANSION, LLC
 CONDITIONAL USE PERMIT &
 LOT LINE ADJUSTMENT
 MCKINLEYVILLE AREA
 CUP-18-034/LLA-18-021**

**APN: 510-171-039, -040, -060
 T07N R01E S31 HB&M (Arcata North)**

Project Area = 

This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.





ZONING MAP

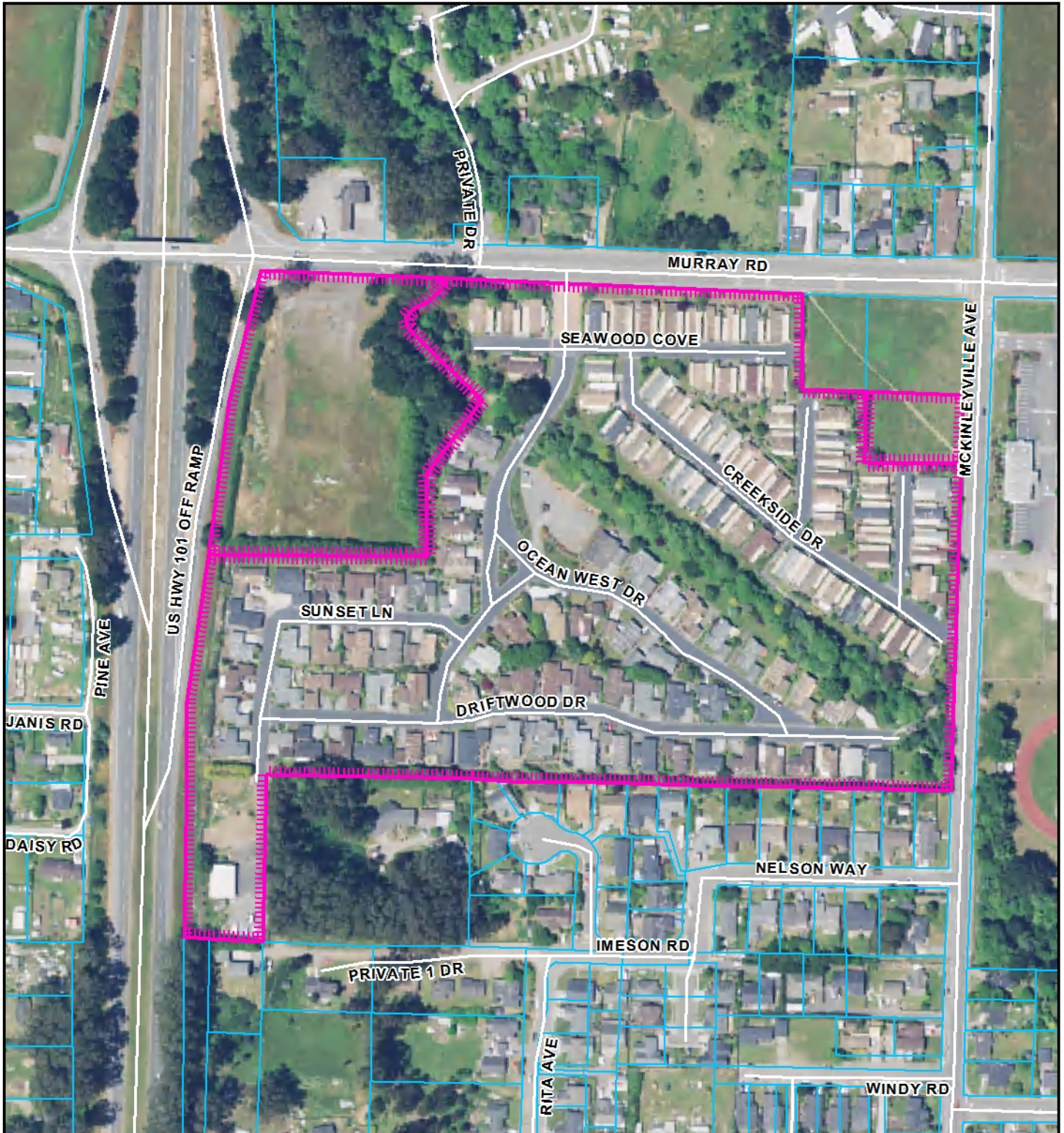
**PROPOSED SUN OCEAN WEST EXPANSION, LLC
 CONDITIONAL USE PERMIT &
 LOT LINE ADJUSTMENT
 MCKINLEYVILLE AREA
 CUP-18-034/LLA-18-021**

**APN: 510-171-039, -040, -060
 T07N R01E S31 HB&M (Arcata North)**

Project Area = 

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AERIAL MAP

**PROPOSED SUN OCEAN WEST EXPANSION, LLC
 CONDITIONAL USE PERMIT &
 LOT LINE ADJUSTMENT
 MCKINLEYVILLE AREA
 CUP-18-034/LLA-18-021**

**APN: 510-171-039, -040, -060
 T07N R01E S31 HB&M (Arcata North)**

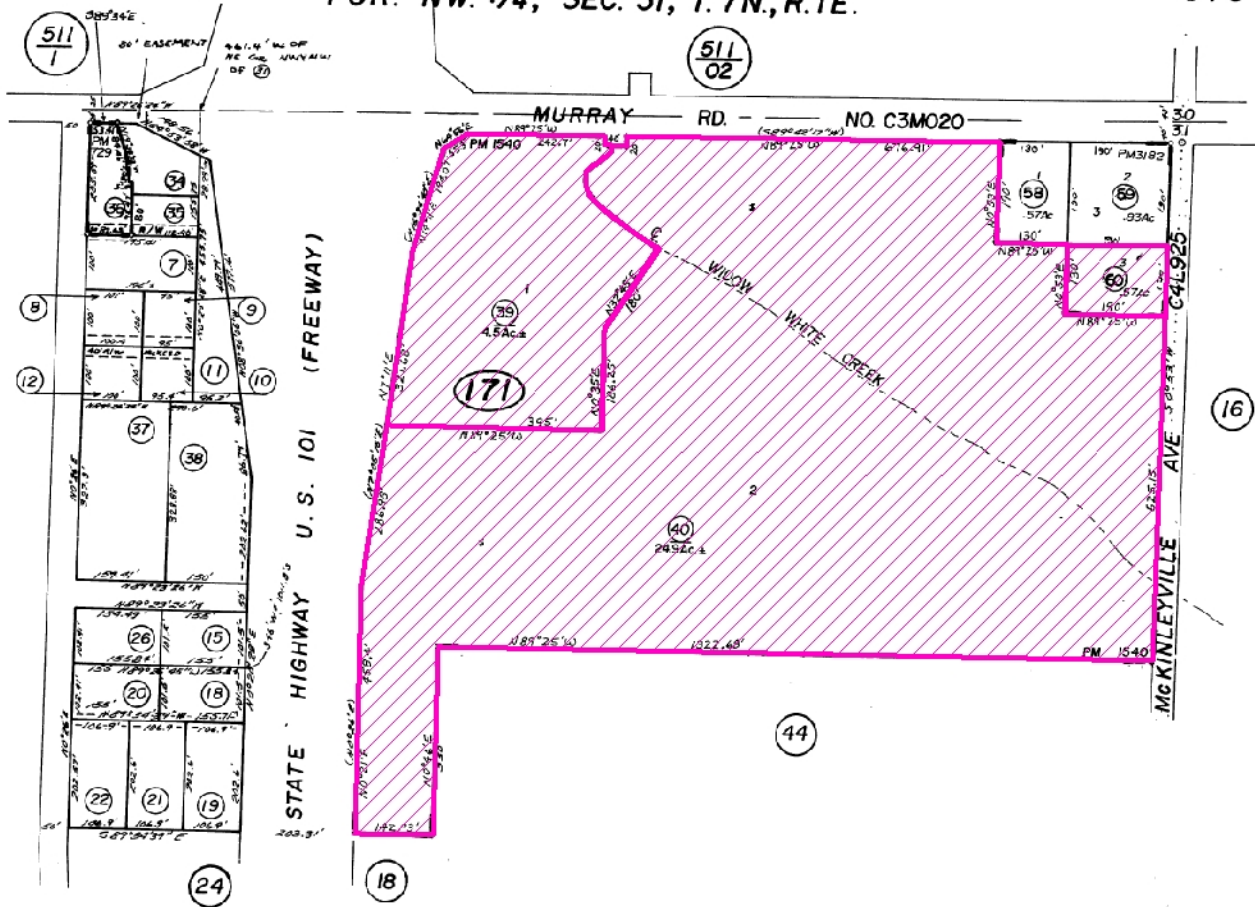
Project Area = 

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POR. NW 1/4, SEC. 31, T. 7N., R. 1E.

510-17



R.S. 10 Pg. 64
 P.M. No. 729 of P.M. Bk. 6, Pg. 85
 P.M. No. 1540 of P.M. Bk. 13, Pg. 87

PM 3182 of P.M. Bk. 29, Pgs. 143-144

Assessor's Maps Bk. 510 - Pg. 17
 County of Humboldt, Calif.

NOTE - Assessor's Block Numbers Shown in Ellipses
 Assessor's Parcel Numbers Shown in Circles

ASSESSOR PARCEL MAP

**PROPOSED SUN OCEAN WEST EXPANSION, LLC
 CONDITIONAL USE PERMIT &
 LOT LINE ADJUSTMENT
 MCKINLEYVILLE AREA
 CUP-18-034/LLA-18-021**

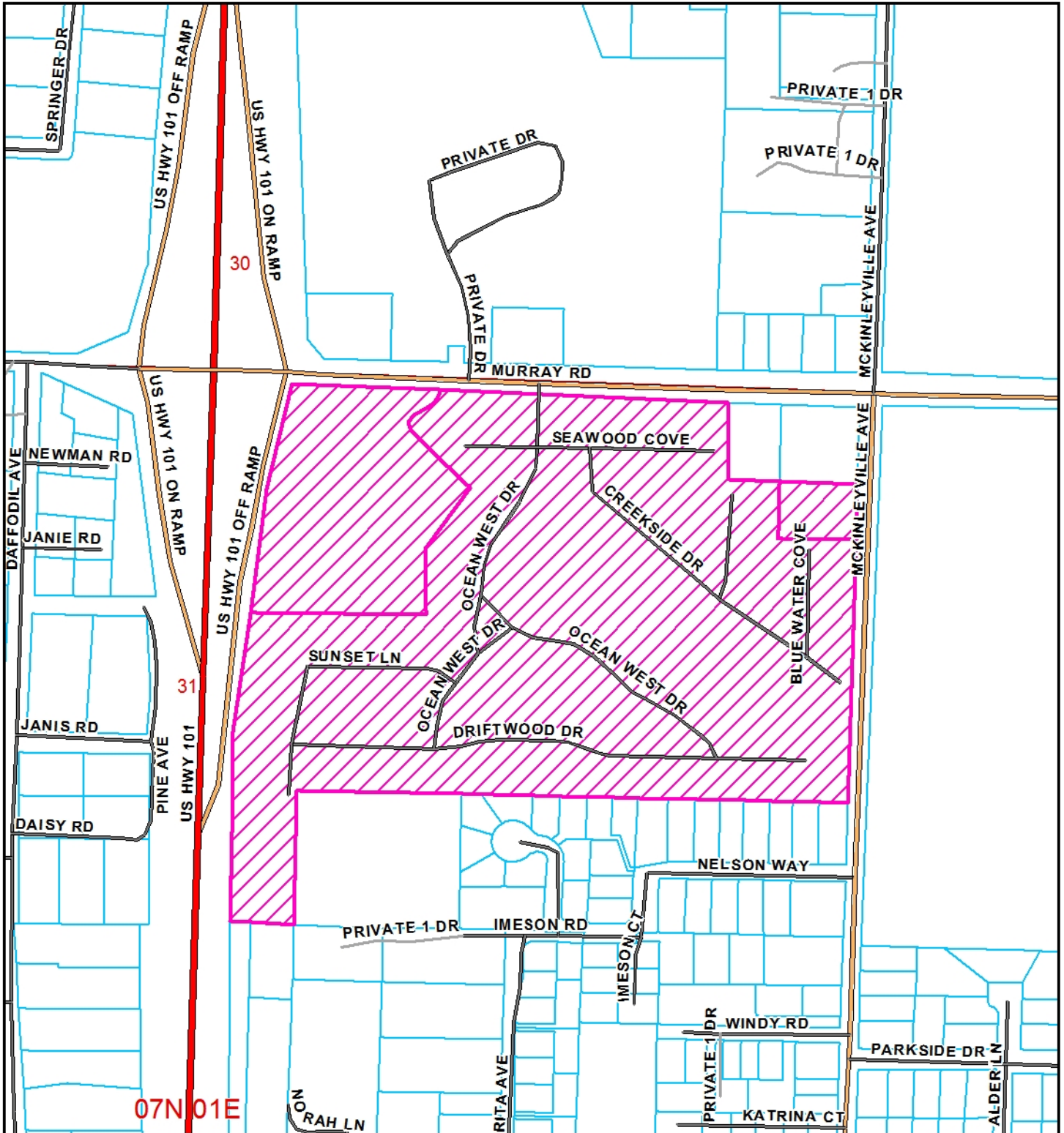
**APN: 510-171-039, -040, -060
 T07N R01E S31 HB&M (Arcata North)**

Project Area = 

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MAP NOT TO SCALE



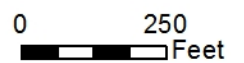
LOCATION MAP

**PROPOSED SUN OCEAN WEST EXPANSION, LLC
 CONDITIONAL USE PERMIT &
 LOT LINE ADJUSTMENT
 MCKINLEYVILLE AREA
 CUP-18-034/LLA-18-021**

**APN: 510-171-039, -040, -060
 T07N R01E S31 HB&M (Arcata North)**

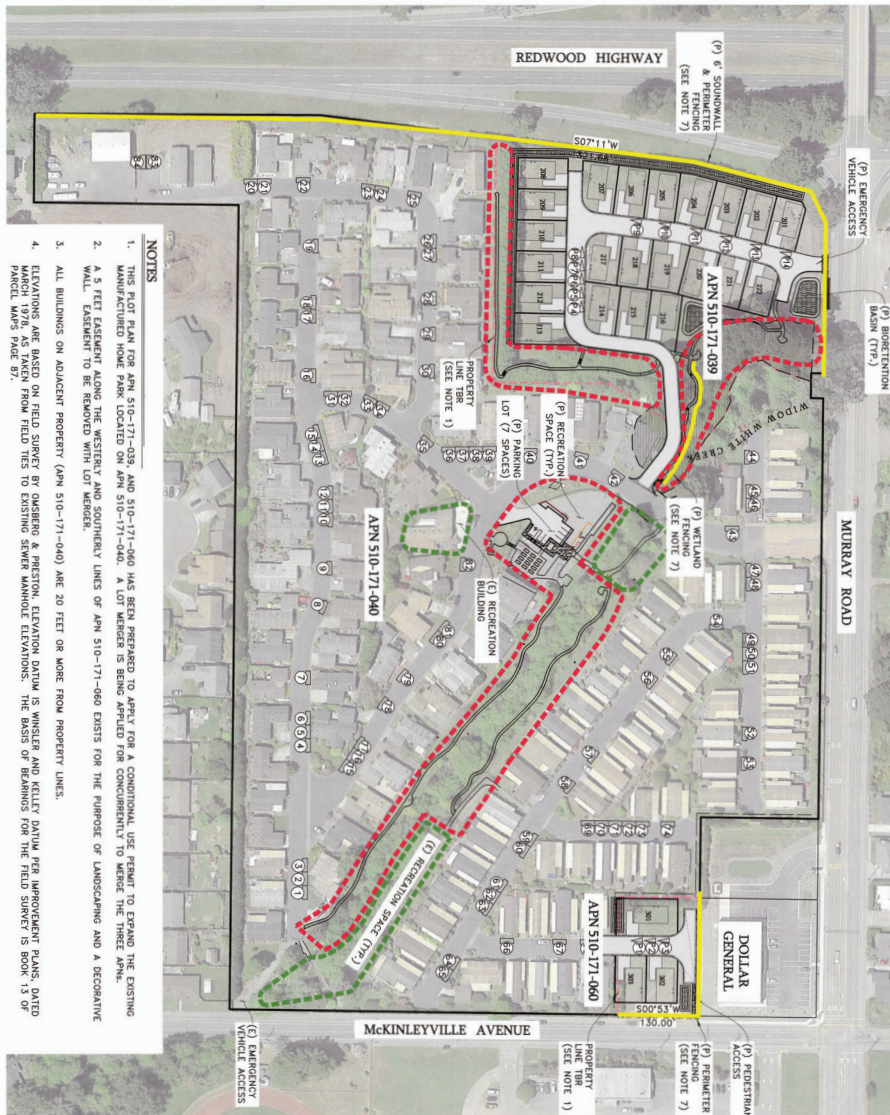
Project Area = 

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OCEAN WEST EXPANSION - CUP

McKINLEYVILLE, CALIFORNIA



- NOTES**
1. THIS CUP PLAN FOR APN 510-171-039, AND 510-171-040 HAS BEEN PREPARED TO APPLY FOR A CONDITIONAL USE PERMIT TO EXPAND THE EXISTING MANUFACTURED HOME PARK LOCATED ON APN 510-171-040. A LOT MERGER IS BEING APPLIED FOR CONCURRENTLY TO MERGE THE THREE APNs.
 2. WALL ENCASEMENT TO BE REMOVED WITH LOT MERGER.
 3. ALL BUILDINGS ON ADJACENT PROPERTY (APN 510-171-040) ARE 20 FEET OR MORE FROM PROPERTY LINES.
 4. ELEVATIONS ARE BASED ON FIELD SURVEY BY CHUBBERG & PRESTON. ELEVATION DATUM IS WINGLER AND KELLY DATUM PER IMPROVEMENT PLANS, DATED MARCH 2015. AS TAKEN FROM FIELD TIES TO EXISTING SEWER MANHOLE ELEVATIONS. THE BASIS OF BEARINGS FOR THE FIELD SURVEY IS BOOK 13 OF PUBLISHED MAPS PAGE 59.
 5. APN 510-171-039 HAS A ZONING WITH COMBING ZONE OF C-1-AP-N-WR. APN 510-171-040 HAS A ZONING WITH COMBING ZONE OF R-3-D-N-N-WR. R-1-N. APN 510-171-060 HAS A ZONING WITH COMBING ZONE OF C-1-AP-N.
 6. THE EXISTING FACILITY HAS A MINIMUM OF EIGHT-FOUR (84) ON-STREET GUEST PARKING SPACES. AN EXISTING STREET IS 32' WIDE. AN ADDITIONAL FOURTEEN (14) ON-STREET PARKING SPACES ARE PROPOSED AS PART OF THE EXPANSION. SHOWN, ADDITIONAL PARKING WILL ALSO BE PROVIDED WITHIN THE PROPOSED RESERVATION AREAS. REFER TO THE LANDSCAPE PLAN FOR ADDITIONAL INFORMATION.
 7. SOUNDWALL PERIMETER FENCING TO BE 6-FOOT TALL WOOD FENCE WITHOUT GAPS (SHRIMP OR EQUIVALENT). REFER TO LANDSCAPE DRAWINGS FOR WETLAND & FENCELINE FENCING.
 8. THIS PLAN IS NOT INTENDED TO BE USED FOR CONSTRUCTION PURPOSES.

DESIGNED BY: **CHUBBERG & PRESTON**
 27777 BAINBRIDGE ROAD, SUITE 200
 SOUTHERFIELD, MI 48064

OWNER: **SINO OCEAN WEST**
 317 N. K. T. HALL
 SOUTHERFIELD, MI 48064

APPLICANT: **CHUBBERG & PRESTON**
 27777 BAINBRIDGE ROAD, SUITE 200
 SOUTHERFIELD, MI 48064



CHUBBERG & PRESTON
 ENGINEERS
 27777 BAINBRIDGE ROAD, SUITE 200
 SOUTHERFIELD, MI 48064

DATE: 09/29/21
 TIME: 10:11:20
 SHEET NO: 11/14/19

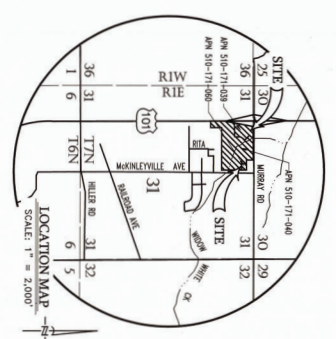
APN 510-171-039 & -060

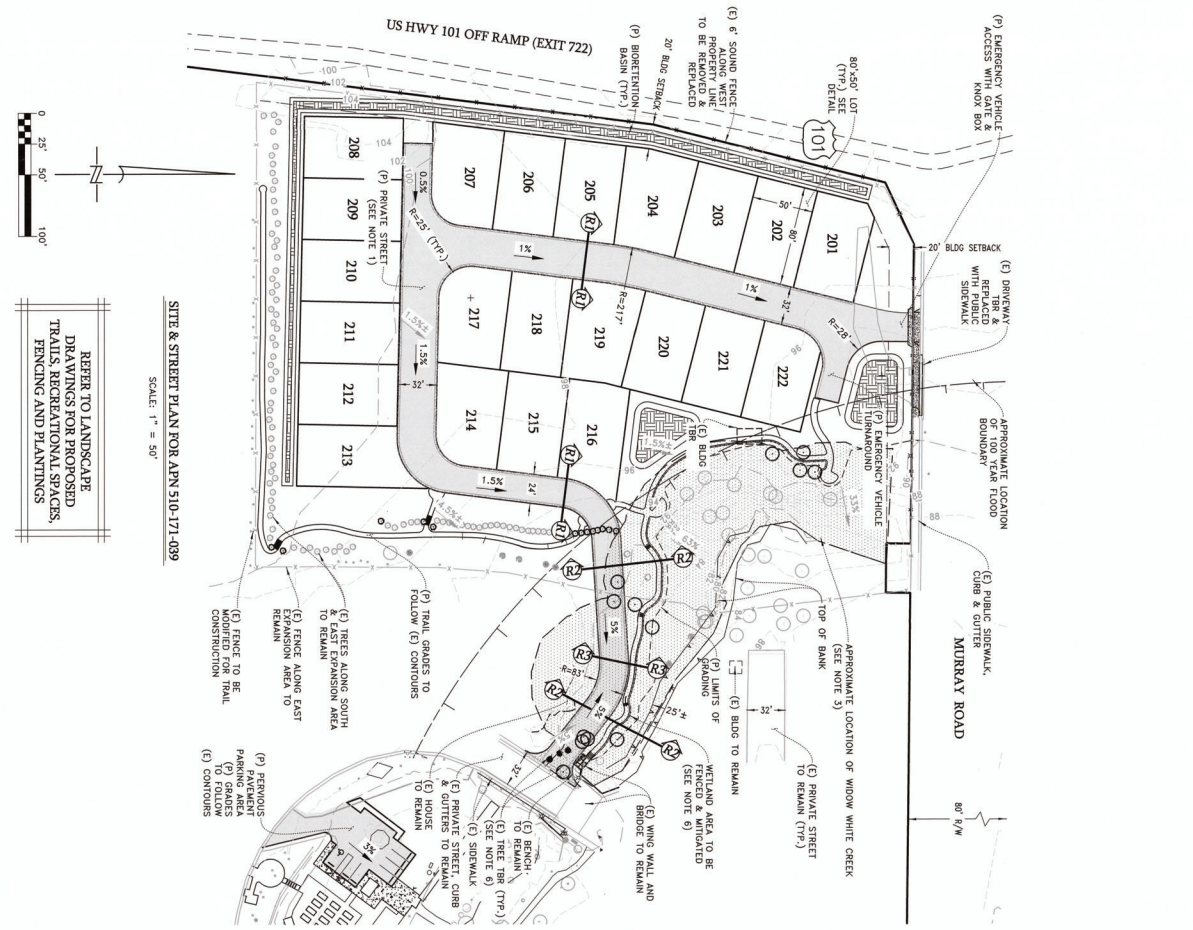
CUP SITE PLAN

SINO OCEAN WEST
 In the Corporation of the State of Michigan
 Subsection 31, 17N, R.1E, T.14E

ABBREVIATION	INDICATES	SYMBOL	INDICATES
(E)	EXISTING	---	TOP OF BANK
LD	LOW IMPACT DEVELOPMENT	---	CONTOUR AT 2-FOOT INTERVALS
(P)	PROPOSED	---	EXISTING FENCING
R/W	RIGHT OF WAY	---	PROPOSED PARKING SPACE
BLDG	BUILDING	---	EXISTING SLOPE
S.F.	SQUARE FEET	---	PROPOSED SLOPE
C.V.	CUBIC YARDS	---	EXISTING STORM DRAIN INLET
C.F.	CUBIC FEET	---	PROPOSED STORM DRAIN
SMA	STREAMSIDE MANAGEMENT AREA	---	PROPOSED STORM DRAIN CLEANOUT
SD	STORM DRAIN	---	EXISTING SANITARY SEWER CLEANOUT
HD	HEAD	---	PROPOSED SANITARY SEWER CLEANOUT
W	WATER	---	PROPOSED UNDERGROUND GAS & ELECTRIC
WM	WATER METER	---	PROPOSED UNDERGROUND ELECTRIC
SSD	SANITARY SEWER	---	EXISTING SANITARY SEWER MANHOLE
FN	FIRE HYDRANT	---	EXISTING WATER
G	GAS	---	PROPOSED WATER
O	PACIFIC GAS & ELECTRIC	---	EXISTING GAS
TR	TO BE REMOVED	---	EXISTING SANITARY SEWER
TR	TYPICAL	---	EXISTING FIRE HYDRANT
(P)	PROPOSED PARKING SPACE AND PARKING #	---	PROPOSED SANITARY SEWER
(P)	PROPOSED RECREATIONAL SPACE (32,759± S.F.)	---	EXISTING UNDERGROUND GAS & ELECTRIC
(P)	PROPOSED RECREATIONAL SPACE (12,571± S.F.)	---	PROPOSED UNDERGROUND GAS & ELECTRIC
(P)	EXISTING RECREATIONAL SPACE (12,571± S.F.)	---	PROPOSED UNDERGROUND GAS & ELECTRIC
(P)	PROPOSED SOUNDWALL & PERIMETER FENCING (REFER TO LANDSCAPE DRAWINGS)	---	PROPOSED UNDERGROUND GAS & ELECTRIC
(P)	EXISTING SOUNDWALL & PERIMETER FENCING (REFER TO LANDSCAPE DRAWINGS)	---	PROPOSED UNDERGROUND GAS & ELECTRIC
(P)	EXISTING PROPERTY LINE TO BE REMOVED	---	PROPOSED UNDERGROUND GAS & ELECTRIC

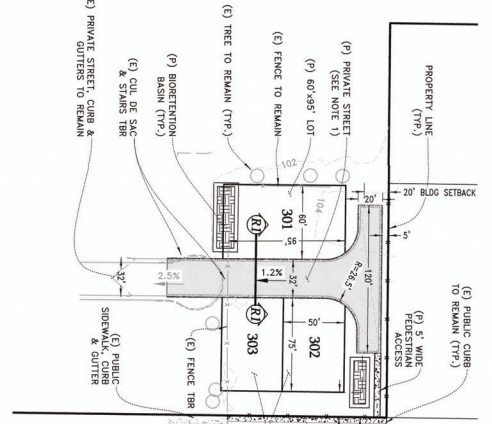
ABBREVIATION	INDICATES
C1	CUP SITE PLAN
C2	SITE & STREET PLAN
C3	WATER PLAN
L100	LANDSCAPE & SITE AMENITIES MASTER PLAN
L101	LANDSCAPE & SITE AMENITIES MASTER PLAN
E1	NOTES, LEGENDS, 1-LINE, GROUND
E2	ELECTRICAL SITE PLAN
E3	ELECTRICAL PLAN, NORTHWEST AREA
E4	ELECTRICAL PLAN, SOUTHWEST AREA
E5	ELECTRICAL PLAN, EAST AREA
E6	ELECTRICAL PLAN, WEST AREA
E7	ELECTRICAL PLAN, SOUTHWEST/EAST AREA
E8	LIGHTING PLAN, SOUTHWEST/EAST AREA
E9	LIGHTING CERTIFICATION FORMS



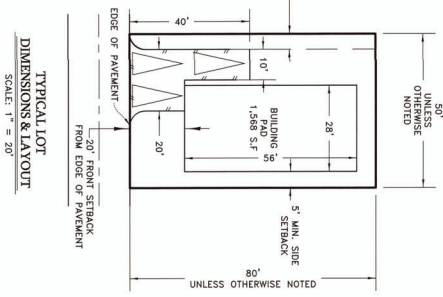


REFER TO LANDSCAPE DRAWINGS FOR PROPOSED TRAILS, RECREATIONAL SPACES, FENCING AND PLANTINGS

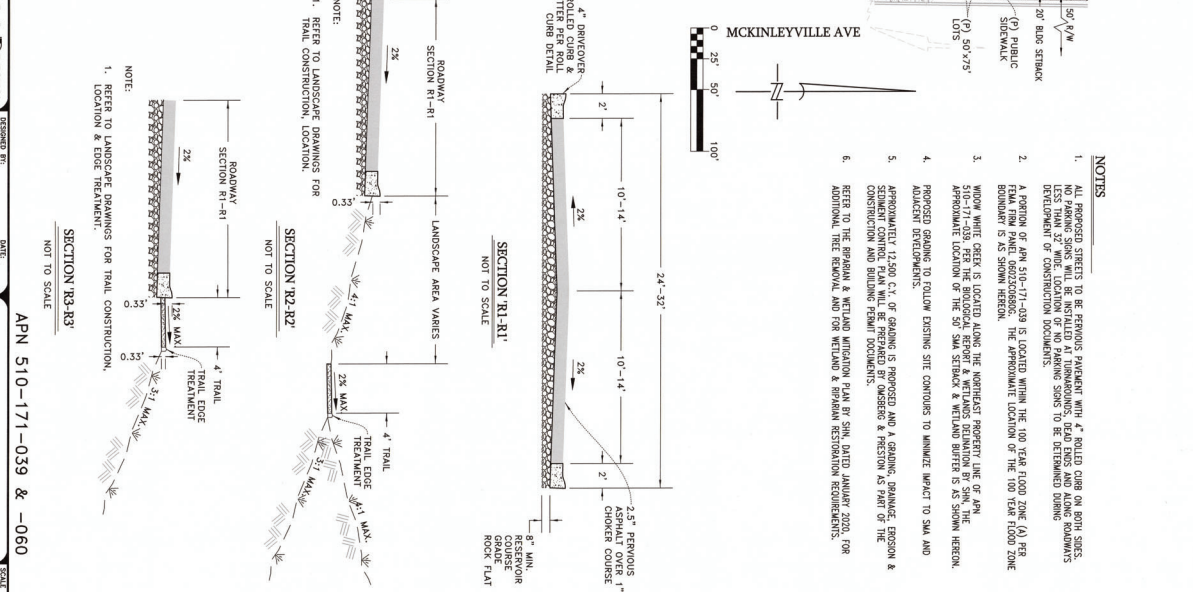
SITE & STREET PLAN FOR APN 510-171-039
SCALE: 1" = 50'



SITE & STREET PLAN FOR APN 510-171-040
SCALE: 1" = 50'



TYPICAL LOT DIMENSIONS & LAYOUT
SCALE: 1" = 20'



SECTION R1-R1
NOT TO SCALE

SECTION R2-R2
NOT TO SCALE

SECTION R3-R3
NOT TO SCALE

- NOTES**
1. ALL PROPOSED STREETS TO BE PAVED WITH 4" ROLLED CURB ON BOTH SIDES, LESS THAN 32" WIDE. LOCATION OF NO PARKING SIGNS TO BE DETERMINED DURING DEVELOPMENT OF CONSTRUCTION DOCUMENTS.
 2. A PORTION OF APN 510-171-039 IS LOCATED WITHIN THE 100 YEAR FLOOD ZONE (A) PER FEMA FIRM PANEL 06020308G. THE APPROXIMATE LOCATION OF THE 100 YEAR FLOOD ZONE BOUNDARY IS AS SHOWN HEREON.
 3. WINDOW WHITE CREEK IS LOCATED ALONG THE NORTHEAST PROPERTY LINE OF APN 510-171-039 PER THE BIOLOGICAL REPORT & WETLANDS DECLARATION BY SUN. THE APPROXIMATE LOCATION OF THE SUN SETBACK & WETLAND BUFFER IS AS SHOWN HEREON.
 4. PROPOSED GRADING TO FOLLOW EXISTING SITE CONDITIONS TO MINIMIZE IMPACT TO SUN AND ADJACENT DEVELOPMENTS.
 5. APPROXIMATELY 13,500 C.Y. OF GRADING IS PROPOSED AND A GRADING, DRAINAGE, EROSION & SEDIMENT CONTROL PLAN WILL BE PREPARED BY CUNBERG & PRESTON AS PART OF THE CONSTRUCTION AND BUILDING PERMIT DOCUMENTS.
 6. REFER TO THE PERMANENT WETLAND IMPROVEMENT PLAN BY SUN, DATED JANUARY 2020, FOR ADDITIONAL TREE REMOVAL AND FOR WETLAND & BIRCHAM RESTORATION REQUIREMENTS.

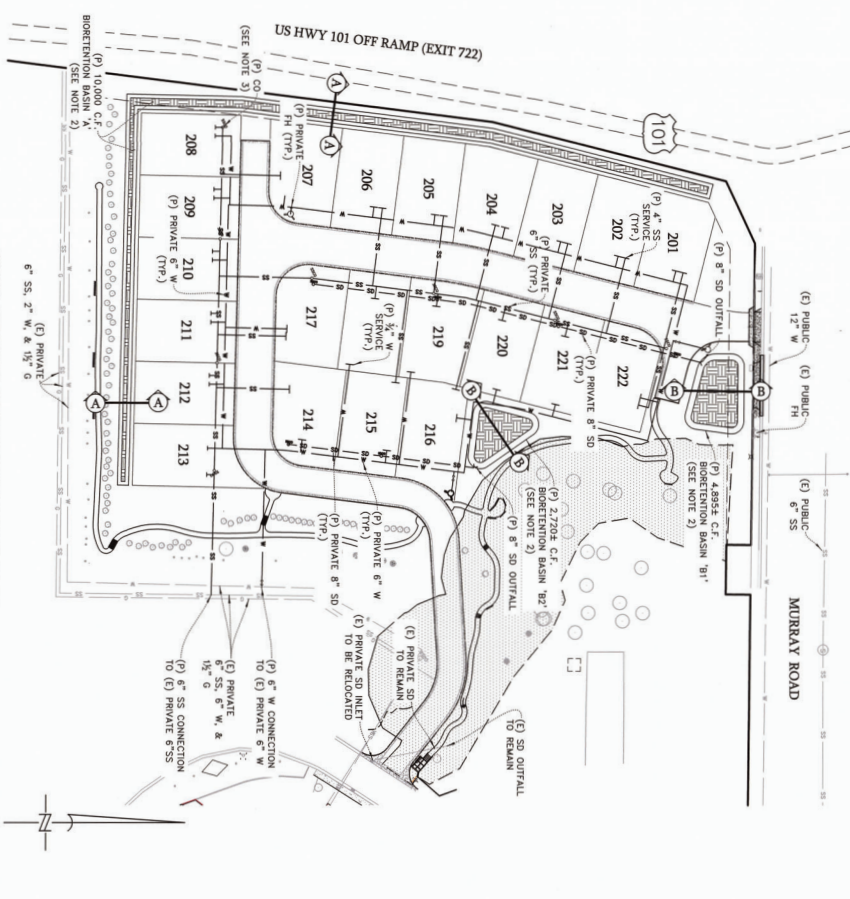
REVISED: 09/29/21
06/17/21
02/04/20
11/14/19

CUNBERG & PRESTON
INCORPORATED
10000 S. SUNSET BLVD., SUITE 100
MCKINLEYVILLE, OHIO 45156
(513) 433-0000
WWW.CUNBERGANDPRESTON.COM

DESIGNED BY: JAMES W. WILSON
CHECKED BY: ERICA M. WILSON
DATE: 07/09/18
PROJECT NO.: 2018-001
SHEET NO.: 03

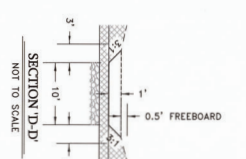
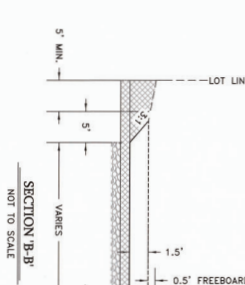
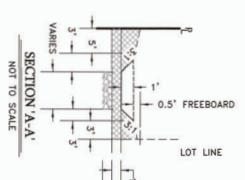
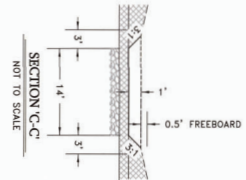
APN 510-171-039 & -060

SUN OCEAN WEST
In the Section 51, 171, 039, & 060, 060
SUN OCEAN WEST

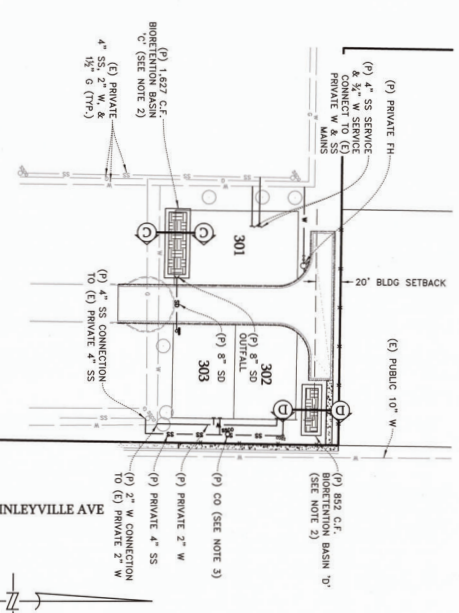


STORM, SANITARY & WATER PLAN FOR APN 510-171-039
SCALE: 1" = 50'

- NOTES**
1. ALL LOTS ARE TO BE PROVIDED WITH 4" WATER SERVICE AND 4" SANITARY SEWER SERVICE AS SHOWN HEREON.
 2. FUTURE ROOF RUNOFF FROM LOTS 201-213 TO BE DIRECTED TO RETENTION BASIN 'A', ROOF RUNOFF FROM LOTS 217-222 TO BE DIRECTED TO RETENTION BASIN 'B', ROOF RUNOFF FROM LOTS 214-216 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 201 & 203 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 218-219 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 210 & 202 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 211 & 209 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 212 & 208 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 213 & 207 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 215 & 206 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 216 & 205 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 217 & 204 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 218 & 203 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 219 & 202 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 220 & 201 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 221 & 200 TO BE DIRECTED TO BASIN 'C'. ROOF RUNOFF FROM LOTS 222 & 199 TO BE DIRECTED TO BASIN 'C'. CRITICAL FEATURES INCLUDING LOT LINES, & SMA STRUCK, FTE OF FUTURE MANUFACTURED HOMES TO BE 1'-100' MIN. ABOVE TOP OF BIORETENTION BASIN.
 3. SCHEDULE SPECIFIC REQUIREMENTS TO HAVE CLEANOUTS EVERY 100 FEET. EXACT LOCATION OF CLEANOUTS TO BE DETERMINED DURING DEVELOPMENT OF CONSTRUCTION REQUIREMENTS.
 4. GATE VALVES TO BE PLACED ON WATER LINE AT ALL CONNECTION POINTS AND JUNCTIONS. LOCATION OF GATE VALVES TO BE SHOWN ON CONSTRUCTION DOCUMENTS.
 5. GCS TO BE PROVIDED BY POLE IN JOINT TRENCH, REFER TO ELECTRICAL PLANS FOR JOINT TRENCH.



STORM, SANITARY & WATER PLAN FOR APN 510-171-060
SCALE: 1" = 50'

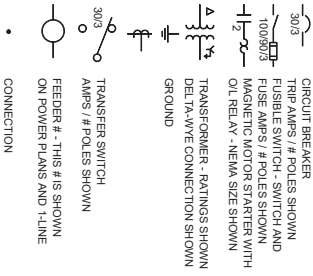


<p>REVISED: 09/29/21 12/01/20 02/11/20 11/14/19</p>	<p>DATE: 07/09/18</p>
<p>DAWBERG & DREYER 4425 S. Ocean Blvd. Suite 200 San Juan Capistrano, CA 92675 (949) 444-8801 www.dawbergdreyer.com</p>	<p>PROJECT: STORM, SANITARY & WATER PLAN SHEET: 18-301 SCALE: 1" = 50'</p>
<p>APN 510-171-039 & -060</p>	<p>STORM, SANITARY & WATER PLAN SUN OCEAN WEST In the unincorporated area of Inland County Section 31, 17N, 8E, 1E, 1M</p>

GENERAL NOTES

- A ALL WORK TO CONFORM TO CALIFORNIA ELECTRIC CODE CALIFORNIA ENERGY CODE, HOD MOBILE HOME PARKS ACT, GO-128 AND APPLICABLE SECTIONS OF "GREENBOOK". ANY DEVIATION FROM THE APPROVED ELECTRICAL PLANS WILL REQUIRE APPROVAL FROM THE ELECTRICAL DESIGNER OF RECORD. PER CALIFORNIA BUSINESS & PROFESSIONS CODE.
- B PROVIDE ALL PARTS AND LABOR FOR A COMPLETE AND WORKING ELECTRICAL SYSTEM WITH THE EXCEPT OF THESE DRAWINGS. COORDINATE ELECTRICAL WORK WITH OTHER TRADES. CONFIRM YOUR WORK SCOPE WITH GENERAL CONTRACTOR. CONTRACTOR TO ARRANGE FOR AND PAY FOR ALL PERMITS AND INSPECTIONS REQUIRED FOR THE WORK. PROVIDE OWNER WITH FINAL AS-BUILT DOCUMENTS AS PART OF CONTRACT CLOSEOUT.
- C ELECTRICAL DRAWINGS ARE DIAGRAMMATIC AND DO NOT SHOW EXACT LOCATIONS OF EQUIPMENT. CONTRACTOR SHALL VERIFY EXACT DIMENSIONS OF PROPOSED EQUIPMENT NUMBERS AND THE EXACT SPACE MEANINGS ON THESE SHEETS. THEY INCLUDE SYMBOLS NOT PART OF THIS PROJECT.
- D WIRING METHODS FOR POWER LIGHTING AND NON-POWER LIMITED CONTROL WIRING U.N.C. CONDUCTORS SHALL BE COPPER, TYPE THHN/THWN INSULATION. PANEL & EQUIPMENT FEEDERS INDIVIDUAL CONDUCTORS IN CONDUIT. BRANCH CIRCUIT WIRING INDIVIDUAL CONDUCTORS IN CONDUIT. CONDUIT TYPES INTERIOR CONDUIT OR EXPOSED - EMT. EMT WITH WATER TIGHT HUBS/COUPLINGS UNDERGROUND. SCHEDULE 40 P/C EQUIPMENT CONNECTIONS & FIXTURE WHIPS LIQUID TIGHT FLEX - SEALTITE - MAX 2 FT.
- E WIRING METHODS FOR LOW VOLTAGE CLASS 2 POWER LIMITED WIRING - SAME METHODS AS ABOVE FOR NON-POWER LIMITED WIRING.
- F INSTALL GREEN INSULATED EQUIPMENT GROUNDING CONDUIT IN ALL FEEDER AND BRANCH CIRCUITS.
- G VERIFY ALL EXISTING CONDITIONS PRIOR TO STARTING WORK. MAINTAIN CONTINUITY OF ALL EXISTING WIRING SERVING EQUIPMENT THAT REMAINS.
- H PROVIDE NEW TYPEWRITTEN PANEL DIRECTORIES. IDENTIFY LOAD TYPE AND LOCATION. E.G. "OUTLETS RW 205"

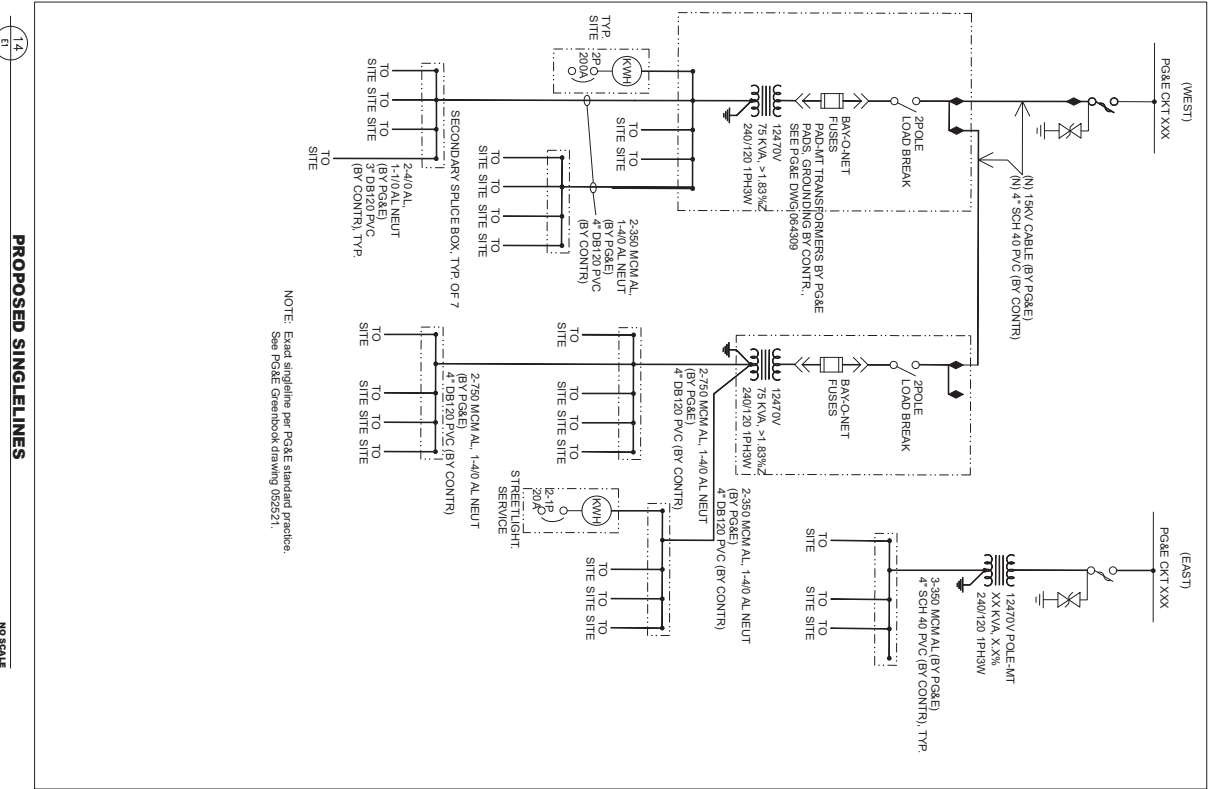
ONE LINE LEGEND



ABBREVIATIONS

A/AMP	AMPERE(S)
A/FE	C.B. FRAME AMPERE RATING
A/FL	ABOVE FINISH FLOOR
A/FC	ARC FAULT CIRCUIT INTERRUPTER
A/AT	AMPS INTERRUPTING CAPACITY
A/ATS	C.B. TRIP AMPERE RATING
C/CON	AUTOMATIC TRANSFER SWITCH
C/CON	CONDUIT
C/BRK	CIRCUIT BREAKER
C/CR	CONTROL ONLY (WITH PULL ROPE)
C/CR	CONTROL RELAY
C/CR	EXISTING
E/MT	ELECTRICAL METALLIC TUBING
E/MT	ELABORATED TIME METER
F/PA	FUTURE
F/PA	FIRE ALARM CONTROL PANEL
F/PA	FLEXIBLE METALLIC CONDUIT
F/PA	FULL VOLTAGE NON-REVERSING
G/ND	GROUND
G/ND	GROUND FAULT CIRCUIT INTERRUPTER
G/ND	GALVANIZED RIGID METAL CONDUIT
LS	LIGHTING FIXTURE SCHEDULE
LS	LEVEL SWITCH-HIGH/LOW
LT	LEVEL TRANSMITTER
M/C	MOTOR CONTROL CENTER
M/N	MINIMUM
M/N	MAIN SWITCHBOARD
N/NEUT	NEUTRAL
N/NEUT	NORMALLY CLOSED
N/OP	NORMALLY OPEN
N/OP	NON-METALLIC SHEATHED CABLE (RMC/N)
N/OP	OR APPROVED EQUAL
O/E	OVERHEAD
O/E	OVERHEAD RELAY
P/C	POINT OF COMMON COUPLING
P/C	PVC COATED GALV. RIGID CONDUIT
P/SH	PRESSURE SWITCH-HIGH
P/SH	PRESSURE TRANSMITTER
P/C	PVC CONDUIT, SCHEDULE 40 U.O.N.
R/M	RETURN AIR (HVAC EQUIP.)
R/M	RIGID METALLIC CONDUIT
R/M	REMOTE TERMINAL UNIT
SA	SUPPLY AIR (HVAC EQUIP.)
SA	STREET LIGHT
SW/B	SWITCHBOARD
THM	TEMPERATURE MAGNETIC
THM	TEMPERATURE SWITCH-HIGH
THM	TEMPERATURE SWITCH-LOW
TVSS	TRANSIENT VOLTAGE SURGE SUPPRESSOR
TYP	TYPICAL (OF QUANTITY)
U/O	UNDERGROUND
U/O	UNUSUAL DELAYED WORK
W/P	WEATHER PROOF
X/MR	TRANSFORMER
##	HEIGHT INCHES AFT. INDOOR FLOOR FINISH
##	ALL HEIGHTS ARE TO BOX CENTER

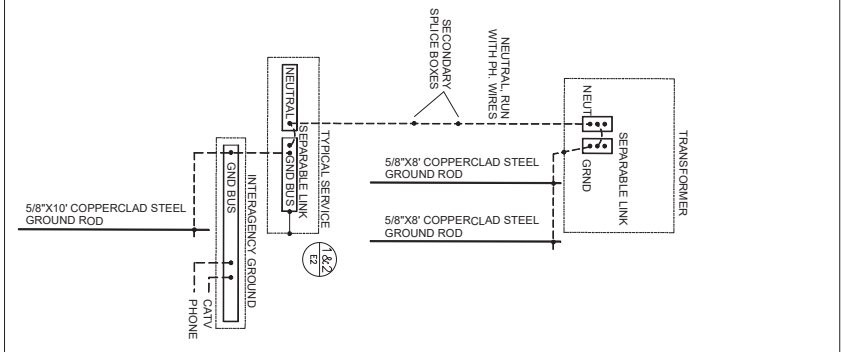
GENERAL LEGEND



NOTE: Exact singlelines per PG&E standard practices. See POLE Greenbook drawing 052521.

15

GROUNDING DIAGRAM



ELECTRICAL SHEETS:

- E1 NOTES, LEGENDS, 1-LINE, GROUND
- E2 ELECTRICAL LEGEND
- E3 ELECTRICAL SITE PLAN
- E4 ELECTRICAL SITE PLAN NORTHWEST AREA
- E5 ELECTRICAL PLAN NORTHWEST AREA
- E6 ELECTRICAL PLAN EAST AREA
- E7 LIGHTING PLAN, NORTHWEST AREA
- E8 LIGHTING PLAN, SOUTHWEST/EAST AREAS
- E9 LIGHTING CERTIFICATION FORMS

PROPOSED SINGLELINES

NO SCALE

NO SCALE



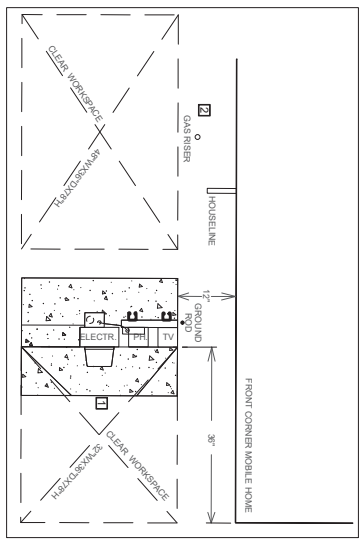
For Review
REVISION: 06/12/21

James W. Rankins, PE
Professional Engineer
State of California
License No. 61087
ELECTRICAL ENGINEER
CIVIL WORKER

ISSUED BY	DATE
JWR	07/29/18
DATE	07/29/18
DATE	07/29/18
DATE	07/29/18

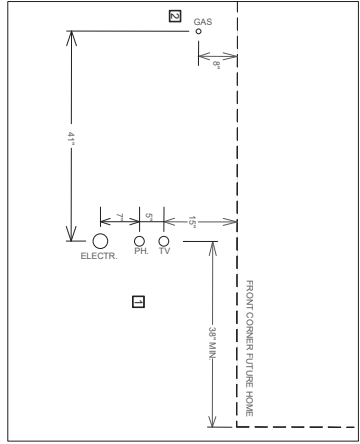
SUN OCEAN WEST
14000 Sun Ocean West
San Diego, CA 92128
Sun Ocean West, Inc.
A Sun Communities Company

SCALE	SHEET
20% (AS SHOWN)	9

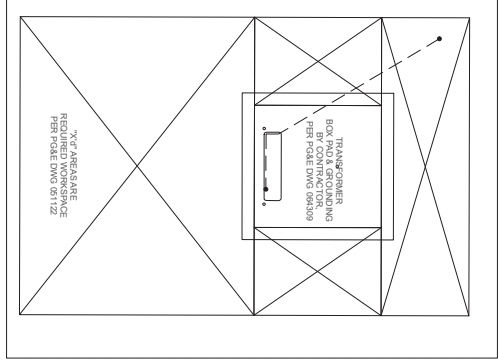


1 TYPICAL PLAN VIEW, DEVELOPED SITE
SCALE APPROX 1" = 4' FT

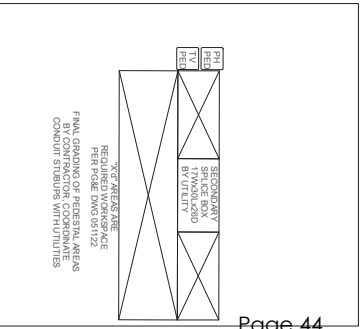
- KEYNOTES:**
- Arrangement of elect, pedestal and PUVV backboard may reverse left-to-right (facing front of Mobile Home) refer to site plans. Gas Houseline is always to right of gas riser, facing wall.
 - Gas piping installation to be done per FGAE Greenbook, Board codes. Refer to "Gas Qualification Requirements" on www.pjpe.com



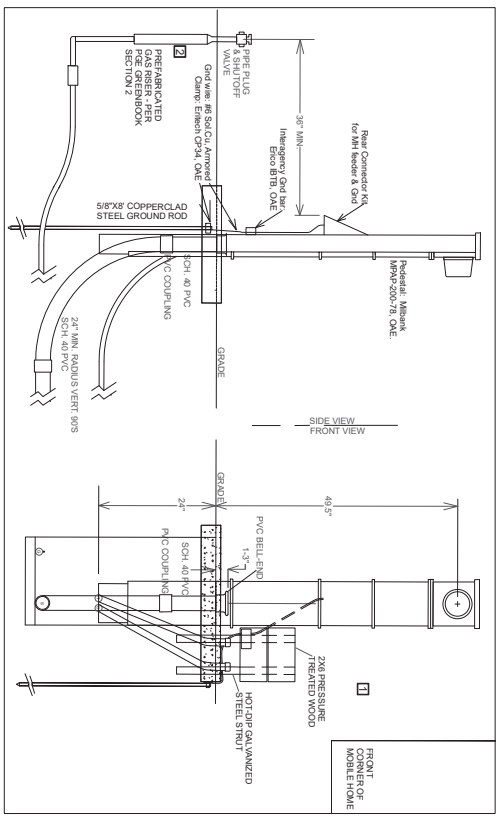
2 TYPICAL STUBUP UNDEVELOPED SITE
SCALE 1" = 4'



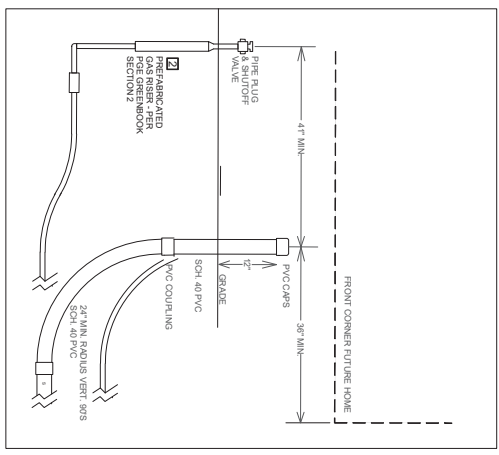
3 TRANSFORMER BOX PAD PLAN
SCALE 1" = 2'



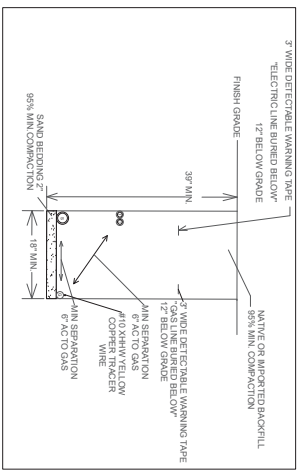
4 SECONDARY JUNCTION PLAN
SCALE 1" = 2'



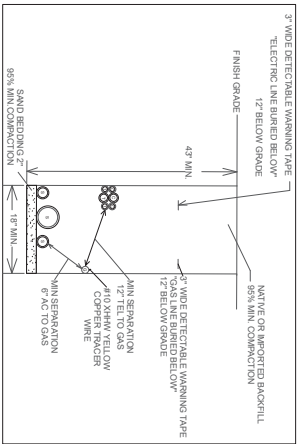
5 TYPICAL ELEVATIONS, DEVELOPED SITE
SCALE APPROX 1" = 4' FT



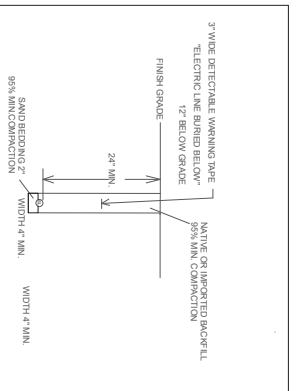
6 TYPICAL STUBUP UNDEVELOPED SITE
SCALE 1" = 4'



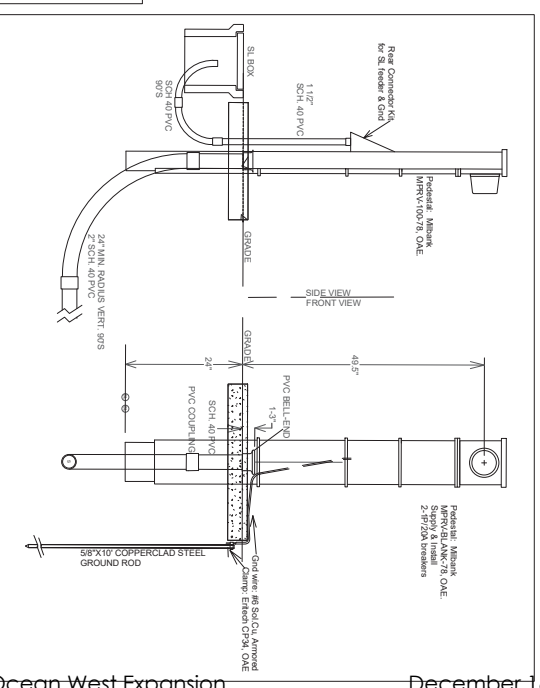
7 TYPICAL JOINT SERVICE TRENCH
SCALE 1" = 4'



8 TYPICAL JOINT DISTRIBUTION TRENCH
SCALE 1" = 4'



9 STREETLIGHT TRENCH
SCALE 1" = 4'



10 STREETLIGHT SERVICE
SCALE 1" = 4'

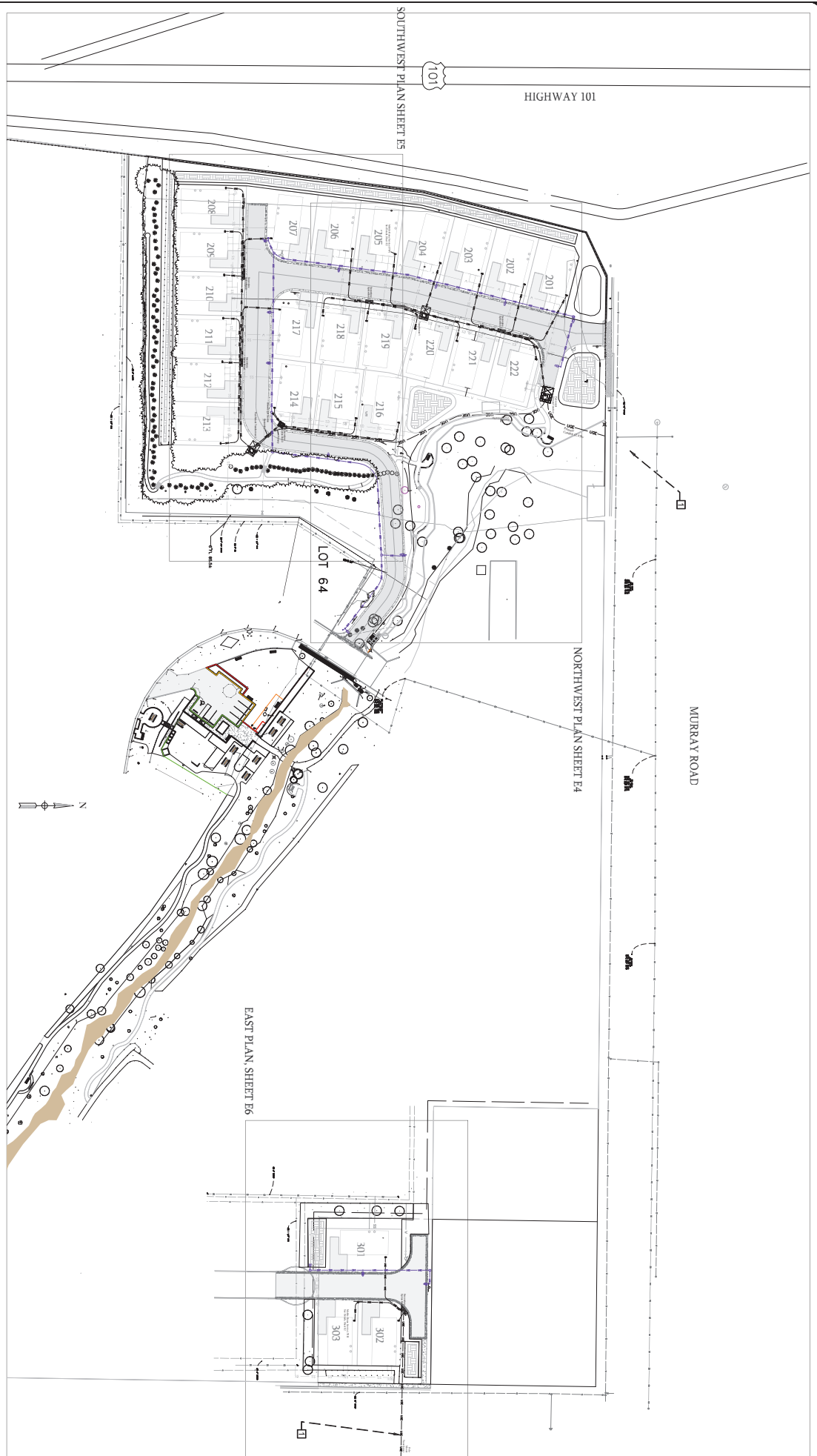


For Review

James W Rankins PE
Professional Engineer
No. 10000
State of Florida
ELECTRICAL ENGINEER

REVISION	DATE	BY	CHKD	DESCRIPTION
1	07/28/18	JWR	JWR	ISSUED SET
2	07/28/18	JWR	JWR	REVISIONS TO PERFORMER COMMENTS
3	07/28/18	JWR	JWR	REVISIONS TO PERFORMER COMMENTS
4	07/28/18	JWR	JWR	REVISIONS TO PERFORMER COMMENTS

SCALE: 1" = 4'



OVERALL SITE PLAN
Scale: 1" = 50 ft

- JOINT GAS ELEC. PL. CATV ————
- SANITARY SEWER ————
- STREET LIGHTING ————
- STORM DRAIN ————
- WATER ————

- KEYNOTES:
- Exact Utility Tie-in points to be determined by respective utilities.
 - Streetlighting and other items shown for reference. Openness CA G.O. 1728 rules where parallel and crossing. See sheet E7 for street lights, streetlight conduits do NOT go in joint trenches



For Review

James W. Rankins PE
Professional Engineer
ELECTRICAL ENGINEER

ISSUED BY	JWR	DATE	07/29/18
DRAWN BY	JWR	DATE	07/29/18
CHECKED BY	JWR	DATE	07/29/18
DESIGNED BY	JWR	DATE	07/29/18

APN 510-171-039, -040 & -060
SUN OCEAN WEST
14268 Ocean West
San Francisco, CA 94133



VOLTAGE DROP CHECK

FROM	TO	SITES	D.F. (1)	WATTS	AMPS	DR-120 WIRE	FEET	DROP-V	DROP %
T1	SSB1	4	0.39	38944	162	4	390 AL	92	3.73
T1	SSB1	201	1.00	24665	105	3	400 AL	110	2.37
T1	SSB2	4	0.39	38944	162	4	390 AL	6.10V	2.54%
T1	SSB2	220	1.00	24665	105	3	400 AL	70	2.84
T1	Total	11	0.27	74144	309		400 AL	79	1.70
									Farthest Drop: 4.54V 1.89%

(1) Table 550.31 2019 NEC

FAULT CHECK (2)

FROM	TO	IMP	PVC WIRE	FEET	AMPS@240V	AMPS@120V	
T1	221	100KVA	1.66%	3	40 AL	61	
							0
							25139
							38300
							5500
							3449

(2) Assumes 100kva @ 1.66%Z(GE)

KEYNOTES

- Exact Utility Tie-in points to be determined by respective utilities.
- Strengthening and other fixes shown for reference. Observe CA GO-128 rules wire bundle and crosing. See sheet E7 for street lights, streetlight conductors and NOT for joint enclosures.

LINE LEGEND:

- JOINT (GAS, ELEC, PH, CATV)
- SANITARY SEWER
- SAINTARY RAIN
- STORM DRAIN
- WATER

APN 510-171-039, -040 & -060

LOT 64

Scale 1" = 15 ft

For Review

James W. Rankins, PE
 31400 Via Mariposa, Suite 100
 San Jose, CA 95128
 (408) 261-1111
 jrankins@jrankins.com

DATE: 07/29/18
 NORTHWEST PLOT PLAN
 SUN OCEAN WEST

See Northwest Plot Plan, sheet E4



VOLTAGE DROP CHECKS

FROM	TO	SITES	D.F. (1)	WATTS	AMPS	WIRE	PVC	FEET	DROP, V	DROP, %
T2	SSB3	3+SL	0.44	32953	140	350 AL	4"	51	1.63	0.68
SSB4	Longest	1		24965	105	4/0 AL	3"	164	2.93	1.22
Furthest Drop: 4.56v									1.90%	
T2	SSB4	8	0.28	55920	233	750 AL	4"	107	5.27	2.19
SSB4	SSB5	4	0.39	38944	162	350 AL	4"	105	2.65	1.11
SSB5	Site 208	1		24965	105	4/0 AL	3"	120	2.59	1.08
Furthest Drop: 10.51v									4.38%	
T2	Total	11	0.27	74144	309					

SOUTHWEST PILOT PLAN

Scale 1" = 15 ft



- REMARKS:**
- 1 Exact Utility 7' rain points to be determined by respective utilities.
 - 2 Sizing and other line shown for reference. Orange CA CO 128 rules when parallel and crossing. See sheet E7 for street lights, streetlight conditions on NOT go in joint entries.
 - 3 SSB4 and SSB5 are 24x36" - SSB3 17x30"

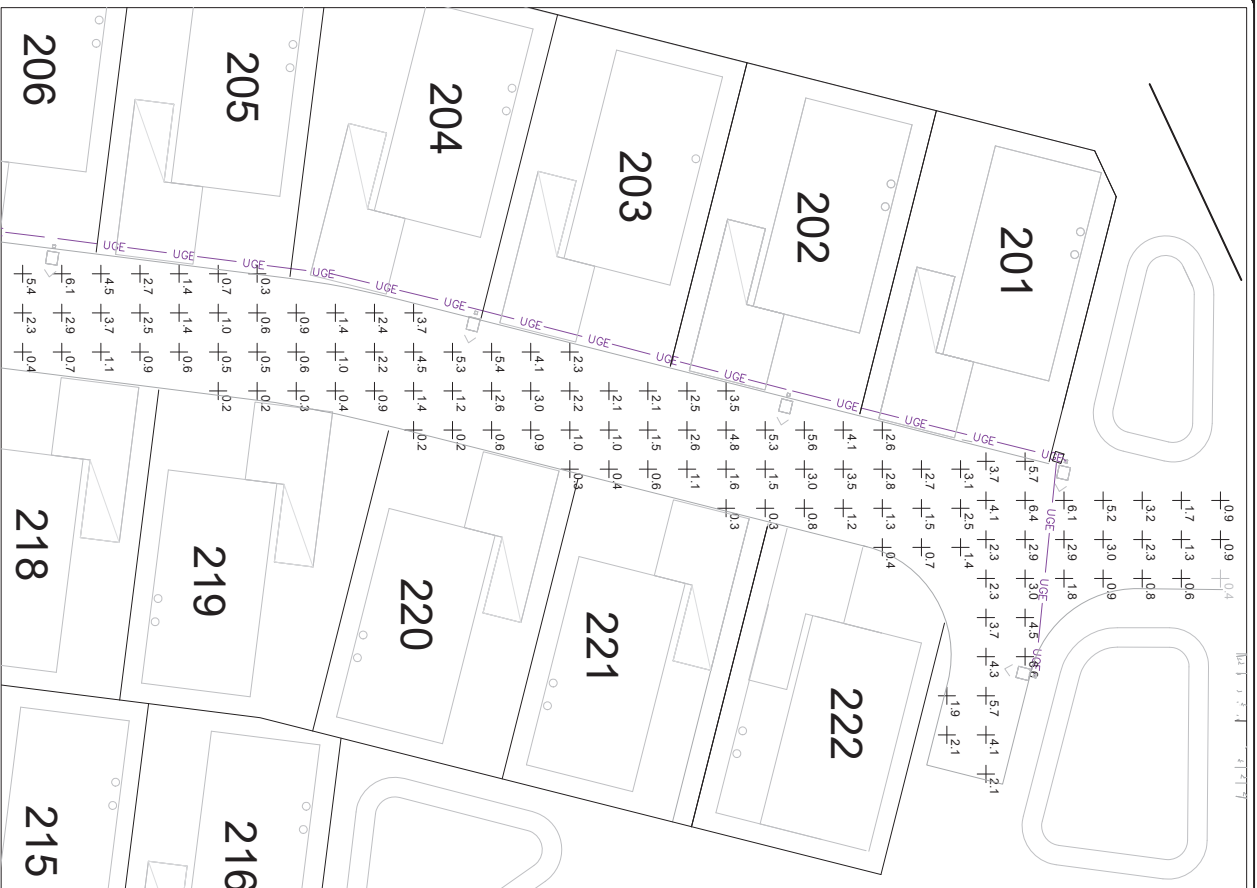
APN 510-171-039, -040 & -060

For Review

James W. Rankins, PE
 2100 Westline
 Suite 204
 San Diego, CA 92108
 ELECTRICAL ENGINEER

DATE	BY	REVISION
07/29/18	JWR	ISSUED SET
07/29/18	JWR	DATE
07/29/18	JWR	DATE
07/29/18	JWR	DATE

SOUTHWEST PILOT PLAN
 SUN OCEAN WEST
 1400 S. Ocean Blvd., Suite 100, San Diego, CA 92108
 SCALE: 1" = 15'



LIGHTING FIXTURE SCHEDULE

SYMBOL	DESCRIPTION	LAMPS	BALLAST	INPUT W	MFR CATALOG #
□	LED Full Cutoff, 15' pole	3000K LED	ELI 120Vdc, Photocell	55	RAB RWLED 2150 Y PCS_OAE
□	Streetlighting Junction Box				COOK 12X18 XIXD_H10 UD-STREET LIGHT_OAE

FOOTCANDELES (fc, at grade)

Area	Average	Max	Min
Approach Street	1.7 fc	6.9 fc	0.1 fc
East Street	1.5 fc	6.0 fc	0.1 fc
South Street	2.0 fc	7.3 fc	0.2 fc
West Street	1.7 fc	6.1 fc	0.1 fc
West Turnaround	3.7 fc	6.6 fc	0.4 fc

NOTE:
 Note placement of utility joint trenches, see sheets E3-E6. Streetlight conduits do NOT go in joint trenches.

OUTDOOR MANDATORY LIGHTING MEASURES

Section	Requirement
□ §190.01	Power determined by fixture rating for medium-base sockets without permanently installed luminaires > 100 watts must have efficacy > 60 lumens/watt or be controlled by motor sensor
□ §190.2(a)	Luminaires with amps > 175 watts must meet the Cutoff Requirements
□ §190.2(b)	All permanently installed outdoor lighting must meet listed control requirements
□ §190.2(c)	Parking lots, garages, carports, building facades, and outdoor sales areas must meet the Minimum Lighting Requirements.

NORTHWEST LIGHTING PLAN
 Scale: 1" = 15 ft

SEE SHEET E8



For Review
 REVISION: 08/14/21

James W. Rankins PE
 210 Riverside Ave., Suite 200
 San Francisco, CA 94102
 ELECTRICAL ENGINEER

REVISION	DATE
1	07/29/18
2	07/29/18
3	07/29/18

LIGHTING PLAN, NORTHWEST
 SUN OCEAN WEST
 14268 Ocean West Expansion

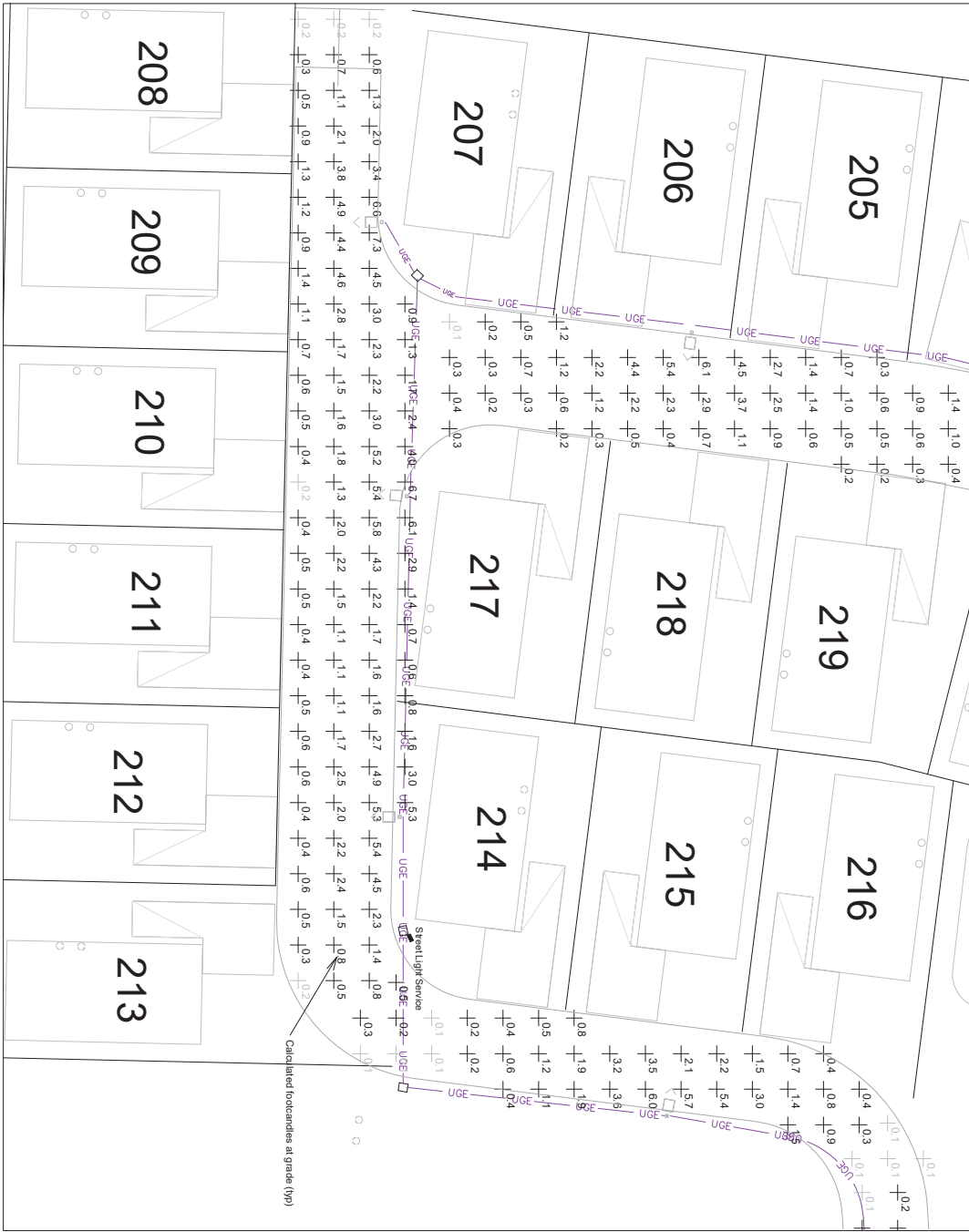
SCALE	DATE
20% REDUCED	12/16/21
1" = 15'	12/16/21

LIGHTING FIXTURE SCHEDULE

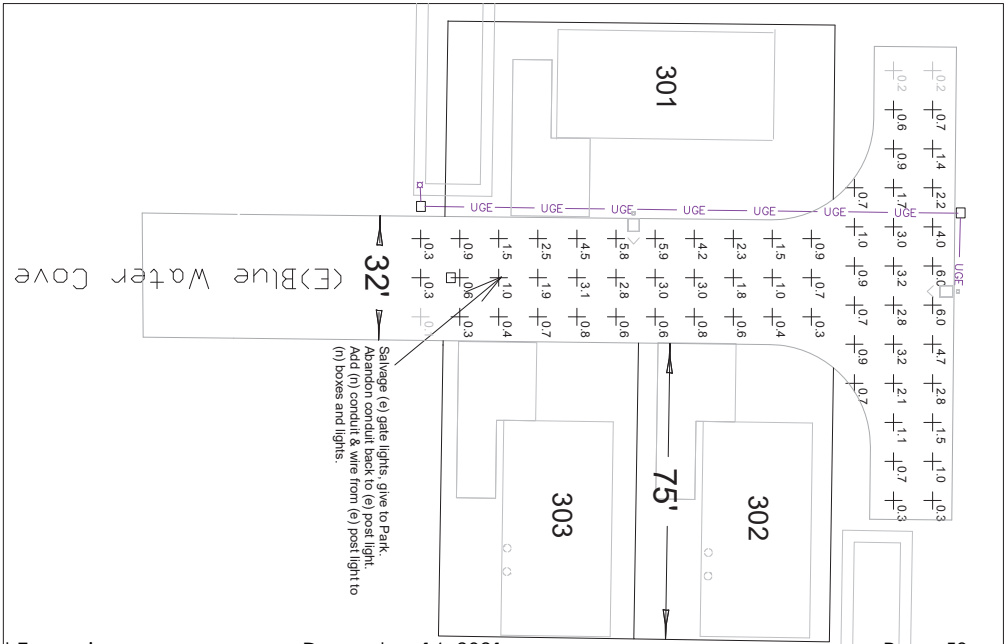
SYMBOL	DESCRIPTION	LAMPS	BALLAST	INPUT W	MFR CATALOG #
□	LED Full Cutoff, 15' pole	3000K LED	EL-120vac, Photocell	55	RAV RWLED 2700V / PCS OAE
□	Streetlighting Junction Box				COOK 12X18 X20, H10 LID STREET LIGHT - OAE

FOOTCANDLES (fc, at grade)			
Area	Average	Min	Max
East Cove	1.8 fc	5.6 fc	0.2 fc
East Hornmehed	1.8 fc	5.2 fc	0.2 fc
East Street north	1.8 fc	5.6 fc	0.1 fc
East Street south	1.7 fc	5.2 fc	0.3 fc
West Street south	2.2 fc	5.9 fc	0.1 fc
South Street			

NOTE:



SOUTHWEST LIGHTING PLAN
Scale: 1" = 15'



EAST LIGHTING PLAN
Scale: 1" = 15'



For Review

REVISION: 08/15/21

DESIGNED BY: J.M.R.	DATE: 07/29/18
DRAWN BY: J.M.R.	DATE: 07/29/18
CHECKED BY: J.M.R.	DATE: 07/29/18
IN CHARGE: J.M.R.	DATE: 07/29/18

APN 510-171-039, -040 & -060

LIGHTING PLAN SE

SUN OCEAN WEST

1400 S. Ocean Blvd., Suite 201, Ft. Lauderdale, FL 33304

SCALE: 1" = 15'

DATE: 07/29/18

BY: J.M.R.

ATTACHMENT 1A Conditions of Approval

Approval of the Conditional Use Permit, Special Permit, and Notice of Merger is conditioned on the following terms and requirements which must be satisfied before work is initiated or during project implementation, accordingly:

1. All components of project shall be developed, operated, and maintained in conformance with the Project Description, the approved Site Plan, Recreation and Landscape Master Plan, and the Proposed Mitigation Measures, Monitoring, and Reporting Program (including the replacement of Mitigation Measure #10) included in the MND, and these conditions (Attachment 1B, 2 and 3).
2. The applicant shall record a Notice of Merger on forms provided by the Department. All applicable document review, Assessor and recording fees shall apply.
3. Prior to issuance of grading permit, a riparian and wetland habitat restoration plan shall be submitted to the department for approval. The content of this plan must comply with the form, information, analysis, and any other requirements based on the hearing officer's conditional approval. At minimum, the restoration plan shall include:
 - a) A complete statement of the restoration objectives.
 - b) A complete description of the restoration site including a map of the project site, at a mapping scale no smaller than 1" = 200' (one-inch is equal to 200 feet).
 - c) Resource Inventory and Impact Analysis of all plant, fish, and wildlife habitat values that would be affected by the stormwater runoff from the access road, grading or filling, and including:
 - i. Any changes in plant and animal natural species diversity, abundance, and composition and an assessment of how, if at all, these affect the long-term stability of the ecosystem (i.e., natural species, diversity, abundance and composition are generally unchanged as a result of the project);
 - ii. Any impacts to rare or endangered species or their habitat;
 - iii. Any impacts to a species or habitat essential to the natural biological functioning of the wetland or the riparian ecosystem; and,
 - iv. Any significant reduction to non-consumptive values such as water quality and research opportunity, values of the wetland or riparian ecosystem.
 - d) Restoration Schedule. At a minimum, a clear statement of when restoration work will commence and be completed, a schedule for inspection, and a maintenance schedule shall be provided. Restoration shall commence simultaneously with project construction and be completed prior to commencement of operation of the proposed project.
 - e) A complete restoration description with scaled, detailed diagrams, and including:
 - i. Description of site preparation; i.e., excavation, grading, stockpile of topsoil, removal of stumps, etc. This grading plan shall depict any alterations to topography, natural land forms, and drainage channels and areas where existing fill and debris will be removed;
 - ii. A vegetation preparation plan including a list of plant species to be eliminated and a list of plant species to be introduced on the restoration site, and describing the methods of plant preparation, including source of plantings and any treatment

- with rooting hormone, and proposing a schedule for eliminating and establishing vegetation.
 - iii. Use of mulch and/or fertilizers.
 - iv. Identify any necessity of irrigation and/or fencing.
 - v. Other measures necessary to achieve restoration objectives and to protect the restoration site from adverse impacts of adjacent development and use.
- f) The implementation of the restoration plan shall include a description for adherence with the following performance standards:
- i. Year one – 80% tree species viable and achieving at least 4 inches of growth from initiation of planting.
 - ii. Year three – plugs of native riparian vegetation shall cover at least 30% of project site.
 - iii. Monitoring Requirements – (standard is five years of monitoring) typically conducted in June or as necessary, conducted during the appropriate time of year for monitoring of a specific species.
 - iv. Annual reporting – The County and CDFW shall receive an annual monitoring report.
 - v. Photos shall be included in the annual monitoring report.
4. The conditions on the Department of Public Works referral dated **October 17, 2018**, included herein as Attachment 5, as may be modified by the decision maker, shall be completed or secured to the satisfaction of that department. These include:
- a. The applicant must apply for and obtain an encroachment permit to construct improvements within the County right of way
 - b. The permit will require the existing concrete driveway apron on APN 510-171-039 to be removed and replaced with a Portland Cement Concrete (PCC) Caltrans Type A2-6 curb and gutter, and ADA compliant sidewalk.
 - c. There is no parking allowed on the south side of Murray Road fronting APN 510-171-039 and the curb is currently painted red. Applicant shall paint the section of the new curb, in compliance with the MUTCD, after construction is completed.
 - d. Pursuant to the Airport Land Use Compatibility Plan, a deed notice is required to be dedicated to the County of Humboldt.
 - e. Applicant shall be responsible to correct any involved drainage problems to the satisfaction of the department.
 - f. Low Impact Development (LID): The subject property is located within the municipal separate storm sewer system (MS4) boundary area. Development of the property will be required to comply with the MS4 requirements. The Applicant is advised to ensure that MS4 requirements for the proposed project can be achieved prior to the project being heard by the Planning Commission.
5. A Deed Notice is required in addition to disclosure to prospective residents about the potential noise impacts related to overflight. The project site is approximately 1 mile from the nearest airport and located within airport compatibility zone D, an area identified as having negligible risk and potential annoyance from overflights (Humboldt County General Plan table 14-A). Property owner shall also disclose to all prospective park tenants that there is potential for some overflight noise.
6. New manufactured homes shall be certified to limit interior noise levels to 45 dB CNEL-Ldn in all habitable rooms and 60 dB CNEL-Ldn outside. A 6-foot wood fence along the park boundary abutting Highway 101 and the Murray Road exit off-ramp has been constructed. Gaps between planks and between the bottom of the fence and the ground need to be filled to meet the noise requirements. An acoustic study was completed showing that these requirements will be met once gaps both between planks and between the bottom of the

fence and the ground are filled/covered with additional planks along the whole western boundary of the park. This condition shall be met prior to occupancy of any new homes on the western expansion parcel.

7. Prior to the issuance of grading permit, the applicant shall submit 2 copies of a stormwater management plan demonstrating compliance with the County's Storm Water Permit for post-construction storm water runoff. This plan should address North Coast Regional Water Quality Control Board's comments that were not addressed in the preliminary plan, specifically it should demonstrate how stormwater from the proposed access road would enter Widow White Creek without causing erosion to Widow White Creek.
8. Applicant shall incorporate Low Impact Design (LID) into the project by complying with County's MS4 (storm water quality) permit requirements set forth in County Code Section 337-1 et seq.
9. Prior to issuance of a grading permit, the applicant must have a 401 Certification from the Regional Water Quality Control Board.
10. To address North Coast Regional Water Quality Control Board's comments, the following additional measures must be implemented into the proposal:
 - a. Fencing around bioretention basins shall be used, only if NCRWQCB deems the use necessary to protect wildlife and public safety.
 - b. The design of the bioretention basins should reduce drawdown time to reduce standing water and therefore reduce vectors being drawn to the basins in order to be compliant with local Vector Control District requirements
 - c. Permeable pavement must be regularly maintained according to the maintenance schedule included with the applicant's evidence titled Pervious Paving Maintenance Plan. If the pavement is clogged and cannot be repaired, it must be replaced.
 - d. The disturbance envelope during construction should be minimized as much as possible to minimize disturbance to the riparian area.
 - e. Stage construction so that the road access construction will only occur during the dry season.
11. Only minimal grading will be required to develop the access roads and manufactured home pads. All grading work will be done in accordance with the Humboldt County Grading Ordinance and applicable Best Management Practices, including watering to control fugitive dust. The project must comply with NCUAQMD fugitive dust emission standards.
12. The proposed expansion areas are required to be consistent in design with the design features of the existing park. The height, bulk, and area of buildings within the expansion area are to be consistent with the existing buildings. All setbacks from property lines of the expansion should be consistent with the existing setbacks. The external colors, textures, and materials of the proposed homes within the expansion area should be consistent with the existing homes, as well as the type, pitch, and material of roofs. The type, size, and location of signs should be consistent with the existing signs in the park. Some of the landscaping in the existing parcel will be altered for the Proposed Mitigation Measures, Monitoring, and Reporting Program.
13. The applicant shall submit at least three (3) copies of a Development Plan to the Planning Division for review and approval. The map shall be drawn to scale and give detailed specifications as to the buildout of the entire Ocean West Manufactured Home park. The following details shall be included:
 - A) Mapping
 - (1) The location of all existing and proposed pedestrian paths and recreation areas and amenities for the entire 30.38-acre park. Include a line item listing of the types of amenities and their exact area.
 - (2) Proposed auto ingress and egress for park residents.
 - (3) All manufactured home sites identified with their space numbers, envelopes and easements consistent with the submitted tentative map;

- (4) The location of all drainage improvements and related easements;
- (5) Two (2) off-street parking spaces on all lots consistent with Section 314-107.1 Humboldt County Code;
- (6) Location of on-site guest parking consistent with Section 314-107.1 Humboldt County Code;
- (7) The location of the Streamside Management Area restoration and related split rail boundary fencing.
- (8) Location and description and type of noise attenuation barrier (i.e., solid board fence, masonry wall, earthen berm, etc).
- (9) Landscaping and restoration plan consistent with the Mitigation Measures, Monitoring, and Reporting Program included in the MND, and the Riparian and Wetland Mitigation Plan, Revision 2 prepared by SHN.

B) Notes to be placed on the Development Plan:

- (1) "The project site is not located within an area where known cultural resources have been located. However, as there exists the possibility that undiscovered cultural resources may be encountered during construction activities, the following mitigation measures are required under state and federal law:
 - If cultural resources are encountered, all work must cease and a qualified cultural resources specialist contacted to analyze the significance of the find and formulate further mitigation (e.g., project relocation, excavation plan, protective cover).
 - Pursuant to California Health and Safety Code §7050.5, if human remains are encountered, all work must cease and the County Coroner contacted."
- (2) "The project is located in a designated non-attainment area for the state's health-based particulate matter (PM10) air quality standard. As such, additional emission from the project could exacerbate air quality problems, including non-attainment of ambient air quality standards. In order to address potential effects to air quality the District recommends:
 - Prohibition of open fireplaces.
 - Heating should be provided using clean fuels (electricity or natural gas), when feasible.
 - If wood heating must be used, only US Environmental Protection Agency (EPA) certified heating appliances should be permitted in new construction."
- (3) "Hours of construction activity shall be limited to Monday through Friday from 7:00 am to 6:00 pm, Saturday from 9:00 am to 5:00 pm with no construction activity on Sunday"
- (4) "Subject to landscaping plan"
- (5) "Development of open space is prohibited in SMA restoration area"

14. The applicant shall cause to be recorded a "Notice of Development Plan" for the property on forms provided by the Humboldt County Planning Division. Document review fees as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors (currently \$415.00 plus applicable recordation fees) will be required.

15. Tree removal and vegetation clearing associated with the Project should be conducted outside of the bird breeding season (the nesting season is generally considered to be March 1 – August 15) in order to avoid 'take' as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 et seq.). If work must be conducted during the bird nesting season, a qualified ornithologist (someone who is able to identify Northern California birds, and who has experience in nest-searching for passerines and raptors) should thoroughly survey the area no more than seven days prior to tree/vegetation removal to determine whether active nests (nests containing eggs or nestlings) are present. If active nests are found, appropriate buffers should be developed in consultation with CDFW to avoid a taking.
16. All activities related to the removal of trees under this permit shall be in strict conformance with the applicable County's Small Woodland Performance Standards (copy available from the Planning Division) in addition to Forest Practice Rules Section 1038 and applicable sections of 1104.1. An executed copy of the Small Woodland Performance Standards shall be submitted to the Department prior to commencement of the tree removal operation.
17. The applicant shall contact THPOs from Blue Lake Rancheria, the Wiyot Tribe, and the Bear River Band of the Rohnerville Rancheria to give them opportunities to salvage native strawberry plants prior to any ground disturbing work, including restoration work.
18. Prior to issuance of grading permit, and in accordance with Humboldt County Zoning Ordinance §314.107.1.6, a landscaping and fencing plan shall be provided to Planning Division for approval. At a minimum, the landscaping plan shall include native tree species, which are non-pyrophytic, and identify the location, type (by species and common name), size, method for irrigation, and maintenance program, including replacement of plantings over time. Landscaping shall not affect visibility and shall conform to the visibility ordinance as required by the Department of Public Works. All undeveloped areas within the park expansion shall be landscaped except for the habitat restoration area.
19. Current residents of Ocean West expressed concern about the absence of street signs in the park for emergency personnel and guests to navigate the internal streets in the park. The applicant shall put street signs on every appropriate internal corner throughout the existing park, and throughout the proposed expansion of Ocean West.
20. Current residents expressed concern about the lack of ADA-compliant emergency access exits in the park. The sidewalk of the emergency exit on Murray Road on the northwest corner of the western expansion must be ADA-compliant, as stated in the Public Works Memo (Attachment 5). The Murray Road emergency access point will have a gate, Knox box for emergency personnel, and provide vehicle access.
21. For mail delivery to not be impeded by parked cars, the applicant shall either install neighborhood box units instead of individual mailboxes, or postal workers would need to deliver primarily by foot throughout the park instead of driving between each individual mailboxes. The applicant shall work with the appropriate Post Master to decide the best option if mail delivery becomes impeded by curbside parked cars.
22. Arcata Fire Protection Service District and the County Building Department recommended conditional approval of this project. The condition is that the emergency ingress/egress from McKinleyville Ave be maintained. The road connecting the emergency access point on McKinleyville Ave and the internal road (Driftwood Drive) shall be paved, and it shall be maintained so vegetation does not block access. The gate shall have a Knox box for emergency personnel and the sidewalk shall be ADA compliant.

23. The McKinleyville Community Services District recommended conditional approval of this project. The District requires approval of water and sewer mainline design and inspection during installation.
24. The project is to comply with the Humboldt County Building Code Flood Ordinance.
25. **Within five (5) days of the effective date of the approval of this permit**, the applicant shall submit a check to the Planning Division payable to the Humboldt County Recorder in the amount of \$2,480.25. Pursuant to Section 711.4 of the Fish and Game Code, the amount includes the California Department of Fish and Wildlife (CDFW) fee plus a \$50 document handling fee. This fee is effective through December 31, 2021 at such time the fee will be adjusted pursuant to Section 713 of the Fish and Game Code. Alternatively, the applicant may contact CDFW by phone at (916) 651-0603 or through the DFW website at www.wildlife.ca.gov for a determination stating the project will have *no effect* on fish and wildlife. If CDFW concurs, a form will be provided exempting the project from the \$2,480.25 fee payment requirement. In this instance, only a copy of the CDFW form and the \$50.00 handling fee is required.

Note: If a required filing fee is not paid for the project, the project will not be operative, vested or final and any local permits issued for the project will be invalid (Section 711.4(c)(3) of the State Fish and Game Code).

26. The applicant is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Department will provide a bill to the applicant upon file close out after the Planning Commission decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 H Street, Eureka.
27. The following required Mitigation Measures for development within a Streamside Management Areas, detailed in BR-S8 of the Humboldt County General Plan, shall at a minimum, include, and shall be conducted:
 - a. Retaining snags unless felling is required by CAL-OSHA, by CAL FIRE forest and fire protection regulations or for public health and safety reasons. The felling must be approved by the Planning Director. Felled snags shall be left on the ground if consistent with fire protection regulations and the required treatment of slash or fuels.
 - b. Retain live trees with visible evidence of current or historical use as nesting sites by hawks, owls, eagles, osprey, herons, kites or egrets.
 - c. Erosion control measures (as per Standard BR-S9- Erosion Control).
 - d. Maximum feasible retention of overstory canopy in riparian corridors.
28. The following required erosion control measures for development within a Streamside Management Areas, detailed in BR-S9 of the Humboldt County General Plan, shall at a minimum, include, and shall be conducted:
 - a. During construction, land clearing and vegetation removal will be minimized, following the provisions of the Water Resources Element and the standards listed here.
 - b. Consistent with BR-S8, construction sites with at least 100 square feet of exposed soil will be planted or seeded as appropriate per mitigations as recommended in writing by the lead agency with native or non-invasive vegetation and mulched with natural or chemical stabilizers to aid in erosion control and ensure revegetation.
 - c. Long slopes will be minimized to increase infiltration and reduce water velocities down cut slopes by such techniques as soil roughing, serrated cuts, selective grading, shaping, benching, and berm construction.
 - d. Concentrated runoff will be controlled by the construction and continued maintenance of culverts, conduits, non-erodible channels, diversion dikes, interceptor ditches, slope drains, or appropriate mechanisms. Concentrated runoff will be carried

- to the nearest drainage course. Energy dissipaters may be installed to prevent erosion at the point of discharge, where discharge is to natural ground or channels.
- e. Runoff shall be controlled to prevent erosion by on-site or off-site methods. On-site methods include, but are not limited to, the use of infiltration basins, percolation pits, or trenches. On-site methods are not suitable where high groundwater or slope stability problems would inhibit or be aggravated by on-site retention or where retention will provide no benefits for groundwater recharge or erosion control. Off-site methods include detention or dispersal of runoff over non-erodible vegetated surfaces where it would not contribute to downstream erosion or flooding.
 - f. Disposal of silt, organic, and earthen material from sediment basins and excess material from construction will be disposed of out of the Streamside Management Area to comply with California Department of Fish and Wildlife and the North Coast Regional Water Quality Control Board requirements.
 - g. Winter operations (generally October 15 thru April 15) shall employ the following special considerations: Slopes will be temporarily stabilized by stage seeding and/or planting of fast germinating seeds, such as barley or rye grass, and mulched with protective coverings such as natural or chemical stabilizations. Runoff from the site will be temporarily detained or filtered by berms, vegetated filter strips, and/or catch basins to prevent the escape of sediment from the site. Drainage controls are to be maintained as long as necessary to prevent erosion throughout construction.
29. Short fencing shall be placed to demarcate the trails from the restoration areas, along with signs notifying people to not disturb the restoration area.
30. If cultural resources are encountered during construction activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist as well as the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the applicant and lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided.

The Native American Heritage Commission (NAHC) can provide information regarding the appropriate Tribal point(s) of contact for a specific area; the NAHC can be reached at 916-653-4082. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the NAHC will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to PRC 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99

The applicant is ultimately responsible for ensuring compliance with this condition.

31. The final plan needs to comply with the recreation space requirement of 1,500 square feet of recreation space per acre of the park (Zoning Code 313-107.1.3.2). This means that the 30.38-acre park would require a total of 45,570 square feet of recreation space.
32. The applicant shall apply for an LSAA with CDFW, if necessary.
33. The applicant shall apply for a 404 Permit with the U.S. Army Corps of Engineers, if necessary.

On-going Requirements/Development Restrictions Which Must be Satisfied for the Life of the Project:

34. The project shall be developed, operated, and maintained as described in the Project Description, Plan of Operations, site plan, elevations and as conditioned herein. Changes in the project other than Minor Deviations from the Plot Plan as provided in Humboldt County Code Section 312-11.1 shall require a modification of this permit.
35. All lighting on the property, shall be installed to avoid overspill beyond the parcel boundaries. Lights for the appurtenant signage shall be dim enough to prevent glare into auto traffic from any direction. Lighting within fifty (50) feet of the habitat restoration area shall be down shielded and low wattage so as to minimize impacts to wildlife.
36. The applicant is responsible for receiving all necessary permits and/or approvals from state and local agencies.

Informational Notes:

1. The applicant is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Department will provide a bill to the applicant after the decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
2. The Conditional Use Permit and Special Permit shall be effective for 12 months from the date to coincide with the term of the approved Tentative Map. Extensions of this term may be requested in conformance with provisions of the Humboldt County Code.

**ATTACHMENT 1B
Proposed Mitigation Monitoring and Reporting Program**

Mitigation Measure #1 – Retaining snags unless felling is required by CAL-OSHA, or by California Department of Forestry forest and fire protection regulations, or for public health and safety reasons, approved by the Planning and Building Director. Felled snags shall be left on the ground if consistent with fire protection regulations and the required treatment of slash or fuels.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD		

Mitigation Measure #2 – Retain live trees with visible evidence of current or historical use as nesting sites by hawks, owls, eagles, osprey, herons, kites or egrets.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD		

Mitigation Measure #3 – Any brush clearing or tree removal must be conducted outside of the bird breeding season (March 1 – August 15) in order to avoid a “take” as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 et seq.). If any brush or trees must be removed within the breeding season, the Project proponent shall consult with CDFW prior to removal in order to assess the potential for take of active bird nests. The Grading and Development Plan shall include the following language: “Tree removal and vegetation clearing associated with the Project should be conducted outside of the bird breeding season (the nesting season is generally considered to be March 1 – August 15) in order to avoid ‘take’ as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 et seq.). If work must be conducted during the bird nesting season, a qualified ornithologist (someone who is able to identify Northern California birds, and who has experience in nest-searching for passerines and raptors) should thoroughly survey the area no more than seven days prior to tree/vegetation removal to determine whether active nests (nests containing eggs or nestlings) are present. If active nests are found, appropriate buffers should be developed in consultation with CDFW to avoid take.”

Timing for Implementation/Compliance: Prior to tree removal or vegetation clearing
 Responsible Party for Implementation: Applicant and successors
 Person/Agency Responsible for Enforcement: Humboldt County Planning and Building/CDFW
 Monitoring Frequency: Throughout construction
 Evidence of Compliance: Visible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD and CDFW		

Mitigation Measure #4 - Replanting of disturbed areas with riparian vegetation (including alders, cottonwoods, willows, sitka spruce, etc.) if natural regeneration does not occur within two years of the completion of the development project.

Timing for Implementation/Compliance: Throughout project construction
 Responsible Party for Implementation: Applicant and successors
 Person/Agency Responsible for Enforcement: Humboldt County Planning and Building
 Monitoring Frequency: Throughout construction
 Evidence of Compliance: Visible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD		

Mitigation Measure #5 - Performing erosion control measures contained in the Sensitive and Critical Habitat Standards of the General Plan (Chapter 10 Standard BR-S9- Erosion Control).

Timing for Implementation/Compliance: Throughout project construction
 Responsible Party for Implementation: Applicant and successors
 Person/Agency Responsible for Enforcement: Humboldt County Planning and Building
 Monitoring Frequency: Throughout construction
 Evidence of Compliance: Visible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD		

Mitigation Measure #6 - Maximum feasible retention of overstory canopy in riparian corridors.

Timing for Implementation/Compliance: Throughout project construction
 Responsible Party for Implementation: Applicant and successors
 Person/Agency Responsible for Enforcement: Humboldt County Planning and Building
 Monitoring Frequency: Throughout construction
 Evidence of Compliance: Visible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD		

Mitigation Measure #7 – Project construction related noise levels shall be minimized so that sound levels are below 50 decibels at 100 feet from the source.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Audible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD		

Mitigation Measure #8 – High visibility construction fencing shall demarcate the boundaries of all Environmentally Sensitive Habitat prohibiting encroachment of construction work and equipment. Grading and development plans shall show the location of this fencing.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Throughout Construction	Continuous		HCP&BD		

Mitigation Measure #9 – A second seasonally appropriate botanical and wildlife survey and impact analysis shall be conducted prior to finalization of project design, issuance of grading permit and approval of development plan. The project design shall be modified first to avoid special status species or second minimize impacts to special status species if avoidance is not possible. Should impacts occur to special status species, the applicant shall develop a mitigation and monitoring plan to be approved by the Department in consultation with CDFW.

Timing for Implementation/Compliance: Prior to commencement of vegetation removal or grading

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building/CDFW

Monitoring Frequency: Prior to construction

Evidence of Compliance: Letter report

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Prior to issuance of grading permits	Continuous		HCP&BD and CDFW		

Mitigation Measure #10 – Post development, implementation the approved Wetland and Riparian Mitigation Plan – Revision 2 prepared by SHN dated May 2021. The plan proposes to restore 630 square feet of wetland habitat and 18,750 square feet of riparian woodland. Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period.

Timing for Implementation/Compliance: Post-construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building/CDFW

Monitoring Frequency: As per Wetland and Riparian Mitigation Plan

Evidence of Compliance: Annual monitoring reports

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Prior to occupancy of the first unit	Continuous		HCP&BD and CDFW		

Mitigation Measure #11- The following note shall be placed on the Grading or Development Plan and carried out through project implementation: "If suspected archaeological resources are encountered during the project: 1. Stop work within 100 feet of the find; 2. Call a professional archaeologist, the representatives from the Blue Lake Rancheria, Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe, the Calfire project representative (if applicable) and the County Planning and Building Department; 3. The professional historic resource consultant, Tribes and Calfire officials will coordinate and provide an assessment of the find and determine the significance and recommend next steps.

"If human remains are encountered: 1. All work shall stop and per CA Health and Safety Code Section 7050.5: 2. Call the Humboldt County Coroner at (707) 445-7242; 3. The Coroner will determine if the remains are of prehistoric/historic Native American origin. If the remains are Native American Heritage Commission within 24 hours. 5. The NAHC is responsible under CA PRC 5097.98. (a) for identifying the most likely descendent (MLD) immediately and providing contact information. The MLD may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

The applicant is ultimately responsible for ensuring compliance with this condition.

Timing for Implementation/Compliance: Prior to initiation of grading or other ground disturbing activity

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning & Building Department in consultation with Native American tribes.

Monitoring Frequency: Throughout construction

Evidence of Compliance: Suspension of work and notification to County and Tribal representatives if cultural resources are encountered.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Prior to issuance of grading permits	Continuous		HCP&BD and Tribes		

Mitigation Measure #12- Grading Plans shall show optimization of the site layout in accordance with Stormwater Permit section. E.12.d and E.12.e. Source Control and Low Impact Development (LID) Design Standards pages 51-55 (attachment 2), and Humboldt County Low Impact Development Stormwater Manual Sections 5.0 and 6.0 (attachment 3)

Timing for Implementation/Compliance: Prior to initiation of grading or other ground disturbing activity

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building and Public Works Land Use Division

Monitoring Frequency: Throughout construction

Evidence of Compliance: Issued Grading and MS4 Permit

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
Prior to issuance of grading permits	Continuous		HCP&BD and HCPW		

ATTACHMENT 2

Applicant's Evidence in Support of the Required Findings

- Application Form (On file)
- Fee Schedule (On File)
- Site Plans for Ocean West Expansion-CUP by Omsberg & Preston, dated September 2021 **(Attached)**
- Landscape and Site Amenities Master Plan by Wilding Design Studio, dated August 2021. **(Attached)**
- Tree Removal Map and Chart prepared by SHN, dated August 2021 **(Attached)**
- Access Road Alternatives Analysis prepared by SHN dated October 2019. **(Attached)**
- Riparian and Wetland Mitigation Plan – Revision 2: Ocean West Properties prepared by SHN dated January 2020 and revised May 2021. (Revision 2 **Attached**; Revision 1 on file)
- One-Parameter Wetland and Other Waters Delineation Report APN 510-171-039 prepared by SHN dated January 2019. (On file)
- Tree Removal Plan: Ocean West Expansion prepared by SHN dated February 2019. (On file)
- Natural Resources Assessment: Ocean West Properties prepared by SHN dated June 2018. (On file)
- Preliminary Stormwater Control Plan for Ocean West Expansion (Job No. 18-2015) prepared by Omsberg & Preston dated November 2019, revised December 2020, and revised September 2021. **(Attached)**
- Acoustic Study for Ocean West (Project No. 7670-001) by Veneklasen Associates dated May 2021. **(Attached)**
- Draft Pervious Paving Maintenance Plan by Omsberg and Preston dated October 2021. **(Attached)**

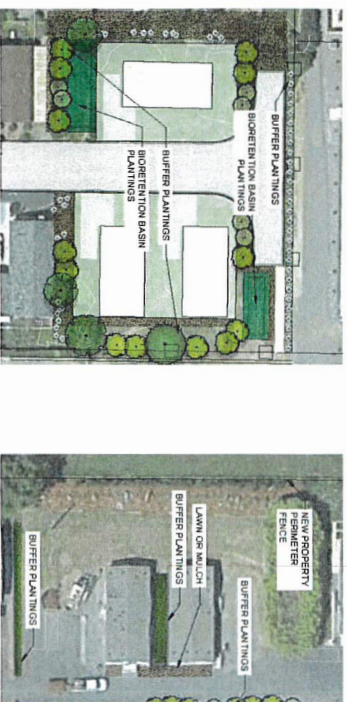


SITE PLAN OVERVIEW

SEAN VIEW LANDSCAPE + RECREATIONAL MASTER PLAN



NEW DEVELOPMENT AREA APN 510-171-039



NEW DEVELOPMENT AREA APN 510-171-060

UNITS 118 & 122

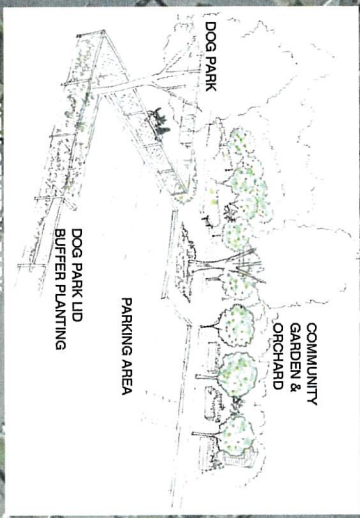
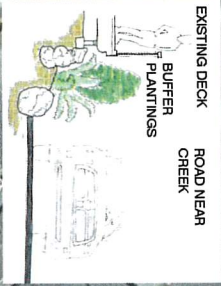
NEW DEVELOPMENT ENLARGED PLANS

L100



AN VIEW LANDSCAPE + RECREATIONAL MASTER PLAN

RECREATIONAL AMENITIES



RECREATIONAL AMENITY COMPLIANCE		25.1C	25.1D
Required	Required	Required	Required
Parcel	APN-510-171-039	24.9	3
	APN-510-171-040	4.5	
	APN-510-171-060	0.6	
New Total		45.36	
Existing		12.5	
Trail		5.2	
Overlooks and Benches		1.1	
Clubhouse		6.1	
New		32.7	
Completion of loop trail		4.8	
Dog Park		4.5	
Comm Garden & Orchard		4.5	
Picnic Areas		2.5	
Park Walkway		1.2	
New Creek Trail + Overlooks		2.4	
Cypress Trail		2.5	
Dog Park LID Plantings		5	
Pine Avenue Overlook		2.5	
Trailside Buffer Plantings		7.7	

PLAN 14268-CUP Ocean West Expansion



L101



16, 2021

MOSTLY DRY

SOMETIMES WET

FREQUENTLY WET



DIPSACES FLORIBUNDUS OSSEUM	LYONOTHAMNUS FLORIBUNDUS SSP ASPENIFOLIUS CATALINA IRONWOOD	PINUS CONTORTA CONTORTA SHORE PINE	RIBES SAANGUINEUM REDFLOWERING CURRANT	MORELLA CALIFORNICA WAX MYRTLE	RHODOENDRON OCCIDENTALIS WESTERN AZALEA	C.T. PENWYLL BLUE	CHAMAECYPARIS LAMSONIANA PORT ORFORD CEDAR	CARPENTERIA CALIFORNICA BISH ANEMONE	CORNUS NUTTALLII WESTERN DOGWOOD	ALNUS RUBRA RED ALDER	CORNUS SERICEA REDDOSIER DOGWOOD
-----------------------------------	--	--	--	-----------------------------------	---	-------------------	--	--	-------------------------------------	--------------------------	--

MOSTLY DRY

SOMETIMES WET

FREQUENTLY WET

CALIFORNICA 3 CASE BERRY	ERIOGONUM LATIFOLIUM SEASIDE BUCKWHEAT	MONARDELLA VILLOSA COYOTE MINT	BERBERIS AQUIFOLIUM COMMON BARBERRY	DIPLOCLADUS AURANTIACUS STICKY MONKEYFLOWER	VACUINIUM OVATUM HUCKLEBERRY	ROSA SPP LOCAL NATIVE CALIFORNIA ROSES	POLYSTICHUM MUNITUM WESTERN SWORDFERN	LUPINUS RIVULARIS STREAMBANK LUPINE	SPHRAEA DOUGLASSII DOUGLAS SPHRAEA	CORNUS KESSEYI C
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3-4 PHYLOS CURSI BERRY	BACCHARIS PILLULARIS SSP PILLULARIS DWARF COYOTE BUSH	CEANOETHUS GLORIOSUS, C. THYRSIFLORUS VAR THYRSIFLORUS CREEPING BLUEBLOSSOM	SISYRINCHIUM BELLUM BLUE EYED GRASS	FRAGARIA VESCA/ CHILLOENSIS WOODDEBACH STRAWBERRY	IRIS DOUGLASSIANA DOUGLAS IRIS	BERBERIS AQUIFOLIUM VAR REPPENS CREEPING BARBERRY	SECOIOIDA SEMPERVIRENS 'KELLY'S PROSTRATE	FESTUCA CALIFORNICA CALIFORNIA FESCUE	CALAMAGROSTIS NUTKAENSIS PACIFIC REEDGRASS	DESCHAMPSIA CESPTIOSA TUFTED HAIRGRASS
---------------------------------	---	--	--	--	--------------------------------------	--	---	--	---	--

WILD PALETTE OCEAN WEST EXPANSION

WILDFILING
 DESIGN STUDIO
 SINCE 2011

Participate in our Survey!

- 1. Review** the recreational amenity options
 - 2. Suggest** another option if you want
 - 3. Rank** your top five
 - 4. Return** this form to Midori Thompson by September 14.
- We'll evaluate the community's favorites for inclusion in upcoming improvements!



Sun Communities wants to hear from you!

What recreational activities would you like dedicated space for at Ocean West?



We are considering options like picnic & bbq space, courts for pickleball or bocce, exercise equipment, community garden beds, a dog park, benches, a fire pit, or a trail.



What are your favorites? Are there other activities you'd like to suggest?



SUN COMMUNITIES, INC.®

Ocean West Mobile Home Park

Recreational Amenities Community Member Survey



Rank your TOP 5 RECREATIONAL AMENITIES

1 = most preferred

1

2

3

4

5

Something else?
Write it in!

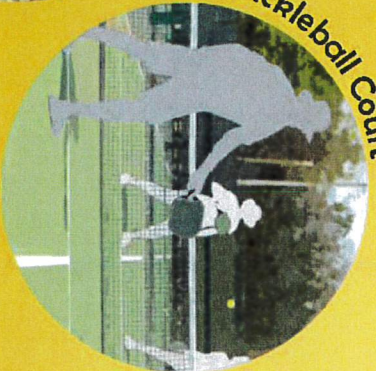
BBQ Grill(s)



Exercise Equipment



Pickleball Court



Picnic Tables



Benches



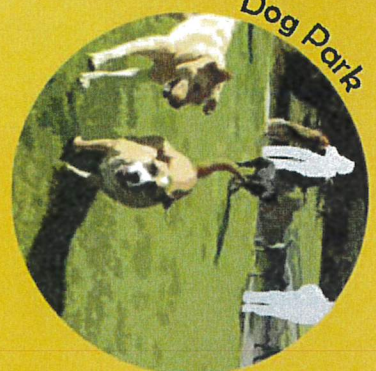
Outdoor Chess Table(s)



Bocce Court



Dog Park



Community Garden



Fire Pit



Extended Nature Trail



OceanWest Recreational Amenities Ranked Voting Results

Activity	Total Points	Ranked Votes				
		1 (5 pts)	2 (4 pts)	3 (3 pts)	4 (2 pts)	5 (1 pt)
Trail	95	9	5	6	5	2
Dog Park	68	7	4	3	2	4
Community Garden	57	4	6	2	2	3
Benches	37	1	5	1	4	1
Picnic Table	31		2	5	2	4
Fire Pit	29	2	1	2	3	3
Exercise Equip	27	2	2	2	1	1
Bocce	24	1	2	2	2	1
BBQ	16			3	3	1
Pickleball	16	1	1	1	1	2
Swimming Pool	11	2				1
Adult Playground	4		1			
Folk Dancing	2				1	
Ping Pong	1					1
Free wifi	1					1
Chess	0					



General Notes

SYMBOLS LEGEND

- TREES IN STUDY AREA TO REMAIN (NOT ALL TREES ON SITE)
- TREES TO BE REMOVED
- POTENTIAL TREES FOR REMOVAL

No.	Description	Revision/Issue	Date
1	DESCRIPTION	YYYYMMDD	

Designed by:
WILDING DESIGN STUDIO
 224 W. SOKOMA ST
 SUITE 100
 SOUTHFIELD, MICHIGAN 48033
 248.986.2442

(LOGO)	(SEAL)
--------	--------

Project Client:
SUN COAST WEST EXPANSION LLC
 2700 W. WINDYBROOK BLVD
 SOUTHFIELD, MICHIGAN 48033

Project:
 1070 WILSON ROAD
 MICHIGANVILLE, CA 95939

Project Owner: PROJECT MANAGER
 ATWELL LLC
 4070 S. SCOTTSMAN AVENUE
 MARIETTA, GA 30067
 atwell@atwell-group.com
 403.582.2128

NOT FOR CONSTRUCTION	Sheet
Date: 08/11/2021	PRELIMINARY
Scale: 1/20	TREE REMOVAL
	DIMENSION

**Table 1 Updated Tree Removal List 8/11/2021
Ocean West Expansion**

Tree #	Latin Name	Common Name	Est. Tree size (DBH)	Tree Health	Status	Notes
Trees to be removed for Proposed Access Road and Recreation Path						
1	<i>Prunus serrulata</i> (cultivar)	flowering cherry	8 in	Healthy, mature	Non-native, planted	No issues, within vicinity of proposed trail footprint
2	<i>Trachycarpus fortunei</i> (cultivar)	Chinese windmill palm	6 in	Healthy, mature	Non-native, planted	Fibrous trunks are very flammable
3	<i>Trachycarpus fortunei</i> (cultivar)	Chinese windmill palm	6 in	Healthy, mature	Non-native, planted	Fibrous trunks are very flammable
4	<i>Trachycarpus fortunei</i> (cultivar)	Chinese windmill palm	6 in	Healthy, mature	Non-native, planted	Fibrous trunks are very flammable
5	<i>Betula papyrifera</i> (cultivar)	paper birch	10 in	Healthy, mature	Non-native, planted	Within proposed road prism
6	<i>Betula papyrifera</i> (cultivar)	paper birch	12 in	Healthy, mature	Non-native, planted	Within proposed road prism
7	<i>Betula papyrifera</i> (cultivar)	paper birch	12 in	Healthy, mature	Non-native, planted	Within proposed road prism
8	<i>Acer rubrum</i> (cultivar)	red maple	16 in	Rotting center	Non-native, planted	This is a hazard tree with a large crack between the two primary limbs and a rotten center.
9	<i>Cornus kousa</i> (cultivar)	Kousa dogwood cultivar	5 in	Healthy	Non-native, planted	No issues, within vicinity of proposed trail footprint
10	<i>Cornus kousa</i> (cultivar)	Kousa dogwood cultivar	8 in	Healthy	Non-native, planted	No issues, within vicinity of proposed trail footprint
11	<i>Sequoia gigantea</i>	giant sequoia	12 in	Healthy	Non-native, planted	No issues at time of survey. Tree is young, this species susceptible to disease on the coast.
12	<i>Pinus radiata</i>	Monterey pine	40 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot. Will become a hazard.
13	<i>Pinus radiata</i>	Monterey pine	48 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot. Will become a hazard
14	<i>Alnus rubra</i>	red alder	14 in	Dead	Native	Tree is a hazard
15	<i>Alnus rubra</i>	red alder	14.6	mature, healthy	Native	Healthy mature alder. Will be subject to windthrow following removal of surrounding trees.
16	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	20 in	mature, healthy	Non-native, planted	Two trunks, fast growing.
17	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	17 in	mature, healthy	Non-native, planted	Four trunks, fast growing.
18	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	18 in	mature, healthy	Non-native, planted	One trunk, fast growing.
19	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	14 in	mature, healthy	Non-native, planted	One trunk, fast growing.

**Table 1 Updated Tree Removal List 8/11/2021
Ocean West Expansion**

Tree #	Latin Name	Common Name	Est. Tree size (DBH)	Tree Health	Status	Notes
20	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	19 in	mature, has structure issues	Non-native, planted	Three trunks, one has a massive fissure indicating high potential for collapse.
21	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	15.6 in	mature, healthy	Non-native, planted	Two trunks, fast growing.
22	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	15.6 in	mature, healthy	Non-native, planted	One trunk, fast growing.
23	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	23 in	mature, healthy	Non-native, planted	Four trunks, fast growing.
24	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	15 + 20 in	mature, healthy	Non-native, planted	Two trunks, fast growing.
25	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	7.6 in	mature, healthy	Non-native, planted	Three trunks, fast growing.
26	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	2-8 in	mature, healthy	Non-native, planted	Eight trunks, fast growing.
27	<i>Prunus serrulata</i> (cultivar)	flowering cherry	5 in	dying, mature	Non-native, planted	Canopy is dying back and shows symptoms of extreme stress.
Total Number of Trees to be Removed for Proposed Access Road and Recreation Path			27			
Trees to be Removed for Proposed Mitigation Plan						
1m	<i>Eucalyptus globulus</i>	blue gum	48 in	mature, large canopy	Invasive	Half of the canopy extends over Murray Road. Mature eucalyptus are known to become brittle with age and are prone to breakage.
2m	<i>Pinus radiata</i>	Monterey pine	30 in	mature, healthy	Non-native, planted	
3m	<i>Pinus radiata</i>	Monterey pine	44 in	mature, healthy	Non-native, planted	Large tree shading a portion of the proposed mitigation area.
4m	<i>Betula papyrifera</i> (cultivar)	paper birch	6 in	young, no health issues	Non-native, planted	Young landscape tree adj. to stream.
5m	<i>Eucalyptus globulus</i>	blue gum	30 in	mature, uneven canopy	Invasive	Fully mature tree, uneven canopy due to adjacent Monterey pine, could be more susceptible to blowdown.
6m	<i>Pinus radiata</i>	Monterey pine	48 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot. Will become a hazard
7m	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	4 in	shade stunted	Non-native, planted	small, shade stunted tree
8m	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	4 in	shade stunted	Non-native, planted	small, shade stunted tree
9m	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	8 in	shade stunted	Non-native, planted	small, shade stunted tree

Riparian and Wetland Mitigation Plan – Revision 2

Ocean West Expansion
McKinleyville, California

Prepared for:

Sun Communities, Inc.

May 2021

018062



Phone: (707) 822-5785 **Email:** info@shn-engr.com
Web: shn-engr.com • 1062 G Street, Ste. I, Arcata, CA 95521-5800

Riparian and Wetland Mitigation Plan - Revision 2

Ocean West Expansion McKinleyville, California

Prepared for:

Sun Communities, Inc.

Prepared by:



1062 G Street, Suite I
Arcata, CA 95521
707-822-5785

May 2021

QA/QC:SEC

Reference: 018062

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Appendices

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Abbreviations and Acronyms

Terms of Measurement

in	inches
sqft	square feet

Additional Terms

APN	Assessor's Parcel Number
CDFW	California Department of Fish and Wildlife
DBH	diameter at breast height
Mitigation Plan	Riparian and Wetland Mitigation Plan
SMA	streamside management area
SMAP	Streamside Management Area Policy
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

1.0 Introduction

This Riparian and Wetland Mitigation Plan (Mitigation Plan) is submitted by SHN on behalf of Sun Communities, Inc. and outlines the mitigation plan for the Ocean West expansion project. The goals of this Mitigation Plan are:

- 1) Enhance wetland habitat adjacent to the Ocean West expansion to compensate for the loss of one-parameter wetlands as a result of the development of an access road and recreational paths for the project, and
- 2) Develop self-sustaining riparian habitat adjacent to the Ocean West Expansion to compensate for the loss of riparian habitat as a result of the development of an access road and recreational paths within the riparian buffer for Widow White Creek.

2.0 Project Background

Sun Communities, Inc. is proposing to develop approximately five acres with age-qualified manufactured housing similar to what exists on the surrounding parcels. Development is proposed on two parcels on either side of the existing age-qualified manufactured housing development. The larger of the parcels, Assessor's Parcel Number (APN) 510-171-039, is approximately 4.5 acres, and the smaller parcel (APN 510-171-060) is 0.5 acres. A portion of the access road to the larger parcel is located on a parcel (APN 510-171-040) within the existing age-qualified manufactured home residential community. A total of 30 units are proposed, including access roads, utility extensions, and recreational paths. All development is proposed outside of sensitive habitat, except for the access road to the larger parcel and recreational paths and benches. As such, this Mitigation Plan focuses on the area impacted by the access road and recreational paths along Widow White Creek within the expansion area.

The project is located in the unincorporated area of Humboldt County, California within the McKinleyville Community Planning Area urban expansion boundary (Township 7 North, Range 1 East, Section 31) and is within the United States Geological Survey (USGS; Google Earth, 2016) 7.5-minute Arcata North topographic quadrangle (see Figure 1). Elevation at the site is approximately 97 feet above mean sea level.

Wetlands and waters potentially impacted by the project include (see Figure 2):

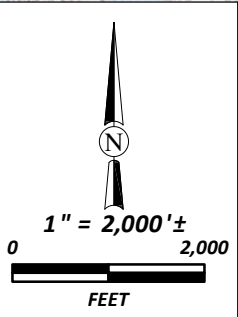
- Portions of a one-parameter wetland consisting of hydrophytic vegetation along Widow White Creek within the footprint of the proposed access road and a portion of a recreational path.

Sensitive habitat potentially impacted by the project include (see Figure 2):

- Widow White Creek Riparian Habitat, and
- Widow White Creek Streamside Management Area.

Streams and riparian habitats receive protection under the McKinleyville Community Plan Streamside Management Area Policy (SMAP); as defined in Section 3422:1-6 of the McKinleyville Community Plan (County of Humboldt, 2002, Amended 2017). Development and work within streamside management areas (SMAs) require a special permit from the County if those activities are not exempt. In areas within urban development and expansion areas as shown in the McKinleyville Community Plan Figure 5, SMAs are defined as extending 50 feet from either side of the stream transition line for perennial streams, and

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Sun Communities, Inc. - Ocean West
Mitigation, Monitoring, & Reporting Plan R.2
McKinleyville, California

Project Location

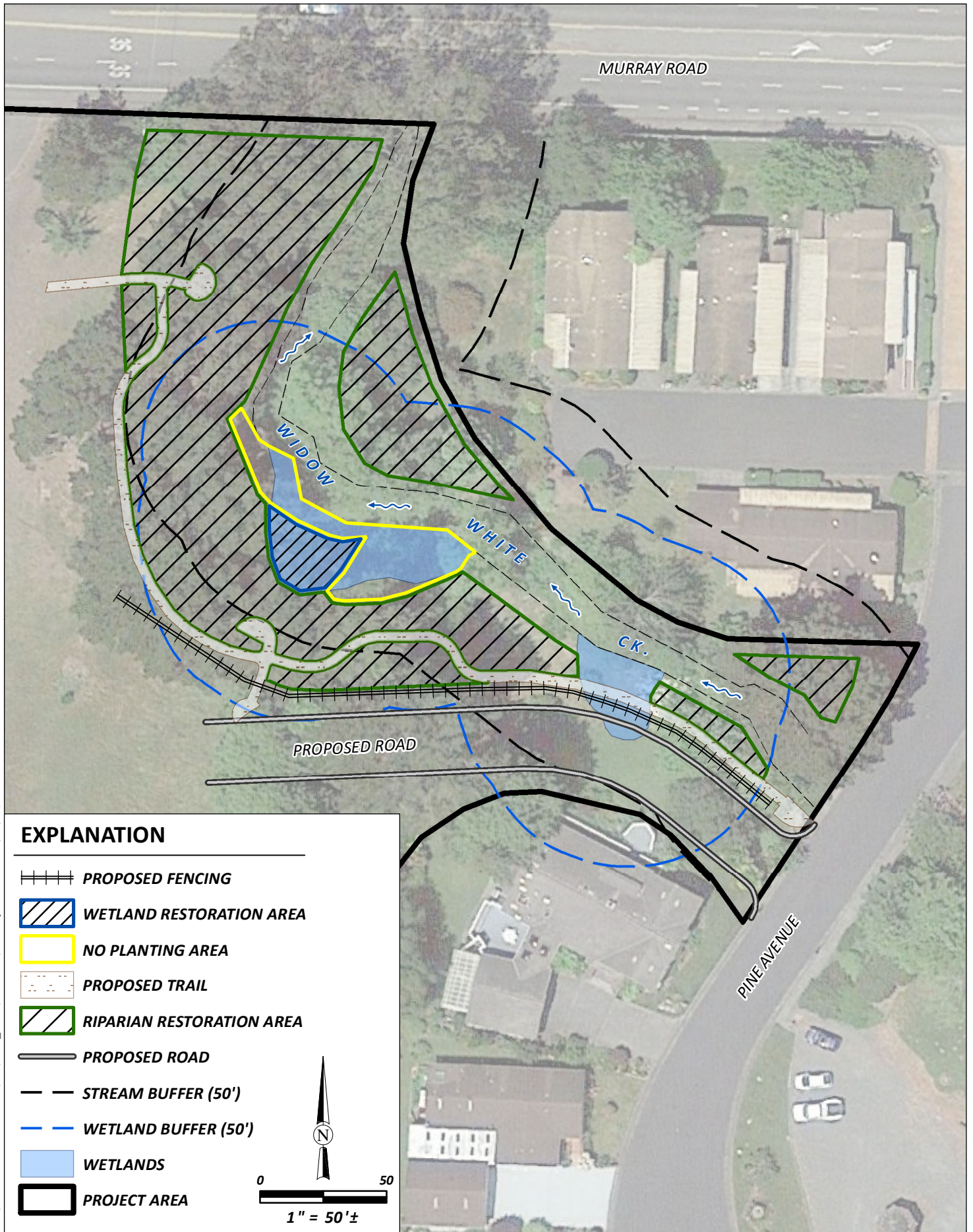
SHN 018062

May 2021

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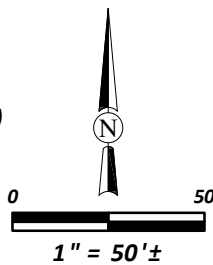
Figure 1

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EXPLANATION

- PROPOSED FENCING**
- WETLAND RESTORATION AREA**
- NO PLANTING AREA**
- PROPOSED TRAIL**
- RIPARIAN RESTORATION AREA**
- PROPOSED ROAD**
- STREAM BUFFER (50')**
- WETLAND BUFFER (50')**
- WETLANDS**
- PROJECT AREA**



Sun Communities, Inc. - Ocean West
 Mitigation, Monitoring, & Reporting Plan R.2
 McKinleyville, California

Riparian Restoration

SHN 018062

May 2021

MMRPr2_Fig2_RiparianRestoration

Figure 2

25 feet from the transition line of intermittent streams. The McKinleyville Community Plan defines the stream transition line as, “[t]hat line closest to a stream where riparian vegetation is permanently established.”

Wetland areas receive protection under the McKinleyville Community Plan; as defined in Section 3422:7-20 of the McKinleyville Community Plan (County of Humboldt 2002, Amended 2017). Development and work within wetland areas requires a special permit from the County if those activities are not exempt. In areas within urban development and expansion areas as shown in the McKinleyville Community Plan Figure 5, wetland buffers are defined as extending 50 feet from the boundary of the wetland. The McKinleyville Community Plan defines a wetland area as “a given area that satisfies at least one of the following three criteria:

- The presence of at least periodic predominance of hydrophytic vegetation; or,
- Predominately hydric soils; or,
- Periodic inundation for seven (7) consecutive days.”

3.0 Proposed Project Mitigation Requirements

Approximately 4,228 square feet (sqft) of wetlands exist within the project area, of which 3,405 sqft is one-parameter and 823 sqft is three-parameter wetlands (SHN, 2019b). An estimated 209 sqft of one-parameter wetlands (5% of the total wetland area) will be impacted by the project and project-related activities. Wetlands to be impacted by the project include a portion of one-parameter wetlands that consists of an area dominated by non-native hydrophytic vegetation, primarily creeping bentgrass (*Agrostis stolonifera*) and creeping buttercup (*Ranunculus repens*). This area will be filled for the proposed access road and recreational path as part of the project. In addition, approximately 2,704 sqft of road and 1,266 sqft of recreational path will be constructed within the 50-foot wetland buffer for a total of 3,970 sqft of project construction within the wetland buffer (see Wetland Delineation for details on wetland extent and delineation methods, SHN, 2019a; and Alternatives Analysis for proposed impacts of selected access road alignment, SHN, 2019b).

A portion of the project will encroach within the SMA for Widow White Creek (see Wetland Delineation for a description of SMA determination methods, SHN, 2019a). This portion represents the construction of approximately 3,049 sqft of road and 1,212 sqft of recreational paths. The majority of this area is currently composed of manicured lawn, non-native planted landscaping trees, and other landscaping features such as a gravel path. No more than 25% of the lot surface located within the SMA shall be made effectively impervious by development activities. The proposed roadway and recreational paths will impact 4,261 sqft of the SMA, which represents less than 20% of the lot surface located within the SMA, and potentially an even smaller percentage when considering the length of Widow White Creek through the existing Ocean West park.

Widow White Creek has been impacted by surrounding development and the natural conditions along the stream course have been completely altered or eliminated. The existing conditions within and surrounding the proposed location for the access road are an example of the alteration that has occurred along Widow White Creek. Currently, non-native trees are the dominant species; manicured lawns are planted up to the stream transition line; and gravel paths with non-native shrubby landscaping species occur along the length of Widow White Creek within the project area. While the proposed roadway will further impact the quality of habitat within a portion of the SMA, this proposed

mitigation plan will mitigate for impacts associated with the proposed project and will result in the restoration of an even greater area of streamside habitat. This will improve habitat for salmonids, amphibians, native plants, and other species that rely on intact riparian habitat.

To mitigate for the loss of 209 sqft of one-parameter wetlands and 4,261 square feet of SMA, as well as encroachment into wetland buffer areas, the project proponent is proposing to restore 630 sqft of three-parameter wetland and restore 18,750 sqft of riparian habitat along Widow White Creek immediately downstream from the proposed access road (see Figure 2). A mix of non-native tree and shrub removal, native tree planting, and three-parameter wetland restoration will be used to restore habitat along Widow White Creek and mitigate for impacts to wetlands and riparian habitat associated with this project. Native plant screening and wildlife-friendly fencing will be used to prevent human encroachment into existing and restored habitat following completion of the project.

Areas disturbed during construction, grading, or related activities within 50 feet of the boundary of the wetland in areas within the Urban Development Area such as the proposed project, shall be restored to original contours and sufficiently and promptly replanted with vegetation naturally occurring in the immediate area. In addition, development and construction shall minimize cut and fill operations and erosion and sedimentation potentials through construction of temporary and permanent sediment basins, seeding or planting bare soil, diversion of runoff away from graded areas and areas heavily used during construction, and avoidance of grading in the buffer areas during the rainy season. Mitigation measures prescribed by the Grading Ordinance shall also be incorporated during the construction of the project as in the Grading Ordinance's Grading, Excavation, Erosion, and Sedimentation Control Section H.C.C §331-14 (<https://humboldt.county.codes/Code/331-14>). The release rate of stormwater runoff to adjacent natural wetlands, in any size storm, shall not exceed the natural rate of storm runoff for a 50-year storm of 10-minute duration, and stormwater outfalls, culverts, gutters, and other similar facilities, shall be dissipated.

4.0 Mitigation Goals

The goals of this mitigation plan are to:

- 1) mitigate for wetland and riparian impacts resulting from the Ocean West expansion;
- 2) restore wetland habitat along Widow White Creek;
- 3) improve riparian habitat along Widow White Creek; and
- 4) prevent erosion and degradation of SMA during construction of the project.

Specifically, wetlands and riparian habitat will be restored within a disturbed area along Widow White Creek immediately downstream from the proposed access road (see Figure 2). The area is currently dominated by non-native landscaping trees and shrubs including Monterey pine (*Pinus radiata*), eucalyptus (*Eucalyptus globulus*), escallonia (*Escallonia rubra*), and cotoneaster (*Cotoneaster lacteus*), among others. Portions of the proposed mitigation area appear to be either naturally or anthropogenically filled off-channel habitat associated with Widow White Creek. This mitigation plan would restore the native wetland function of this area including native wetland species dominance. The total three-parameter wetland restoration area would equal 630 sqft, representing a 3:1 restoration ratio of wetlands restored to wetland area impacted.

The total mitigation area, including wetland restoration, would equal 19,380 sqft. The majority of the area outside of the wetland restoration area, a total of 18,750 sqft, would consist of the removal of non-native trees and shrubs, and the planting of native riparian vegetation including Sitka spruce (*Picea sitchensis*), red alder (*Alnus rubra*), and big leaf maple (*Acer macrophyllum*), among others, in addition to native shrubs and herbaceous species (See Appendix 1, Planting Lists).

The goal of the mitigation plan is to create riparian, wetland, and streamside habitat to mitigate for impacts to wetlands and the Widow White Creek SMA and associated riparian habitat. See Section 5.0 Wetland and Riparian Mitigation Plan for the full detailed mitigation plan for Widow White Creek

5.0 Wetland and Riparian Mitigation Plan

5.1 Existing Conditions

Approximately 209 sqft of one-parameter wetland area is estimated to be permanently impacted by the proposed access road and recreational trail and will require compensatory mitigation. Currently, this area is characterized by non-native herbaceous species such as creeping bentgrass, creeping buttercup, sheep sorrel (*Rumex acetosella*), as well as non-native landscaping trees including Chinese windmill palm (*Trachycarpus fortunei*) and dogwood (*Cornus cultivar*). Some cover is provided by a remnant red alder, located within the stream channel, which will not be impacted by the construction of the proposed project (see Appendix 2, Photos 1 and 2 for existing conditions).

Approximately 4,261 sqft of SMA is estimated to be impacted by the construction of the access road and recreational trail. The SMA area to be impacted by the project is currently composed almost entirely of non-native species. A large portion of the area is a well-maintained lawn, surrounded by non-native planted trees and shrubs. Landscaping within this area, including lawn and gravel path, extend to the stream transition line (See Appendix 1, Photos 1 and 2 for existing conditions).

The location of the proposed wetland restoration is within a highly degraded existing one- and three-parameter wetland within disturbed riparian habitat. The area was landscaped in the past as evidenced by weedmat, landscape rock, cobble, and a small footbridge. All is abandoned and little vegetation cover exists within the depression containing the wetland. Soils are disturbed within the area, indicating natural and anthropogenic deposition. The area surrounding this feature is dominated by California and Himalayan blackberry (*Rubus ursinus* and *armeniacus*) and is shaded by adjacent Monterey pines. Some native, hydrophytic plant species are present in the herbaceous stratum with low cover, including common rush (*Juncus effusus*), lady fern (*Athyrium filix-femina* var. *cyclosorum*), and panicled bulrush (*Scirpus microcarpus*). In addition, many non-native herbaceous species are present, with low cover reflecting past disturbance and shaded conditions (See Appendix 2, Photos 3, 7, 10, 13, and 14 for existing conditions).

The remaining area proposed for riparian habitat restoration, to mitigate for impacts associated with the development of the access road and recreational path within the SMA, is dominated by non-native planted trees and shrubs, as well as non-native grasses. This includes Monterey pine, Eucalyptus, Escallonia, Rosemary (*Rosmarinus officinalis*), Scotch and French brooms, (*Cytisus scoparius*, *Genista monspessulana*), and Leyland cypress (*Cupressus x leylandii*), as well as large quaking grass (*Briza maxima*), and sweet vernal grass (*Anthoxanthum odoratum*), among others. This area is primarily located

on the western bank above Widow White Creek and has the potential to support native riparian woodland. This is currently infeasible due to the cover by Monterey pine and eucalyptus (See Appendix 2, Photos 3-7, 9, 11, and 13 for existing conditions).

5.2 Wetland and Riparian Mitigation Plan

5.2.1 Wetland Restoration

Wetland restoration will be conducted as part of this mitigation plan, to mitigate for impacts to one-parameter wetlands resulting from the creation of the access road. A total of 630 sqft of wetlands along Widow White Creek will be restored to mitigate for the impacts to wetlands as a result of this project. Wetland restoration will consist of removal of weed mat, pedestrian path, and non-native vegetation, and will include the planting of native wetland plants within the area of restoration (see Figure 2 and Appendix 1, Table 1). No excavation will be conducted for this restoration effort, and all work will be conducted outside of the Widow White Creek channel.

The first phase of wetland restoration would consist of the removal of weed mat, pedestrian path, and non-native vegetation. The weed mat within the existing wetland has almost certainly prevented the establishment of vegetation, leaving a depression filled with debris and muck over the weed mat. The weed mat and debris would be removed, allowing for the establishment of hydrophytic vegetation. The abandoned pedestrian path within the wetland would be removed, restoring wetland conditions in an area currently filled with large timbers and gravel. The path is unused, and its removal would enhance wetland conditions along Widow White Creek. Non-native plants, specifically escallonia and Scotch broom would be removed. Escallonia is currently represented by a very large shrub overhanging a portion of the wetland area. Scotch broom occurs within the abandoned pathway to be removed. The total wetland restoration area would equal 630 sqft and would be approximately 20 feet wide and 35 feet long within an existing depression.

Native wetland vegetation would be planted following the removal of the weed mat, debris, pedestrian path, and invasive species. A total of 216 herbaceous wetland plants will be needed to revegetate the restored wetland area (see Appendix 1, Table 1). Herbaceous plants will be planted on 1.5-foot centers to reduce erosion and ensure that native vegetation becomes established within the restored wetland. The number of each species of herbaceous wetland plants required for replanting is based on the composition of riparian wetlands within the surrounding area. The majority of these species are tolerant of seasonal inundation and dry periods and will be suitable within all elevations of the wetland. The exception to this is the nodding semaphore grass which will need to be planted at the highest elevations along the wetland under the canopy of red alder.

A total of 10 native wetland species will be planted within the wetland restoration area (Appendix 1, Table 1). Native wetland vegetation to be planted will consist of 36 slough sedge (*Carex obnupta*), 18 common rush, 27 spreading rush (*Juncus patens*), 27 paniced bulrush, 18 lady fern, 11 chain fern (*Woodwardia fimbriata*), 14 arctic sweet-colt's foot (*Petasites frigidus* var. *palmatius*), 22 western inflated sedge (*Carex exsiccata*), 25 pacific aster (*Symphotrichum chilense*), and 18 nodding semaphore grass (*Pleuropogon refractus*).

The planting of the wetland restoration area will be done concurrently with the planting of the riparian restoration. The riparian woodland plants will be planted to complement the restored wetland habitat to create functional self-sustaining riparian habitat.

5.2.2 Riparian Habitat Restoration

Riparian habitat restoration along Widow White Creek is proposed to mitigate for impacts resulting from the construction of the access road and recreational path. A total of 18,750 sqft of riparian woodland along the west bank of Widow White Creek is proposed to be restored to mitigate for the impact to 4,261 sqft of SMA, and the encroachment into 3,970 sqft of wetland buffer setback. Riparian woodland restoration will primarily consist of the removal of non-native trees and shrubs and the planting of native flora, primarily trees and shrubs to establish functional riparian woodland along this portion of Widow White Creek.

The first phase of riparian habitat woodland restoration counter-intuitively consists of the removal of trees. A total of seventeen (17) trees would need to be removed to restore native riparian woodland within this area along Widow White Creek. This is composed of eleven (11) mature Monterey pine trees ranging in size from 24 inches (in) Diameter at Breast Height (DBH) to 48 in DBH, two (2) eucalyptus trees (30 and 48 in DBH), three (3) young Leyland cypresses (4 in DBH), and one (1) mayten tree (*Maytenus boaria*) (4 in DBH) (see Tree Removal report, SHN, 2019c). It will be impossible to restore native riparian conditions within this location without the removal of the aforementioned trees. The existing trees on site shade the area and prevent the establishment of native trees and shrubs. In addition, eucalyptus trees contain allelopathic chemicals that prevent the establishment of other plant species. A survey of the mature trees on site proposed for removal for the construction of the road and for restoration of native riparian woodland, indicates that many of the trees are in decline and represent a serious hazard for existing and proposed development (see Tree Removal report, SHN, 2019c). The non-native trees currently prevent the establishment of native riparian woodland. Non-native trees do not support healthy riparian woodland, as many native herbaceous species will not survive in the conditions that exist under these trees. Without the occurrence of native vegetation, many wildlife species such as the northern red-legged frog (*Rana aurora*) will be unlikely to occur. All native trees and shrubs will be avoided and will not be removed for this restoration project. In addition, an existing chain-link fence which may act as a barrier to wildlife movement along Widow White Creek would be removed at the same time as tree removal as part of the restoration effort (see Appendix 2, Photo 8).

Following removal of non-native trees, native vegetation will be planted to ensure proper shading of the stream and the re-establishment of native riparian woodland. Proper spacing of planted vegetation will diminish the encroachment and establishment of non-native vegetation. Native plants will be planted along elevation gradients on the west bank of Widow White Creek, with wetland species lower on the slope and along the stream channel, and upland species planted mid to high bank and along the top of the bank. A mix of native trees and shrubs will be planted to restore riparian woodland conditions within the mitigation area.

A total of 232 trees will be needed to reforest the mitigation area following removal of the non-native trees, representing over 13 times the number of trees that are slated for removal (see Appendix 1, Table 1). Trees will be spaced on 10-foot centers, to ensure proper cover of the mitigation area. Eight tree species are proposed for planting within the mitigation area. The number of each species of tree required for replanting is based the composition of riparian forests within the surrounding area, which typically is hardwood-dominated along the stream channel and transitions to more upland conifer forest toward the top of the banks. In addition, evergreen species will be used for habitat screening and to promote shading of areas that are more likely to experience invasive species encroachment.

Sixty-four red alder, 25 black cottonwood (*Populus trichocarpa*), 12 cascara (*Frangula purshiana* ssp. *purshiana*), 4 coast willow (*Salix hookeriana*), 30 coast redwood (*Sequoia sempervirens*), 20 big leaf maple,

22 wax myrtle (*Morella californica*), and 55 Sitka spruce are needed to revegetate the mitigation area and restore native riparian woodland within this location (see Appendix 1, Table 1 for plant numbers and locations). Species will be planted along elevation gradients in order to improve survival rates and to more accurately mimic the natural forest composition that would have been found along Widow White Creek at this location.

A number of shrub species will be planted in addition to the required tree species. Planting shrub species between the trees will more quickly mimic natural riparian conditions, will reduce the potential for invasive species encroachment, and will make human incursion into the mitigation area less likely. A total of 144 shrubs will be planted within the mitigation area and will consist of ten (10) different species. Shrub species will not be planted at a specific spacing, but will be planted in available space between trees. Shrubs will also be planted along elevation gradients, with wetland shrubs planted at the lowest elevations nearest the stream, and upland shrubs planted at higher elevations.

A total of 30 salmonberry (*Rubus spectabilis*), 22 salal (*Gaultheria shallon*), 6 twinberry (*Lonicera involucrata* var. *ledebourii*), 18 evergreen huckleberry (*Vaccinium ovatum*), 12 hazelnut (*Corylus cornuta*), 12 red-twig dogwood (*Cornus sericea*), 8 pink honeysuckle (*Lonicera hispidula*), 18 ninebark (*Physocarpus capitatus*), 10 mock orange (*Philadelphus lewisii*), and 8 red flowering currant (*Ribes sanguineum* var. *sanguineum*) will be planted within the riparian woodland restoration area. See Appendix 1, Table 1 for plant numbers and locations.

5.3 Habitat Establishment

Split rail fencing (Figure 3), or similar wildlife-friendly deterrent barriers, shall be placed in areas where foot or vehicle traffic could interfere with the establishment of planted areas primarily between the proposed recreational trail and the mitigation area, and between proposed manufactured housing and the mitigation area (see Figure 2). Not only will the fence act as a deterrent to foot traffic, but it will also add to the aesthetics of the area. Additional temporary fencing should be considered during the plant establishment period if vegetation shows high levels of herbivory or human incursion.



Figure 3: Split Rail Fencing Example
(source: http://firewoodonline.net/redwood_split_rail_fencing_log_posts)

Once the newly planted vegetation begins to become established, structural complexity within the mitigation area will increase, allowing for the development of a mosaic of native vegetation that will support diverse assemblages of plant and animal communities. Monitoring of the mitigation areas will record the success of the development of habitat within the mitigation areas.

5.4 Schedule

The proposed mitigation program will be initiated in spring or summer 2022.

Vegetation removal and other ground-disturbing activities associated with any construction activities will occur between August and mid-March, when birds are not typically nesting.

If vegetation removal or ground-disturbing activity is to occur during the nesting season (March 15 to August 1 for most birds), a qualified biologist shall conduct a pre-construction nesting bird survey. Pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) and implemented to prevent abandonment of the active nest.

Project activities in areas near Widow White Creek and seasonally wet areas that provide amphibian habitat shall occur from July 15 through October 31, to minimize potential impacts to these species.

Work within or adjacent to Widow White Creek shall occur between June 15 and October 15. Work window extensions (if needed) will not occur without CDFW and USFWS approval.

The Humboldt County Planning Division and CDFW will be notified at least one month before the work is to begin and shall be given the name and contact information for the party responsible for supervising and documenting implementation of the mitigation plan.

5.5 Stormwater, Erosion Control and Grading

Areas disturbed during construction, grading, or related activities within 50 feet of the boundary of the wetland in areas within the Urban Development Area such as the proposed project, shall be restored to original contours and sufficiently and promptly replanted with vegetation naturally occurring in the immediate area. In addition, development and construction shall minimize cut and fill operations and erosion and sedimentation potentials through construction of temporary and permanent sediment basins, seeding or planting bare soil, diversion of runoff away from graded areas, and areas heavily used during construction, and avoidance of grading in the buffer areas during the rainy season.

- Mitigation measures prescribed by the Grading Ordinance shall also be incorporated during the construction of the project as in the Grading Ordinance's Grading, Excavation, Erosion, and Sedimentation Control Section H.C.C §331-14 (<https://humboldt.county.codes/Code/331-14>).
- The release rate of storm runoff to adjacent natural wetlands, in any size storm, shall not exceed the natural rate of storm runoff for a 50-year storm of 10-minute duration, and stormwater outfalls, culverts, gutters, and other similar facilities, shall be dissipated.

6.0 Monitoring and Reporting Program

6.1 Performance Standards

Success of the mitigation program is defined as creating self-sustaining wetland and riparian habitat to mitigate for a loss of wetlands and construction of an access road within the SMA for Widow White Creek. A total of 630 sqft of self-sustaining wetland habitat will be created and planted with native

wetland vegetation species. An additional 18,750 sqft of riparian woodland habitat will be planted along Widow White Creek to improve riparian habitat conditions within this area (Appendix 2, Table 1). The success of the wetland mitigation planting areas may be achieved with a combination of success criteria that includes:

- A total of 630 sqft of wetlands habitat is restored,
- A total of 18,750 sqft of riparian woodland is restored along Widow White Creek,
- 85 percent survival of herbaceous plants (including wild recruitment of native species) within the restored wetlands,
- 85 percent survival of planted trees, shrubs, and herbaceous plants (including wild recruitment of native species) within the restored riparian woodland mitigation area,
- Live vegetation throughout all revegetated area (some minor gaps are expected),
- Invasive species are removed and prevented from becoming established within the restored wetland and restored riparian woodland planting areas,
- Revegetation plants are not substantially suppressed by herbivory, competition from weeds, or encroachment by humans, and
- Neither supplemental irrigation nor replacement plantings have been needed in the preceding growing season to meet the 85 percent survival threshold.

6.2 Monitoring and Reporting Program

As part of the monitoring program, both quantitative and qualitative (visual assessment) sampling will be performed by a qualified ecologist/biologist. This assessment will be used to make maintenance recommendations in annual reports, which will evaluate the success of the mitigation plan. An “as planted” report will be produced after planting and grading to verify which species were planted and where. This will be created immediately after the planting of the site and will be used to assess percent survival. It will also aid in monitoring in the future as vegetation grows and site conditions change. Any change in the number of plants and species planted will be recorded within the “as planted” report and will be approved by the project biologist prior to planting. Vegetation monitoring shall be conducted at the mitigation site for a total of five years of monitoring.

6.2.1 Quantitative Sampling

Quantitative vegetation data will be collected annually in the late spring/early summer. An assessment of riparian vegetation planting areas will consist of verifying direct count method, in which all trees planted and naturally recruited are counted to determine the percent survival rate, and to ascertain survival rates within individual species. Recruitment of wild native species within planting areas may be included when assessing success of habitat development. Abundance and percent cover of each species within planting areas will be recorded to track habitat development towards the goal of planting and restoring a combined area of 19,380 sqft, which includes restored wetland and restored riparian habitats. The habitat improvement project will be considered successful if the combined planting area achieves:

- 85% survival of planted trees and shrubs (including wild recruitment of native species), or
- viable shrub or tree species at a density of 1 plant spaced every 12 feet on center (approximately 2 plants per 15 square feet) after 5 years of monitoring.

Results will determine if plant cover and survival meet the prescribed success criteria as described in Section 6.1 Performance Standards.

6.2.2 Qualitative Visual Assessment

During each monitoring event, visual observations of habitat conditions will be noted. The qualitative visual assessment will be the primary tool by which habitat development is evaluated and the need for any remedial measures is identified. Qualitative visual assessment will help assess the overall functioning of the site as a whole and will help to identify localized or low-level trends such as new invasive species encroachment, localized changes in species abundance, and other changes that might be overlooked by simply counting planted trees and shrubs.

Particular attention will be paid to the following:

- native species recruitment and habitat development in the restored wetland and the restored riparian woodland,
- evidence of viable plant reproduction in the wetland area and riparian woodland restoration area,
- the presence of birds and other wildlife in the mitigation areas,
- introduction and infestation of exotic species; species encroachment and spread will be recorded,
- erosion within the mitigation area, and
- evidence of continued herbivory or human encroachment into the mitigation areas.

6.3 Photo Documentation

In addition to the general qualitative assessment and transect sampling, several permanent stations for photo documentation will be established in the mitigation areas. Photos will be taken prior to implementation and following installation of the proposed project. Photo stations will be established during the first site visit and the locations will be recorded in the “as planted” report, to be used in each successive monitoring report. Photos will include direction of view, and a reference to the photo monitoring location, and will be included within each annual monitoring report.

6.4 As-Planted Report and Annual Report

An “As Planted” report will be produced after planting and grading to verify which species were planted and where. This will be created immediately after the planting of the site and will be used to assess the success target for percent survival. It will also aid in monitoring in the future as vegetation grows and site conditions change. Any change in the number of plants and species planted will be recorded within the “As Planted” report and will be approved by the project biologist prior to planting. Vegetation monitoring shall be conducted at the mitigation sites for a total of five years of monitoring. The first annual monitoring event will occur after one year following plant installation. Recommendations for any corrective action necessary to ensure the continued success of the mitigation plan will be included in the report, as well as results from the quantitative and qualitative monitoring. Photos from each established photo station will be included within each annual monitoring report. Monitoring results will be compiled into annual reports and submitted following each yearly monitoring effort. Monitoring reports, including an evaluation of success, will be due annually by December 31 and will be submitted to CDFW, the County of Humboldt, and other applicable permitting agencies.

7.0 Maintenance Plan

7.1 Maintenance During the Five-Year Monitoring Period

7.1.1 Initial Maintenance Measures

Weed eradication will be conducted as necessary to minimize competition that could prevent the establishment of native species within the mitigation area. Invasive species shall be removed by hand or other manual means. The use of herbicide for weed control shall not be permitted, except in extraordinary circumstances, and only with approval from CDFW.

Planting areas may need protection by fencing or protective barriers to prevent herbivory and trampling. If the mitigation area is showing evidence of human encroachment, then additional fencing and/or signage shall be installed to prevent further disturbance of the mitigation areas. Additional woody debris or plants can be installed within encroachment areas to deter people from entering the mitigation areas.

If the success of tree plantings falls below 85 percent survival within the monitoring period, then replanting will occur to ensure correct mitigation for habitat loss. Replanting will be seasonally appropriate and will consist of the same species that died and are being replaced. Replanting cannot occur for the last two years of monitoring to achieve success.

In order to ensure 85 percent survival of the revegetation plants, it is recommended that summer watering occur at least within the first summer/fall after planting. This has been shown to increase the likelihood of survival greatly, especially in drier areas. It is recommended that watering occur monthly during the dry months of the first year between July and the first soaking rains. Watering cannot occur the last year of monitoring as the revegetation plants must be self-sustaining.

As part of the maintenance program, erosion and slope stability of the west bank of Widow White Creek and within the restored wetland will be monitored and maintained. This will include noting any new erosion features and reporting any new erosion within the mitigation area. Erosion maintenance will be conducted by the project proponent, and any large-scale erosion control or repair will be the responsibility of the project proponent during the years of monitoring.

7.1.2 Maintenance Schedule

Maintenance will be conducted as necessary to meet final performance standards and will be conducted based on the findings and recommendations contained within the monitoring reports. As native habitat develops within the mitigation area, the need for maintenance activities (for example, watering and weed control) should decrease.

7.1.3 Invasive Species Removal

Invasive species prevention and management is central to the success of this mitigation plan. Encroachment of invasive plant species into mitigation areas will limit the potential habitat value of these features and can limit the success of revegetation plantings through direct competition. Invasive species such as the American bull frog or canary reedgrass are leading to the decline of native amphibian and botanical species, and poorly maintained wetland mitigation areas are creating additional habitat for these species. Invasive species encroachment and spread will be managed through monitoring and removal, in addition to wetland design and dense native vegetation planting.

Mitigation areas will be monitored and maintained to prevent the establishment of invasive species within the mitigation areas within the first five years of establishment. Monitoring will include noting invasive species occurrences and will suggest methods for removal if the occurrence is too large to address by the monitor. Should the mitigation areas become infested with invasive species, it may affect the ability of the mitigation areas to meet success criteria, and more large-scale restoration work may become warranted.

Invasive species currently within the proposed mitigation area and throughout the site that may become established within the mitigation areas include:

English holly (*Ilex aquifolium*), Cotoneaster species (*Cotoneaster lacteus* and *franchetii*), French broom, Scotch broom, English ivy (*Hedera helix*), Himalayan blackberry, fennel (*Foeniculum vulgare*), English laurel (*Prunus laurocerasus*), pampas grass (*Cortaderia jubata*), and the mayten tree, among others (California Invasive Plant Council, 2019).

It should be noted that the list of target invasive species may change as soil is moved and equipment is used in construction of the project, which may introduce seeds from other invasive species not currently on site. Monitoring reports will document invasive species establishment and ongoing removal during the monitoring period.

7.2 Adaptive Management Maintenance

The adaptive management maintenance is proposed to ensure the successful establishment and persistence of habitat within the mitigation areas.

Adaptive management is used to better achieve success within mitigation areas. It allows for the inherent changes and instability experienced in natural habitats and the ecological processes that define them. Adaptive management allows the results and observations of the monitoring visits to drive the maintenance plan and the solutions to problems that may arise. This allows the project proponent and project biologist to learn by experience within site-specific environments and apply solutions to remedy deficiencies using a controlled and scientific approach.

Adaptive management procedures will be recommended on a case-by-case basis and will be reported within the Annual Reports. Adaptive management actions could include:

- Adjust weeding methods to reduce weeds around the mitigation areas to decrease competition from non-native grasses and forbs. This includes adjusting the timing of removal and the methods of removal dependent on the species encountered;
- Supplemental planting in areas that have deficiencies in the planted material;
- Supplemental replacement of species (may be in-kind, or if a specific species is not successful within a particular area, a suitable replacement species can be supplemented for the original plant species);
- Supplemental watering (for plants doing poorly, or supplemental plantings); and
- Additional erosion control.

Unpredictable natural conditions could potentially alter the mitigation areas and necessitate changing the goals, objectives, strategies, and actions set forth in this plan. Unpredictable natural conditions that could impact the mitigation areas include:

- Unusual weather patterns, such as extended drought, or excessive rainfall;
- Changes in plant compositions, such as through invasion of a new non-native invasive plant or wildlife species to the site;
- Erosion or deposition of sediments; and
- Excessive human encroachment or disturbance of the mitigation areas.

Should any changes be deemed necessary to achieve creation of wetlands and successful planting of the mitigation areas, then the project biologist shall meet with the project proponent to revise the adaptive management plan. Any changes will be recorded within the Annual Reports submitted to the applicable permitting agencies.

8.0 Completion of Mitigation

The project proponent will notify the County of Humboldt, CDFW, and other applicable permitting agencies upon completion of the five-year mitigation program through the submittal of a final monitoring report. If the project meets performance standards at the end of the five-year monitoring period, the mitigation will be considered a success. Should the mitigation fail to meet the success criteria, problems will be evaluated and further addressed, and the maintenance and monitoring program may be extended. Monitoring extensions will be done only for areas that fail to meet final success criteria. This process will continue until all standards are met or until the agencies determine that other mitigation measures are appropriate. If the mitigation effort meets all goals prior to the end of the five-year monitoring period, the County of Humboldt, CDFW, and other applicable permitting agencies may terminate the monitoring effort at their discretion.

9.0 Responsible Parties

The following participants are responsible for the installation, maintenance, and monitoring of this mitigation program. The responsibilities of each party are described below.

9.1 Project Proponent

The project proponent, Sun Communities, Inc., will be ultimately responsible to ensure that the approved mitigation plan is implemented and successful. Sun Communities, Inc. will be responsible for financing the preparation, maintenance, and monitoring of the mitigation area.

9.2 Project Biologist

Monitoring of the mitigation area will be the responsibility of a qualified biologist. The project proponent is responsible for retaining the project biologist. The project biologist will coordinate with Sun Communities, Inc. staff to assist with interpreting mitigation goals and performance standards.

After each annual monitoring event, the project biologist will provide Sun Communities, Inc. with a written list of items in need of attention. The project biologist will be responsible for identifying habitat areas requiring remedial measures and for directing the implementation of such measures.

10.0References

- California Invasive Plant Council. (2019). *California Invasive Plant Inventory Database*. Berkeley, California. Accessed January 2019 at: <http://www.cal-ipc.org/paf/>.
- County of Humboldt. (2017). *McKinleyville Community Plan*. Eureka, CA:County of Humboldt. Accessed January 2019 at: <https://humboldt.gov/DocumentCenter/View/65033/McKinleyville-Community-Plan-as-amended-by-General-Plan-2017-PDF>.
- Firewood Online. (NR). Accessed February 2018 at: http://firewoodonline.net/redwood_split_rail_fencing_log_posts.
- Google Earth. (2016). "McKinleyville." 40.955826, -124.114408. Accessed January 2019. NR:Google Earth.
- SHN. (2019a). *One-parameter Wetland and Other Waters Delineation Report*. January 2019. Eureka, CA:SHN.
- . (2019b). *Ocean West Access Road Alternatives Analysis*. October 2019. Eureka, CA:SHN.
- . (2019c). *Tree Removal Report*. February 2019. Eureka, CA:SHN.
- U.S. Geological Survey. *Arcata North 7.5-Minute Quadrangle*. NR:USGS.

Planting List

1

**Table 1 Planting List
Ocean West Expansion Mitigation**

Latin Name	Common Name	# of Plants	Min ^a Spacing (feet)	Plant Size	Placement
Wetland Restoration Area (630 sqft)					
Herbs					
<i>Carex obnupta</i>	slough sedge	36	2-4	4" or 1 gallon	low to high elevation
<i>Juncus effusus</i> ssp. <i>pacificus</i>	common rush	18	2	4" plug	low to mid elevation
<i>Juncus patens</i>	spreading rush	27	2	4" plug	mid to high elevation
<i>Scirpus microcarpus</i>	panicled bulrush	27	2	4" plug	low to mid elevation
<i>Athyrium filix-femina</i> var. <i>cyclosorum</i>	lady fern	18	2	4" plug	mid to high elevation
<i>Woodwardia fimbriata</i>	chain fern	11	10	1 gallon	mid to high elevation
<i>Petasites frigidus</i> var. <i>palmaris</i>	arctic sweet colt's foot	14	2	4" plug	mid elevation
<i>Carex exsuccata</i>	western inflated sedge	22	2	4" plug	mid elevation
<i>Symphyotrichum chilense</i>	pacific aster	25	2	4" plug	mid elevation
<i>Pleuropogon refractus</i>	nodding semaphore grass	18	2	4" plug	high elevation
Total Number of Plants - Wetland Restoration Area		216			
Riparian Woodland Restoration Area (18,750 sqft)					
Trees					
<i>Acer macrophyllum</i>	big-leaf maple	20	7	1-5 gallon	mid bank to top of bank
<i>Alnus rubra</i>	red alder	64	7	1 gallon	stream side to top of bank
<i>Frangula purshiana</i> ssp. <i>purshiana</i>	casacara	12	7	1 gallon	mid bank
<i>Morella californica</i>	California wax myrtle	22	7	1 gallon	top of bank
<i>Picea sitchensis</i>	Sitka spruce	55	7	1-5 gallon	mid bank to top of bank
<i>Populus trichocarpa</i>	black cottonwood	25	7	1gallon or live stake	stream side to mid bank
<i>Salix hookeriana</i>	coast willow	4	7	live stake	streamside
<i>Sequoia sempervirens</i>	coast redwood	30	7	1-5 gallon	top of bank
Shrubs					
<i>Cornus sericea</i>	red-twig dogwood	12	random	1 gallon	streamside to low banks
<i>Corylus cornuta</i>	hazelnut	12	random	1 gallon	mid-bank
<i>Gaultheria shallon</i>	salal	22	random	1 gallon	mid to high bank
<i>Lonicera hispidula</i>	pink honeysuckle	8	random	4" plug	mid to high bank
<i>Lonicera involucrata</i> var. <i>ledebourii</i>	twinberry	6	random	1 gallon	low to mid bank
<i>Philadelphus lewisii</i>	mock orange	10	random	1 gallon	low to mid bank
<i>Physocarpus capitatus</i>	ninebark	18	random	1 gallon	low to high bank
<i>Ribes sanguineum</i> var.	red-flowered	8	random	1 gallon	mid to high bank

Table 1 Planting List Ocean West Expansion Mitigation					
Latin Name	Common Name	# of Plants	Min ^a Spacing (feet)	Plant Size	Placement
<i>sanguineum</i>	currant				
<i>Rubus spectabilis</i>	salmonberry	30	random	1 gallon	low to mid bank
<i>Vaccinium ovatum</i>	evergreen huckleberry	18	random	1 gallon	high bank
Total Number of Plants - Riparian Woodland Restoration Area		376			
Total Wetland Mitigation Plants		592			

^a Spacing on center. Size substitutions acceptable, at appropriate compensation ratio, if specified size not available. Example: 4 in. can be similar size such as deep pot, tree tube, quart, etc. Per contractor discretion in consultation with project biologist.

Photos **2**



Photo 1: Existing Conditions looking west within the proposed location of the access road. Note non-native vegetation and manicured lawn. Widow White Creek is to the right of the photo. Photo taken May 14, 2018.



Photo 2: Existing conditions southwest within the proposed location of the access road heading up the bank away from Widow White Creek. Note non-native vegetation and manicured lawn. Photo taken May 14, 2018.



Photo 3: Looking northwest at the west bank of Widow White Creek within the area proposed for riparian woodland mitigation. Note non-native Monterey pines and shrubs. Wetland restoration would occur at the base of the bank in the center of the photo. Photo taken April 10, 2018.



Photo 4: Looking west at the west bank of Widow White Creek within the area proposed for riparian woodland mitigation. Note non-native Monterey pines and non-existent herbaceous vegetation. Photo taken April 10, 2018.



Photo 5: Looking northwest at the west bank of Widow White Creek within the area proposed for riparian woodland mitigation. Note non-native Monterey pines and shrubs. These trees would be removed, and the area would be planted with native riparian trees. Photo taken April 10, 2018.



Photo 6: Looking east from the upland project area toward Widow White Creek and the area proposed for riparian woodland mitigation. Note non-native Monterey pines, to be removed for restoration of native riparian woodland. Restoration planting would extend approximately to the drip line of the existing trees. Photo taken April 10, 2018.



Photo 7: Looking north from the top of bank down over the proposed riparian restoration area. Wetland restoration would be located at the base of the slope. Note pedestrian path just visible in the lower right of the photo. Photo taken April 10, 2018.



Photo 8: Looking south across Widow White Creek toward restoration area. Non-native vegetation would be removed, and existing fence would be removed. Photo taken April 10, 2018.



Photo 9: Looking south across Murray Road toward proposed riparian restoration area. Non-native eucalyptus and Monterey pine trees to the right will be removed. Non-native eucalyptus tree to the left will remain as it is on the opposite bank of Widow White Creek and is outside of the restoration area. Photo taken April 10, 2018.



Photo 10: Vegetation along Widow White Creek within the proposed riparian woodland restoration area. Native vegetation in the center of the photo will not be removed for the mitigation plan. Photo taken January 10, 2019.



Photo 11: Looking north within the northern portion of the proposed riparian woodland restoration area. This portion of the restoration area is devoid of understory vegetation due to allelopathic effect from eucalyptus trees. Native multi-trunked willow to remain. Photo taken January 10, 2019.



Photo 12: Widow White Creek looking east. No restoration work would occur within or immediately adjacent to the active channel. Photo taken April 10, 2018.



Photo 13: Proposed restoration area looking south east from the top of bank. Proposed wetland restoration would occur at the base of the slope. Non-native Monterey pines and escallonia would be removed and replaced with native vegetation. Photo taken January 10, 2019.



Photo 14: Proposed wetland restoration area looking north. Existing pedestrian bridge and weed mat to be removed and the area replanted per the specifications. Photo taken April 10, 2018.



**Table 1 Updated Tree Removal List 8/11/2021
Ocean West Expansion**

Tree #	Latin Name	Common Name	Est. Tree size (DBH)	Tree Health	Status	Notes
10m	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	8 in	shade stunted	Non-native, planted	small, shade stunted tree
11m	<i>Pinus radiata</i>	Monterey pine	32 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot. Will become a hazard
12m	<i>Pinus radiata</i>	Monterey pine	40 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot. Will become a hazard.
13m	<i>Pinus radiata</i>	Monterey pine	38 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot. Will become a hazard
14m	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	4 in	shade stunted	Non-native, planted	small, shade stunted tree
15m	<i>Arbutus unedo</i> (cultivar)	strawberry tree	4 in	shade stunted	Non-native, planted	small, shade stunted tree
16m	<i>Pinus radiata</i>	Monterey pine	24 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot. Will become a hazard
17m	<i>Pinus radiata</i>	Monterey pine	36 in	mature, has health issues	Non-native, planted	Has a large rotten cavity resulting from the breakage of another main trunk.
18m	<i>Pinus radiata</i>	Monterey pine	40 in	mature, healthy	Non-native, planted	
19m	<i>Pinus radiata</i>	Monterey pine	48 in	mature, healthy	Non-native, planted	Very large tree shading a large portion of the proposed mitigation area.
20m	<i>Pinus radiata</i>	Monterey pine	30 in	mature, has health issues	Non-native, planted	Has a bole infection (most likely western gall rust), leading to a weakened trunk.
21m	<i>Pinus radiata</i>	Monterey pine	40 in	mature, has health issues	Non-native, planted	Many broken branches and associated rot.
22m	<i>Maytenus boaria</i>	Mayten tree	4 in	healthy	Invasive	currently colonizing more area along Widow White Creek through root shoots.
Potential	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	8 in	healthy	Non-native, planted	potentially going to be removed
Potential	<i>Cupressus × leylandii</i> (cultivar)	Leyland cypress	24 in	healthy	Non-native, planted	potentially going to be removed
Total Number of Trees to be removed for Proposed Mitigation Area			24			
Total number of trees to be removed for the project along Widow White Creek			51			



**PRELIMINARY
STORMWATER CONTROL PLAN
For
OCEAN WEST EXPANSION
McKinleyville, CA
(APN 510-171-039, 510-171-040, 510-171-060)**

(Job No. 18-2015)

Prepared by:
OMSBERG & PRESTON
402 E Street
Eureka, CA 95501
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November 12, 2019
Revised: September 29, 2021

Erika M. Willor, P.E.
R.C.E. 92836



PROJECT DESCRIPTION

The Ocean West Expansion Project in McKinleyville, California, proposes to expand the existing manufactured home park on APN 510-171-040 to APN 510-171-039 (Parcel 1) and 510-171-060 (Parcel 2). The project will merge the three APNs and create 22 manufactured home lots on Parcel 1 and three manufactured home lots on Parcel 2, along with associated streets, driveways, pedestrian trails, and utilities, as shown on Exhibit 'B'. In addition to the improvements within the expansion areas, the existing gravel parking lot on APN 510-171-040 will be improved with a parking area, dog park, and community garden.

EXISTING SITE

Parcel 1 is located northwest of the existing park and is approximately 4.5 acres. The parcel is bordered by Murray Road to the north, Highway 101 to the west, Widow White Creek along the northeast, and the existing park along the east and south as shown on Exhibit 'A'. The property contains one small building and a minimal amount of pavement, all to be removed. The site is gently sloped, draining northeast to Widow White Creek. A small portion of the property along the creek is within the 100-year flood zone.

Parcel 2 is located northeast of the existing park and is approximately 0.6 acres. The parcel is bordered by McKinleyville Avenue to the east, the Dollar General Store to the north, and the existing park to the west and south. The site is undeveloped and very flat.

Per the Geotechnical Investigation Report by SHN, dated October 2019, the soils for both parcels are mostly sandy with less than 50 percent fines per ASTM D 422D, Standard Test Method for Particle-Size Analysis of Soils. Wet weather observations have also determined that seasonal high groundwater levels exceed 9 feet from existing ground surface elevations.

Per the Natural Resources Conservation Services (NRCS), the onsite soils are classified as Arcata and Candymountain soils and are in hydrologic soil group B.

PROPOSED STORMWATER MANAGEMENT PLAN

The McKinleyville Community Plan (MCP) requires all developments to detain the 100-year, 24-hour post-development runoff rates to the 2-year, 24-hour pre-development runoff rates. Additionally, per the Humboldt Low Impact Development (LID) Stormwater Manual this project is a Hydromodification Project since more than one (1) acre of impervious area is being replaced and/or created. Per the LID Manual, Hydromodification Projects are required to retain the 85th percentile, 24-hour storm event (0.65-inches) and/or use runoff reduction techniques (e.g. permeable pavement, tree planting, etc) to mitigate impervious surfaces. As with the MCP, Hydromodification Projects are also required to maintain the post-project runoff at or below the pre-project flow rates for the 2-year, 24-hour storm event.

As shown on Exhibit 'B', pervious pavement is proposed to be used for all roadways, parking areas and driveways to mitigate the increase of runoff from the site. Similarly, the proposed pedestrian trails will be constructed of permeable decomposed granite to mitigate the increase in impervious areas. Therefore, the only increase in impervious surfaces and runoff will be from

the future manufactured homes. Runoff generated by the 100-year, 24-hour storm event from the future homes will be retained onsite within bioretention basins. Since the 100-year storm is significantly larger than the 85th percentile storm and full retention (not detention) will be provided, both the requirements of the MCP and LID manual will be exceeded.

DRAINAGE ANALYSIS

To provide conservative sizing of the pervious pavement and bioretention systems, infiltration rates have been neglected from the sizing calculations. Therefore, the pervious pavement, and bioretention basins have been sized to store the total volume of runoff generated during the 100-year, 24-hour storm event. Per the NOAA Precipitation Frequency Atlas of the United States, California, the 100-year, 24-hour storm event is 6.19 inches (0.52 feet).

Single Home Hydrology Analysis

The maximum building coverage that will be allowed per lot is 1568 square feet. Therefore, to determine a conservative runoff volume for the post-development improvements, the drainage analysis assumes each lot will have maximum building coverage.

The runoff volume generated by a 1568 square foot home for the 100-year, 24-hour storm event was determined using the SCS method, Hydraflow Hydrographs computer program, and the following parameters:

Area = 0.036 acres (1568 square feet)

Curve Number (CN) = 98

Time of Concentration (Tc) = 5 minutes

100-year, 24-hr Precipitation = 6.18 inches (per the NOAA Atlas 14 Precipitation Frequency Map)

Per the attached Hydrograph Report, the volume of runoff generated for the maximum allowed home size for the 100-year, 24-hour storm is 728 cubic feet.

Bioretention Basins

The storage volume for the proposed bioretention basins include the above ground and below ground storage volumes. The below ground storage volume was calculated using a 35% porosity value as allowed in the LID manual. All bioretention basins will be designed to have an additional 0.5 feet of freeboard to any critical feature including lot lines, structures, and streamside management areas. Given the depth to seasonal groundwater and well infiltrating soils, it is unlikely the bioretention basins will overflow during storm events exceeding the 100-year event.

Based on the single home hydrology analysis above, once fully developed the total runoff volume from all homes on Parcel 1 and Parcel 2 will be 16,016 cubic feet and 2184 cubic feet, respectively, for the 100-year storm event. Downspouts for each future home will either be directed or conveyed via a private storm drain system to the bioretention basins as listed in the tables below.

Table 1: Parcel 1

Bioretention Basin	Storage Volume CF	Lots	Runoff Volume CF
A	10,000	201-213	9464
B1	4895	217-222	4368
B2	2720	214-216	2370
Total	17615	201-222	16016

Table 2: Parcel 2

Basin	Storage Volume CF	Lots	Runoff Volume CF
C	1627	301, 303	1456
D	852	302	728
Total	2479	301-303	2184

As shown in the tables above, the storage volume for all the bioretention basins exceeds the 100-year runoff volume being diverted to the basins. Therefore, exceeding both the MCP and LID manual requirements.

All proposed bioretention basins will be located outside the 100-year flood zone, wetland buffer areas, and the Widow White Creek streamside management area.

Pervious Pavement

The pervious pavement will be designed to retain and infiltrate stormwater from the 100-year, 24-hour storm event. To fully retain the 100-year storm event, the pavement base section will need to be deep enough to store the runoff volume generated from the 100-year storm event. Per the calculations below, the pervious pavement base section will need to be 1.5 feet deep to accommodate stormwater generated by the 100-year storm event.

$$\begin{aligned}
 \text{Pervious Pavement Base Depth:} &= (\text{Rainfall Depth}) / (\text{Rock Base \%Void}) \\
 &= 0.52 \text{ ft} / 0.35 \\
 &= 1.49 \text{ ft}
 \end{aligned}$$

To further protect the adjacent Window White Creek, the proposed pervious pavement access road within the Widow White Creek stream side management area (SMA) and the mapped 100-year flood zone will be graded to be roughly three feet above the calculated 100-year base flood elevation. Therefore, during the unlikely event that a 100-year storm event and a 100-year flood event occur concurrently there will be no runoff generated by the pervious

pavement and the bottom of pervious pavement section will be a foot above the base flood elevation. Therefore, the use of pervious pavement within this area is acceptable. Preliminary flood plain calculations indicate that the small amount of fill required to grade the access road within the flood plain will not significantly impact the base flood elevation and/or impact adjacent improvements.

LOW IMPACT DEVELOPMENT MEASURES

As mentioned above, pervious pavement will be used to mitigate impervious surfaces for the roadways, driveways, and parking areas and runoff generated from future homes, for the 100-year, 24-hour design storm, will be retained onsite via bioretention basins. Therefore, the Humboldt County LID requirements will be exceeded since the 85th percentile storm event (0.65 inches) is much smaller than the 100-year design storm (6.18 inches).

The Regulated Projects Worksheet 2 is also attached to demonstrate compliance with the Humboldt County Low Impact Development Stormwater Manual.

SOURCE CONTROL

To prevent potential pollutants from entering the storm drain system, and to ensure the LID measures are operating properly, the pervious pavement and bioretention basins shall be maintained and operated per the attached Pervious Paving Maintenance Plan and Bioretention Maintenance Plan. Since the proposed improvements are residential, no other pollutant point sources are anticipated.

Attachments

Exhibit A

Exhibit B (2 sheets)

Monition Well Observations

Soil Test Results

Hydrograph Report – Single Home Analysis

Regulated Projects Worksheet 2

Maintenance Plans (to be provided during permitting of construction documents)

OMSEBERG & PRESTON
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 95501
 Telephone
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SURVEYORS
PLANNERS
ENGINEERS

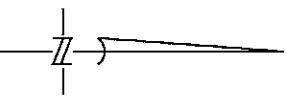


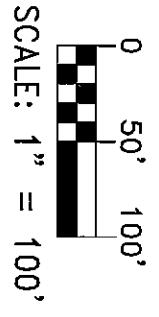
EXHIBIT 'A' - EXISTING SITE
 for
OCEAN WEST EXPANSION
 in the unincorporated area of Humboldt County
 Section 31, T.7N., R.1E., H.B.&M.

SCALE
 AS SHOWN

JOB NO.
 18-2015

SHEET
 1 OF 1

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PLANNERS
ENGINEERS



SYMBOL	INDICATES
(E)	EXISTING
S.F.	SQUARE FEET
FT.	FEET
C.F.	CUBIC FEET
[Pattern]	PROPOSED PERVIOUS PAVEMENT
[Pattern]	STREAMSIDE MANAGEMENT AREA, WETLAND BUFFER & 100 YEAR FLOOD ZONE
[Pattern]	BIORETENTION BASIN

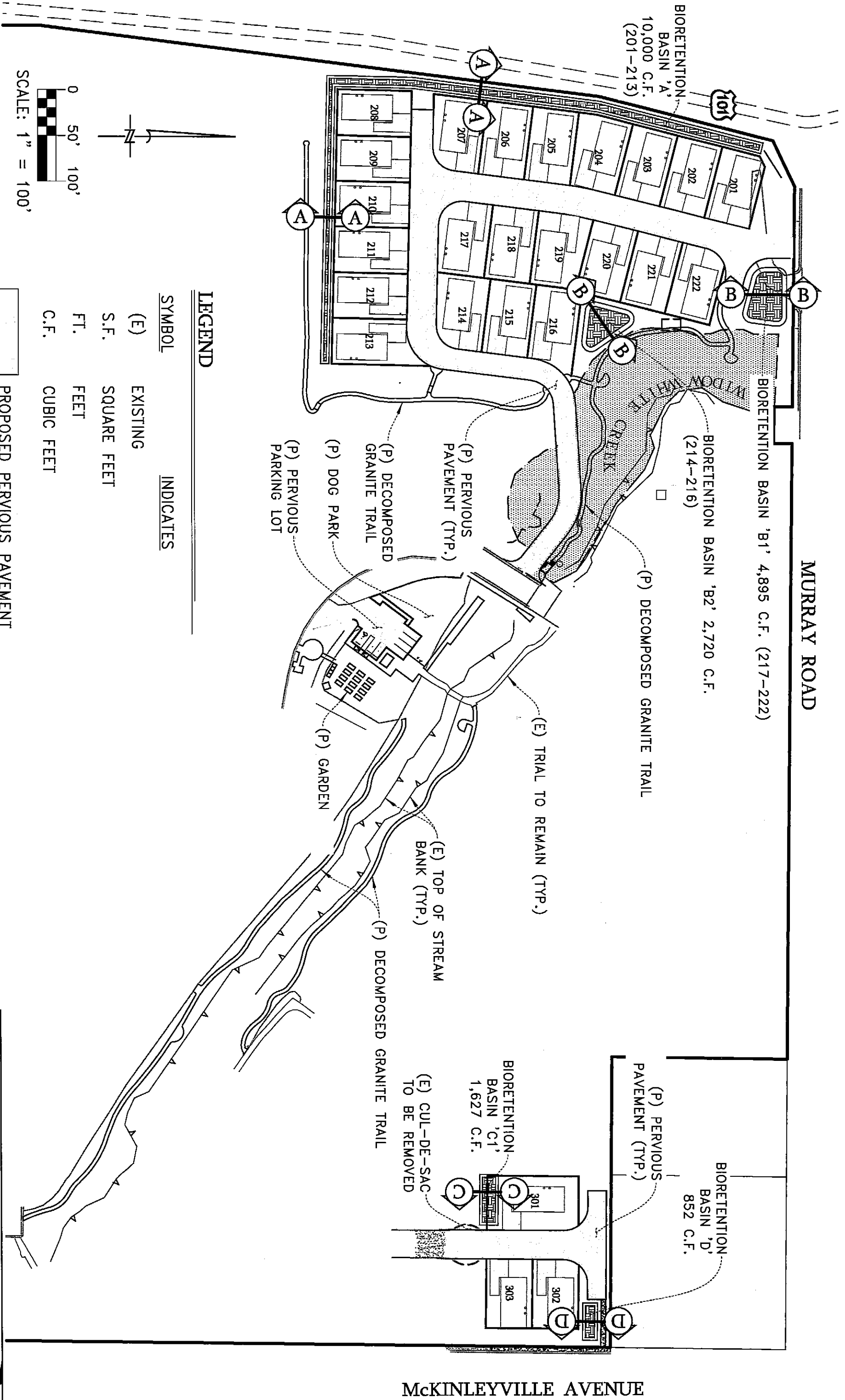


EXHIBIT 'B' - PROPOSED SITE LAYOUT
 for
OCEAN WEST EXPANSION
 in the unincorporated area of Humboldt County
 Section 31, T.7N., R.1E., H.B.&M.

SCALE AS SHOWN
 JOB NO. 18-2015
 SHEET 1 OF 2

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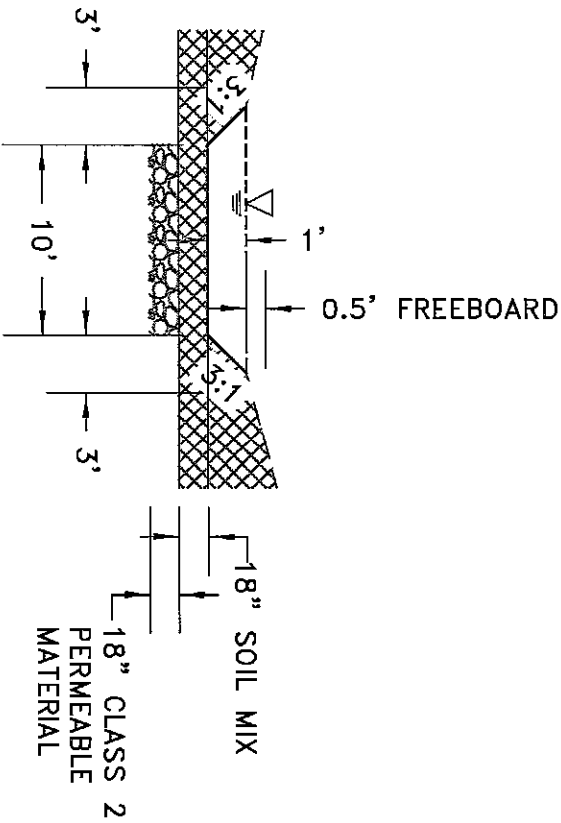
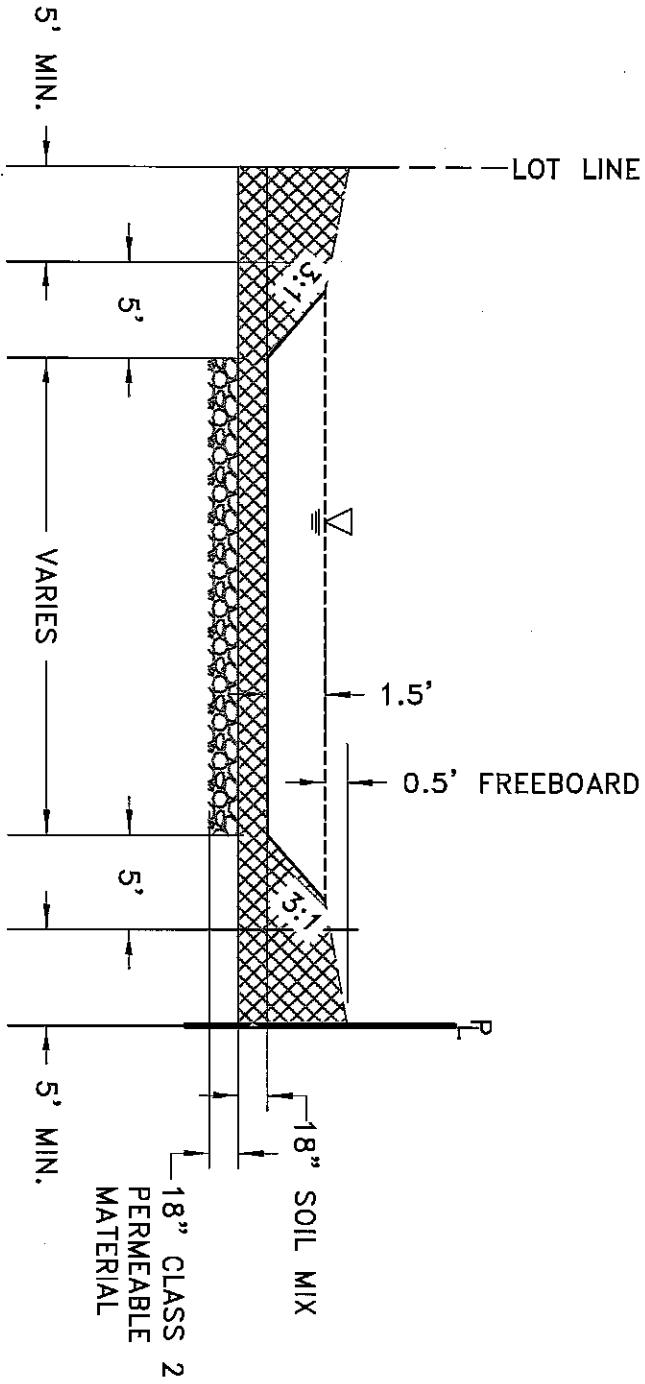
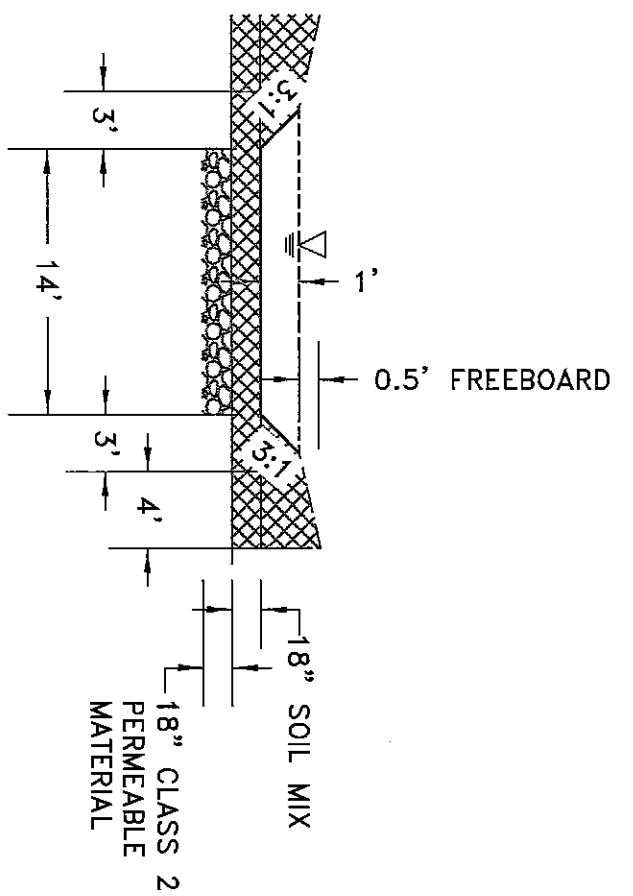
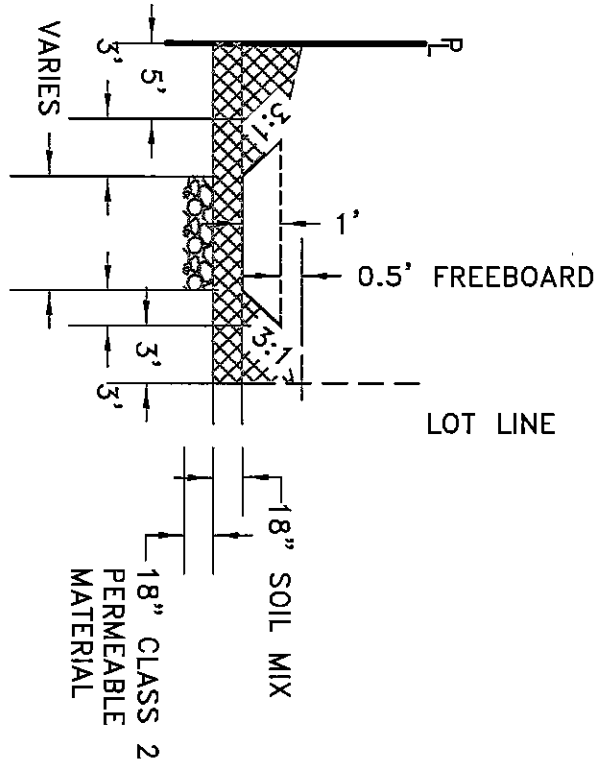


EXHIBIT 'B' - SECTIONS

for
OCEAN WEST EXPANSION
 in the unincorporated area of Humboldt County
 Section 31, T.7N., R.1E., H.B.&M.

SCALE	AS SHOWN
JOB NO.	18-2015
SHEET	2
OF	2



Reference: 018062

April 17, 2020

Dennis Roberts
Atwell, LLC
4700 E. Southern Avenue
Mesa, AZ 85206

Subject: Monitoring Well Observations at Proposed Ocean West Expansions, APN 510-171-039 and 510-171-060

Dear Dennis Roberts:

On December 30, 2019, an SHN representative installed one groundwater monitoring well on the currently vacant lot south of and adjacent to the lot occupied by an existing Dollar Tree store (APN 510-171-060). Three additional monitoring wells were installed on the currently vacant parcel on the southeast corner of the intersection of Murray Road and U.S. Highway 101 (APN 510-171-039).



Dennis Roberts

Monitoring Well Observations at Proposed Ocean West Expansions, APN 510-171-039 and 510-171-060

April 17, 2020

Page 2

All monitoring wells were installed to depths ranging from 10.1 feet BGS (below ground surface) to 8.70 feet BGS. Borings were advanced with a hand auger. Annular space was filled with clean, washed sand to approximately 2 feet BGS. The upper 2 feet were backfilled with bentonite chips. The bottom 5 feet of each well casing was screened.

On Wednesday, February 12, March 18, and March 26, 2020, depth to water was measured for each well. These readings were during the Humboldt County Environmental Health Department wet weather season determination. There was no water detected in any of the wells on these dates. The data is presented in the table below. Approximate sample locations are shown in the attached figure.

Monitor Well number	Depth of well BGS (feet)	Depth to groundwater BGS - 2/12/20 (feet)	Depth to groundwater BGS - 3/18/20 (feet)	Depth to groundwater BGS - 3/26/20 (feet)
MW-1	10.10	Dry	Dry	Dry
MW-2	8.70	Dry	Dry	Dry
MW-3	9.16	Dry	Dry	Dry
MW-4	9.47	Dry	Dry	Dry

If you have any questions, please call me at (707) 441-8855.

Sincerely,

SHN



Greg Williston
Principal

GSW:lam

c: Erika Willor, Project Engineer, City of Eureka
OMSBERG & PRESTON



Soil Test Results

Path: \\neurika\projects\2018\018062A-Widow-Wf-CK\GIS\PROJ_MXD\Figure2_SiteMap.mxd User Name: psundberg DATE: 7/26/19, 4:55PM



	<p>Ocean West Ocean West Widow White Creek McKinleyville, California</p>	<p>Site Map Showing Test Pit Locations SHN 018062.100</p>
<p>July 2019</p>		<p>Figure 1</p>

IMAGE SOURCE: GOOGLE EARTH, DATED 5/26/2016

Test Pit	Depth Interval (ft)	Gravel	Sand	Silt	Clay
TP-1	1-1.5	6.3	59.6	31.5	2.5
TP-1	3-3.5	5.8	64.8	27.5	1.9
TP-3	1-3.5	7.5	67.1	28.9	2.5
TP-4	2-4.5	0.9	68.9	26.7	3.5
TP-6	2-2.5	1.3	59.9	33.8	5
TP-6	4-4.5	8.5	76.8	12.8	1.8
TP-7	1-3.5	0.5	37	49	13.5



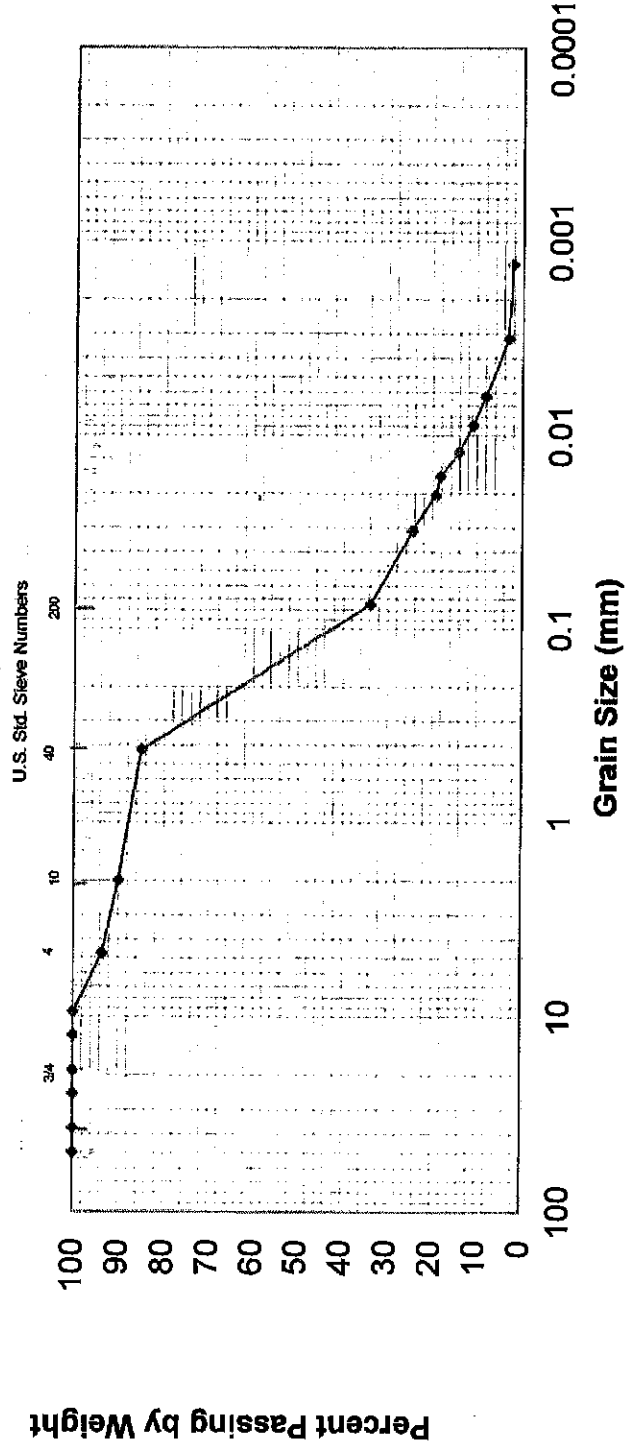
Phone: (707) 441-8855 Email: info@shn-engr.com Web: shn-engr.com
 812 W. Wabash Avenue, Eureka, CA 95501-2138

Project Name: Ocean West
 Boring ID: TP1
 Sample Depth: 1-1.5
 Sample Number: P13

Project Number: 018062.1
 Lab #: 19-610
 Checked By: NAN
 Date: 7/24/19

SIEVE	2"	1.5"	1"	0.75"	0.5"	0.375"	#4	#10	#40	#200								
SIEVE SIZE (mm)	50	37.50	25	19.00	12.5	9.5	4.75	2.00	0.425	0.075	0.0913	0.0205	0.0163	0.0123	0.0069	0.0063	0.0032	0.0013
PERCENT PASSING	100.0	100.0	100.0	100.0	100.0	100.0	93.7	90.2	85.1	34.0	24.6	19.4	18.4	14.2	11.1	8.2	3.2	2.3

Gradation Test Results



GRAVEL		SAND		SILT		CLAY
Coarse	Fine	Coarse	Medium	Fine		

% Gravel **6.3** % Sand **59.6** % Silt **31.5** % Clay **2.5**



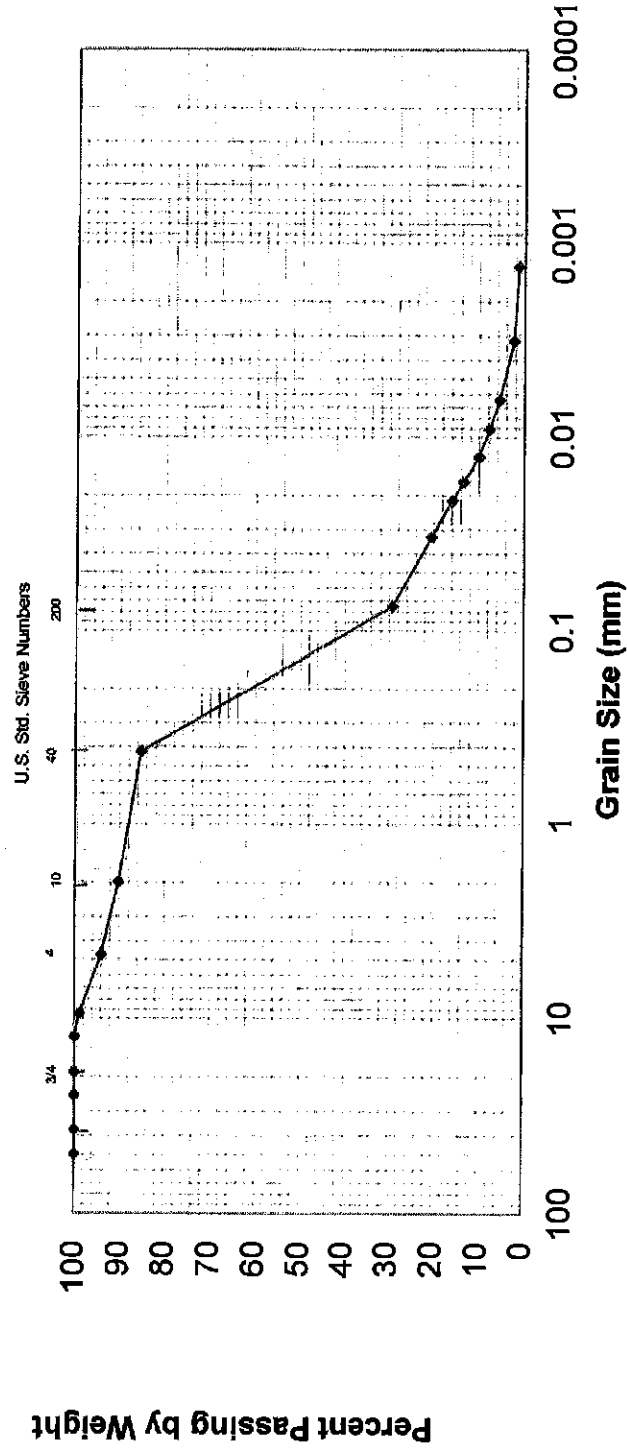
Phone: (707) 441-8855 Email: info@shn-engr.com Web: shn-engr.com
 812 W. Wabash Avenue, Eureka, CA 95501-2138

Project Name: Ocean West
 Boring ID: TP1
 Sample Depth: 3-3.5
 Sample Number: A12

Project Number: 18062.1
 Lab #: 19-611
 Checked By: NAN
 Date: 7/24/19

SIEVE	2"	1.5"	1"	0.75"	0.5"	0.375"	#4	#10	#40	#200								
SIEVE SIZE (mm)	50	37.50	25	19.00	12.5	9.5	4.75	2.00	0.425	0.075	0.0300	0.0214	0.0171	0.0127	0.0091	0.0064	0.0032	0.0013
PERCENT PASSING	100.0	100.0	100.0	100.0	100.0	99.0	94.2	90.3	85.4	29.4	20.7	16.0	13.6	10.1	7.9	5.6	2.5	1.4

Gradation Test Results



GRAVEL		SAND		SILT		CLAY	
Coarse	Fine	Coarse	Medium	Coarse	Fine	Coarse	Fine

% Gravel **5.8** % Sand **64.8** % Silt **27.5** % Clay **1.9**



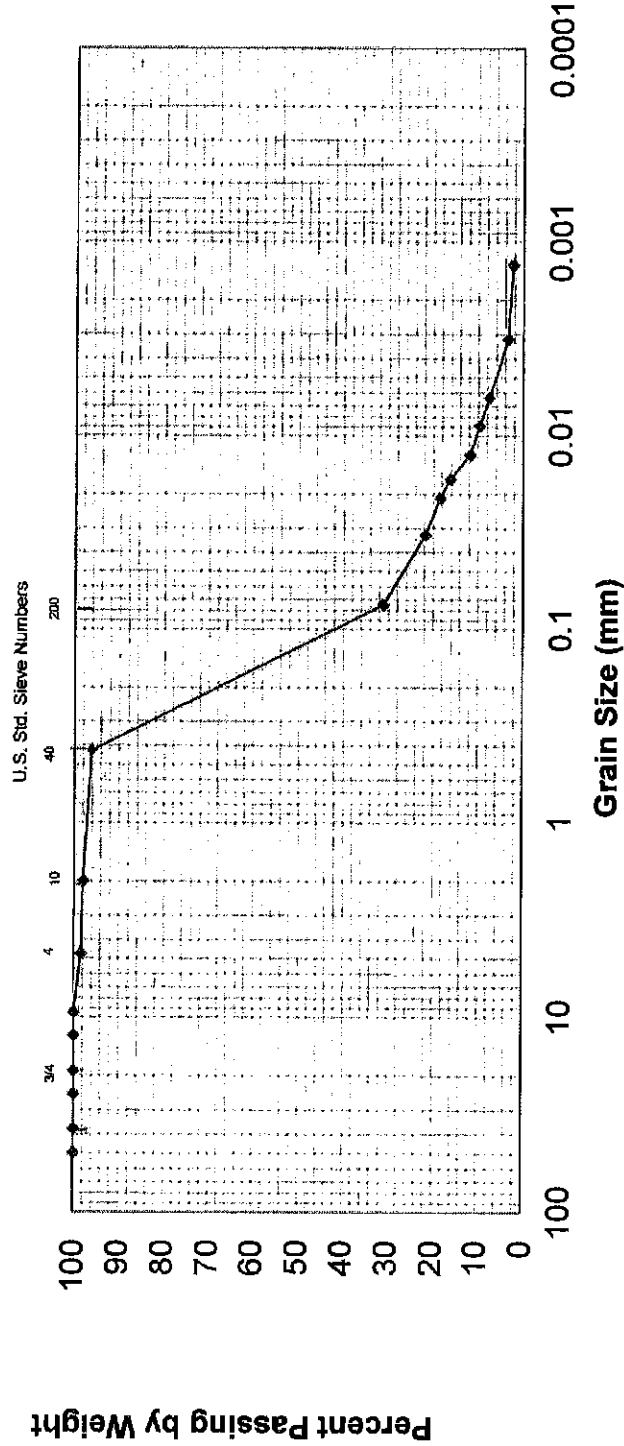
Phone: (707) 441-8855 Email: info@shn-engr.com Web: shn-engr.com
 812 W. Wabash Avenue, Eureka, CA 95501-2138

Project Name: Ocean West
 Boring ID: TP3
 Sample Depth: 1-3.5'
 Sample Number: A4

Project Number: 18062.1
 Lab #: 19-616 & 617 Combo
 Checked By: NAN
 Date: 7/24/19

SIEVE	2"	1.5"	1"	0.75"	0.5"	0.375"	#4	#10	#40	#200								
SIEVE SIZE (mm)	50	37.50	25	19.00	12.5	9.5	4.75	2.00	0.425	0.075	0.0325	0.0210	0.0168	0.0126	0.0089	0.0064	0.0032	0.0013
PERCENT PASSING	100.0	100.0	100.0	100.0	100.0	100.0	98.5	98.1	96.2	31.4	21.9	18.6	16.4	11.9	9.8	7.7	3.4	2.4

Gradation Test Results



GRAVEL		SAND		SILT		CLAY	
Coarse	Fine	Coarse	Medium	Fine			

% Gravel **1.5** % Sand **67.1** % Silt **28.9** % Clay **2.5**



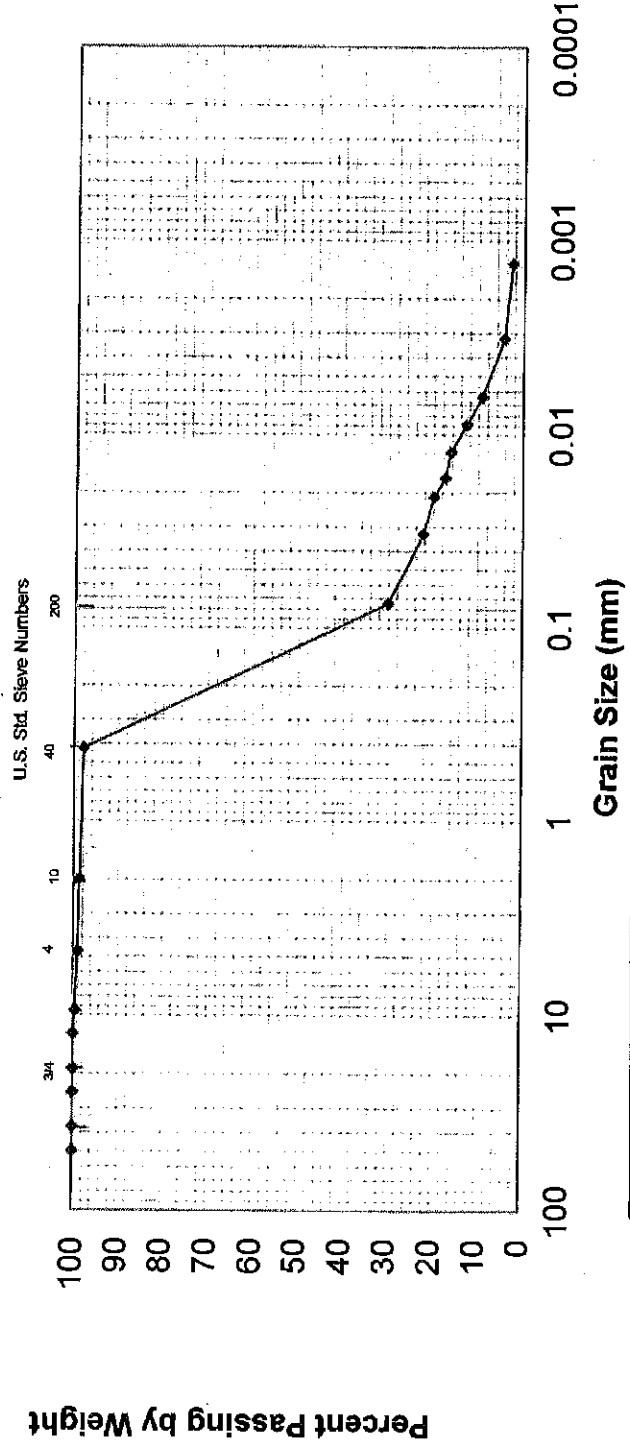
Phone: (707) 441-8855 Email: info@shn-engr.com Web: shn-engr.com
 812 W. Wabash Avenue, Eureka, CA 95501-2138

Project Name: Ocean West
 Boring ID: TP4
 Sample Depth: 2-4.5
 Sample Number: 00

Project Number: 18062.1
 Lab #: 19-619-620 Combo
 Checked By: NAN
 Date: 7/24/19

SIEVE	2"	1.5"	1"	0.75"	0.5"	0.375"	#4	#10	#40	#200								
SIEVE SIZE (mm)	50	37.50	25	19.00	12.5	9.5	4.75	2.00	0.425	0.075	0.0327	0.0210	0.0168	0.0123	0.0089	0.0064	0.0032	0.0013
PERCENT PASSING	100.0	100.0	100.0	100.0	100.0	99.6	99.1	98.8	98.0	30.2	22.5	20.0	17.6	16.4	12.9	9.3	4.5	2.7

Gradation Test Results



GRAVEL	SAND		SILT	CLAY
Coarse	Fine	Coarse	Medium	Fine

% Gravel 0.9 % Sand 58.9 % Silt 26.7 % Clay 3.5



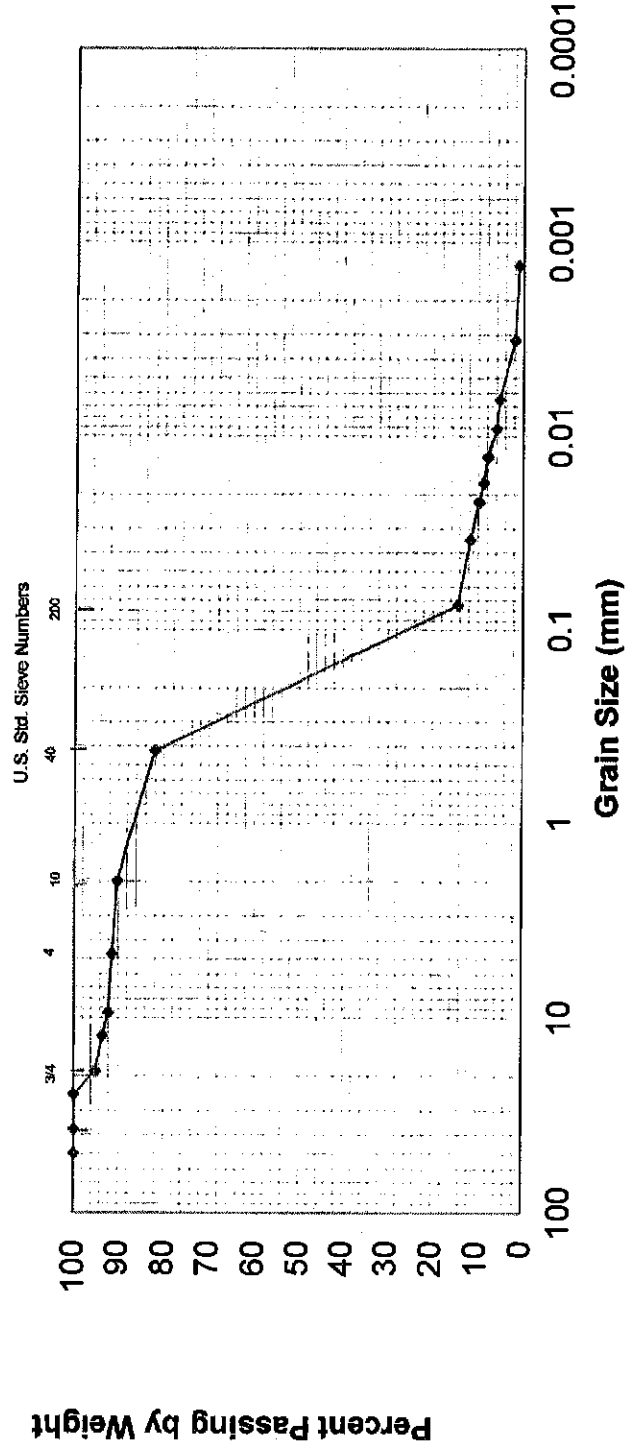
Phone: (707) 441-8855 Email: info@shn-engr.com Web: shn-engr.com
 812 W. Wabash Avenue, Eureka, CA 95501-2138

Project Name: Ocean West
 Boring ID: TP6
 Sample Depth: 4-4.5
 Sample Number: A8

Project Number: 018062.1
 Lab #: 19-625
 Checked By: NAN
 Date: 7/24/19

SIEVE	2"	1.5"	1"	0.75"	0.5"	0.375"	#4	#10	#40	#200								
SIEVE SIZE (mm)	50	37.50	25	19.00	12.5	9.5	4.75	2.00	0.425	0.075	0.0344	0.0220	0.0175	0.0092	0.0065	0.0032	0.0013	
PERCENT PASSING	100.0	100.0	100.0	95.1	93.5	92.3	91.5	90.3	82.2	14.6	11.9	9.9	8.9	7.9	6.1	5.4	2.0	1.2

Gradation Test Results



GRAVEL	SAND		SILT		CLAY
Coarse	Coarse	Medium	Coarse	Fine	

% Gravel **18.5** % Sand **76.8** % Silt **12.8** % Clay **1.8**



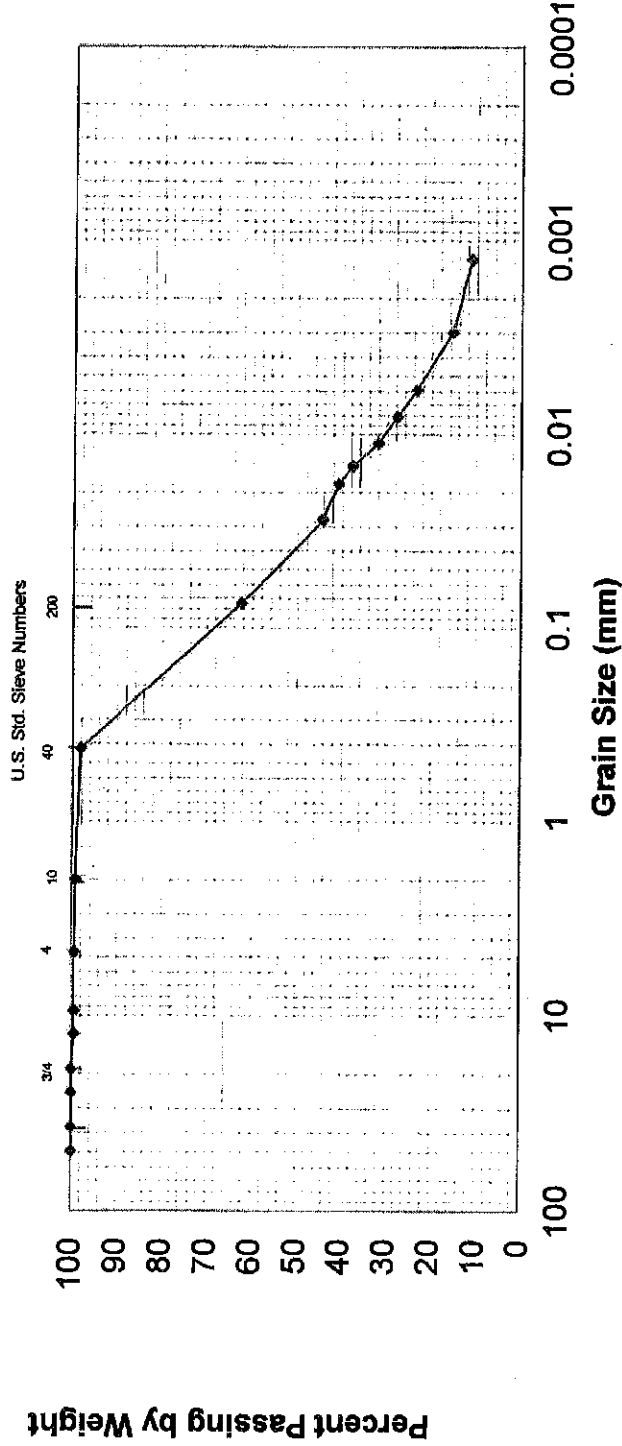
Phone: (707) 441-8855 Email: info@shn-engr.com Web: shn-engr.com
 812 W. Wabash Avenue, Eureka, CA 95501-2138

Project Name: Ocean West
 Boring ID: TP7
 Sample Depth: 1-3.5
 Sample Number: A10

Project Number: 018062.1
 Lab #: 19-626 & 627
 Checked By: NAN
 Date: 7/24/19

SIEVE	2"	1.5"	1"	0.75"	0.5"	0.375"	#4	#10	#40	#200								
SIEVE SIZE (mm)	50	37.50	25	19.00	12.5	9.5	4.75	2.00	0.425	0.075	0.0279	0.0181	0.0147	0.0112	0.0081	0.0059	0.0030	0.0013
PERCENT PASSING	100.0	100.0	100.0	100.0	99.5	99.5	99.5	99.3	98.3	62.5	44.4	41.1	37.7	32.2	27.9	23.6	15.6	11.3

Gradation Test Results



GRAVEL	SAND		SILT		CLAY
Coarse	Fine	Coarse	Medium	Fine	

% Gravel **0.5** % Sand **37.0** % Silt **49.0** % Clay **13.5**

Hydrograph Report - Single Home

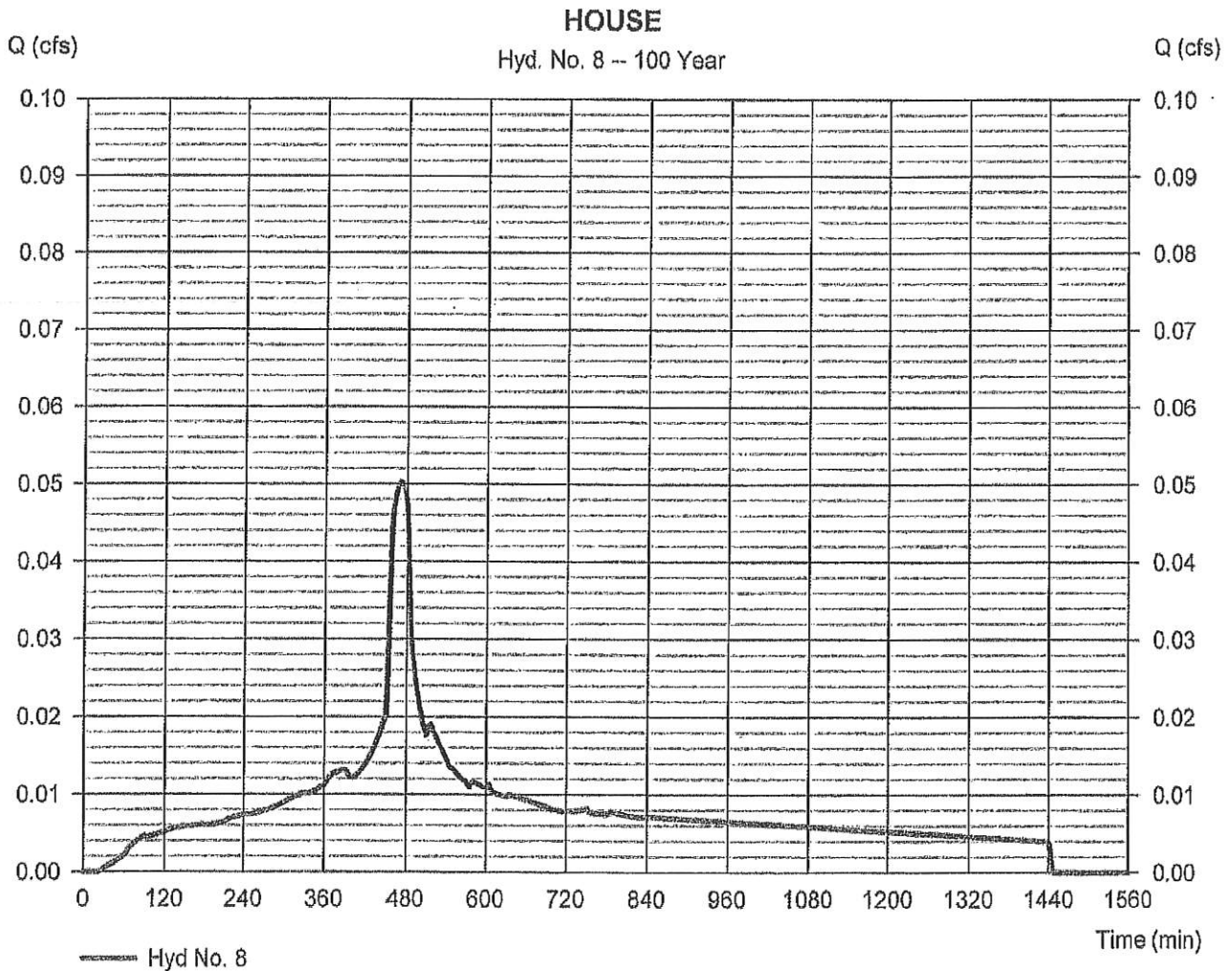
Hydraflow Hydrographs Extension for AutoCAD® Civil 3D® 2010 by Autodesk, Inc. v9.25

Thursday, Oct 31, 2019

Hyd. No. 8

HOUSE

Hydrograph type	= SCS Runoff	Peak discharge	= 0.050 cfs
Storm frequency	= 100 yrs	Time to peak	= 470 min
Time interval	= 2 min	Hyd. volume	= 728 cuft
Drainage area	= 0.036 ac	Curve number	= 98
Basin Slope	= 0.0 %	Hydraulic length	= 0 ft
Tc method	= User	Time of conc. (Tc)	= 5.00 min
Total precip.	= 6.18 in	Distribution	= Type IA
Storm duration	= 24 hrs	Shape factor	= 484



Regulated Projects Worksheet 2
Humboldt Low Impact Development Stormwater Manual

Project Information						Formulas/Notes
DMA Name: Parcel 1						
Total Post-Project Impervious Surface Area (square feet)	A	74070	square feet			
24 hour - 85th Percentile Design Storm	B	0.65	inch			B = Select Design Storm Value (0.65-inch Humboldt Bay Area, 1.3-inch Shelter Cove)
Impervious Surface Runoff Value (Potential Stormwater Runoff due to impervious surface area and design storm value)	C	29891	Gallons per 24 hours			C = A x B x 0.083 x 7.48
Pervious Self-Retaining Area (SRA) Credit (if applicable, if none enter 0)						
Self-Retaining Area (square feet)		0	3.5	SRA Credit	0	square feet
						SRA Credit = Self-Retaining Area x Multiplier Select Multiplier (3.5 Humboldt Bay Area, 1.3 Shelter Cove)
Site Design Measure Credits						
Tree Planting and Preservation						
New Trees						
	# of trees					
100 square feet per deciduous tree	D	50	E	5000	square feet	E = D x 100
200 square feet per evergreen tree	F	0	G	0	square feet	G = F x 200
Existing Trees (Credit for 50% of existing canopy area)						
	Canopy diameter (feet)					
Tree #1	H ₁	100	J ₁	3925	square feet	J ₁ = 3.14 x (H ₁ /2) ² x 0.50
Tree #2	H ₂	0	J ₂	0	square feet	J ₂ = 3.14 x (H ₂ /2) ² x 0.50
Tree #3	H ₃	0	J ₃	0	square feet	J ₃ = 3.14 x (H ₃ /2) ² x 0.50
Rain Barrel or Cisterns (55 gallon minimum)						
Square foot credit per gallon based on 24-hour, 85th Percentile Design Storm	K	2.48				K = Select square foot credit per gallon (2.48 Humboldt Bay Area, 1.24 Shelter Cove)
Gallons						
Rain Barrels	L		M	0	square feet	M = L x K
Cisterns	N	0	O	0	square feet	O = N x K
Infiltration Trench/Basin (55 gallon minimum ~ 21 ft ³)						
cubic feet						
volume(ft ³) = length x width x depth	P	0	Q	0	square feet	Q = P x R x K x 7.48
porosity (approximate %)	R	35%				
Subsurface Infiltrators (55 gallon minimum)						
Proprietary units vary, insert estimated storage in ft ³	S	0	T	0	square feet	T = S x 7.48
Impervious Area Disconnection						
Credit per square foot of pervious receiving area	U	0				U = Enter square foot value
Soil Quality Improvement						
Credit per square foot of soil quality improvement	V	0				V = Enter square foot value
Green Roof						
Credit per square foot of green roof installation	W	0				W = Enter square foot value
PPPP (Alternative engineered hardscaping surfaces)						
Credit per square foot of PPPP	X	39575				X = Enter square foot value
Vegetated Swales						
Credit per square foot of vegetated swale	Y	0				Y = Enter square foot value
Stream Setbacks and Buffers						
Credit per square foot of stream setback and buffer [#]	Z	0				Z = Enter square foot value
Credits Total						
	AA	48500	square feet			AA = SRA Credit + E + G + J ₁ + J ₂ + J ₃ + M + O + Q + T + U + V + W + X + Y + Z
Post-Project Impervious Surface Area minus Site Design Measure Credits						
	BB	25570	square feet			BB = A - AA
NEW Impervious Surface Runoff Value (Potential Stormwater Runoff due to impervious surface area and design storm after implementation of Site Design Measures)						
	CC	10319	Gallons per 24 hours			CC = BB x B x 0.083 x 7.48
Percent reduction in Impervious Surface Runoff Value*						
	DD	65.5	%			DD = ((C - CC) / C) x 100%

*If value for DD is not greater than or equal to %100 then bioretention is required for treating remaining runoff from impervious area indicated by value BB. Design and implement bioretention facility in accordance with Humboldt LID Stormwater Manual - Part C. *Bioretention provided for 22 homes (34,496 SF)*

**Infiltration Trench/Basin calculations are based on porosity (35%). Increased trench dimensions (volume) are required to meet 55 gallon minimum capacity.

<input type="text" value="Green"/>	Fill In [Enter Value]
<input type="text" value="Red"/>	Calculated Value
<input type="text" value="Black"/>	Fixed Value/Selectable Value

Conversions Used:
 1 inch = 0.083 feet
 1 cubic foot = 7.48 gallons
 # check with agency with project area jurisdiction for requirements

Regulated Projects Worksheet 2
Humboldt Low Impact Development Stormwater Manual

Project Information						Formulas/Notes
DMA Name: Parcel 2						
Total Post-Project Impervious Surface Area (square feet)	A	13,055	square feet			
24 hour - 85th Percentile Design Storm	B	0.65	inch			B = Select Design Storm Value (0.65-inch Humboldt Bay Area, 1.3-inch Shelter Cove)
Impervious Surface Runoff Value (Potential Stormwater Runoff due to impervious surface area and design storm value)	C	5268	Gallons per 24 hours			C = A x B x 0.083 x 7.48
Pervious Self-Retaining Area (SRA) Credit (if applicable, if none enter 0)						
Self-Retaining Area (square feet)		0	3.5	SRA Credit	0	square feet
						SRA Credit = Self-Retaining Area x Multiplier Select Multiplier (3.5 Humboldt Bay Area, 1.3 Shelter Cove)
Site Design Measure Credits						
Tree Planting and Preservation						
New Trees						
100 square feet per deciduous tree	D	27	E	2700	square feet	E = D x 100
200 square feet per evergreen tree	F	0	G	0	square feet	G = F x 200
Existing Trees (Credit for 50% of existing canopy area)						
Canopy diameter (feet)						
Tree #1	H ₁	0	J ₁	0	square feet	J ₁ = 3.14 x (H ₁ /2) ² x 0.50
Tree #2	H ₂	0	J ₂	0	square feet	J ₂ = 3.14 x (H ₂ /2) ² x 0.50
Tree #3	H ₃	0	J ₃	0	square feet	J ₃ = 3.14 x (H ₃ /2) ² x 0.50
Rain Barrel or Cisterns (55 gallon minimum)						
Square foot credit per gallon based on 24-hour, 85th Percentile Design Storm	K	2.48				K = Select square foot credit per gallon (2.48 Humboldt Bay Area, 1.24 Shelter Cove)
Gallons						
Rain Barrels	L		M	0	square feet	M = L x K
Cisterns	N	0	O	0	square feet	O = N x K
Infiltration Trench/Basin (55 gallon minimum ~ 21 ft ³)						
cubic feet						
volume(ft ³) = length x width x depth	P	0	Q	0	square feet	Q = P x R x K x 7.48
porosity (approximate %)	R	35%				
Subsurface Infiltrators (55 gallon minimum)						
Proprietary units vary, insert estimated storage in ft ³	S	0	T	0	square feet	T = S x 7.48
Impervious Area Disconnection						
Credit per square foot of pervious receiving area	U	0			square feet	U = Enter square foot value
Soil Quality Improvement						
Credit per square foot of soil quality improvement	V	0			square feet	V = Enter square foot value
Green Roof						
Credit per square foot of green roof installation	W	0			square feet	W = Enter square foot value
PPPP (Alternative engineered hardscaping surfaces)						
Credit per square foot of PPPP	X	8350			square feet	X = Enter square foot value
Vegetated Swales						
Credit per square foot of vegetated swale	Y	0			square feet	Y = Enter square foot value
Stream Setbacks and Buffers						
Credit per square foot of stream setback and buffer [#]	Z	0			square feet	Z = Enter square foot value
Credits Total	AA	11050	square feet			AA = SRA Credit + E + G + J ₁ + J ₂ + J ₃ + M + O + Q + T + U + V + W + X + Y + Z
Post-Project Impervious Surface Area minus Site Design Measure Credits	BB	2005	square feet			BB = A - AA
NEW Impervious Surface Runoff Value (Potential Stormwater Runoff due to impervious surface area and design storm after implementation of Site Design Measures)	CC	809	Gallons per 24 hours			CC = BB x B x 0.083 x 7.48
Percent reduction in Impervious Surface Runoff Value*	DD	84.6	%			DD = ((C - CC) / C) x 100%
*If value for DD is not greater than or equal to %100 then bioretention is required for treating remaining runoff from impervious area indicated by value BB. Design and implement bioretention facility in accordance with Humboldt LID Stormwater Manual - Part C.						
**Infiltration Trench/Basin calculations are based on porosity (35%). Increased trench dimensions (volume) are required to meet 55 gallon minimum capacity.						
Green	Fill In [Enter Value]					Conversions Used:
Red	Calculated Value					1 inch = 0.083 feet
Black	Fixed Value/Selectable Value					1 cubic foot = 7.48 gallons
Regulated Projects Worksheet 2, Version 2.0 - June 29, 2016						# check with agency with project area jurisdiction for requirements

Bioretention provided for 3 homes (4704 SF)

Regulated Projects Worksheet 2
Humboldt Low Impact Development Stormwater Manual

Project Information					Formulas/Notes	
DMA Name: Parking Lot						
Total Post-Project Impervious Surface Area (square feet)	A	5,110	square feet			
24 hour - 85th Percentile Design Storm	B	0.65	Inch		B = Select Design Storm Value (0.65-Inch Humboldt Bay Area, 1.3-Inch Shelter Cove)	
Impervious Surface Runoff Value (Potential Stormwater Runoff due to impervious surface area and design storm value)	C	2062	Gallons per 24 hours		C = A x B x 0.083 x 7.48	
Pervious Self-Retaining Area (SRA) Credit (if applicable, if none enter 0)						
Self-Retaining Area (square feet)		0	3.5	SRA Credit	0 square feet	SRA Credit = Self-Retaining Area x Multiplier Select Multiplier (3.5 Humboldt Bay Area, 1.3 Shelter Cove)
Site Design Measure Credits						
Tree Planting and Preservation						
New Trees						
100 square feet per deciduous tree	D	19	E	1900	square feet	E = D x 100
200 square feet per evergreen tree	F	0	G	0	square feet	G = F x 200
Existing Trees (Credit for 50% of existing canopy area)						
Canopy diameter (feet)						
Tree #1	H ₁	0	J ₁	0	square feet	J ₁ = 3.14 x (H ₁ /2) ² x 0.50
Tree #2	H ₂	0	J ₂	0	square feet	J ₂ = 3.14 x (H ₂ /2) ² x 0.50
Tree #3	H ₃	0	J ₃	0	square feet	J ₃ = 3.14 x (H ₃ /2) ² x 0.50
Rain Barrel or Cisterns (55 gallon minimum)						
Square foot credit per gallon based on 24-hour, 85th Percentile Design Storm	K	2.48				K = Select square foot credit per gallon (2.48 Humboldt Bay Area, 1.24 Shelter Cove)
Gallons						
Rain Barrels	L		M	0	square feet	M = L x K
Cisterns	N	0	O	0	square feet	O = N x K
Infiltration Trench/Basin (55 gallon minimum ~ 21 ft ³)						
cubic feet						
volume(ft ³) = length x width x depth	P	0	Q	0	square feet	Q = P x R x K x 7.48
porosity (approximate %)	R	35%				
Subsurface Infiltrators (55 gallon minimum)						
Proprietary units vary, insert estimated storage in ft ³	S	0	T	0	square feet	T = S x 7.48
Impervious Area Disconnection						
Credit per square foot of pervious receiving area	U	0			square feet	U = Enter square foot value
Soil Quality Improvement						
Credit per square foot of soil quality improvement	V	0			square feet	V = Enter square foot value
Green Roof						
Credit per square foot of green roof installation	W	0			square feet	W = Enter square foot value
PPPP (Alternative engineered hardscaping surfaces)						
Credit per square foot of PPPP	X	4025			square feet	X = Enter square foot value
Vegetated Swales						
Credit per square foot of vegetated swale	Y	0			square feet	Y = Enter square foot value
Stream Setbacks and Buffers						
Credit per square foot of stream setback and buffer [#]	Z	0			square feet	Z = Enter square foot value
Credits Total	AA	5925	square feet			AA = SRA Credit + E + G + J ₁ + J ₂ + J ₃ + M + O + Q + T + U + V + W + X + Y + Z
Post-Project Impervious Surface Area minus Site Design Measure Credits	BB	-815	square feet			BB = A - AA
NEW Impervious Surface Runoff Value (Potential Stormwater Runoff due to impervious surface area and design storm after implementation of Site Design Measures)	CC	-329	Gallons per 24 hours			CC = BB x B x 0.083 x 7.48
Percent reduction in Impervious Surface Runoff Value*	DD	115.9	%			DD = ((C - CC) / C) x 100%

*If value for DD is not greater than or equal to %100 then bioretention is required for treating remaining runoff from impervious area indicated by value BB. Design and implement bioretention facility in accordance with Humboldt LID Stormwater Manual - Part C.

**infiltration Trench/Basin calculations are based on porosity (35%). Increased trench dimensions (volume) are required to meet 55 gallon minimum capacity.

Green Fill In [Enter Value]

Red Calculated Value

Black Fixed Value/Selectable Value

Conversions Used:

1 inch = 0.083 feet

1 cubic foot = 7.48 gallons

check with agency with project area jurisdiction for requirements

Regulated Projects Worksheet 2, Version 2.0 - June 29, 2016

May 4, 2021

Atwell, LLC
250 N. Meyer Ave
Tucson, AZ 85701

Attention: Dennis Roberts | Property Manager

Subject: **Ocean West**
McKinleyville, CA
Acoustic Measurement
Veneklasen Project No. 7670-001

Dear Dennis:

Veneklasen was contracted to measure the exterior noise levels at the Ocean West project. The goal of the survey was to quantify the residential property noise levels and to evaluate them with respect to compliance with the County of Humboldt noise requirements. This report documents our results and evaluation.

1.0 INTRODUCTION

This study was conducted to measure the impact of the exterior noise sources on the Ocean West project in McKinleyville, California after the construction of a fence. Veneklasen's scope of work included measuring existing sound levels, calculating the exterior noise levels impacting the site and determining the method, if any, required to reduce the exterior sound levels to meet the applicable code requirements of the State of California and the County of Humboldt.

The project consists of a 22-unit expansion and an existing mobile home community. The project is bounded by Redwood Highway (US-101) to the west, Murray Road to the north, and existing Ocean West residences to the south and east.

2.0 NOISE CRITERIA

CNEL (Community Noise Equivalent Level) is the 24-hour equivalent (average) sound pressure level in which the evening (7 pm–10 pm) and nighttime (10 pm – 7 am) noise is weighted by adding 5 and 10 dB, respectively, to the hourly level. Since this is a 24-hour metric, short-duration noise events (truck pass-by's, buses, trains, etc.) are not as prominent in the analysis.

Leq (equivalent continuous sound level) is defined as the steady sound pressure level which, over a given period of time, has the same total energy as the actual fluctuating noise.

The State of California Building Code (Section 1206, "Sound Transmission") and County of Humboldt (General Plan Chapter 13 Noise Element) state that interior CNEL values for residential land uses are not to exceed 45 CNEL in any habitable room, or the residential land uses must be proven to have an exterior CNEL value not to exceed 60 CNEL.

The McKinleyville Community Plan Policy 3242-1 also agrees with the State and County requirements. Table 6 in Section 3244 lists mobile-home land use category is "Normally Acceptable" at CNEL 60 or below.

3.0 EXTERIOR NOISE MEASUREMENTS

Traffic on the Redwood Highway and Murray Road was the primary source of noise affecting the site. Veneklasen visited the site and made short-term noise measurements on Monday, July 27, 2020 and Friday, March 12, 2021.

Long-term measurement data was collected in July 2020 at location S4 with corresponding measurement locations at the remaining locations. Calculated 24-hour averages were calculated with this data, per approval from the Planning Division of Humboldt County in correspondence dated October 15, 2020.

Humboldt County General Plan Chapter 13 Noise Element Table 13-B also gives noise measurement data from 2016. This is consistent with Veneklasen’s 2020 and 2021 measurements when corrected for distance. Table 1 summarizes the measurement results and Figure 1 shows measurement locations.

Table 1 – Measured Sound Levels

Location	CNEL	
	07/27/20	03/12/21
S1	—	61
S2	—	60
S3	—	56
S4	71	73
S5	—	56

50-65

Figure 1 – Aerial View of Project Site Showing Measurement Locations



4.0 CONCLUSIONS

We have the following conclusions from the measurements.

- The fence at location S1 as-built has air gaps between the planks and between the bottom and the ground. This does not meet Veneklasen's design recommendations. In order to meet the requirements of the County of Humboldt, the air gaps should be covered with additional planks and the bottom of the fence should have no gaps to the ground. The fence with these changes is calculated to meet County requirements of CNEL 60.
- The remaining locations measured comply with all Code requirements for exterior noise.

With the items in this section implemented, the site is calculated to meet CNEL 60 dBA. This satisfies the exterior and interior requirements. For reference, typical construction would meet the CNEL 45 dBA requirement with windows completely open.

Various noise mitigation methods may be utilized to satisfy the noise criteria described in this report. Alteration of mitigation methods that deviate from requirements should be reviewed by the acoustical consultant.

If you have any questions or comments regarding this report, please do not hesitate to contact us.

Sincerely,
Veneklasen Associates, Inc.



Ryan Schofield
Senior Associate

APPENDIX I – MEASURED HOURLY NOISE LEVELS

Location	Start Time	Duration (hr:min:s)	LAeq (dB)
S1	3/12/2021 11:00	0:15:00	59
	3/12/2021 21:00	0:15:00	54
S2	3/12/2021 11:15	0:15:00	57
	3/12/2021 21:15	0:15:00	54
S3	3/12/2021 11:30	0:15:00	55
	3/12/2021 21:30	0:15:00	47
S4	7/27/2020 17:45	0:15:00	68
	7/28/2020 10:15	0:15:00	70
	3/12/2021 12:00	0:15:00	72
	3/12/2021 22:00	0:15:00	65
S5	3/12/2021 12:15	0:15:00	54
	3/12/2021 22:15	0:15:00	48

Pervious Paving Maintenance Plan

September 21, 2021

The term “pervious paving” encompasses a range of paved stormwater treatment practices, including pervious concrete or porous asphalt, as well as paving stones with permeable joints (“permeable joint pavers”), paving stones or pavers that are permeable themselves, and turf blocks. These different types of pervious paving facilities all accomplish a similar function by allowing infiltration of stormwater.

I. Routine Maintenance Activities

Routine maintenance activities for pervious paving facilities, and the frequency at which they will be conducted, are shown in Table 1. Note that there is some variation in maintenance requirements depending on the type of pavement. For example, vacuum sweeping is generally required for pervious pavement, but is prohibited for permeable joint pavers that use sand in the joints between pavers.

In addition to, or in support of, any routine maintenance activities identified here, pervious paving products should be maintained in accordance with any manufacturer’s instructions. Where applicable, manufacturer’s instructions/maintenance guidelines for pervious paving products should be included as an attachment to this plan.

Table 1		
Routine Maintenance Activities for Pervious Paving		
No.	Maintenance Task	Frequency of Task
1	<ul style="list-style-type: none"> • Remove any accumulated trash or debris from pervious paving surface and/or between joints. Also remove any trash or debris from downspouts to pervious paving facility or in outlets to storm drains. 	Monthly
2	<ul style="list-style-type: none"> • Irrigate and mow turf block grass as required for selected turf species; no-mow and low-water species are advised. 	Irrigate turf block as specified by landscape architect. Mow turf block as needed to maintain grass at the upper end of the range of height specified by manufacturer or landscape architect.
3	<ul style="list-style-type: none"> • Vacuum sweep (for permeable joint pavers with sand in joints use minimum suction required to remove surface debris and minimize aggregate loss). • Clean surface of pervious paving, taking care not to move fine sediments into any permeable joints. If power washing is used, aim the spray at a minimum 45 degree angle in relation to the pavement surface, to avoid dislodging aggregate. 	Twice annually (in September before wet season, and in May, after wet season)
4	<ul style="list-style-type: none"> • Inspect pervious paving using the attached inspection checklist. 	Before wet season (inspect in August, make all corrections by September 30); After wet season (May); Monthly during wet season (October through April)

II. Prohibitions of Pesticides and Quick-release Fertilizer

The use of pesticides and quick release fertilizers is strongly discouraged. For the purposes of stormwater treatment measure maintenance and function, it is anticipated that non-chemical controls (i.e., biological, physical, and cultural controls) will be adequate to address any pest problems. Proper and timely maintenance, as described in this plan, should serve to reduce the potential for pest establishment.

To avoid the need for pesticides or quick release fertilizers, follow the principles of integrated pest management (IPM):

1. Employ non-chemical controls (biological, physical and cultural controls) before using chemicals to treat a pest problem.
2. Prune plants properly and at the appropriate time of year.
3. Provide adequate irrigation for landscape plants. Do not over water.
4. Limit fertilizer use unless soil testing indicates a deficiency. Slow-release or organic fertilizer is strongly preferred. Check with municipality for specific requirements and prohibitions.
5. Pest control should avoid harming non-target organisms, or negatively affecting air and water quality and public health. Apply chemical controls only when monitoring indicates that preventative and non-chemical methods are not keeping pests below acceptable levels. When pesticides are required, apply the least toxic and the least persistent pesticide that will provide adequate pest control. Do not apply pesticides on a prescheduled basis.
6. Sweep up spilled fertilizer and pesticides. Do not wash away or bury such spills.
7. Do not over apply pesticide. Spray only where the infestation exists. Follow the manufacturer's instructions for mixing and applying materials.
8. Only licensed, trained pesticide applicators shall apply pesticides.
9. Apply pesticides at the appropriate time to maximize their effectiveness and minimize the likelihood of discharging pesticides into runoff. With the exception of pre-emergent pesticides, avoid application if rain is expected.
10. Unwanted/unused pesticides shall be disposed as hazardous waste.

III. Pollution Prevention

Do not apply, transfer, or store chemicals or fine-grained material on pervious pavement. Contact the County of Humboldt for immediate assistance responding to spills of hazardous materials. Record the time/date, weather, and site conditions if site activities contaminate stormwater. Record the date/time and description of corrective action taken.

IV. Inspections

The attached Pervious Paving Inspection and Maintenance Checklist shall be used to conduct inspections at the frequency indicated in Table 1 (or as needed), identify needed maintenance, and record maintenance that is conducted.

Pervious Paving Inspection and Maintenance Checklist

Property Address: _____

Property Owner: _____

Treatment Measure No.: _____ Date of Inspection: _____ Type of Inspection: Monthly during wet season Pre-Wet Season
 After heavy runoff End of Wet Season
 Other: _____

Inspector(s): _____

Defect	Conditions When Maintenance Is Needed	Maintenance Needed? (Y/N)	Comments (Describe maintenance completed and if needed maintenance was not conducted, note when it will be done)	Recommended Action / Results Expected When Maintenance Is Performed
1. Drainage	<ul style="list-style-type: none"> • Ponds covering more than 10 percent of the paved area remain present for more than one hour after a rainstorm. 			<ul style="list-style-type: none"> • Vacuum/clean permeable surface/joints of any debris that may be obstructing flow. • Use industrial pressure washer to restore permeability. • For permeable joint pavers, replace permeable joint materials. • If above methods do not restore infiltration rates, reconstruction or replacement of the surface and/or subsurface layers may be required.
2. Downspouts (if any)	<ul style="list-style-type: none"> • Flow to the facility is impeded • Downspouts are clogged or pipes are damaged 			<ul style="list-style-type: none"> • Remove any sediment or debris blocking flows. • Repair or replace broken downspouts as needed, so that flow is conveyed efficiently to the pervious paving surface area.
3. Outlet to Storm Drain (if any)	<ul style="list-style-type: none"> • Does not safely convey excess flows to storm drain • Piping damaged or disconnected • Sediment/debris clogs outlet to storm drain (check inside drain) 			<ul style="list-style-type: none"> • Repair the overflow pipe or remove material clogging the overflow outlet, so that excess flow is conveyed efficiently to storm drain. • Remove any debris or obstruction that is blocking the drain, including any material inside the drain.
4. Structural Integrity	<ul style="list-style-type: none"> • Pervious paving structure is cracked, broken, concrete spalling or raveling; missing paver blocks or grid • Aggregate loss in permeable joint pavers 			<ul style="list-style-type: none"> • Porous concrete or asphalt - Fill with patching mixes; large cracks and settlement may require cutting and replacing the pavement section. Pavers/turf block: Repair or replace broken structural components as needed, per manufacturer's instructions. • Replenish permeable joint material as specified by manufacturer or in design plans
4. Pavement Settling	<ul style="list-style-type: none"> • Portions of the paved area are one inch (1"), or more, lower than the general surface of the pavement 			<ul style="list-style-type: none"> • Remove pavers and bedding stone¹ in the affected area. Level the exposed base course² and compact. Replace bedding stone and reinstate pavers and jointing aggregate.
5. Vegetation	<ul style="list-style-type: none"> • Root systems of adjacent trees encroach on subsurface structural components or cause pavement lift • Weeds in joints of permeable joint pavement 			<ul style="list-style-type: none"> • Consult with arborist to assess safety of pruning off problem roots; consider installing a mechanical barrier. • Manually remove weeds. Do not use herbicides. Mow, torch, or, if vegetation is specified in joints, inoculate with preferred vegetation.

¹ The bedding stone is the shallow layer of stone (or, in some cases, sand) on which the pavers are placed. The bedding stone is located above the base course.
² The base course is the layer of stone below the bedding stone. The stone size used for the base course is typically larger than the bedding stone.

ATTACHMENT 3

**Initial Study and Mitigated Negative Declaration with included Proposed Mitigation Measures,
Monitoring, and Reporting Program**

Project Information

Project Title: Sun Ocean West Manufactured Home Park Expansion

Lead Agency

Humboldt County Planning and Building Department – Planning Division
3015 H Street
Eureka, CA 95501
(707) 445-7541

Property Owner

Ocean West Holdings Llc Co
27777 Franklin Road
Southfield MI 48034

Project Applicant

Same as owner

Project Location

The project is located in Humboldt County, in the McKinleyville area, on the south side of Murray Road, approximately 790 feet west from the intersection of McKinleyville Avenue and Murray Road, on the property known as 1000 and 1010 Murray Road and the property know to be in the northeast quarter of the northwest quarter of Section 31, Township 07 North, Range 01 East.

General Plan Designation

(CS,AP) Commercial Services (CS), Airport Land Use Compatibility Zone (AP), Density: N/A; (RL1-7,AP) Residential/Low Density (RL1-7), Airport Land Use Compatibility Zone (AP), Density: 1 to 7 dwelling units per acre; (RM,AP) Residential/Medium Density (RM), Airport Land Use Compatibility Zone (AP), Density: 7 to 30 dwelling units per acre; Slope Stability: Relatively Stable (0)

Zoning

(C-1-AP-N-WR) Neighborhood Commercial (C-1), Airport Safety Review (AP), Noise Impact (N), Streamside Management Areas and Wetlands (WR); (R-3-D-AP-N-WR) Residential Multiple Family (R-3), Design Control (D), Airport Safety Review (AP), Noise Impact (N), Streamside Management Areas and Wetlands (WR); (R-1-N) Residential One-Family (R-1), Noise Impact (N).

Project Description

Proposed expansion of Ocean West Manufactured Home Park.

REQUIRED PERMITS: Conditional Use Permit, Special Permit and previously approved Lot Merger for expansion of Ocean West Manufactured Home Park (hereafter referred to as. The Lot Merger portion of the proposed project consists of the merging of two vacant 4.5 acre and 0.57-acre parcels into the 25.33 acre developed manufactured home park for a total of 30.4 acres. The merger would allow for the expansion of 35 spaces for a total of 160 units. The Conditional Use Permit is required to operate a manufactured home park in the C-1 Neighborhood Commercial zoning district. There is a previously approved Conditional Use Permit (CUP-37-77) for the existing 25.33-acre portion of Ocean West. The Special Permit is required for development within the Streamside Management Area (SMA) protective buffer of Widow White Creek, resulting in temporary and permanent impacts to the riparian habitat and associated wetlands.

INTERNAL CIRCULATION: A new access road into the expansion area and streets inside the expansion areas are privately owned and would be paved with a permeable surface. A maintenance plan will be required.

TREE REMOVAL: A total of 29 trees are proposed for removal along Widow White Creek. Eleven trees proposed for removal are due to the new access road, and 18 trees proposed for removal are for implementing restoration and enhancement of the riparian habitat. Twenty-eight of the trees are non-native and unhealthy. The one native proposed for removal (red alder) is also in an unhealthy state of condition.

GRADING/EXCAVATING: The project proposes approximately 10,500 cubic yards grading for the internal circulation of the expansion area which includes a new access road and streets. MS4/LID requirements will involve stormwater retention basins. Manufactured homes will be placed on 30 new pads. A final erosion/sediment control plan, hydrology and drainage plan will be required before grading permit is issued.

UTILITIES: Domestic use water and sanitation is provided to the property from the McKinleyville Community Services District.

EMERGENCY ACCESS: Emergency vehicle ingress and egress is through the main entrance of the park off of Murray Road and a new point of ingress/egress will be established off of McKinleyville Avenue at the intersection of Creekside Drive.

Baseline Conditions: Surrounding Land Uses and Setting

The proposed expansion comprises two areas: 1) a 4.5-acre parcel located in between State Highway 101 and the western boundary of the established portion of the Manufactured Home Park with Murray Road boarding on the north; 2) the second area is a 0.57-acre parcel located in between the eastern boundary and McKinleyville Avenue.

Land uses adjacent to the 4.5-acre parcel consist of a mix of Neighborhood Commercial (C-1) and Residential Multiple Family (R-3). C-1 zoning comprises uses that provide convenient sales and service facilities to residential neighborhoods. The R-3 zoning is intended for low density apartment development with a density range of 1-7 units per acre and a maximum floor area ratio of 1.0. The 4.5-acre expansion area is situated at a 97-foot elevation above mean sea level in the Widow White Creek drainage system. The 0.57-acre expansion area is zoned Neighborhood Commercial (C-1) and manufactured home parks require a Conditional Use Permit. Adjacent zoning and land uses include Residential Multiple Family (R-3), Neighborhood Commercial (C-1), and Single Family Residential (R-1). The terrain is flat and is approximately 97-feet above sea level. This portion of the expansion has no environmental constraints.

The proposed project involves the expansion of a manufactured park constrained by the Streamside Management Area (SMA) of Widow White Creek, a class 1 perennial stream that flows into Norton Creek which flows into the Mad River near its confluence with the Pacific Ocean. Widow White Creek has been impacted by surrounding development and the natural conditions along the stream course have been completely altered or eliminated. Historically, Widow White Creek has been habitat to the Federally Threatened Coast Cutthroat Trout but due to impacts of surrounding development, their presence in Widow White Creek has not been documented within the last 40 years (CNDDDB).

Figure 5 of the McKinleyville Community Plan (MCCP) identifies the project location to be within the Urban Development Area and defines the Streamside Management Area (SMA) within the Urban Development Areas as the outer boundaries for streams comprising 50 feet measured as a horizontal distance from the stream transition line on either side of perennial streams (MCCP p. 47). Further, MCCP page 49 defines Wetland Areas as one parameter and Wetland Buffers as the area around a wetland where restrictions on development are required to protect the wetland from significant impact, as mapped or as identified through the Open Space Implementation Standards, or as identified through the CEQA process. For the purposes of this project, the wetland protective buffer has been identified as 50 feet.

Within the expansion area, both west and east sides of Widow White Creek are associated with approximately one (1) acre of riparian vegetation and conifers, also known as the Streamside Management Area (SMA). The SMA is dominated by non-native planted trees and shrubs, non-native herbaceous species with low cover reflecting past disturbance and shaded conditions. The west side of the creek has approximately 4,228 square feet of one (1) and three (3) parameter wetland located within the SMA. The wetland and riparian habitat on the west side of the creek has been degraded due to the adjacent development of Ocean West and the installation of landscaping that stretches to the stream transition line. The McKinleyville Community Plan defines the Stream Transition Line as that line closest to a stream where riparian vegetation is permanently established. This area has been either eliminated or altered significantly with landscaping and walking paths.

The vacant 0.57-acre parcel comprises grassland and bounded on the north by a recently constructed commercial retail establishment and the western and southern boundaries of this parcel are adjacent to the developed Ocean West Park. Adjacent to the east is McKinleyville Avenue, a two-lane collector street and McKinleyville High School

Other Public Agencies Whose Approval Is or May Be Required (permits, financing approval, or participation agreement): Humboldt County Public Works, Building Inspection Division, North Coast Regional Water Quality Control Board.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? No. If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? n/a

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Environmental Factors Potentially Affected: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards/Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Determination: On the basis of this initial evaluation:

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

Signature

Date

Tricia Shortridge, Planner II
Printed Name

Humboldt Planning & Building Dept.
For

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except No Impact answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A No Impact answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A No Impact answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. Potentially Significant Impact is appropriate if there is substantial evidence that an effect may be significant. If there are one or more Potentially Significant Impact entries when the determination is made, an EIR is required.
- 4) Negative Declaration: Less Than Significant with Mitigation Incorporated applies where the incorporation of mitigation measures has reduced an effect from Potentially Significant Impact to a Less Than Significant Impact. The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 17, Earlier Analyses may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review. **N/A**
 - b) Impacts Adequately Addresses. Identify which effects from the above checklist were within the scope of and adequately analyze in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis. **N/A**
 - c) Mitigation Measures. For effects that are Less Than Significant with Mitigation Measures describe the mitigation measures which they address site-specific conditions for the project. **N/A**
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plan, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats, however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue identifies:
 - a) The significant criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Checklist

Checklist and Evaluation of Environmental Impacts: An explanation for all checklist responses is included, and all answers take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. The explanation of each issue identifies (a) the significance criteria or threshold, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance. In the **Checklist**, the following definitions are used:

"Potentially Significant Impact" means there is substantial evidence that an effect may be significant.

"Potentially Significant Unless Mitigation Incorporated" means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.

"Less Than Significant Impact" means that the effect is less than significant, and no mitigation is necessary to reduce the impact to a lesser level.

"No Impact" means that the effect does not apply to the proposed project, or clearly will not impact nor be impacted by the project.

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion</p> <p>(a-d) Less Than Significant Impact: The project parcels are both located within an urbanized area and not located within a mapped or designated scenic highway, corridor, or viewshed. The proposed expansion infills a parcel planned and zoned for the proposed use. There are 29 trees slated for removal for construction of the access road, but many are either diseased or dying or are a non-native species. New trees will be planted as part of the Mitigation and Monitoring Plan discussed in the Biological Resources section of this document. During grading and construction activities there may be temporary impacts on aesthetics due to the presence of construction activities and equipment on the project site. Other than the temporary negligible impacts discussed, there is no evidence to suggest that the expansion of the manufactured home park will result in permanent aesthetic impacts detectable beyond the boundaries of the property.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest and (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conservation of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Discussion:</p> <p>(a-e) No Impact: The project involves redevelopment and infill of an existing parcel zoned Neighborhood Commercial (C-1). General Agriculture is not a permitted use within C-1 zoning. The site is not or never has been designated as unique farmland or farmland of statewide significance, nor are there any intensive agricultural uses in the immediate vicinity. According to NRCS mapping, neither the project parcel or any others in the vicinity contain prime agricultural soils. The entire property is surrounded by urban environment and is zoned for commercial uses (Manufactured home parks are allowed with a conditional use permit). The Department finds no evidence that the proposed project, will result in a significant impact on agricultural or forestry resources.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significant criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion:</p> <p>(a-e) Less than Significant: The project site is located within the North Coast Air Basin and the jurisdiction of the North Coast Unified Air Quality Management District (NCUAQMD). The North Coast Air Basin (NCAB) currently meets all federal air quality standards; however, the entire air basin is currently designated as non-attainment for the State 24-hour and annual average particulate matter smaller than 10 microns in size (PM10) standards. Both natural and anthropogenic sources of particulate matter (including vehicle emissions, dust, wildfire and residential wood burning stoves) in the NCAB have led to the PM10 non-attainment designation. To address this, the NCUAQMD adopted a Particulate Matter Attainment Plan in 1995. This plan presents available information about the nature and causes of PM₁₀ standard exceedance, and identifies cost-effective control measures to reduce PM₁₀ emissions, to levels necessary to meet California Ambient Air Quality Standards. These include transportation measures (e.g., public transit, ridesharing, vehicle buy-back programs, traffic flow improvements, bicycle incentives, etc.), land use measures (infill development, concentration of higher density adjacent to highways, etc.), and combustion measures (open burning limitations, hearth/wood burning stove limitations; NCUAQMD 1995).</p> <p>The project would generate a minor amount of particulate emissions during construction and project operations, mainly in the form of vehicle emissions. The project would not substantially add to the level of PM10 or other emissions such that it would cause a cumulatively considerable net increase of pollutant emissions in the area. The proposed project is consistent with the planned build-out of the area and 30 space expansion would not: (1) obstruct implementation of the applicable air quality plan; (2) violate air quality standards; (3) contribute substantially to an existing or projected air quality violation; (4) expose sensitive receptors to substantial pollutant concentrations; or (5) create objectionable odors.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

(a, b, c, d, e) Less Than Significant with Mitigation Incorporated: Although suitable habitat exists within the project area for botanical species that are rare but not State or Federally listed, none were detected. The animal species survey revealed that there is moderate or high potential for occurrence within the project area. Birds with a moderate or high potential for occurrence within the project area are the sharp-shinned hawk, the Osprey, and the black-capped chickadee. None of these species are listed under the FESA or CESA and only the black-capped chickadee was observed in the project area. In terms of amphibians, the project area contains habitat for the northern red-legged frog (species of special concern, CDFW) although the potential for occurrence is low. The nearest Critical Habitat identified by USFWS is the Mad River in which is connected upstream. The County's GIS layer for the California Natural Diversity Database (CNDDDB) shows Widow White Creek as being habitat for Coast Cutthroat Trout (species of special concern, CDFW) although the potential for occurrence is low. The CNDDDB also lists the Western Snowy Plover a federally threatened and state species of special concern

as occurring nearby. However, the Natural Resources Assessment Report indicates that the site is located over 3,000 feet from the dunes adjacent to the Mad River and the potential for occurrence at the project site is none.

The proposed location of the access road to serve the park expansion requires conversion of approximately 3,231 sq. ft. of Streamside Management Area (SMA) which would involve permanent impacts to 82 sq. ft. of wetland, 3,006 sq. ft. of wetland buffer (50 ft. buffer). Most of the SMA is degraded with non-native invasive species, well maintained lawn, ornamental landscaping and gravel walking paths. The proposed location of the road would require placement of fill within a wetland resulting in 82 sq. ft. of permanent impacts to the wetland and conversion of 3,006 sq. ft. of wetland buffer.

The applicant provided a draft Riparian and Wetland Mitigation Plan, Revision 1 (January 2020) that indicates the impacts on the wetlands and SMA can be mitigated with appropriate design and construction techniques. The implementation of a Mitigation and Monitoring Plan which will involve 350 square feet of wetland restoration (equivalent to 4:1 mitigation), and 15,000 sq. ft. of riparian habitat restoration equivalent to almost 5:1 mitigation. Any adverse impacts to, or loss of, natural or constructed wetlands and their beneficial uses due to development and construction activities must be fully mitigated and permitted by the Regional Water Board.

(f) No Impact: There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan for the project location, thus, the project will not conflict with any such plans.

In addition to mitigation measures in the Riparian and Wetland Mitigation Plan – Revision 1 prepared by SHN dated January 2020 (Mitigation Measure #10 below and included as Attachment 1), the McKinleyville Community Plan and Humboldt County Land Use and Development Code Chapter 4, Section 314-61.1 Streamside Management Area and Wetland Ordinance requires mitigations for development within the SMA and the protective wetland buffer zone, some of which are already included in the applicant's mitigation and monitoring plan. The following mitigations will be included in the Conditions of Approval and a revised Mitigation and Monitoring Plan for the project:

Mitigation Measure #1 – Retaining snags unless felling is required by CAL-OSHA, or by California Department of Forestry forest and fire protection regulations, or for public health and safety reasons, approved by the Planning and Building Director. Felled snags shall be left on the ground if consistent with fire protection regulations and the required treatment of slash or fuels.

Mitigation Measure #2 – Retain live trees with visible evidence of current or historical use as nesting sites by hawks, owls, eagles, osprey, herons, kites or egrets.

Mitigation Measure #3 – Any brush clearing or tree removal must be conducted outside of the bird breeding season (March 1 – August 15) in order to avoid a “take” as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 *et seq.*). If any brush or trees must be removed within the breeding season, the Project proponent shall consult with CDFW prior to removal in order to assess the potential for take of active bird nests.

Mitigation Measure #4 - Replanting of disturbed areas with riparian vegetation (including alders, cottonwoods, willows, sitka spruce, etc.) if natural regeneration does not occur within two years of the completion of the development project.

Mitigation Measure #5 - Performing erosion control measures contained in the Sensitive and Critical Habitat Standards of the General Plan (Chapter 10 Standard BR-S9- Erosion Control).

Mitigation Measure #6 - Maximum feasible retention of overstory canopy in riparian corridors.

Mitigation Measure #7 – Project related noise levels should be minimized so that sound levels are below 50 decibels at a distance of 100 feet from the source.

Mitigation Measure #8 – High visibility construction fencing shall demarcate the boundaries of all Environmentally Sensitive Habitat prohibiting encroachment of construction work and equipment. Grading and development plans shall show the location of this fencing.

Mitigation Measure #9 – A second seasonally appropriate botanical and wildlife survey and impact analysis shall be conducted prior to finalization of project design. The project design shall be modified first to avoid special status species or second minimize impacts to special status species if avoidance is not possible. Should impacts occur to special status species, the applicant shall develop a mitigation and monitoring plan to be approved by the Department in consultation with CDFW.

Mitigation Measure #10 – Post development, implementation the approved Wetland and Riparian Mitigation Plan prepared by SHN dated January 2020. The plan proposes to restore 350 square feet of wetland habitat and 15,000 square feet of riparian woodland. Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period.

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

(a) No Impact: No historical resources have been documented on site. The site is currently vacant but was previously developed and used as a mobilehome sales lot. Therefore, the project will have no impact on historical resources defined in California Environmental Quality Act (CEQA) §15064.5.

(b and c) Less Than Significant with Mitigation Incorporated: The project was referred to the Northwest Information Center (NWIC), the Blue Lake Rancheria, the Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe. Although the response from the NWIC recommended a study, further consultation with the Blue Lake Rancheria and the Wiyot Tribe recommended approval with no further study provided a note regarding inadvertent discovery is included in the project. If archaeological resources are encountered during construction activities, the contractor will execute Mitigation Measure No. 11. by halting construction and coordinating with a professional archaeologist, who meets the Secretary of the Interior’s Standards and Guidelines and appropriate tribes so resources can be evaluated so that there is not a substantial adverse change in the significance of an archaeological resource. The project is not expected to disturb any human remains, including those interred outside of formal cemeteries. However, implementation of Mitigation Measure No. 11 has been included in the event that human remains are accidentally discovered during construction.

Mitigation Measure #11- The following note shall be placed on the Grading or Development Plan and carried out through project implementation: "If suspected archaeological resources are encountered during the project: 1. Stop work within 100 feet of the find; 2. Call a professional archaeologist, the representatives from the Blue Lake Rancheria, Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe, the Calfire project representative (if applicable) and the County Planning and Building Department; 3. The professional historic resource consultant, Tribes and Calfire officials will coordinate and provide an assessment of the find and determine the significance and recommend next steps. "If human remains are encountered: 1. All work shall stop and per CA Health and Safety Code Section 7050.5: 2. Call the Humboldt County Coroner at (707) 445-7242; 3. The Coroner will determine if the remains are of prehistoric/historic Native American origin. If the remains are Native American Heritage Commission within 24 hours. 5. The NAHC is responsible under CA PRC 5097.98. (a) for identifying the most likely descendent (MLD) immediately and providing contact information. The MLD may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site."

The applicant is ultimately responsible for ensuring compliance with this condition."

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion:</p> <p>(a-b) Less Than Significant Impact: The project will result in short-term energy consumption during the construction phase, with long-term energy consumption associated with the ongoing occupancy of the 30 new manufactured home sites. The construction phase is not anticipated to utilize excessive energy and the homes will be manufactured off site to federal standards and installed in accordance with state and local requirements. Therefore, a less than significant impact will occur.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a)i)-iv) and c) through f) No Impact. Based on the Alquist-Priolo Fault Hazard maps from the California Department of Conservation, the project site is situated neither in an Alquist-Priolo Fault Hazard special studies zone or any other potentially active fault zone. According to the County's Hazard Mitigation Map the property is shown not to be subject to liquefaction and of in an area of low instability. The site was previously graded for used as a manufactured home sales lot and is relatively flat, does not contain expansive soils and will be served by community waste water systems.

b) Less Than Significant Impact Only minimal grading will be required to develop the access roads and manufactured home pads. All grading work will be done in accordance with the Humboldt County Grading Ordinance and applicable Best Management Practices, including watering to control fugitive dust. The project is conditioned to comply with NCUAQMD fugitive dust emission standards.

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discussion:				
<p>(a-b) Less Than Significant Impact: In 2002 the California legislature declared that global climate change was a matter of increasing concern for the state's public health and environment, and enacted law requiring the California Air Resources Board (CARB) to control GHG emissions from motor vehicles (Health & Safety Code §32018.5 et seq.). In 2006, the California Global Warming Solutions Act (Assembly Bill 32) definitively established the state's climate change policy and set GHG reduction targets (health & Safety Code §38500 et sec.), including setting a target of reducing GHG emissions to 1990 levels by 2020. AB 32 requires local governments to take an active role in addressing climate change and reducing greenhouse gas (GHG) emissions. While methodologies to inventory and quantify local GHG emissions are still being developed, recommendations to reduce residential GHG emissions include promoting energy efficiency in new development.</p> <p>The proposed project involves infill development of a 4.5-acre parcel and on 0.57-acre parcel to create 30 pads for future installation of manufactured homes. The eventual installation of premanufactured housing units on the home sites would contribute temporary, short-term increases in air pollution from equipment usage. Because of the temporary nature of the greenhouse gas contributions, coupled with the modest quantity of emission, the proposed project would not have a significant impact on the environment, nor conflict with applicable plan, policy, or regulation for the purposes of reducing greenhouse gas emissions. Future residential use would emit limited greenhouse gases.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Discussion:

(a-d, f and g) No Impact: The project site is not included on a list of hazardous material sites, nor does the proposed manufactured home park expansion require or involve transport, use or disposal of hazardous materials. The Department of Environmental Health has recommended approval of the project. The site is within the Arcata Fire Protection District. Future development of the site will require compliance with the Uniform Fire Code and UBC. According to the Fire Hazard map, the parcel is located in a low fire hazard area. Arcata Fire Protection District approved the proposed project.

(e) Less Than Significant Impact: The project site is approximately 1 mile from the nearest airport and located within airport compatibility zone D, an area identified as having negligible risk and potential annoyance from overflights (Humboldt County General Plan table 14-A). A Deed Notice is required in addition to disclosure to prospective about the potential noise impacts related to overflight. In addition, conditions of approval for this project require that new manufactured homes shall be certified to limit interior noise levels to 45 dB CNEL-Ldn in all habitable rooms.

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Discussion:

(a, c, and e) Potentially Significant Unless Mitigation Incorporated: Because the Ocean West Project would create and/or replace more than 5,000 square feet of impervious surface, this Project is required by the County's Storm Water Permit to implement site design measures to control the quality and volume of storm water runoff from the Project site. Before the County can issue a grading permit, the project is required to implement site design and stormwater treatment measures in accordance with the Humboldt County Low Impact Development Stormwater Manual and consistent with the County of Humboldt Stormwater Permit issued by the North Coast Regional Water Quality Control Board.

According to the Flood Insurance Rate Map, the new access road for the 4.5-acre expansion is partially located within the mapped 100-year flood plain (Flood Zone A). This means this portion of the property is expected to flood once every 100 years on average. The area of development within the flood zone is the access road where it intersects with Ocean West Drive. The remaining area is upland and this is where manufactured homes will be placed – this area is located in Zone X, which is defined as “areas of minimal flooding”.

Prior to issuance of grading permits and approval of the development plan, the project will be required to submit a 401 Certification from the Regional Water Quality Control Board. A preliminary drainage report was prepared and reviewed by Public Works and they recommended as a condition of approval that the applicant submit a complete hydraulic report and drainage plan for their approval. The applicant has proposed Low Impact Development techniques to comply with the State Water Board's Phase II Small Municipal Separate Storm Sewer System (MS4) Program. In addition, the project will comply with Section 3310.5 of the McKinleyville Community Plan which states: “Development shall only be allowed in such a manner that the downstream peak flows will not be increased.” No streams, creeks or other waterways will be altered as a result of this subdivision. With Mitigation incorporated into the project design, the Department finds no evidence that the proposed project will result in significant hydrologic or water quality impacts.

(b and d) Less Than Significant Impact: The project site is not included on a list of hazardous material sites, nor does the proposed manufactured home park expansion require or involve transport, use of or disposal of hazardous materials. There is minimal potential for impacts to parked automobiles to get caught up in a flood and leak gasoline because the manufactured homes will be placed outside the 100-year flood zone.

The project site is an area served by community water and sewer. The McKinleyville Community Services District (MCSD) has indicated that it is able to provide water and sewer service to the proposed manufactured home park expansion upon the payment of the appropriate fees. MCSD has not identified any concerns with regard to the project interfering with groundwater recharge.

Mitigation Measure #12- Grading Plans shall show optimization of the site layout in accordance with Stormwater Permit section. E 12.d and E.12.e. Source Control and Low Impact Development (LID) Design Standards pages 51-55 (attachment 2), and Humboldt County Low Impact Development Stormwater Manual Sections 5.0 and 6.0 (attachment 3)

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion:</p> <p>(a-b) Less Than Significant Impact: Both expansion sites are located in General Plan land use designation Commercial Service (CS) and zoned Neighborhood Commercial (C-1). A Conditional Use Permit is required to operate a manufactured home park in the commercial zoning district. Both sites are surrounded by Neighborhood Commercial zoning and Residential Medium and Low-Density zoning. The neighborhood is characterized as urban residential. The proposed expansion of Ocean West infills an established development pattern, is consistent with the planned build-out of the area and is consistent with the policies and regulations specified in the McKinleyville Community Plan and the Humboldt County General Plan. There are no habitat conservation or natural community conservation plans proposed or adopted for this area. The creation of 30 spaces for the expansion of the manufactured home park is consistent with adjacent parcel's zoning and land use density. The Department finds there is no evidence that the project will result in significant adverse impact with regard to land use and planning.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion:				
(a-b) No Impact: On-site soils and geologic resources are not suitable as commodity materials that would be of value to the region or the state. The site is not designated as an important mineral resource recovery site by a local general plan, specific plan, or other land use plan.				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discussion:				
(a-c) Less Than Significant Impact: This parcel is located within the Noise Impact combining zone due to the proximity to Highway 101. The parcel begins approximately 125 feet from Highway 101 and the EIR for the McKinleyville Community Plan established a distance of 525 feet from the noise source to be outside the area of concern. Given the proximity to the highway, the McKinleyville Community Plan requires barriers to be installed between the site and prominent noise sources to make the outdoor environment tolerable. A sound wall along the western boundary of the property has been incorporated into the project design. Noises generated by the proposed project will result in a temporary increase during construction because the proposed project may require the use of heavy equipment (excavator, grader, loader and backhoe). The construction does not include equipment that would result in ground borne vibration. The project area is approximately 1 mile from the California Redwood Coast – Humboldt County Airport and located within compatibility Zone D. Noise impacts associated with the airport are not anticipated to be excessive, however, a condition of approval will require the property owner to disclose to all prospective park tenants that there is potential for some overflight noise.				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
14: POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion:</p> <p>(a, b) Less Than Significant Impact. Medium Density single-family residential uses is a compatible use within the plan designation, zoning district and surrounding land uses and zones. The Department finds no evidence that the project will result in a significant adverse impact on population and housing.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES.				
<p>a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p>				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion:</p> <p>(a-e) Less Than Significant: Ingress and egress from Ocean West is from two locations off of Murray Road and McKinleyville Avenue. The individual manufactured homes will be accessed via private road network inside Ocean West. The Arcata Fire Protection District did not identify any fire protection issues – both entrances/exits are adequate for emergency response. The Department finds no evidence that the project will result in a significant adverse impact on public services.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion:</p> <p>(a-b) Less Than Significant Impact: The project is required to provide onsite recreation areas. Humboldt County Zoning Ordinance section 314-107 requires a minimum of 1,500 square feet of recreation area per acre of manufactured home park. The previously approved Conditional Use Permit (CUP-37-77) required the construction of a rec building. The Department finds no evidence that the project will require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p>				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

(a-d) Less Than Significant Impact: The Ocean West property is accessed by Murray Road and McKinleyville Avenue. Conditions of approval for the final project design will require that both permanent points of ingress and egress meet the requirements of the Humboldt County Zoning Ordinance Section 314-107.1 for ingress/egress and internal circulation of the Park's private road system.

The Department finds there is no evidence that the project will exceed the level of service standard, will result in a change in air traffic patterns, will result in vehicle miles traveled beyond that expected, will result in inadequate emergency access, inadequate access to nearby uses or inadequate parking capacity; or will conflict with adopted policies supporting transportation. The project site is approximately 1.5 miles south of the California Redwood Coast – Humboldt County Airport, the closest airport.

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resource Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

(a-b) Less Than Significant Impact: The project was referred to the Northwest Information Center (NWIC), the Blue Lake Rancheria, the Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe. Although the response from the NWIC recommended a study, further consultation with the Blue Lake Rancheria and the Wiyot Tribe recommended approval with no further study provided a note regarding inadvertent discovery is included in the project. The standard condition of inadvertent discovery has been included as Mitigation Measure No. 11.

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discussion:				
(a-e) Less than significant: The Department finds there is no evidence that the project will be inconsistent with the planned build-out of the area or will result in a significant adverse impact to utilities and service systems. The parcel is zoned for commercial uses where a manufactured home park is permitted with a Conditional Use Permit. The 30 additional manufactured homes will be individually served by community water and sewer provided by the McKinleyville Community Services District who has recommended approval of the project.				

Issues and Supporting Information	Potentially Significant	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(a-d) Less than significant: The project is located within the urbanized area of McKinleyville and the Local Responsibility Area (LRA) for fire protection and served by the Arcata Fire Protection District. State responsibility lands are located approximately one-half mile to the east in which a half mile of the SRA spanning eastward is located within the Urban Expansion Area. The Department finds the project impact to be less than significant.				

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

Discussion:

(a -b) Potentially Significant Unless Mitigation Incorporated: The mitigation measures proposed and required for the project will help ensure that it has a less than significant potential to substantially

degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Nor will it have impacts that are individually limited, but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). Mitigation measures consistent with the County's Stormwater Permit and the Humboldt Low Impact Development Stormwater Manual will be included in the final project design grading and development plans. The outcome will result in compliance with the McKinleyville Community Plan of no increase of downstream flows and compliance with the North Coast Regional Water Quality Control Board MS4 Program. The Division of Public Works reviewed the Preliminary Stormwater Control Plan and determined that the applicant will be required to provide a complete hydraulic report and drainage plan. The Department finds the project impacts to be less than significant with the proposed mitigation.

(c) Less Than Significant Impact: The project does not have the potential to have significant environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

Proposed Mitigation Measures, Monitoring, and Reporting Program

Mitigation Measure #1 – Retaining snags unless felling is required by CAL-OSHA, or by California Department of Forestry forest and fire protection regulations, or for public health and safety reasons, approved by the Planning and Building Director. Felled snags shall be left on the ground if consistent with fire protection regulations and the required treatment of slash or fuels.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Mitigation Measure #2 – Retain live trees with visible evidence of current or historical use as nesting sites by hawks, owls, eagles, osprey, herons, kites or egrets.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Mitigation Measure #3 – Any brush clearing or tree removal must be conducted outside of the bird breeding season (March 1 – August 15) in order to avoid a “take” as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 *et seq.*). If any brush or trees must be removed within the breeding season, the Project proponent shall consult with CDFW prior to removal in order to assess the potential for take of active bird nests. The Grading and Development Plan shall include the following language: “Tree removal and vegetation clearing associated with the Project should be conducted outside of the bird breeding season (the nesting season is generally considered to be March 1 – August 15) in order to avoid ‘take’ as defined and prohibited by Fish and Game Code (FGC) §3503, 3503.5, 3513, and by the Federal Migratory Bird Treaty Act (16 U.S. Code 703 *et seq.*). If work must be conducted during the bird nesting season, a qualified ornithologist (someone who is able to identify Northern California birds, and who has experience in nest-searching for passerines and raptors) should thoroughly survey the area no more than seven days prior to tree/vegetation removal to determine whether active nests (nests containing eggs or nestlings) are present. If active nests are found, appropriate buffers should be developed in consultation with CDFW to avoid take.”

Timing for Implementation/Compliance: Prior to tree removal or vegetation clearing

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building/CDFW

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Mitigation Measure #4 - Replanting of disturbed areas with riparian vegetation (including alders, cottonwoods, willows, sitka spruce, etc.) if natural regeneration does not occur within two years of the completion of the development project.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Mitigation Measure #5 - Performing erosion control measures contained in the Sensitive and Critical Habitat Standards of the General Plan (Chapter 10 Standard BR-S9- Erosion Control).

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Mitigation Measure #6 - Maximum feasible retention of overstory canopy in riparian corridors.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Mitigation Measure #7 – Project construction related noise levels shall be minimized so that sound levels are below 50 decibels at 100 feet from the source.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Audible evidence

Mitigation Measure #8 – High visibility construction fencing shall demarcate the boundaries of all Environmentally Sensitive Habitat prohibiting encroachment of construction work and equipment. Grading and development plans shall show the location of this fencing.

Timing for Implementation/Compliance: Throughout project construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building

Monitoring Frequency: Throughout construction

Evidence of Compliance: Visible evidence

Mitigation Measure #9 – A second seasonally appropriate botanical and wildlife survey and impact analysis shall be conducted prior to finalization of project design, issuance of grading permit and approval of development plan. The project design shall be modified first to avoid special status species or second minimize impacts to special status species if avoidance is not possible. Should impacts occur to special status species, the applicant shall develop a mitigation and monitoring plan to be approved by the Department in consultation with CDFW.

Timing for Implementation/Compliance: Prior to commencement of vegetation removal or grading

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building/CDFW

Monitoring Frequency: Throughout construction

Evidence of Compliance: Letter report

Mitigation Measure #10 – Post development, implementation the approved Wetland and Riparian Mitigation Plan prepared by SHN dated January 2020. The plan proposes to restore 350 square feet of wetland habitat and 15,000 square feet of riparian woodland. Eighty-five percent (85%) survival rate of plantings and wild recruitment in both the restored wetland and the streamside management area. The plan includes annual monitoring reports with photo documentation submitted to the Planning Division and California Department of Fish & Wildlife prior to December 31, each year, for a 5-year period.

Timing for Implementation/Compliance: Post-construction

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building/CDFW

Monitoring Frequency: As per Wetland and Riparian Mitigation Plan

Evidence of Compliance: Annual monitoring reports

Mitigation Measure #11- The following note shall be placed on the Grading or Development Plan and carried out through project implementation: "If suspected archaeological resources are encountered during the project: 1. Stop work within 100 feet of the find; 2. Call a professional archaeologist, the representatives from the Blue Lake Rancheria, Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe, the Calfire project representative (if applicable) and the County Planning and Building Department; 3. The professional historic resource consultant, Tribes and Calfire officials will coordinate and provide an assessment of the find and determine the significance and recommend next steps.

"If human remains are encountered: 1. All work shall stop and per CA Health and Safety Code Section 7050.5: 2. Call the Humboldt County Coroner at (707) 445-7242; 3. The Coroner will determine if the remains are of prehistoric/historic Native American origin. If the remains are Native American Heritage Commission within 24 hours. 5. The NAHC is responsible under CA PRC 5097.98. (a) for identifying the most likely descendent (MLD) immediately and providing contact information. The MLD may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

The applicant is ultimately responsible for ensuring compliance with this condition.

Timing for Implementation/Compliance: Prior to initiation of grading or other ground disturbing activity

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning & Building Department in consultation with Native American tribes.

Monitoring Frequency: Throughout construction

Evidence of Compliance: Suspension of work and notification to County and Tribal representatives if cultural resources are encountered,

Mitigation Measure #12- Grading Plans shall show optimization of the site layout in accordance with Stormwater Permit section. E 12.d and E.12.e. Source Control and Low Impact Development (LID) Design Standards pages 51-55 (attachment 2), and Humboldt County Low Impact Development Stormwater Manual Sections 5.0 and 6.0 (attachment 3)

Timing for Implementation/Compliance: Prior to initiation of grading or other ground disturbing activity

Responsible Party for Implementation: Applicant and successors

Person/Agency Responsible for Enforcement: Humboldt County Planning and Building and Public Works Land Use Division

Monitoring Frequency: Throughout construction

Evidence of Compliance: Issued Grading and MS4 Permit

SOURCE/REFERENCE LIST: The following documents were used in the preparation of this Initial Study. The documents are available for review at the Humboldt County Planning & Building Department during regular business hours.

County of Humboldt, Planning & Building Department (December 2017). *Humboldt County General Plan*.

County of Humboldt, Planning and Building Department (up to date). *Humboldt County Land Use and Development Code, Division I*

State Water Resources Control Board (February 2013). *Water Quality Order No. 2013-0001-DWQ, Waste Discharge Requirements for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (County of Humboldt Stormwater Permit)*

SHN (June 2018). *Natural Resources Assessment, for Sun Communities, Inc.*

SHN (July 2018). *Wetland and Other Waters Delineation Report, for Sun Communities, Inc.*

SHN (January 2019). *One-Parameter Wetland and Other Waters Delineation Report, for Sun Communities, Inc.*

SHN (January 2020). *Riparian and Wetland Mitigation Plan – Revision 1, for Sun Communities, Inc.*

ATTACHMENT 4
Referral Agency Comments and Recommendations

The project was referred to the following referral agencies for review and comment. Those agencies that provided written comments are checked off.

Referral Agency	Response	Recommendation	Location
Public Works, Land Use Division	✓	Conditional Approval	Attached
Building Department	✓	Conditional Approval	On file
County Division of Environmental Health	✓	Approval	On file
Arcata Fire Protection District	✓	Conditional Approval	On file
McKinleyville Community Services District	✓	Conditional Approval	On file
Northwest Information Center	✓	Further Study; Consultation with Tribes	On file and confidential
Blue Lake Rancheria	✓	Conditional Approval	On file and confidential
CDFW	✓	Commented; Comments addressed	On file
North Coast Regional Water Quality Control Board	✓	Commented; Comments addressed	Attached
Army Corps of Engineers	✓	Commented; Comments addressed; No Corps Permit Required	On file
Bear River Band of the Rohnerville Rancheria	✓	Conditional Approval	On file and confidential
County Counsel	✓	No Comment	On file
Wiyot Tribe	✓	Conditional Approval	On file and confidential
Trinidad Rancheria		No Response	

ATTACHMENT 5
Public Works Letter dated October 2018



DEPARTMENT OF PUBLIC WORKS
C O U N T Y O F H U M B O L D T

MAILING ADDRESS: 1106 SECOND STREET, EUREKA, CA 95501-0579
AREA CODE 707

ARCATA-EUREKA AIRPORT TERMINAL
McKINLEYVILLE
FAX 839-3596

PUBLIC WORKS BUILDING
SECOND & L ST., EUREKA
FAX 445-7409

CLARK COMPLEX
HARRIS & H ST., EUREKA
FAX 445-7388

AVIATION 839-5401

ADMINISTRATION 445-7491
BUSINESS 445-7652
ENGINEERING 445-7377
FACILITY MAINTENANCE 445-7493

NATURAL RESOURCES 445-7741
NATURAL RESOURCES PLANNING 267-9540
PARKS 445-7651
ROADS & EQUIPMENT MAINTENANCE 445-7421

LAND USE 445-7205

LAND USE DIVISION INTEROFFICE MEMORANDUM

TO: Tricia Shortridge, Planner, Planning & Building Department
FROM: Kenneth Freed, Assistant Engineer 
DATE: 10/17/2018
RE: **SUN OCEAN WEST EXPANSION, LLC, APN 510-171-039, CUP18-034, NOM18-012, APPS# 14268**

Notice of Merger: The Department has no comment regarding the proposed Notice of Merger.

ROAD: The subject parcel is located on Murray Road (CoRdNo. A3M020), a paved County maintained road.

MS4 AREA: The subject property is located within the municipal separate storm sewer system (MS4) boundary area. Development of the property is required to comply with MS4 permit requirements. The Applicant is advised to ensure that MS4 requirements for the proposed project can be achieved prior to the project being heard by the Planning Commission.

AIRPORT: The subject property is located near the California Redwood Coast – Humboldt County Airport. The Airport is maintained by County of Humboldt. The Department of Public Works assists the Airport Land Use Commission in determining if a project is compatible with the Airport Land Use Compatibility Plan (ALUCP). In Humboldt County, the Airport Land Use Commission consists of the Board of Supervisors (see Board of Supervisors Agenda item for 05/19/1981 *Airport Land Use Commission; Approved Recommendations*). The Department typically reviews items for compliance with the ALUCP:

The subject property is located entirely within the Airport Land Use Compatibility Zone D. The subject property.

The subject property is located within the area covered by County Code section 333-1 et seq. Due to the geographic location of the subject property, development of the property can occur without further proof of compliance with County Code Section 333-4.

The following conditions are recommended: Our review of this project is limited to what is shown on the submitted plot plan. If other facilities not shown on the plot plan will be constructed, contact this Department immediately for approval **before** construction. This Department has regulations regarding facilities such as retaining walls, fence site visibility,
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drainage culverts, and parking lanes within the County right of way. This Department has included general statements for facilities that may not be included on the plot plan.

1. The applicant must apply for and obtain an encroachment permit to construct improvements within the County road right of way. [reference: County Code section 411-11 (a)(b)].
2. The permit will require the existing concrete driveway apron on APN 510-171-039 to be removed and replaced with a Portland Cement Concrete(PCC) Caltrans Type A2-6 curb and gutter, and ADA compliant sidewalk. [reference: County Code section 411-1]
3. There is no parking allowed on the south side of Murray Road fronting APN 510-171-039 and the curb is currently painted red. Applicant shall paint the section of new curb, in compliance with the MUTCD, after construction is completed.
4. Pursuant to the Airport Land Use Compatibility Plan, a deed notice is required to be dedicated to the County Humboldt.
5. Applicant shall be responsible to correct any involved drainage problems to the satisfaction of the Department. [reference :California Plumbing Code Section 1101.1]
6. Low Impact Development (LID): The subject property is located within the municipal separate storm sewer system (MS4) boundary area. Development of the property will be required to comply with the MS4 permit requirements. The Applicant is advised to ensure that MS4 requirements for the proposed project can be achieved prior to the project being heard by the Planning Commission (or Zoning Administrator). [Reference: National Pollutant Discharge Elimination System (NPDES) General Permit For Waste Discharge Requirements (WDRS) for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4S), Order No. 2013-0001-DWQ, NPDES No. CAS000004 adopted 02/05/2013, MS4 permit section E.12.b; Humboldt Low Impact Development Stormwater Manual v2.0 (06/30/2016) Part A (Table 1), Part 2, and Part 3 (Section 1.4)]

// END //

ATTACHMENT 6
Water Board Comments dated April 2020 and October 2021

From: Thompson, Brendan@Waterboards
To: Jacobson, Rebecca
Subject: RE: comments requested for updates to PLN-14268-CUP Ocean West Manufactured Home Park expansion
Date: Monday, October 11, 2021 5:00:40 PM
Attachments: [image002.png](#)

Hello Rebecca,

I think the alterations to the project plans are a definite improvement. We have two areas of potential concern.

1. Use of New Tree Site Design Measure Credits in the Humboldt LID Calculator. County staff should review the exact location of each New Tree on each parcel and ensure:
 - a. Trees are actual trees (not shrubs, etc.);
 - b. Overhang impervious surface; and
 - c. Are not riparian trees used as part of the Widow White Creek mitigation work. Riparian trees that significantly overhang impervious may be counted.

Any reduction in tree credit must be met with an adjustment to the bioretention basins as appropriate to compensate for the reduction in tree credits.

2. Maintenance of pervious asphalt. Pervious asphalt has very high failure rates due to lack of or poor maintenance. County staff should review the proposed maintenance plan for the pervious asphalt and ensure that there is the ability and funding to maintain pervious asphalt long-term.

Thank you. Please let me know if you have any questions.

Brendan Thompson
Environmental Scientist
Municipal Stormwater Coordinator
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403-1072
(707) 407-0036

From: Jacobson, Rebecca <rjacobson@co.humboldt.ca.us>
Sent: Friday, October 1, 2021 4:09 PM
To: Thompson, Brendan@Waterboards <Brendan.Thompson@waterboards.ca.gov>
Subject: comments requested for updates to PLN-14268-CUP Ocean West Manufactured Home Park expansion

Hi Brendan,

I am working on PLN-14268-CUP, an expansion of Ocean West Manufactured Home Park in McKinleyville. There are minor revisions that are reflected in the project description.

Notice of Merger, Conditional Use Permit, and Special Permit. Proposed expansion of Ocean West Manufactured Home Park. The Lot Merger portion of the proposed project consists of the merging of two vacant 4.5 acre and 0.57-acre parcels into the 25.33 acre developed manufactured home park for a total of 30.4 acres. The merger would allow for the expansion of 25 spaces for a total of 155 units. 22 spaces are proposed on the western parcel and 3 spaces are proposed on the eastern parcel. The Conditional Use Permit is required to operate a manufactured home park in the C-1 Neighborhood Commercial zoning district. There is a previously approved Conditional Use Permit (CUP-37-77) for the existing 25.33-acre portion of Ocean West. The proposed road connecting the proposed western expansion to the rest of the park will result in approximately 82 sqft of one-parameter wetland fill and 3,049 sqft of encroachment into the Streamside Management Area (SMA). The Special Permit is required for development within the SMA protective buffer of Widow White Creek, resulting in temporary and permanent impacts to the riparian habitat and associated wetlands. Mitigation measures will be required to reduce the potentially significant impact to wetlands, the SMA, water quality, and to habitats. Mitigation measures include invasive and non-native vegetation and tree removal, native planting within the restoration area, 350 sqft of wetland restoration, and 15,000 sqft of riparian restoration. 51 trees are proposed for removal and 185 trees will be planted. Low impact development measures are proposed to reduce stormwater runoff and to meet County standards for Hydromodification projects. These measures include the use of permeable pavement for all roadways and driveways, and the use of bioretention basins. Approximately 30,000 sqft of additional recreational space is proposed to meet requirements for the expansion of manufactured home park. This will include a dog park, trails, community garden, and picnic areas. UTILITIES: Water and sanitation is provided to the property from the McKinleyville Community Services District CEQA: A Mitigated Negative Declaration/Initial Study was circulated in February and March 2020.

You left comments on the IS/MND and previous comments. The plans have changed, and the preliminary stormwater drainage plan has changed as well. To address your comments, the use of bioretention basins will be used instead of infiltration basins, and the proposed 2:1 slopes were revised to address comments that the basins were too steep, and are now proposed as 3:1 slopes. I am referring it back out to you to see if you have comments.

Thank you,



Rebecca Jacobson
Planner
Current Planning Division
3015 H Street Eureka, CA 95501
Phone: 707-268-3727

From: Thompson, Brendan@Waterboards <Brendan.Thompson@waterboards.ca.gov>
Sent: Wednesday, April 1, 2020 10:35 AM
To: Shortridge, Tricia
Cc: Moore, Heaven@Waterboards; Stevens, Brandon D.@Waterboards; Filak, Jordan@Waterboards; OPR State Clearinghouse
Subject: Regional Water Board Comments on Sun Ocean West Manufactured Home Park Expansion Project (SCH No. 2020029032)

Governor's Office of Planning & Research

APR 01 2020

Dear Ms. Shortridge,

STATE CLEARINGHOUSE

Thank you for providing North Coast Regional Water Quality Control Board (Regional Water Board) staff the opportunity to comment on the Mitigated Negative Declaration (MND) for the Sun Ocean West Manufactured Home Park Expansion Project (Project) (SCH No., 2020029032, County Case No. CUP-18-034). The State Clearinghouse comment deadline was March 10, 2020, but Humboldt County staff indicated that late comments would be accepted from the Regional Water Board to help inform the County's decision making process as it moves forward on its Project review. Please note that we also provided comments on the Project's County Planning Application on March 26, 2019. The below comments build upon our March 2019 comments and are informed by recent Project documents, including the MND, tentative plan sheets, and preliminary stormwater plan. While we do not have sufficient Project plans that may inform more detailed Project comments, the available Project materials do present significant concerns to Regional Water Board staff. We look forward to discussing our concerns in more detail with County staff in the near future as well as with the applicant during the 401 water quality certification review process, as needed.

1. Compliance with Stormwater Permit Provision E.12

The applicant proposes to use an infiltration basin to meet the post-construction stormwater treatment requirements of section E.12 of the [State Water Resources Control Board Water Quality Order No. 2013-0001-DWQ, Waste Discharge Requirements for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems \(MS4\)](#) (Stormwater Permit). We are concerned that the level of detail provided does not demonstrate compliance with the Stormwater Permit because:

- a. The infiltration basin is identified as a "Site Design Measure." Stormwater Permit Provision E.12.b does not identify infiltration basins (or infiltration trenches) as acceptable Site Design Measures. Although the Humboldt LID Manual treats infiltration basins as Site Design Measures, the LID Manual was produced by and for Humboldt and Mendocino County Phase II stormwater MS4s for their own convenience, and is not a requirement of or enforceable part of the Storm Water Permit; and
- b. The infiltration basin, as proposed, does not meet the Low Impact Development Design Standards of Stormwater Provision E.12.e (page 52). Provision E.12.e.ii(f) (page 54) requires stormwater treatment facilities that are at least as effective as bioretention systems. The proposed infiltration basin does not meet the bioretention standard primarily because there is no biotreatment as required in Provisions E.12.e(f) and (g). If the infiltration basin were to remain as designed, stormwater would need to be pre-treated using some form of bio-treatment before discharging to the basin.

2. Infiltration Basin Concerns

Beyond our concerns that the infiltration basin does not meet the Stormwater Permit requirements, we have the following additional concerns:

- a. The basin has relatively steep 2:1 slopes. Based upon Regional Water Board staff's prior experience with detention basins in the 90s and early 2000's (when these types of basins were more common), the side slopes and standing water would necessitate fencing around the entire basin perimeter for public safety reasons. The current plans don't appear to designate fencing around the basin. We are bringing this to your attention in the event the County or Applicant cannot accept fencing, which would affect the feasibility of this strategy.
- b. Depending upon the basin drawdown time of the basin, there may be vector concerns with standing water. This should be evaluated to ensure the design would be compliant with requirements of the local Vector Control District.
- c. The basin is proposed to infiltrate a very large amount of water and is placed immediately adjacent Widow White Creek. The Applicant will need to demonstrate the basin's structural integrity during large storm events. Elements of concern are:
 - i. What happens to stormwater flows during events surpassing the 100-year storm? How do those flows reach Widow White Creek without causing erosion to the basin or Widow White Creek?
 - ii. What happens during flood and other high flows in Widow White Creek? How will the basin be protected?
- d. The Preliminary Stormwater Control Plan mentions that pervious asphalt may not be a feasible stormwater control option in locations of high groundwater, and that additional investigation is needed before seasonally high groundwater levels may be determined. High groundwater would impact the efficacy and drawdown of the infiltration basin as well. We are concerned that the stormwater BMP planning has preceded these groundwater investigations and recommend that if groundwater investigations cannot be completed prior to the County's Final CEQA Determination, that alternative project designs be presented to address a scenario where high groundwater renders the proposed post-construction BMPs infeasible.

3. Pervious asphalt

Pervious asphalt is proposed for all roads in Parcel 1. Per the Stormwater Permit, pervious asphalt is an approved Site Design Measure and any stormwater drainage from these areas would not require additional treatment. However, pervious asphalt requires a significant level of maintenance and oversight to ensure it continues to infiltrate stormwater and remain effective. Required maintenance includes regular vacuuming to prevent clogging. If pervious pavement becomes clogged, then replacement of the clogged portion(s) is typically the only recourse. Also, the facility should be planned and monitored to ensure that sediment is not depositing onto the pavement.

Stormwater Permit Provision E.12.h requires specific measures of the County to ensure the Applicant has a sufficient Operations and Maintenance strategy that will ensure the Project BMPs, including the porous pavement, continue to operate as designed. Because the porous pavement is a significant component of the Applicants proposal to protect water quality post-construction, the adequacy of the Applicants BMP O&M program will be evaluated by Regional Water Board staff during the 401 water quality certification review process. If needed, additional conditions may be included in the 401 water quality certification to ensure the porous pavement is adequately maintained.

4. Other

- a. The Project documents do not demonstrate how stormwater from the access road would enter Widow White Creek. The Applicant will need to demonstrate how water connects from the road to Widow White Creek without causing erosion to Widow White Creek. Also, any impacts to the riparian area or Widow White Creek associated with the conveyance must be identified and mitigated for.
- b. Our review of the Project documents focused on Parcel 1, however, these comments also apply to Parcel 2, where appropriate.
- c. The proposed access road is being planned very close to Widow White Creek and there is a significant potential threat to the water quality of Widow White Creek during the construction phase. The Applicant must identify measures to avoid and minimize potential construction-stage impacts to Widow White Creek by 1) reducing the temporary disturbance envelope as much as possible to minimize intrusion into the riparian area and 2) stage construction so that this portion of road construction begins and ends only during the dry season.

Thanks again for accepting our comments. We look forward to discussing this project and post-construction stormwater implementation with the County in the near future.

Brendan Thompson
Environmental Scientist
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403-1072
(707) 407-0036

The governor of California has issued a statewide shelter in place order due to the COVID-19 emergency. The Water Boards are continuing day-to-day work protecting public health, safety, and the environment. However, most staff are working remotely and we continue to check email and voicemail regularly. Thank you and stay healthy and safe.

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ATTACHMENT 7
Public Comments Received during Circulation Period February 17, 2020 to March 17, 2020

- 2 recent units added; drainage under units
- Flood plain development permit?
- March notice- scrambling
- Wednesday email comments
- Wall between 4 units and existing: remove?
- Alternative access?
- Avoid White Widow Creek impact
- Flood plain and flooding up stream?
- Runoff- previous paving
- Road alternative- buy out existing unit- relocate to new unit
- Rents in new addition
- Measure V not applicable to new lots
- How will rent increases be managed?
- Require long-term lease?
- Ground water monitoring to determine how drainage will be handled – infiltration rate
- Utilities- how will addition be served?
 - Electricity- separate
 - Water- connected
 - Sewer- 4 units connected; 26 units separated
- 4 units:
 - Grade differences
 - Proximity to existing homes
 - Drainage
 - Loss of open space
- Loss of mature trees
 - Monterey cypress
 - Eucalyptus
- Leave trees between existing and new addition
- Road construction to protect stream fill and retaining wall
- Loss of trees and greenbelt and elevation differences (26 units)
- Road proximity to units at south end of northwest addition
- Buffer- plant replacement trees?
- Fire access wide enough?
- Trees- wind protection, noise reduction
- Wildlife- raptors, fox, cutthroat trout, and restoration period
- Unit density and loss of amenities
- Loss of existing habitat
- Trees are key to what draws residents to this park

- Dense layout- downgrade development
- Phase I transformer needs to be changed out (40 years old)
- Upgrade at same time of addition
- Emergency exits are not ADA accessible (stairs)
- No street signs (emergency response)
- Locked emergency exits (vehicle)
- Murray entrance- traffic delay and safety (1 point of access)
- Keep trees (bird habitat)
- Substitute open space
- Parking: where do service vehicles park?
- Roads- too narrow
- Boardwalk over wet trail
- Clubhouse 60 person occupancy
- Activity center 30 persons; not connected to water
- Existing park:
- Caregiver parking lacking
- Green space and common area loss
- Measure V – loss of amenities?

From: [TomPam Devitt](#)
To: [Shortridge, Tricia](#)
Subject: Copy of email I sent to Tom Carpenter SUN
Date: Friday, March 13, 2020 5:46:42 PM

Dear Tricia,

Thank you for sending me the minor deviation to CUP for these two spaces. This is the email I wrote to Tom Carpenter.

Now that I know about the requirement for a sound barrier behind our house, it makes the butterfly bushes saga even more ludicrous. Ocean West planted 100 butterfly bushes along the top of the berm that is between our back yard and highway 101. Their purpose was to thicken and grow to a height of 18 feet and deflect the sound and sight of the busy highway.

They had grown to a height of 4 or 5 feet. Two weeks ago, a very inexperienced maintenance man was sent by the park manager to trim the weeds on the berm. Before anyone discovered it, he had cut half the butterfly bushes right down to ground level.

I think I told you about the new gutter, just installed in front of our house. The northern half of the gutter flows south and the southern half flows north, meeting in the middle right in front of the space between the two houses. So a little pond forms there, fortunately there has not been much rain.

As I said before, there is much that needs to be addressed at Ocean west before any new addition is approved.

Tom Devitt

Dear Mr. Carpenter,

My name is Thomas K. Devitt, my wife Pamela and I have purchased a new manufactured home from Sun Communities, Inc., located on a new space #118 at Sun's Ocean West Mobile Home Park in McKinleyville, CA 95519. Our California Registration number is: **LBN 9899**. Phone 469-406-7469

I had not planned on ever writing any of this to you, however, when I learned that you had publicly praised Jody before the executive committee, for her success in selling two homes at over \$200,000, I was severely offended. If success is just measured by the amount of money deposited in Sun's bank account, then perhaps those sales could be considered a success. But if success is measured by customer satisfaction, then both homes are dismal failures. Is Sun not interested in the good will of customers or positive referrals to potential home buyers? When we first began seeking a home in Ocean West, we befriended Jody, invited her to church, introduced her to many of our friends and arranged for a friend of ours to stay with Jody's children while Jody traveled to Michigan for a SUN meeting in August. But, from the beginning our confidence and trust in Jody began to erode. The following is less than exhaustive, but a report of some of the things that have happened to us since moving to Ocean West.

I do desire a response to this email.

Pre-purchase Sales promises from Jody: “McKinleyville is requiring a sound barrier wall to be built along highway 101 when the additional homes are put in the park. So, space 118 will not be so noisy after that”. “All you need to do on this property is add is a little landscaping to complete it”.

It was only a moment or two after we signed our deposit check of \$2000 at the open house on May 4th, to purchase this home that Jody asked for the first of many times; “*when are you going to close escrow*”. Since we had already been accepted as residents of the park and had previously received approval for a loan on another home in Ocean West, we felt that it might be a little faster than normal, but we had no idea what normal was. Jody determined that 30 days would be adequate, and the house would be ready in that time. So, we agreed to a move in date of June 4th. At some point Jody suggested an earlier date by the end of May. We choose May 31st. We notified our landlord that we would be moving out the end of May and contracted with a local moving company to move us from our rented home in Eureka to Ocean West on that date. We arranged for packers to begin packing us. As the date approached, Jody, who was talking to the escrow people nearly every day, informed us that we need to move our date forward to June 7th. So, we contacted our landlord about another month, paid June’s rent and changed the date for the movers. On June 6th Jody informed us that the loan was approved and “*We were good to go for a 1:00 pm move in on June 7th*”. When we and the moving van arrived at space 118, Ocean West, at the appointed time, we were informed by Jody that we could not move in as escrow had not closed, but it might happen any minute. Also, the house was not ready to be moved into, there were no steps into the house and the temporary steps had all been pulled away. The carpenters were shocked that we had arrived, as they had not been notified of our coming. They feverously worked to complete the front steps. After two hours with the moving crew and van waiting and us being charged an additional \$150.00 per hour, the approval was received by Jody from the escrow company and we were given the keys. Despite the front steps not quite being finished, the movers were able to run a ramp from the van directly onto our front porch and unload the truck.

This exact same scenario was played out a month later, when our neighbors moved into #122 next door, only their delay was three hours.

When we first walked into our brand-new home, it was obvious that no Post Construction cleaning had not been done. This home had been sitting here for nearly a year, the entire house; floors, carpet, walls, counters and cabinets were covered with a coating of dust, floors were dirty and spotted with paint, the paint on several corners of walls was worn off and no touch up paint was ever made available. Decorations and paper goods from the open house, several weeks before, were still in place. We immediately complained to Jody and her response was, “it was cleaned for the open house”. When we pressed her, she sent her assistant Madori with a swifter mop and a box of some sort of wipes to perform a very inadequate cleaning. While here, Madori mentioned that when Jim at Lazy J sold a new home, he had a cleaning crew come in and clean it. Before Rich the contractor was finished building the garage, he came in and cleaned the paint spots from the floor. And we hired a professional cleaner to clean the house.

On move in day, Jay the maintenance man was installing a door lock and handle on the door from the house into the garage. It never worked; we could not lock the back door. After a week or two we complained to Rich, the contractor, he took the mechanism apart, discovered it was installed backwards and re-installed it.

After living in the home several days, the state inspector came to visit and he was very angry with Rich that we had been allowed to move in, the front steps had no railing, and the other

two sets of stairs were not finished at all. As I recall, Rich referred to Jody as the one who made the decision for us to move in.

When we received our first monthly bill on July 1st, we noted that our billing period began on May 10th, but we didn't move in until June 7th. We took this bill to the office and Jody said she would contact the "company" and placed the bill on her clip board. A week or so later we contacted her about the billing and she retrieved the bill from deep within the stack on the same clip board and said words to the affect that she had contacted the company and there was nothing to be done about it. Obviously, our meter should have been read on June 7th, but to cover a mistake she told a lie. We paid the bill for nearly a month that we didn't live in the house.

By June 15th the overhead light in the master bath, toilet room stopped working. I asked Rich the contractor to check it, he determined that it was a one-piece LED light fixture that had to be replaced, it was not a bulb. I contacted Jody, told her what Rich had said and she sent Jay the maintenance man over to change the bulb. Jay soon discovered the same thing as Rich, there was no bulb, it was a one-piece LED fixture, which he reported to Jody. I pressed her on getting it repaired and she informed me that she had sent an email to the manufacture. After nearly a month I stopped by the office and asked Jody the status on the light fixture in our bathroom. Her response was, "Oh we found that in the maintenance shed". When I questioned that response, she said that she was waiting for an email from the manufacturer. I waited until mid-August and having received no response, I called the warranty number at Silvercrest and learned that they had never received anything from Jody about our light problem. They emailed Jody, telling her which form she must use for warranty and asking why this home had not been registered with them. So not only had they not received the service order, our home had never been registered with them. Jody became very angry with me that I had gone around her and called the manufacturer, telling me that when she spoke to Silvercrest, they found her previous email. She then sent them the service order and the HUD registration forms. On September 10th, after three months without a light, a repairman from Silvercrest arrived at our door and installed the LED Fixture and gave us an extra light fixture in case another one goes out. When he showed Jody the light fixture, she was shocked that it was not a bulb and he went on the explain to her about light fixtures.

When our driveway was covered with asphalt, both Rich the contractor and the asphalt contractor told me that they had recommended to Jody that the small strip in front of our house, along the road, should be covered with asphalt as well. They and I could see that rainwater was going to come flowing down the road and onto that strip and under the house. It would have been cheap and easy since the equipment was already there. Jody declined having it done. When the driveways at both properties were finished and it became apparent that the asphalt had constructed a pool which had no drainage except between or under the homes. When I pointed this out to Jody and walked her through where the rainwater was going to come from, down the road and into the front of both properties, her words to me were; *"If you want asphalt, do it yourself"*. **(Ocean West was cited by the state inspector on November 4th and given 60 days to correct the road water running into property)**

When Rich the contractor finished building our garage, he installed the two exterior lights that came with the home, one outside the back door and one at the garage back door. However, he could not find the glass covers for these light fixtures, called "jelly jars". He asked Jody about their whereabouts and she had no idea, except maybe in the maintenance shed. Rich checked in there and didn't find them. Later in the summer there was a grand give away or garage sale of much of what was in the maintenance shed. I went over out of curiosity to see what was

available. Hundreds of items had been put on display both in and outside the shed. As I walked around, I saw a stack of new boxes, behind a tape barrier. I asked Madori what those were, and she told me they were not for sale. One box was standing open with several items wrapped in packing paper. I decided to peek inside and as I fumbled through the packing, I discovered the missing jelly jars, which I showed to everyone around, Madori, Jody and Jay were all there. On further examination of the box I found three sets of towel bars and two toilet roll dispensers. I exclaimed, “who’s are these?” (since my home had none of these items) “Oh those must be yours,” someone said, and everyone laughed. “There you go” was shouted, as most of the items were loaded into my arms with Jay taking the rest and we carried them to my garage. Jay installed the jelly jars and Rich the contractor said he would try to get the towel bars installed, but he was really busy and didn’t get around to it. After a few months, we hired someone to install the towel bars and as we had purchased two free standing toilet paper dispensers.

A similar thing happened at #122, except they never received any towel bars or toilet roll holders, they bought them themselves. I recently learned that when they questioned Jody, she told them to take of picture of mine to show her what they looked like.

In mid-June I pointed out to your contractor the obvious grading problems around the house, all four sides of the house appeared to be subject to flooding and the potential of water running under the house. His response was that the State Inspector had signed off on it. I continued pressing the issue and found little resolution to the problem. In mid-September when we received a heavy rain, I was able to take photographs of the water standing around the house as I had predicted. It has been a continuous fight with little resolved until now. Just so I make myself clear, my wife and I are very happy with our home, it suits our every need. We truly enjoy the many friends we have already made at Ocean West, it’s a delightful community with many retired professional people who make it a stimulating environment. We love the climate and proximity of the ocean. I’m 80 years old and my wife is 73, we came here looking for a lower stress lifestyle, to spend our remaining active years. Instead, we find ourselves living in a nightmare of stress about our home being threatened by flooding and what seems like lack of care or service from Sun Communities Management.

Sincerely,
Thomas K. Devitt

Sent from [Mail](#) for Windows 10

From: [TomPam Devitt](#)
To: [Shortridge, Tricia](#)
Subject: FW: email 23 Nov 2019 State Ombudsman
Date: Friday, March 13, 2020 5:16:02 PM

March 13, 2020

Dear Tricia,

The email below was sent to the State Ombudsman for HCD, the state senate select committee on Mobile home parks and to one of the vice-presidents at SUN, Tom Carpenter. This resulted was an inspection from the HCD inspector and a citation against Ocean West, giving them 60 days to correct the problem of run-off drainage coming from the road in front of our home and onto our property. Only the front of the house was cited. The citation was written about December 4th, 2019 and although some work has been done to correct the situation, mistakes were made, and the project is not yet finished.

There are many issues within the park that need to be settled before any new addition should be considered. Many of those issues can be found in the two new spaces, approved by the county in a minor deviation to the existing Conditional Use Permit. I live on one of those spaces.

The property behind both space 118 and 122 is badly impacted and although a French drain was installed all the way across the property, it is not effective as the drainage sump it runs into is inadequate. The crew chief supervising the digging of the ditch for the French drain, said to Jody the park manager, "I don't know where this water is going to go, I dug that sump and it's not deep enough to take all the water that will be coming through this pipe". "You need to run a pipe under the berm or over behind the maintenance shed to get it out of here." The French drain went in and it only works when it's not raining.

Before purchasing our Manufactured Home for \$204,000., we were promised a sound barrier to be built between the back of the house and Highway 101, as this is a very noisy location. Even though the county "minor deviation of the existing CUP" required a sound barrier to be built before the homes were placed on sight, it is not there. Having seen the plans for the new addition to the park, we see that the sound barrier only goes along the new addition, not past our house.

The road in front of our house is only 16 feet wide, it was narrowed sometime in the distant past, when the park interior boundary ended just north of our house. Clearly in violation of the requirement for a 24' roadway.

According to a past president of the homeowner's association, over 100 yards of topsoil was removed from these two spaces, and then some junky gravel with many rocks bigger than my

fist, was dumped on the home site and flattened out. Violation of the county requirement for a permit when moving over 50 yards of soil.

According to the previous park maintenance man, there was never an impaction test made of the soil underneath the homes. Is our home on firm ground, or is it in danger of falling off the post and beam system?

HCD also requires a permit with issues of grading, drainage, health and safety. I have asked SUN management repeatedly for a copy of these permits and they have never been provided and I suspect they do not exist. The state inspector often arrived at our site with the park manager.

Sent from [Mail](#) for Windows 10

Email 23 Nov 2019 to State Ombudsman

Sent: Saturday, November 23, 2019 1:53 PM

To: eric.guerra@sen.ca.gov; tyler.sugimoto@sen.ca.gov; MHassistance@hcd.ca.gov

Cc: tcarpenter@suncommunities.com; [Toni Dobrec](#)

Subject: HCD requirements for a drainage plan/permit, when new sites are added to an existing Mobile Home Park

My name is Thomas K. Devitt, my wife Pamela and I have purchased a new manufactured home from Sun Communities, Inc., located on a new space #118 at Sun's Ocean West Mobile Home Park in McKinleyville, CA 95519. Our California Registration number is: **LBN 9899**. Phone 469-406-7469 We closed escrow on June 7th, 2019 and moved in on that day. We paid \$204,000 for this home. The home was still in the construction phase, a garage was being completed and there were no steps in/out either of the back doors and the front steps were being constructed as we moved in. A concrete slab was poured behind the garage and after a few weeks an asphalt driveway was installed. I understood we were still in the construction phase.

I soon observed that our home was in danger of flooding by rain flowing from several directions, when the 50in of average, annual rainfall begins. It was simple to see that the slope of the ground sloped down to the house on both the front and back ends (east and west). The wider (common) area north and west of the house showed signs of previous flooding. I voiced my concerns to the contractor still working on the property and to the park manager. I was assured that the tiny little ditch (swale) running west from north of the garage to the back yard and south across the back yard, (obviously running up hill) was required by the State inspector and that inspector, Steven Hammond had signed off on the property as having adequate drainage. As I continued voicing my concerns, the park manager, told me that if I wanted something different, I would have to do it myself.

As rain gutters and downspouts were not provided by Sun Communities Inc., we paid a contractor to come in and install a gutter system. Again, I voiced my concern that this concentration of water, caused by four downspouts was going to exacerbate potential flooding. It fell on deaf ears, once again I was told, "the State Inspector signed off on it".

I consulted with several landscapers, one of whom was a retired gentleman who, many years

ago, had installed nearly all the individual drainage systems from each home throughout the park. These all flowed into the curb drain that runs into a storm sewer. I also spoke with a building contractor with 40+ years' experience, a structural engineer and neighbors living near this brand-new site. Everyone said essentially the same thing, "There is no place for the water to go", and neighbors reported how badly this area floods every year. Professionals were recommending a deep catchment basin be dug at some point on the property with a system of drains flowing into it. An existing catchment basin is located on the common land, south west of Space 122, the other new site. The contractor still working here and the park maintenance man, both voiced the opinion that the existing catchment basin no longer functioned, and the overflow did not go anywhere.

In mid-September we received two significant rains. The area to the north, west and east of the house all had standing water. I had dug a little ditch across the front (east) side of the house to prevent water running under the house and that ditch had four inches of water standing in it. The backyard across the west side, was so full of water, that it ran east, back up between the two new homes, running under my house on the south west corner as it traveled east. I have since placed sandbags at that corner for protection.

On September 17 and 18 I provided Ocean West management with photos of standing water and a three-page email, detailing the issues of flooding on this property and how I saw it as a construction problem, not landscaping. I was advised by several of the people I had consulted to ask for a drainage plan, which I did in the September 17 email. I then began searching within the California Department of Housing and Community Development's web site for information on a drainage plan/permit.

I waited one month for some sort of resolution, there were visits by professional landscapers, recommendations made, but nothing transpired. On October 18 I emailed park manager asking what was happening and I gave her until October 21 to resolve this situation. Stating that I would contact HCD, the state ombudsman for mobile homes, that state senate sub-committee for mobile homes, the park HOA President and vice-president of Sun Communities, Inc., Tom Carpenter.

In the weeks since October 18th there has been a series of landscapers and the state inspector, Steve Hammond coming to our property with the Park manager, Jody Fregoso-Banuelos. Several proposals have been made, we wait for progress and each has been turned down by Sun Communities, Inc. The latest proposal has excluded the issues on all four sides of the house and calls for a "French drain" to run across the common land behind the houses into the catchment basin that does not work. Below email from

November 13, 2019 *Hi Tom, Yes, the work will be started tentatively 12/2-12/9. J & G will install 80' of French drain to drain into existing rock catch basin. Project is behind units 118 & 122, Thank you, Jo*

After repeatedly asking for a drainage plan, and sending Jody, the park manager, a copy of the California Department of Housing and Community Development's requirements for a drainage plan/permit, when new sites are added to an existing Mobile Home Park, I received the following email **on;**

November 22, 2019 *Tom, In order for your home to be here, Steve Hammond had to sign off on the land, as previously discussed with Steve. Please feel free to call Steve directly at 70-457-7012, hopefully he can provide the answers you are looking for. Jo*

So, once again the buck has been passed to the state inspector with no understanding by

management that we are not looking for a signed off construction permit, but the drainage plan/permit that must accompany that permit. All of this must be on file in the office of Ocean West or it doesn't exist.

Incidentally, Steve Hammond is the guy who signed off on the little ditch (swale) that goes nowhere and now he has recommended a French Drain system for the west side of property, flowing into the existing catchment basin, that does not work. His total recommendation was based on the overflow, but with a little checking and removal of a few rocks, it is plain that the overflow is a fake, it only goes a few inches out.

On Nov 20 I sent an email to Jo with a photo of the catch basin, showing clearly how the overflow only goes about six inches away from the basin. I have received no response.

I have now waited another month before reaching out for assistance from the state of California. The big rains are coming, my home is very vulnerable, and Sun Communities doesn't care. And they are about to break ground for 35 more spaces in this park and their first two attempts at selling new manufactured homes is a dismal failure.

Key issues are:

0. No plan in place for drainage.
1. No connection to existing park storm drain,
2. Slope around house allows rainwater to run under house.
3. Heavy rains expected very soon.

I have dozens of photos, copies of detailed emails back and forth, a plethora of information that I can provide. But the big question remains, where is the drainage plan/permits? I am attaching significant emails.

Below you will see what I have excerpted from the HCD web site. This drainage plan obviously was not produced for this property, or else it would have been provided to me. I invite anyone reading this to consult the **California Department of Housing and Community Development Web** site for more details.

A construction permit is required when developing a new mobile home park or special occupancy park **or**

constructing additional spaces and/or facilities within an existing park. The following local

government approvals and utility agency "will serve" letters must accompany all park construction project permit applications:

0. **Written approval or stamp of approval on all plans relating to the park surface or subsurface drainage systems from the local public works department, engineering**

department, flood control agency, or water quality control board [[Health and Safety Code Section 18501\(e\) Opens in New Window](#)].

Drainage and Grading

Drainage and grading plans **must** include the following information:

0. General vicinity map of the proposed site.
1. **Property limits and accurate contours of existing ground, details of terrain, and area drainage.**
2. **Limiting dimensions, elevations, or finish contours achieved by grading, proposed drainage channels, or other related construction.**
3. **Detailed plans of all surface and subsurface drainage devices, walls, cribbing, dams and other protective devices constructed with, or as part of, the construction, and a map indicating drainage area(s) and estimated runoff of the area served by any drains.**
4. Location of buildings or structures on the property where the construction is to be performed. Identify location of any buildings or structures on property of adjacent owners which are within 15 feet of property, or that may be affected by proposed grading operations.

Grading notes must be shown on plans:

0. Include **soils report** with the plans.
1. Grading practices must comply with Chapter 70 of the 1985 Uniform Building Code.
2. **The design engineer must provide a letter upon completion of the grading, certifying that the final grades are in compliance with the approved plans.**
3. **The soils engineering firm must conduct field observations and tests during construction to verify the quality of the work, conformance to the specifications, and recommendations contained in the soils report.**
4. Upon completion of the grading, the soils engineer must submit a final report including test results, certifying the construction is in compliance with the specifications/plan(s) and recommendations contained in the soils report.

The Soil and Engineering Report must include the following:

0. Data regarding the nature, distribution, and strength of existing soils, and conclusions.
1. Recommendations for grading procedures.
2. **Design criteria for corrective measures, if necessary, must be included in the report.**
3. **The report must provide recommendations, if any, covering adequacy of sites to be developed by the grading.**
4. Recommendations included in the report and approved by the building official must be incorporated in the grading plans or specifications.

The Engineering Geology Report must include the following:

0. An adequate description of the geology of the site.
1. Conclusions and recommendations regarding the effect of geologic conditions on the proposed development.
2. Options and recommendations covering the adequacy of sites to be developed by the proposed

grading.

3. Recommendations included in the report must be incorporated in the grading plans or specifications.

Sincerely,

Thomas K. Devitt

Space 118 Ocean West, McKinleyville, CA 95519

469-406-7469

Sent from [Mail](#) for Windows 10

Sent from [Mail](#) for Windows 10

Ocean West Homeowners' Association
1090 Murray Road, Space 133
McKinleyville, CA
March 17, 2020

*Environmental/Design Concerns and Issues Regarding Sun Communities, Inc.
Proposed Expansion of Ocean West Manufactured Home Park Project*

The Board of Directors of the Ocean West Homeowners' Association (OWHA) submits its environmental and design concerns and issues on behalf of its membership of approximately 200 members.

The Association is in support of Sun Communities' proposed expansion and strongly believe that the expansion will provide needed homes for moderate to upper-level income seniors. Nevertheless, we do have serious issues and concerns regarding a number of environmental items that potentially affect design elements within Sun's request for Negative Mitigation to the Humboldt County Planning Commission.

We are interested in working in concert with the County of Humboldt Planning and Building Department and the Sun Communities property development division to resolve issues we believe to be detrimental to Widow White Creek and negative impacts which may create externalities affecting the established Ocean West Park and its current 200 or so residents. OWHA wants the culture, aesthetics and neighborhood feeling of the Park to be maintained and believe the new additions should be designed to blend into the existing environment rather than looking like a last-minute add-on to an existing and well-established Park.

Overall, we have several areas of concern regarding the proposed development as designed. Specifically, the OWHA:

- A. Is not in favor of the two ingresses sponsored by the developer for entering the west side expansion area along Widow White Creek, but considers a bridge over the creek as being less damaging to the creek in the long run and more protective of the threatened cutthroat trout species that spawn in the creek.
- B. Finds the proposed park fencing material to be low quality and aesthetically unappealing, not acceptable and should be of a consistent design across the park.
- C. Finds it unacceptable to not have overflow parking for visitors and care personnel located within the two planned expansion areas.
- D. Is concerned for the safety of residents if the ingress/egress as proposed is implemented.

E. Objects to the high-density design of the proposed home lots, said home lots having no garages (only pads for carports), the proposed narrow roads (24ft), and the redundant size of the proposed homes giving the two expansion areas a banal and unattractive cookie-cutter appearance. Existing roads within the park are at minimum 32' gutter-to-gutter with 29' asphalt roadbed.

F. Objects to the reduction of existing public areas and to existing fences being removed in both expansion areas, and strenuously object to the encroachment on approximately 7000 square feet of common area behind existing homes due to the unnecessary density in both proposed expansion sites.

G. Objects to the removal of established *Leylandii* Cypress trees and numerous ornamental trees within the two proposed expansion areas which are enjoyed by the entire park.

1. Established Tree Line/Windbreak: The removal of the established *Leylandii* Cypress trees (where there is visible evidence of nesting sites and habitat for hawks, owls, eagles, osprey, herons, egrets or any species known to be endangered or threatened, per McKinleyville Community Plan Sec 3400) is unwarranted and affects a large number of homeowners who will lose aesthetic values and protection from strong winds as well as highway and other environmentally annoying noises that are now minimized by these trees.

- a. This directly affects the stands of established trees along the south and east boundaries of the proposed 26 home-site expansion. These trees have been cited for removal, along with approximately 4000 square feet of common recreational area.
- b. The trees on the south and east borders currently provide a windbreak and sound barrier to at least 25 homes in the existing park. The value of the east/south line of established *Leylandii* Cypress trees as a natural windbreak can be appreciated by the analysis of windspeed data taken at Space #66 from 2016 through mid-March 2020 (see attachment A for details). This data makes it apparent that the number of months in a year having winds exceeding 20 MPH is increasing (i.e., six months in 2016, seven months in 2017, eight months in 2018, and nine months in 2019). Also, the highest windspeed recorded during each year is also increasing (i.e., 30 MPH in March 2016, 34 MPH in 2017, 39 MPH in 2018, and 47 MPH in 2019). It is logical to conclude that, without the protection of the windbreak, the force of the wind at this location would be significantly greater. Removal of this natural windbreak will not only degrade the aesthetics of the homes in this area, but will also expose them to a more intense wind environment and potential damage to roofs and siding.
- c. According to the Mobile Home Rent Stabilization Ordinance, Section 9101.13., this tree removal would constitute a "service" reduction, which

means the elimination or reduction of any service or park facility provided as of December 2016. "Service" includes physical improvements or amenities. The established tree line is an amenity which provides environmental aesthetics and contributes to the health and welfare of the residents living in the existing section of Ocean West and protects their homes.

- d. At present, the proposed sound barrier is planned only for the new west side expansion sites. Because none of the existing homes along the Highway 101 corridor (west side of existing park) have a manufacturer's certification for conformance (with the possible exception of the 2 homes placed in 2019, for which there is no documentation in the possession of the owners of those two homes) we maintain that the sound wall should extend the entire length of the western side of the park.

2. Wetland Buffer Area: The wetland buffer area within the west side expansion section extends 50 feet out from each bank of Widow White Creek. The two proposed access road alternatives into the expansion area encroach upon that buffer area significantly. Additionally, both alternatives impact the quiet enjoyment, aesthetics, welfare and property value of the residents of the existing home that will be only 6 feet from the road bed with the alternative selected by Sun. Additionally, Widow White Creek is protected as an active spawning area for the threatened cutthroat trout. With spawning of cutthroat trout being dependent upon sufficient rain to provide sufficient creek water to permit the trout to travel upstream, and while year-to-year creek-flow and spawning varies, residents have observed fish spawning in the creek within the past year.

3. Required Maintenance of Widow White Creek: Current maintenance of Widow White Creek by Sun is inadequate to non-existent. In light of that failing we do not believe that the integrity of the creek will be kept to the standards required when the west side expansion encroaches on the streamside and the wetland areas of the creek. Particularly, if the County of Humboldt does not conduct routine and regular inspections of Sun's care of Widow White Creek within Ocean West Park, history indicates that the creek will continue to suffer damage. Sun's existing maintenance of the creek seldom takes into consideration what is native vegetation versus what is noxious vegetation, and has often undertaken indiscriminate vegetation removal and clear-cutting. Spawning trout need native vegetation for protection.

4. Existing Park Ingress/Egress: The current park ingress and egress design via bridge over Widow White Creek is an on-going concern; that is, there is only one way in, and one way out for the residents on the south side of the creek. With the addition of 26 new homes to the south and west of the Widow White Creek, we are concerned with the flow of traffic during natural disasters and other emergencies. If the existing bridge becomes unusable, there is no way out for vehicular traffic. These existing park ingress and egress issues will be compounded by the proposed west side expansion due to the increased number of vehicles of the owners of the 30 new homes.

The siting of the proposed access road alongside of Widow White Creek places it within an existing flood zone, thereby compromising the ingress/egress for those that will be living in the north side expansion area, and potentially affecting upstream migration during periods of heavy rain and floods. Upstream residents on both sides of the creek have experienced over-bank flooding and ground saturation due to heavy rains which is often compounded by debris collection in the creek due to the lack of adequate maintenance by Sun and the previous park owner Inspire.

5. Ocean West Park Utilities Infrastructure: As part of the in-place park utilities infrastructure layout (i.e., water, sewer, electricity, gas connections/interconnections), the existing electrical design of the seven large “Daisy-Chained” transformers is unacceptable; when one goes out, it impacts a substantial area and a large number of residents. The park water supply is equally vulnerable. On several occasions the entire park has been without water due to a minor failure in only one part of the system, or even at a single homesite. The existing park infrastructure, especially water and electricity, could very well be overwhelmed by an additional 30 homes.

6. Storm Water Drainage: Existing stormwater drainage issues within the park have not been sufficiently addressed. There are several stormwater runoff locations draining into the northeast common area of Widow White Creek (behind homes located on Creekside Drive) that render that area unusable due to marshy conditions. The proposed north side 26-home site and the east side 4-home site are each at a higher elevation than the neighboring areas of the park which would add to the on-going problem of drainage and could severely impact homes that are directly on the perimeter of the two proposed expansions. There are existing drainage issues behind the homes adjacent to the proposed 4 home-site area, as well as from the Dollar General side, affecting the existing home closest to that area.

7. Egress onto McKinleyville Avenue and Murray Road: The existing secondary egress onto McKinleyville Avenue is not accessible to residents: a locked gate, with no key or code available to residents. The only access permitted is to public safety agencies. This issue will be compounded by the proposed expansion. We are concerned there is no secondary egress planned for the west side expansion. A proposed retention pond will block the only potential outlet onto Murray Road, thereby making the egress for the 26 expansion homes the same as their ingress. This will intersect with the ingress/egress of 72 existing households on the south side of Widow White Creek, in addition to the 59 homes on the north side of the Creek. This situation will present a great opportunity for a bottleneck of traffic during emergencies and/or natural disasters when entering/exiting Murray Road.

8. Onsite Recreational Areas: Existing onsite recreational areas are not sufficient to accommodate the addition of 30 new homes. The creek-side area on the northeast side of Widow White Creek remains swampy due to existing stormwater drainage from culverts extending north/south into the designated “recreational” area. The addition of a trail through this area with one bench and one picnic table will be insufficient and

virtually unusable (Ocean West is a senior park). Currently there is approximately 17,000 square feet of designated recreational area. The inclusion of the existing creek-side "wild" common areas to calculate usable recreation area is disingenuous at best and not mitigated by two benches and a picnic table.

9. Elimination of Common Areas: Common areas currently located on the South perimeter of the proposed 26-home site and the west perimeter of the proposed 4-home site are to be completely eliminated. These common areas are part of a walking "trails" network which have existed since the park was created. Additionally, many flowering trees, rhododendrons, and evergreens will be removed from those common areas which adversely affects the aesthetics and enjoyment the residents now experience. According to the Mobile Home Rent Stabilization Ordinance, Section 9101.13., this would constitute a "service" reduction, which means the elimination or reduction of any service or park facility provided as of December, 2016. "Service" includes physical improvements or amenities.

10. Clubhouse/Activity Center: The existing clubhouse (which is considered a recreational area) has a current maximum capacity of 60 in the main building and 30 in an adjacent building (which has no plumbing for sinks and/or restrooms). The addition of 30 new homes, with potentially 40-60 new residents, will only exacerbate an already existing problem for resident gatherings. This is also subject to Section 9101.3 of the Rent Stabilization Ordinance, since the additional residents would render the clubhouse space inadequate and adversely impact current residents. By approving Sun's Negative Mitigation plan, the County would be permitting Sun to reduce services thereby excusing the protections of seniors living in the Ocean West Senior Park granted by the Mobile Home Rent Stabilization Ordinance.

11. Overflow Parking and Narrow Streets: The existing overflow parking is currently insufficient; it cannot accommodate the additional overflow generated by the addition of 30 new homes that will have no on-street homesite parking available for day/overnight guests nor caregivers who are a constant presence in our senior park. The streets in the expansion areas are 24' wide, while the existing portion of the park has 32' wide streets (including the gutters) with 29' of pavement. This creates the potential for limiting or blocking movement of emergency vehicles within the proposed expansion areas due to the substantially narrow streets, as proposed. Compounding the lack of overflow parking is Sun's separate plan to install a sizeable carport with solar panels at the east end of the existing overflow parking area.

12. Fencing and Density of Lots: The proposed fencing to be added in the expansion areas will not be consistent with the fencing along the perimeter of the existing park. This will add to the negative appearance issues already discussed regarding overly dense sites. Density in the proposed expansion is not acceptable. The 4 home-site expansion should be reduced to 3 home sites to preserve the common area on the northeast border of the existing homes and the 26 home-site expansion should be reduced in density to best align with the current aesthetics of the park. The two newest homes installed by Sun Communities in 2019 sit on lots that are 7000-8000 square feet

allowing for double-wide homes with garages, unlike the 30 proposed expansion lots which are only about 4000 square feet each.

Summary: In conclusion, we have two distinct areas of concern; the first being problems within Ocean West Park as it exists today:

- Old electrical and plumbing infrastructure
- Drainage problems and areas subject to flooding
- Dangerous entry/exit at Murray Road
- Emergency vehicular exit onto McKinleyville Ave remains locked
- Steps rather than a low gradient pathway for emergency pedestrian exits in a senior park
- Loss of Community Clubhouse space to conversion for park manager's office
- Insufficient parking for guests, health care workers and maintenance crews

Our second area of concern is problems related to the proposed park expansion:

- Density of new housing; narrow roads not allowing sufficient parking for guests, caregivers, maintenance crews, and emergency vehicles
- Insufficient guest overflow parking and open/recreational space as needed to meet requirements
- Retention of trees and hedges, as is
- Perimeter fencing made of concrete and/or wood, not vinyl, for east side expansion area
- Lack of sound wall along entire length of west side of park
- Need for separate water, sewer, and electrical connections
- No new units in the east side expansion area, rather use as open/recreational space, dog park, etc.
- Extension of existing road and bridge for access to west side expansion area may be less impactful to Widow White Creek in the long run versus the proposed road along the creek

Respectfully,

Antonia Dobrec
OWHA, President

Margene DeSmet
OWHA, Vice-President

Ralph Cannon
OWHA, Board Member

Attachment - A

Windspeed Recordings @ Space #66, Ocean West Park

Environment/Setting: The windspeed readings are from a rooftop weather station (Davis Instruments Vantage Vue Model #6357, running Weatherlink software on the resident's personal computer) installed new in 2016 and located approximately 65 feet due east of the north/south Leylandii Cypress tree line (aka, windbreak) and is positioned about 15 feet off the ground. The windbreak is estimated to be approximately 75 feet tall.

Windspeed Recordings: Daily windspeeds (MPH) are tracked by the system, with the day of each month having the highest reading being logged. In the following table only those months with windspeeds of 20 MPH or more are shown for simplicity.

	2016	2017	2018	2019	2020
1	Jan - 29 MPH	Jan - 31 MPH	Jan - 22 MPH	Jan - 40 MPH	Jan - 33 MPH
2	Feb - 27 MPH	Feb - 34 MPH	Mar - 26 MPH	Feb - 28 MPH	Feb - 25 MPH
3	Mar - 30 MPH	Mar - 28 MPH	Apr - 30 MPH	Mar - 30 MPH	Mar - 25 MPH
4	Apr - 29 MPH	Apr - 30 MPH	May - 25 MPH	Apr - 26 MPH	
5	Oct - 27 MPH	May - 29 MPH	Jun - 20 MPH	May - 32 MPH	
6	Nov - 29 MPH	Oct - 22 MPH	Oct - 23 MPH	Jun - 23 MPH	
7		Nov - 25 MPH	Nov - 22 MPH	Oct - 22 MPH	
8			Dec- 39 MPH	Nov - 47 MPH	
9				Dec - 30 MPH	

Observation at this Location: It is apparent that over time the number of months in a year having days that exceed 20 MPH is increasing, and that the highest windspeed recorded during each year is also increasing.

Conclusion: It is logical to conclude that, without the protection of the windbreak, the force of the wind at this location would be significantly greater. Removal of this natural windbreak will not only degrade the aesthetics of the homes in this area, but will also expose them to a more intense wind environment.

<OWP Expansion – Windspeed Recordings (2016-2020)> 17 March 2020

Participate in our Survey!

- 1. Review** the recreational amenity options
 - 2. Suggest** another option if you want
 - 3. Rank** your top five
 - 4. Return** this form to Midori Thompson by September 14.
- We'll evaluate the community's favorites for inclusion in upcoming improvements!



Sun Communities wants to hear from you!

What recreational activities would you like dedicated space for at Ocean West?



We are considering options like picnic & bbq space, courts for pickleball or bocce, exercise equipment, community garden beds, a dog park, benches, a fire pit, or a trail.



What are your favorites? Are there other activities you'd like to suggest?

Ocean West Mobile Home Park

Recreational Amenities Community Member Survey



SUN COMMUNITIES, INC.®

Rank your TOP 5 RECREATIONAL AMENITIES

1 = most preferred

1

2

3

4

5

Something else?
Write it in!



Ocean West Recreational Amenities Ranked Voting Results

Activity	Total Points	Ranked Votes				
		1 (5 pts)	2 (4 pts)	3 (3 pts)	4 (2 pts)	5 (1 pt)
Trail	95	9	5	6	5	2
Dog Park	68	7	4	3	2	4
Community Garden	57	4	6	2	2	3
Benches	37	1	5	1	4	1
Picnic Table	31		2	5	2	4
Fire Pit	29	2	1	2	3	3
Exercise Equip	27	2	2	2	1	1
Bocce	24	1	2	2	2	1
BBQ	16			3	3	1
Pickleball	16	1	1	1	1	2
Swimming Pool	11	2				1
Adult Playground	4		1			
Folk Dancing	2				1	
Ping Pong	1					1
Free wifi	1					1
Chess	0					



Humboldt Co. Planning and
Building Department
3015 H Street
Eureka, CA

Re: Ocean West Expansion Project.

As a resident of affordable housing, I support the expansion of Ocean West Park. After reviewing the proposed plan, I do however, have several concerns.

1. The setback from the Widow White Creek for the entrance of the expansion is less than half the required amount. The amount of construction required for the roadway will be extensive and will have a significant impact on the creek area. I also find no proposal to mitigate the stormwater runoff for the entrance road.
2. The roadway width in the new expansion is somewhat narrower than that of the most recent development within the Park. This will make parking for construction, service or health care vehicles most difficult. Residents within the Park also have a significant number of guests during the daytime.
3. The new expansion does not provide an overflow parking lot for residents if the roadways will be as narrow as proposed.
4. There is inadequate recreation space for this expansion. The requirement of 1,500 square feet per acre for this Park has not been provided for.

I believe that these issues can be resolved by relocating a current home on Sunset Lane just South of the expansion to a new location , and a reduction of density within to provide for wider streets or an overflow parking lot and recreation area.

We do need more housing, however we should not have to sacrifice comfortable living for more corporate profits.

even
Thank you,

Ordell Murphy, Ocean West Space # 104 Cell # 834-6276

Ocean West Expansion Project Conditional Use Permit comments:

This permit should be denied because of the following:

1. Sun Communities, the multi-billion dollar corporation that owns Ocean West, has not made important infrastructure improvements that will support the addition of 32 additional units. The needed improvements include:

A. New water mains and piping. There are often water shut-offs throughout the park due to leaking in the 50-year old original water system which has been breaking down for years. In one section just above the banks of Widow White Creek, there has been constant seepage for at least 11 years.

B. There is currently an electrical grid that includes unpermitted aluminum conduits in the phase one part of the park, and an ancient breaker system that has fuses that are no longer being manufactured, and transformers that PG&E has said must be replaced. There has been more than one multi-week black-outs due to these problems during the past 10 years.

2. Sun Communities holds a Special Senior Park Permit from the California Department of Housing and Community Services (HCD) but has not taken responsibility to provide even basic minimum safety requirements for the existing senior residents of the park, including:

A. handicapped accessible emergency exits; they propose to eliminate both of the existing emergency exit gates in the expansion, but even if they remained, they can only be accessed by climbing steep concrete steps which handicapped residents cannot utilize. For years these gates were also locked and no resident had a key. After years of resident requests, Sun finally placed push bars on each gate, but has steadfastly refused to replace the steps with accessible ramps, citing "costs". Current expansion plans do not include **any** emergency exits, posing a danger to the health and welfare of residents in the park, as well as first responders trying to access the park in emergencies.

B. There is only one access/egress into and out of the park onto the Murry Road lane that is also the extension of the Highway 101 Murray Rd. exiting ramp, which already causes dangerous congestion for early morning community members leaving and returning from work, as well as dangerous pedestrian problems every weekday lunch time when high school students flood both sides of the road. Increasing the park population without adding another access/egress increases hazard to the health and welfare of the entire surrounding community and first responders during an emergency.

C. Although a map exists with street names identifying each road in the park, Sun refuses to place street signs within the park to enable emergency responders, as well as visitors to navigate individual's residences.

3. Sun Communities has already demonstrated their lack of concern for State and County building requirements such as obtaining required permits when they developed two new sites in the park last year. At this time both of those sites are experiencing serious flooding to the point where a Sun Communities executive offered to return the new owner's money. Sun has failed to fully meet the requirements of an existing flooding citation from HCD, and should not be allowed to do any further construction business with the Planning Department at least until this is resolved. Technically, since Sun has failed to resolve the 60-day HCD citation (which expired in February), HCD is required to revoke Sun's license to operate the park until they comply with the requirements of the citation. Because of this imminent risk of loss of the State license to operate, this current permitting application should be refused. It is easy to conclude that if Sun has this many problems with expanding the park by only two new units, allowing 32 **more** new units is tantamount to malfeasance.

4. According to FEMA's Flood Hazard map, Ocean West has been identified as being in the Special Flood Hazard Area in the event of severe damage to Ruth Lake dam during an earthquake event. Adding more units to the park is a violation of Ordinance 2560 for the protection of human life and health.

5. Sun proposes to remove a large copse of trees that provide important habitat to area birds and other wildlife, a wind break for adjacent homes in the park, and a root system that binds and stabilizes surrounding soils. This will negatively affect the safety and welfare of the wildlife habitat in the park, which includes numerous species of birds and raptors as well as foxes, raccoons and other species living in the park and surrounding areas, all of which are necessary to preserve the ecology of the creek watershed both inside and immediately outside of the mobile home park.

6. Sun proposes to build a bridge over Widow White Creek, as well as an access road in a very narrow space along side it where there is currently important natural habitat for a number of wildlife species, and eliminating green belt recreational space for park residents. Although they claim that this construction surrounding the creek will cause no negative effects, it is easy to see that building their proposed retaining wall along-side the creek to protect a road that will potentially handle hundreds of vehicle trips per day will definitely cause increased air and noise pollution to the surrounding homes and wildlife, both during and after construction. This negatively affects the welfare of all park residents, as well as that of wildlife living in the habitat of the creek in the park.

7. Sun's proposal includes too many homes in one small area. It's plans illustrate urban rather than suburban or rural residential housing density and is inappropriate for the unincorporated area of the County. And although this housing is being touted as "affordable senior housing", Sun will not comment on the actual lot fees new residents will be charged. What is known is that in the two new homes Sun installed last year, the sale price of each was over \$200,000. and the lot rent is \$750. per month, which is in excess of \$10,000. more per year than the average lot rents being charged in the other areas of the park, and significantly above the average rents being charged in mobile home parks throughout the County. Additionally it should be understood that these homes will not be subject to Humboldt County's rent stabilization ordinance (Measure V) because the state exempts all park housing installed after 1993 from local government rent control ordinances, which means that Sun can increase the rents up to four times per year, as much as they want, with no limit. So even if the initial sale rents are relatively reasonable, those will be raised significantly when using the Sun rent increase model at its other non rent-controlled parks throughout the United States.

8. Sun plans on removing a significant amount of the current common areas in the park to accommodate the increased density and this represents a reduction in County required recreation space to existing residents. Sun's only mitigation plan for this reduction is to place a bench in one of the areas that is not being reduced, and to place sound reduction walls in the new development along highway 101. This reduction violates County recreational space ordinances and negatively affects the health and welfare of all seniors living in the park. They must be willing to reduce their density to preserve all of the existing common areas, and provide the required amount of recreational space in the new areas of development, as well as sound reduction walls in **all** areas of the park bordering highway 101.

Submitted by:

Hilary Mosher, Area Manager, Golden State Manufactured Home Owner's League (GSMOL)

Chair, Humboldt Mobilehome Owner's Coalition (HMOC)

Resident, Ocean West, #33

Ocean West Expansion Project Conditional Use Permit comments:

This permit should be denied because of the following:

I fully agree with **all points** raised by Hilary Mosher {Resident, Ocean West (#33)}.

Infrastructure updates for the **50 year old** water system, and an outdated electrical system are urgently needed now, **any additional units** to Ocean West will only increase water leakage, and black-outs we are experiencing.

Emergency Exit problem is mentioned by Hilary in detail and the missing emergency exits for the **handicapped** residents among us.

I like to add that Sun has not been trimming the trees in the back of the park, since they took over Ocean West at the end of September 2017. This negligence affects the health and welfare of all seniors living in the park.

Sun is unable to keep the park in a hazard free and healthy and safe condition for us seniors now.

A permit for any additional Units should be denied.

Submitted by:

Gertrud Ajinah

Resident of Ocean West # 112

Humboldt Planning Department
Public Meeting Notes

Problem: Public Comment period began on February 18 and ends on March 18. Documents not received by community until the week of March 2, 2020.

Note: We are not against the expansion of Ocean West Park; the area is in serious need of additional affordable housing, especially for seniors.

Concerns:

1. With regard to Widow White Creek, what is the mitigation plan, if any, for the proposed road going into the northwest development which will severely impact wetlands, setbacks, storm water runoff, road runoff (oil, gas, asphalt fines, dirt), and spawning fish?

2. With the maintenance of Widow White Creek currently being inadequate, what assurance is there that the additional maintenance requirements due to expansion will be adequately addressed?

3. With regard to the removal of several mature trees, what is the mitigation plan, if any, to address the significant increase of noise levels and wind levels that will adversely affect existing home sites and existing wildlife habitat, as well

as address the loss of significant carbon sequestration. (refer to Elaine's research)

4. Existing park ingress and egress are already issues; that is, there is only one way in, and one way out. If the existing bridge becomes unusable, there's no way out for vehicular traffic. These existing park ingress and egress issues will be compounded by the proposed expansion. What is the mitigation plan, if any, to address this?

4.a The siting of the proposed access road places it within an existing flood zone, thereby compromising the ingress/egress for northwest expansion area. What is the mitigation plan, if any, to address this?

5. Concerning the existing park infrastructure (i.e., water, electricity, gas), the existing electrical design with "Daisy Chain" transformer hookups are unacceptable; when one goes out, all are affected. The park water supply is equally vulnerable. On several occasions the entire park has been without water due to failure in one part of the system. The existing park infrastructure (i.e., water, electricity, gas), would be overwhelmed by additional homes. What is the mitigation plan, if any, to address this?

6. Existing stormwater drainage issues within the park have not been sufficiently mitigated. The proposed northwest 26-home site and the northeast 4-home site are each at a higher elevation than the neighboring areas of the park which

could be severely impacted, including Widow White Creek. What is the mitigation plan, if any, to address this cumulative effect?

("cumulatively considerable" is the term used in the Negative Mitigation report as related to the incremental effects of past projects, current projects and future projects.)

7. Existing secondary egress onto McKinleyville Avenue is not accessible: locked gate, no key or code available to residents. This issue will be compounded by the proposed expansion. What is the mitigation plan, if any, to address this?

8. Existing onsite recreational areas are not sufficient to accommodate the addition of 30 new homes. Creekside area on the southeast side of Widow White creek remains swampy due to existing stormwater drainage from a large culvert extending north-south into the designated "recreational" area. The addition of a trail through this area with 1 bench and 1 picnic table will be insufficient and virtually unusable (Ocean West is a senior park, not a family park). Currently there is approximately 17,000 sq ft of designated or recreation area. The inclusion of the creekside "wild" common areas to calculate usable recreation area is disingenuous at best and not mitigated by a bench and a picnic table. What is the mitigation plan, if any, to address this?

9. Existing clubhouse (which is considered a recreational area) has a current maximum capacity of 60 in the main building and 30 in an adjacent building (which has no plumbing

for sinks or bathrooms). The addition of 30 new homes, potentially 40-60 new residents, will strain an already existing problem for resident gatherings. What is the mitigation plan, if any, to address this?

10. Existing overflow parking is currently insufficient; it cannot accommodate the addition of 30 new homes that will have no on-street homesite parking available for day/overnight guests. What is the mitigation plan, if any, to address this?

12. If an emergency egress onto Murray Rd from the northwest corner of the new development is proposed, there may well be a conflict with the planned stormwater retention pond in the same area that's to mitigate the runoff from the new homesites. What is the mitigation plan, if any, to address this? (I did not take great notes about this, but it was one of the things John Ford wanted us to include as a concern if anyone else has some thoughts, please add).

Ocean West Homeowners Association
March 12, 2020

Design Issues for Proposed Ocean West Park Expansion

1. Existing common areas bordering the southeast side of the 26-home proposal and the northwest side of the 4-home proposal are eliminated in the plan as proposed. This adversely impacts 5 homes in the former instance and 4 homes on the latter instance. This is a loss of approximately 5000 sq ft of common area between the two areas, as well as 4-5 mature trees. We would consider this a reduction of services compared to the existing configuration. What is the mitigation plan, if any, to adequately address this?
2. Existing fencing for the park is a combination of wood slat with concrete pillars and cinderblock fencing. The proposed additional fencing is vinyl, which we consider to be a downgrade to the existing mature park setting, as well as not being as secure as either wood or cinderblock. What is the mitigation plan, if any, to adequately address this?
3. It appears none of the additional 30 home sites include garages, only carports, which is a definite downgrade from the existing beauty of the park. Carports force people to store things outside their homes, and within sight of the street; whereas garages offer closed storage and enhanced security. The majority of the homes in the park presently have garages, which was a planned effort to upgrade the look as well as the

marketability of the park and homes. What is the mitigation plan, if any, to adequately address this?

4. The streets shown in the map of the two proposed expansion areas appear to be too narrow to allow on-street parking which would impede emergency vehicles should someone inadvertently park on the street. Additionally, the existing single overflow parking lot is inadequate and cannot provide sufficient guest parking close enough to the new homes (up to two blocks) for visitors to comfortably walk to/from the lot. What is the mitigation plan, if any, to adequately address this?

5. A sound barrier is proposed for the new northwest 26-home site, but not for the existing homes along the Highway 101 and the start of the offramp onto Murray Rd. Why is not sound mitigation being considered for all homes down to the existing Maintenance Shed/RV Storage Lot (i.e., along Highway 101)? Current noise pollution along that part of the park is unacceptable for those residents.

6. The proposed installation of two benches and a picnic table is insufficient mediation for the planned resident count increase and does not meet the requirements of the increased acreage for mandated recreational areas. What is the mitigation plan, if any, to adequately address this?

Ocean West Homeowners Association
March 12, 2020

Shortridge, Tricia

From: elaine allison <allelaine@hotmail.com>
Sent: Friday, March 13, 2020 11:30 AM
To: Shortridge, Tricia
Subject: Ocean West

Dear Tricia,

After last night's meeting, I find that there are a few more thoughts that I would like to share:

There are a number of mobile home parks in Humboldt County. Ocean West charges more to live here than other parks, but we, the residents, are willing to pay this higher price because of the beauty of the park. It may well be the loveliest park in California, perhaps in the U.S. But Sun Communities seems to have no interest in this feature of the park. We used to have three gardeners working 5 days a week. They planted flowers everywhere. But now both gardeners and flowers are gone, except for some perennials which continue to bloom. The greenbelts are mowed, a continuing expense - is that why Sun wants to destroy them as well? The Christmas lights, which attracted admirers from all over the county, have been abandoned. Large shrubs behind homes which are adjacent to the freeway and/or Murray Avenue, have been ripped out with no notice to the residents, leaving them exposed to traffic noise and loss of privacy. They needed no maintenance, so why on earth were they removed? Other plants next to our fence were replaced with extremely ugly orange straw, until protests put a stop to this idea.

And now we have the proposed removal of our huge cypress trees, which has been met with almost universal protest by park residents. One resident reports being willing to chain herself to a threatened tree! Many reasons were given last night for not cutting the trees, but little (perhaps no - I could not hear everything said) mention was made of the loss of the carbon sequestration which would be caused by removing these trees. The Sun representative said that other trees would be planted, but every resident of the park would be dead long before new trees reached the current size of the cypresses. Climate change is real and may destroy human life on earth. We need to fight it in every way possible, and cutting down these trees is exactly what we should not do.

And now I learn that this is only part of their heedless plan, and that they intend not only to cut the trees, but remove the fence, the planting area, and the greenbelt. This would take away the beauty of my lot, the reason I bought this lot. I am a botanist, a 40-year member of the California Native Plant Society, a Hammond Trail volunteer. I have been trying to make this lot as beautiful as possible. I knew that the empty acres could be sold, but never in my worst nightmares did I imagine that Sun would decide to put a house in the middle of what is now greenbelt. I have spent hundreds of dollars on landscaping and planting bulbs, ground cover, and flowers next to the fence, and just put in a brick edging to increase its beauty. I maintain this area and keep it weed free. I spend hours looking out and admiring the view and watching the birds that live and nest in the cypresses. I love this yard so much and would be devastated to have it taken away from me. My property value would also be seriously affected. So, too, would be Sun's property value. If Ocean West is to lose the charm that attracts new residents and retains current residents, the value of their investment will plummet. This is a case of killing the goose which lays the golden eggs.

Sun Communities does not seem to realize the harm that they are doing to themselves and to their residents. Can the Planning Commission step in to restrain their greed, and keep our community as lovely as it was before they took over?

Best regards,

Elaine Allison lot 128



Virus-free. www.avast.com

To the Humboldt County Planning Department

Re: Sun Industries Ocean West Expansion

I have many concerns regarding the proposed expansion of Ocean West Mobile Home Park.

I will try to keep my comments brief without much elaboration. This does not mean I am not passionate about these concerns.

- Great concern over additional traffic and only one entrance and exit for the entire community.
- Very distressed over planned removal of existing Cypress trees leaving homes susceptible to additional freeway noise and coastal winds.
- Lack of additional overflow parking.
- High density of new mobile home sites.
- Narrow streets for new mobile home sites.
- No Parking on streets of new addition. Does not take into account needs of elderly regarding potential caregivers needs, service companies.
- Lack of recreational space requirements being met.
- Impact to wildlife that have naturalized to the existing green spaces.
- Is Sun Industries required to inform new or recent buyers in the current park, of the proposed changes that will occur? In particular, the owners of the large grey home, called the Swanlund House, were they informed that a road would be built right next to their deck?
- I have concern that the current clubhouse is not large enough to accommodate many more residents. How will that be mitigated?
- Damage to the creek, last but certainly not least.

It is my suggestion that Sun Industries redesigns their expansion with fewer house sites, offer double or single wide as with the existing park. This would be in keeping with the lovely community we already have.

Thank you for your time.

Barbara Rincon 1090 Murray Rd. Space 88 McKinleyville Ca.

March 12, 2020

To Humboldt County Supervisors and Planning Commission.

Re: Expansion plan for Ocean West by Sun Communities

First of all, please let me emphasize that I strongly support an increase in affordable housing in Northern Humboldt County, especially for Seniors! This is sorely needed...

However, we must briefly list our concerns about the negative environmental impacts of this expansion as it is currently proposed.

There are two primary environmental impacts from our perspective:

Widow White Creek –

We have significant concerns about further damage to and degradation of the riparian area and waterway surrounding Widow White Creek due to the proposed construction of an egress road to the western development, with woefully inadequate mitigation as proposed.

In a very short distance downstream, along the Hammond Trail off of Murray Rd, Widow White Creek has signs describing its role in salmon habitat, and ongoing efforts to restore and maintain

Does Ocean West (as Sun Communities) wish to have a reputation for environmental destruction on the California Coast, or instead one of environmental stewardship?

We, as residents of Ocean West, much prefer the latter reputation.

Destruction of current green belt Cypress Trees at edges of proposed western expansion –

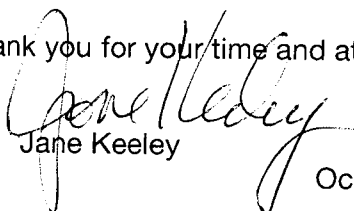
Proposed expansion map indicates the destruction of an extensive row of healthy strong Cypress trees which are an essential "natural" windbreak thoughtfully planted some years ago to provide a much needed windbreak from Northern and Western winds for the entire Ocean West park... and beyond. Undamaged by this autumn's severe wind storm, they are essential as climate changes occur and more violent windstorms occur across Northern California.

This tree belt is also significant habitat and nesting area for many many California and migratory birds, at a time when bird habitat is shrinking in Northern Humboldt, as needed housing development occurs. *REMOVING ONLY 3 HOUSES FROM CURRENT PLAN FOR 26 HOUSES IN THIS WESTERN EXPANSION AREA WOULD ALLOW THESE IMPORTANT TREES TO REMAIN.*

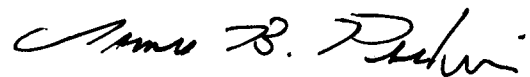
Again... Does Ocean West, as Sun Communities, wish to be known as environmental stewards or environmental degradators of the sensitive ecology of the North Coast of California?

We respectfully ask Humboldt Planning Department, Humboldt Board of Supervisors, California Fish and Wildlife, as well as Sun Communities, to look closely at how this Plan may be modified to decrease its environmental impact, hopefully improve the environment of our section of Widow White Creek, save our windbreak and bird habitat of Cypress trees... and still provide some affordable senior housing in our community.

Thank you for your time and attention!


Jane Keeley

Ocean West Residents #129



James Perkins



Coho
(Oncorhynchus kisutch)

Salmonids in Widow White Creek - Just Passing Through?

Where Highways and Waterways Cross

Behind you, four lanes of Highway 101 cross over Widow White Creek. A culvert and a series of jump pools just below you (pictured right) were constructed to maintain the creek corridor and enable fish passage.

Fish Habitat is Watershed-Wide

Over the course of their life cycle, fish utilize different parts of the watershed at different times of the year. They seek overhanging banks, space between rocks, woody debris, deep pools and irregular, complex shorelines for protection against predators and floods.

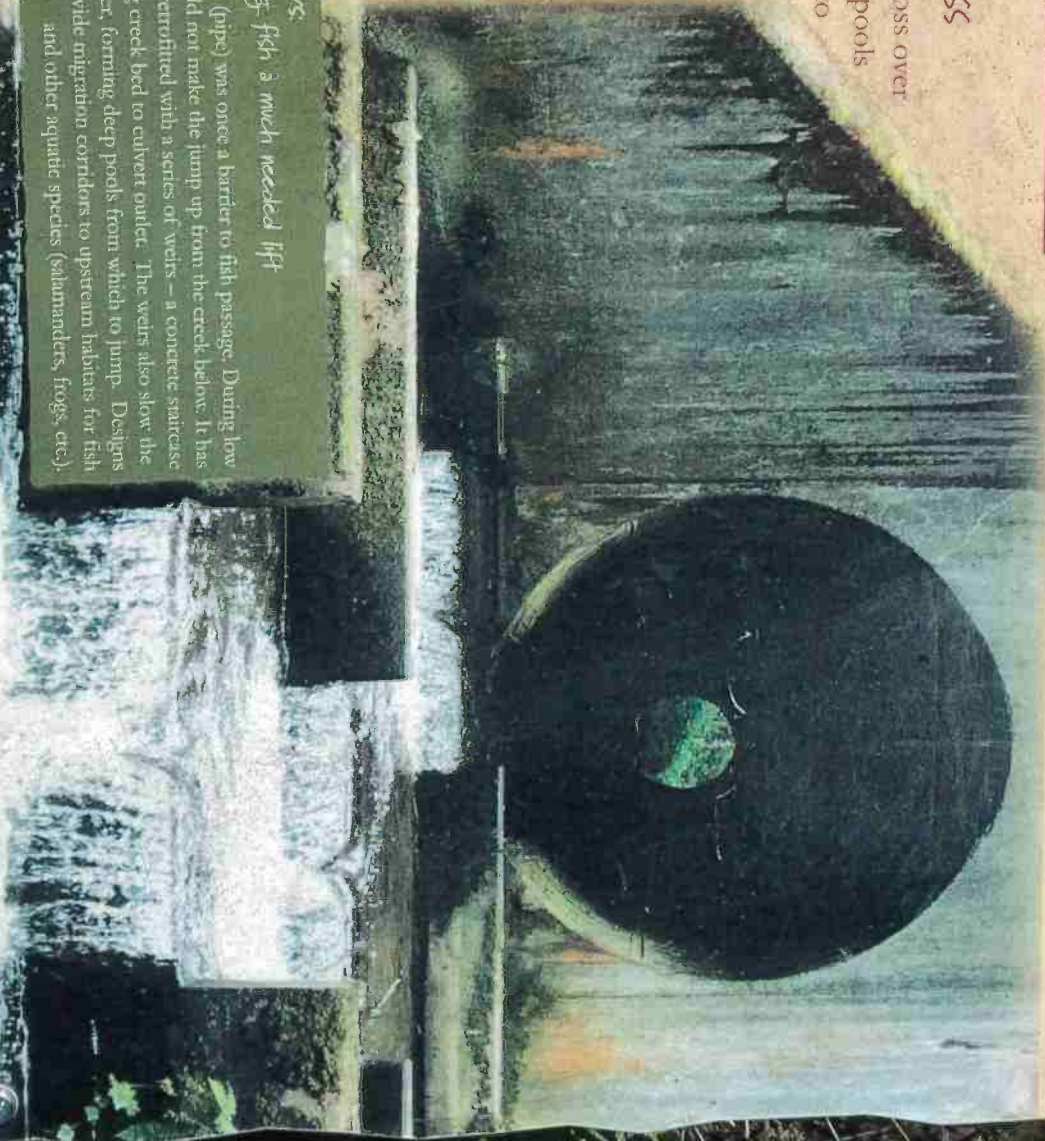
Fish passage between feeding, overwintering and spawning habitats is critical for the survival of individuals.



Cutthroat Trout
(Oncorhynchus clausenii)

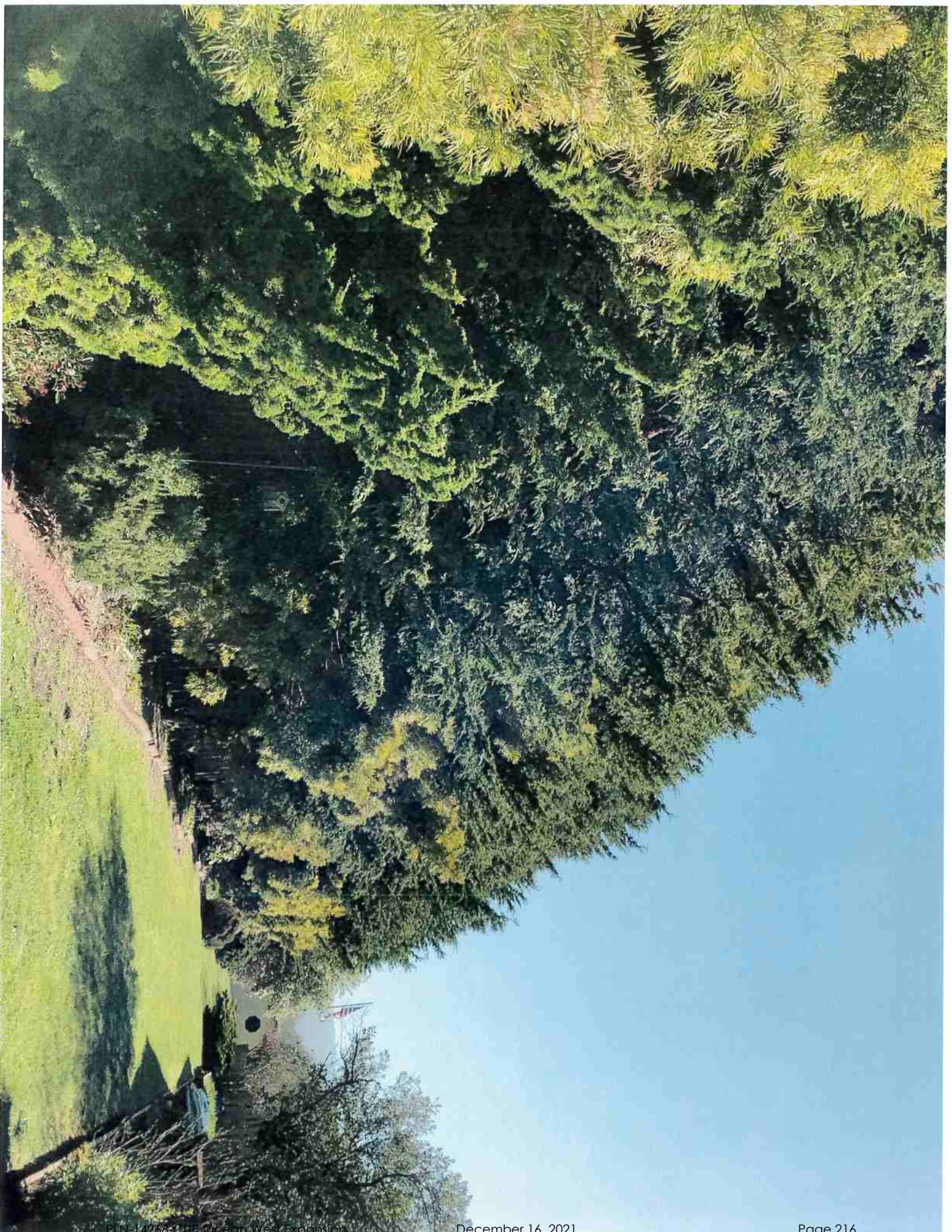


Steelhead
(Oncorhynchus mykiss)



Fish Weirs:
Enabling fish a much needed lift
This culvert (pipe) was once a barrier to fish passage. During low flows fish could not make the jump up from the creek below. It has since been retrofitted with a series of weirs - a concrete staircase connecting creek bed to culvert outlet. The weirs also slow the velocity of water, forming deep pools from which to jump. Designs like these provide migration corridors to upstream habitats for fish and other aquatic species (salamanders, frogs, etc.).

To learn more about Widow White Creek and its watershed, head north to the next trail junction and follow signs for the interpretive footpath.



ATTACHMENT 8
Public Comments Received before and after circulation period

1090 Murray Road # 128
McKinleyville, CA 95519
Feb. 8, 2020

Tom Carpenter
Divisional Vice President
Sun Communities

Dear Mr. Carpenter,

As construction time for the new units approaches, I find myself lying awake at night worrying about the trees on the other side of my fence. As you know, my neighbors and I cherish the beauty of these trees, which give us privacy and shield us from the wind and traffic noise. But in these days of climate crisis, their function as carbon sequestrators cannot be overlooked. Mature trees like these make a huge contribution to our attempts to modify the frightening effects of climate change.

I am told that perhaps you feel the need to cut them down to make room for more units. But our lots are big enough to have at least one tree! I am sure that the new residents will appreciate the trees as much as we do. Please assure us that they will remain.

Sincerely,

Elaine Allison
Elaine Allison # 128

Annis Black # 125
Sandy Black # 125
Richard Fowler 124
Jane Kelly # 129
Helen Vatcher 131
James B. Perkins 129
Jane Stevens 126
McEwen # 65
Kathy Cannon # 65
Thomas Coole # 66
Carol Lawrence # 66
Colleen Reising # 67

21 Julie Kames
Linda Hughes # 136
Julian E. Johnson # 120
Phyllis Torquemada # 121
Michael Lew # 138
Carol Lu Ruston 117
Judy Wendling # 115
Koy D 115
Shirley Peterson 116
Carl Johnson 139
Marianne Suflet 140
James & Claudia Adair 141
Kathleen G Wiers 114
Dave Wiers 114

Florence Buchert #14

Ken Balke #15

Suzanne Larson 49
Dorothy Balke 20

Stanford W. #38

Jeri Riley #40 Space

Charles J. Mulley #57

Ronda Katz #53

GARY THOMPSON #52

KAY LEBB #52

(David) #47
DAVID ANDERSON

Kay Breyfogle #46

John & Judie Jones #44

* M.E. Corey (Ellon) #42

Vaughn Lee #41

Mary Reid - Hawkins #41

Joe Van Horn 129

Dawn Anich #123

Marty + Sue Broder #119

J. Jim S #112

MARGENE & JEFFREY DESMET #24

Pat Cloyd #143

Richard Boyer #69

Clyde Hatcher #132

Stephen A. Pitts #135

Karla Meixner-Pitts #135

Jenni A. Turk #37

Carol Smulke #70

Kathy Kelcey #45

Rae Ann Murphy "104"

Jerry Atterfer #87

John Atterfer #87

Donald M. ... #104

Barbara Rincon #88

Sissa Anderson #91

Judy Prater Bennett #102

Pamela Devitt # 118
 Thomas Dent # 118
 Nancy Caminiti # 122
 Charlotte Devitt # 105
 Leonard Lund # 97
 Linda Chaffell # 96
 Carol L. Smith # 94
 Sharon Smith # 94
 Sue Ringwald # 77
 Allen Smith 12
 Judy Smith 12
 Jean Browning # 28
 Gary Vose # 26
 Isnelson 23
 Helen Hampson 25
 Carrie Adams 30
 Samuel Washell 32
 James Mack # 33
 Cindy Hurdley # 50
 Carol Mack # 61

Leonard Lund #95

~~Illegible signature~~ #83

Dorothy Ekblad #82

Marion E. Nyquist 92

Arnold E. Nyquist 92

~~Illegible signature~~ 81

Jan Lyon 80

BW Cox 85

Carolyn Jordan 79

Steven Linberg #78

Kit Jones #17

Jane L. Jones #74

Lurline Hatherill 76

Esther Holmes #134

Gay Sobelki #107

Gy Sobelki #107

Antonia Jones #133

Mr. Ford,

The residents of Ocean West Park have been told that Sun Communities has received approval to start the expansion project, the Board of the Ocean West Homeowners' Association (OWHA) has a few questions regarding what we think are still outstanding, unresolved issues. We would like you to share with us as much information as possible regarding the following areas of concern:

1. Recreational Space - From the beginning of this proposed expansion, adequate recreation space became an issue for the existing park due to the addition of 29 new homes in the two expansion lots. As has been documented, the existing park, along with the expansion lots, fell far short of the required 1500 sq ft per acre requirement. Will you please provide us with the latest plan by Sun to remedy this shortfall?

2. Parking - We were recently informed that the existing guest/resident parking lot will be paved and striped for parking, but will not allow residents to park their second vehicles there (which residents have been doing for many years). After Sun purchased Ocean West Park, there was an aggressive enforcement of a "no on-street parking" rule based on what we were told was an emergency vehicle access requirement. A park schematic dated July 18, 2020 drawn by Omsberg & Preston-Surveyors, Planners & Engineers, details on-street parking on all of the streets within the park. Our on-site manager was not aware of this document. Will you please advise of your knowledge of the status of this issue?

3. Trees - The OWHA has been told that the trees bordering the south and east edges of the larger expansion lot were not going to be removed. Most of the trees in that area have been tagged with green tape, however our on-site manager does not know if that signifies removal or saving. Will you please let us know what the current plan is

for those trees. Additionally, we ask that you advise us of the status of the trees bordering the existing park boundaries of the smaller expansion lot.

4. As you are aware, a fence was constructed along the border of the park along Highway 101. It was not and is not a sound wall. Some of the fence boards were removed from the newly constructed fence along the large expansion lot (adjacent to the off-ramp to Murray Rd.) and added to the newly constructed fence along the maintenance area and behind the two newer homes (#118 & 122) of the existing park only, not the remainder of the older/existing homes along the highway border. We have been told by Sun Communities that the sound levels are now within the parameters set for the two newer homes and the older/existing homes even though the double fence was not continued the entire length of the existing park. We would like to know what the sound studies showed for that entire border and if the level of noise meets the specs of less than 45 dB within habitable rooms and less than 60 dB outside the homes.

Thank you for your attention to this request.

Margene DeSmet, President
Ocean West Homeowners' Association

Received via email 07.07.2021

Shortridge, Tricia

From: Margene DeSmet <desmetmj@gmail.com>
Sent: Wednesday, May 27, 2020 3:44 PM
To: Shortridge, Tricia
Subject: Re-send of Sun expansion notes

This is what I sent on May 18:

Good morning, Tricia,

Thanks so much for your responses to my questions.

With respect to your questions, here are my comments:

1. Jim Hoekstra attended a meeting with the Executive Committee of the OWA on February 13, 2020, along with Tom Carpenter, Dennis Dollar, and Jody Fregoso-Banuelos. Towards the end of our meeting (which covered numerous issues the community had with Sun, including Tom Devitt's problems) Sun brought out their site plan for the expansion. We could immediately see numerous issues with their plan and actually mentioned that their preferred road into the larger parcel (4 feet from an existing home, next to the creek) raised concerns with regard to Widow White Creek. I'm positive I even expressed an opinion that a continuation of the existing first street on the right as you enter the park would be much preferable to their proposal. We did not know at that point that their engineering report recommended the Widow White Creek access. We were not given that engineering report until shortly before the public meeting we had with you all at the high school. I also brought up the loss of common space behind lots 24, 25, 26, 27, the drainage issues between DG, the .5 acre parcel, and the inadequate fencing. That was when Hoekstra said (addressing his comments to the Sun people as well as me) that they would look into moving the two proposed homes closest to our common area further away to preserve the green space. When I brought up the loss of privacy between DG and OW, he said that the fencing would be addressed (not being specific). Just as an aside, early in the proposed DG building process (which we found out about 1 month after moving in) I had a conversation with Steve Warner (?) from Humboldt Building/Permitting (not sure what his title is or was) regarding noise abatement, privacy, light pollution, traffic, etc., he told me that DG had talked with Sun about sharing in the cost of a wall between the properties to address noise and privacy and Sun was not interested. Since DG had what was called a Ministerial Permit, there were no conditions regarding noise, light, privacy, etc. So much for the well-being and contentment of residents!

2. The drainage issues are exacerbated by the fact that DG brought in fill to their lot, raising the elevation at least 3 feet compared to OW existing homes and the .5 acre empty lot. You can see how much higher their building pad is by looking at the rear of DG bordering the smaller lot most apparently. The drainage has always been bad in these areas due to the fact that DG's and the .5 acre lots are at a higher elevation anyway. I will send pics, but it is best seen in person. The drainage was especially bad last winter due to the sprinklers being left on all winter (on-site manager did not know how to turn them off) adding to the rainfall. Our side yard is a marshy mess and water seeps into the area under our sun room on the north side of our home, which we would not have known about had we not had to re-insulate under our home and the vendor alerted us to the problem. Since there is a well-established lawn on the common areas surrounding our home, we don't see the pooling Tom sees as much as just soaked ground which leeches under our home.

I hope this clarifies some of my concerns. Thanks for your assistance.

Margene DeSmet

From: [Bob Earl](#)
To: [Jacobson, Rebecca](#)
Subject: Ocean West Expansion
Date: Thursday, September 09, 2021 1:23:08 PM

To Rebecca Jacobson,

Hi,

I am a resident of Ocean West and am very concerned about the plans for the park.

This is just another example by Sun to ignore their responsibilities while trying to expand their profits.

1st: I live in space #83 which backs up to the creek. It is about 10 feet from my house. This lot has a premium on the rent because of the privacy/location. The plans include them putting in a walking path between my home and the creek. This will drastically effect my privacy and my Home value just so they can expand the park for their own profit. I plan to sue if this goes through as I will want compensation for the reduction of my homes value.

2nd: The plans also include a road to go next to #64 as they say it would cost to much for them to extend the street between #60 and 63 which makes the most sense. Once again they are trying to expand their own profits at the expense of us, especially the owner of #64. If I was him I would file against Sun also as the road will be just a few feet from his deck.

3rd: the "sound Wall" by the freeway they put up is a joke. I don't care who studied it "or who was paid off" if you go over there and stand by the "wall" it does not help the sound at all. Once again they plan to do the least to get the expansion done.

4th: The creek needs to be cleared of all unnecessary brush etc to keep it from flooding when it rains. They have ignored that.

5th: Sun has neglected the maintenance of several items saying they don't make any money from Ocean West. If so that is their fault and they should never have bought the park. I was told they bought Ocean West only because of the possibility of expansion.

I could go on but you get my position. Sun is a greedy Corp. and as it says in their SEC filings "we look to acquire properties where we can raise the rent as much as possible".

Feel free to contact me if you wish,

Robert (Bob) Earl

--

Bob Earl
1090 Murray Rd #83
Mckinleyville, CA 95519
415-203-5519 cell
[**earl19@bobearl.net**](mailto:earl19@bobearl.net)

[**www.bobearl.net**](http://www.bobearl.net)
[**www.h2oforhealth.com**](http://www.h2oforhealth.com)
[**http://planethuggers.org/**](http://planethuggers.org/)
[**https://lifewave.com/1201984**](https://lifewave.com/1201984)

<!--[endif]-->

From: [Jane Keeley](#)
To: [Jacobson, Rebecca](#)
Subject: Ocean West Expansion Project- Concerns re pervious asphalt in close proximity to Widow White Creek
Date: Monday, September 06, 2021 12:40:02 PM

I am a resident of Ocean West Community, and first off want to thank you very much for the opportunity for information sharing and planning, especially via the Zoom community meeting of August 18, 2021!

My concern is protecting in perpetuity (and indeed perhaps improving) the ecology of Widow White Creek during this expansion. Please note I feel the additional affordable senior housing is sorely needed and do not oppose the expansion!

In particular, I am concerned about the very close proximity between White Widow Creek and the proposed access road, described by the Omsberg representative as “10-15 feet from the Creek at the pinch” ie closest area of pavement to the creek. I quite agree that pervious asphalt is a green BMP, but strongly question the short term and long term adequacy of this method to prevent potentially polluted storm overflow from porous asphalt access road entering the Creek.

Site selection of pervious pavements is critical to their successful functioning in decreasing polluted runoff into storm water systems. Poor site selection could increase pollution to the area.

Stormwater overflow management is critical to the proper function of this pervious system.

Extreme care during construction is required to avoid significant threat to water quality of the Creek, as well as utilization of expert experienced construction techniques to insure it is properly designed and constructed.

Long term maintenance of this pavement (ie vacuuming) is critical to its continued proper functioning.

Please see below the attached memo of April 1, 2020 from Brendan Thompson of the North Coast Regional Water Quality Board to Tricia Shortridge of Humboldt Planning Department which *certainly mirrors and substantiate my concerns. Have these concerns been properly mitigated and if so how?*

Other questions are raised by my review of other documents such as:

- Federal Highway Administration Tech Brief document FHWA-HIF-15-009 April 2015, ‘Porous Asphalt Pavements’;
- University of New Hampshire Stormwater Center-Design Specifications for Porous Asphalt Pavement and Infiltration Beds, September 2016;
- Best Management Practices Fact Sheet Porous Asphalt Dauphin County Conservation District, Pennsylvania;
- Massachusetts Pollution Management Manual, Porous Pavement, 2006.

In our area of sandy soil and blowing sand in the air, can this pervious asphalt be cleaned rapidly enough and adequately to prevent clogging even without storm water run over?

As well, these sources cite a minimum 100 foot distance of pervious asphalt from both wells and surface water, how is this mitigated in current plans, or can it be mitigated, particularly in a greater than 100 year flood situation? Can the Stormwater “perk” down fast and far enough to prevent flow into White Widow Creek?

These documents also note that base soil should be “undisturbed” and “2-4 feet above groundwater”, with Omsberg representative stating that the access road would be “built up” to level out the construction area raises concerns about adequate level above groundwater and high potential for pollution during the construction process.

Even extensive measures to maintain the pavement ie quarterly mechanical sweeping to avoid asphalt pore clogging may be inadequate due to the amount of very fine blowing sand here at the coastal beach area... the same fine sand that we all find inside our homes here in Ocean West.

I am concerned about who oversees that this maintenance process is completed by the Owners in the long term ie over the 20 year life expectancy of the pervious asphalt?

I also note water percolation testing was done after a winter of drought, so did this really measure risks adequately?

I am not an engineer nor a planner so I claim no expertise, just concerns about the potentially significant environmental impact on White Widow Creek both during and after construction of this access road.

Certainly this system of pervious asphalt has been proven to be a great environmentally better BMP for specific situations, however I do question its use in such close proximity to an environmentally sensitive waterway.

Last month, my husband and I observed a Great Blue Heron, standing & fishing right in Widow White Creek, 15 ft from the proposed access road. Please help save this environmentally sensitive area for the generations to come.

Thank you so much for soliciting our input... it is much appreciated.

Jane Keeley
Ocean West Resident
Space #129

<https://files.ceqanet.opr.ca.gov/259148-2/attachment/WpO-0ZT7mhPBmKd5tQcaIQTbyrJa7qG6ZyFYtEEAJb5RzkSJLpo4z9P4UEWnoMgVXD5MTCLsGvyBGly0>

From: [Jane Keeley](#)
To: [Jacobson, Rebecca](#)
Subject: A brief addendum to my previous email re Ocean West Expansion.
Date: Monday, September 06, 2021 1:11:37 PM

Rebecca

I meant to ask — regarding the placement of the access road of pervious asphalt being much less distant from White Widow Creek than indicated in my review of the documents I listed in my previous email....

Does this merit an Environmental Impact Report?

I don't want to delay things at all, just want to protect (or even improve!) the Creek as much as we can...

Thanks again!

Jane Keeley
Ocean West
Space #129

Ocean West Non-leaseholder (OWN) Residents
1090 Murray Rd. #33
McKinleyville, CA 95519

Ocean West Ownership
1090 Murray Rd.
Clubhouse Office
McKinleyville, CA
95519

To whom it may concern,

Pursuant to Humboldt County, California's Mobile Home Rent Stabilization Ordinance No. 2569, Chapter 9101, we the undersigned hereby notify you of our intent to take action on regulation 9101-13 "Rent Reductions for Service Reductions". This is our notification to you that we are seeking rent reductions for the following reduction in services if these services are not returned as soon as possible. Please note-- all estimates are based upon local pricing for cost to repair/replace/maintain (supplies, materials, labor), times the amount of years these services have been removed or deferred:

1. Removal of Clubhouse game room (231 sq. Feet) for use as the park management office, including associated amenities of clubhouse bathroom (70 sq. feet) as needed, and parking spaces. This is a violation of County regulations requiring increased, not decreased, recreational space. Estimated fair market value for comparable office space in McKinleyville: \$600. per month for a total of 3 years \$21,600.
2. Accurately numbered street signs. Accurate signs were removed in 2018 by Sun and replaced with signs that are misnumbered, causing much confusion for visitors and emergency services, presenting a significant hazard. Value estimate: \$1,000. (x 2 yrs)
3. Failure to repair broken light posts located on either side of the pedestrian bridge leading to the foot path by the creek, creating a hazard to walkers at night. Valued at \$400. (x 2 yrs)
4. Removal of attractive flower beds planted in the island in front of the clubhouse, replaced with river stones, despite the fact that park rules prohibit stones in landscaping. Value estimation: \$200. for replacement vegetation and \$35./per month for maintenance (watering,weeding and feeding) x 2 yrs.
5. Failure to maintain landscaping in multiple areas in the park including: watering/weeding common area grass, maintenance of Eucalyptus trees on west side, and giant pine on SE fence, weed growth over bench seating, and the common area behind #22 and 23 which is covered in weeds and dangerous over-hanging palm fronds. All of the vegetation and trees on the wooden fence all the way around the park need to be weeded/trimmed way back to prevent danger. Value estimate: \$5,000. x 4 yrs.
6. Failure to maintain pedestrian bridges; the one leading to the parking lot has been shut down for years due to the need for stability repairs, the other is in sad disrepair. Value estimate: \$1,000. x 3 yrs

7. Failure to control vermin such as gophers, skunks, rats, and moles, leading to common areas over-run with numerous holes causing tripping hazards and devaluing the surrounding properties. Value estimate: \$500. x 5 yrs.
8. Failure to maintain multiple utility meters in compliance with the state requirements of replacement every ten years. Value estimate: \$500. x 4years
9. All park fencing is in serious need of repair or replacement. It is rotting and falling apart in multiple areas. Value estimate: \$15,000. x 3 years
10. The entire sprinkler system is in need of rapair/maintenance. It is leaking, lacking adequate pressure, and cannot be turned on automatically in several large areas, causing lawn death. Value estimate: \$2,000. x 3 yrs.
11. The rest area enclosure next to the creek is rotting and the table and chairs are rusted and badly in need of sanding and repainting, if not replacement. Value estimate: \$700. x 3 yrs.
12. There has been wrecked transformer housing on the north-east side of the park that is sitting in the common area, the roof upside down, as if blown apart by a storm. A new housing needs to be put in place and the old needs to be hauled away. Value estimate: \$1,500. x 1 yr.
13. Multiple mailbox posts are rotting and need replacement. Value estimate: \$6,500. x 4 yrs.
14. The park fountain needs to be repaired. Value estimate: \$200. x 3 yrs.
15. Failure to regularly maintain the dry grass in the empty lot behind Dollar General, causing potential fire hazards. Value estimate: \$500. per year x 5 yrs.
16. Dismissal of 3 full time maintenance workers (Craig, Elder, Dave). Estimated value: 3 minimum wage salaries-- \$45,000. each x 3 years.
17. Significant reduction of resident manager hours due to requiring them to serve as managers in a different park at the same time. Value estimate: \$20,000. x 4 years

We will be seeking a reduction in rent equal to the total value of the reduction in services, divided by the number of non-leaseholder residents in the park. Your previous responses regarding your need to “...maybe add these expenses into the next years’ budget...” or “We will repair when the expansion begins.” are unaccetable. We’ve seen Sun’s profit records (one billion for the six months ending 6/30/21).

Failure to effectively address all of these issues within 30 days will result in a service reduction complaint being submitted to the County of Humboldt in 30 days after your receipt of this notice. Please see attached regulation of Humboldt County’s Mobilehome Park Rent Stabilization Ordinance.

Sincerely,



Hilary Mosher
OWN-Residents Representative
707-845-5173

Letter to Sun Communities pursuant to Humboldt County's Mobilehome Rent Stabilization Ordinance and "Reduction in Rent For Reduction Of Services"

Ocean West Non-leaseholder resident signatures

Name	lot number	date
1. Helene Prober	33	8/4/21
2. Patricia Pughen	55	8/3/21
3. Patricia Pughen	112	8/5/21
4. Patricia Pughen	3	8/5/21
5. Patricia Pughen	4	8-5-21
6. Patricia Pughen	37	8-5-21
7. Patricia Pughen	36	8-5-21
8. Karen Baker	30	8/5/21
9. Patricia Pughen	41	8/5/21
10. Mr. Elbert Corey	42	8/5/21
11. John Jones	44	8-5-21
12. James O'Brien	141	8-5-21
13. Marianne Siefert	140	8-5-21
14. Kerygan Griffith	70	8-5-21
15. Judith Minie	92	8-5-21
16.		
17.		
18.		

9101-13 RENT REDUCTIONS FOR SERVICE REDUCTIONS

A. "Service reductions" shall mean the elimination or reduction of any service or park facility provided as of December, 2016. "Service" shall also include physical improvements or amenities.

B. A service reduction complaint shall be submitted to the County alleging in a written form and should state:

1. The affected spaces;
2. The prior level of service established by the park owner for that homeowner's mobile home space and common facilities used by that homeowner;
3. The specific changes in the prior level of services comprising the alleged reduction in service;
4. The date the service reduction was first noticed by the homeowner;
5. The date of notice to the park owner of the alleged service reduction, and if such notice was given, whether the notice was given orally or in writing;
6. When and how the park owner responded to the homeowner's notice, if notice was given;
7. Whether the condition was improved or corrected, and if so, when and how;
8. The status of the condition as of the date the complaint is signed; and
9. Where such service reduction was the result of a vote of a majority of the affected homeowners.

C. Submission of Service Reduction Complaint to Hearing Officer.

1. Thirty (30) days after the service reduction complaint is submitted to the County, if the dispute is not settled, either one-third (1/3) of the tenants in a park or the park owner may request that the dispute be submitted to a hearing officer.
2. If the hearing officer finds that a material service reduction has occurred, the hearing officer shall determine the resultant percentage reduction in the homeowners' enjoyment of their homes due to the service reduction.
3. Rent shall be reduced by that percentage or amount. The homeowners also shall be entitled to a rebate of the following sum: the monthly rent reduction multiplied by the number of months between the date the homeowners notified the park owner of the reduction in service, and the date the County determined the rent reduction.
4. A service reduction shall not include the elimination or reduction of a recreational facility or service when such elimination or reduction and rent decrease resulting therefrom have the prior written approval of two-third (2/3) of the homeowners. In

ORDINANCE NO. 2569

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such cases no rebate shall be required.

5. No recreational service or facility which has been reduced or eliminated shall be reinstated at any cost to the homeowners without prior written approval of two-third (2/3) of the homeowners.

D. In the event that a service reduction claim is filed while a fair return petition is pending, either the County, the park owner, or the tenants may require consideration of a claim pursuant to this section in conjunction with the fair return claim.

From: [Hilary Mosher](#)
To: [Ford, John](#); [Madrone, Steve](#); [Planning Clerk](#)
Subject: Ocean West Planning Commission Hearing
Date: Monday, November 01, 2021 12:19:53 PM

To whom it may concern-

Many residents of Ocean West Mobilehome Park in McKinleyville are concerned regarding the scheduling of a Planning Commission meeting on December 2, 2021 to move forward on Sun Communities' application for expansion. It is our understanding that the Planning Department issued a decision regarding this application stating that until/unless Sun Communities corrected existing permitting violations at Ocean West, they wouldn't be allowed to move forward on expansion.

At this time there are at least two areas where Sun has failed to correct violations: sound mitigation, and increase of recreational space within the common areas of the park. Through a recent public records request to the Planning Department we see that Sun had contractors conduct a sound mitigation evaluation that resulted in findings of violations, but we can find no records that demonstrate that Sun has corrected these findings and conducted a final test. If such documents exist, please disclose ASAP.

Additionally, although the County held a zoom meeting in September to allow Sun to present their contractor's corrections to the required additional recreational space, the majority of their correction consists of displacing the parking lot for the clubhouse (considered a current recreational space provision, necessary for residents to gather at the clubhouse) and replacing it with a tiny dog park, some benches and a built-in barbeque. During the presentation when contractor representatives were asked about where residents would park when using the clubhouse, the answer was "on the street". When asked whether the contractors were aware that street parking on narrow streets of mobile home parks is prohibited by state regulation they answered "No." Not having/researching an awareness of regulations in mobilehome parks is evidence that their entire plan is unacceptable. They also planned some additional walking path recreational space contingent upon expansion approval (not meeting the 'prior to' mandate), but at least some, if not most of this inventory was on sensitive habitat, and when questioned the contractor admitted they had not gotten any environmental impact evaluations on the allowability/suitability for this "recreational space" in a riparian habitat subject to Widow White Creek erosion.

At this time it seems that the Planning Department has not conducted a full evaluation to determine whether Sun Communities has corrected existing violations before allowing them to move forward. If the Department has conducted a comprehension evaluation, residents would very much appreciate a copy of the

document.

Many residents in Ocean West believe that the December 2nd Planning Commission Hearing is premature and should not be scheduled until or unless Sun Communities has proven that necessary corrections to existing violations have been completed in full, prior to any further expansion.

-Hilary Mosher, Regional Manager Zone A-1
Golden State Mobilehome Owners League
resident, Ocean West, #33

From: [Margene DeSmet](#)
To: [Jacobson, Rebecca](#)
Subject: Ocean West Expansion
Date: Monday, October 11, 2021 11:45:13 AM

Good morning Rebecca,

I wanted to document some concerns that residents of Ocean West still have concerning some aspects of the proposed Ocean West Expansion in advance of the Planning Commission public hearing. I presume that the hearing will take place in October, as discussed in the Zoom conference you held in August.

1. One of the primary concerns is the impact that the access road beside Widow White Creek will have on that waterway and the proposed surface materials that will be used as well as the proposed pedestrian walkways on either side of the creek.

I know that there have been several studies conducted that seem to say that the impact on the creek is minimal utilizing the pervious asphalt and it is within acceptable parameters, but our concerns deal with effective maintenance of this surface so that it performs as designed and who will be the monitoring agency to make sure that the surface maintenance is performed to hold to that standard to prevent run-off into the creek.

Additionally, the two proposed walkways to be installed on either side of Widow White creek are very close both to the creek and to the homes bordering the creek. Concerns about run-off towards the walkway, particularly on the north side of the creek, and towards the creek on both sides is an issue. As mentioned in the zoom meeting, the north side of the creek is consistently wet, with several large culverts draining into the area, so attention needs to be paid to those issues when constructing the pathway. The existing trail on the northeast side of the park has consistent runoff from the steep slopes behind the homes which results in muddy, mossy, and unsafe walking conditions, and we expect that the same will hold true for the new path.

2. Sound Attenuation

In the May 4, 2021, letter from Atwell, LLC to Dennis Roberts, the measured hourly noise level chart shows acceptable levels of sound for several locations along the Hwy 101 corridor. It does not appear to us that any of the times listed in this study were conducted at peak rush hours, rather in the middle of the day and late evening. I realize that the measurements are weighted and may take that into consideration, however it does not appear that rush hour noise level is sufficiently mitigated. We do not see that any sound tests were done inside any of the homes, which should be below 45 CNEL in any habitable room, which may be because it was determined that outside sound levels were low enough so as not to require that measurement, but without rush hour levels, we do not think this is sufficient.

The fence constructed along that border was originally cedar plank, with air gaps between the planks and between the bottom of the fence and the ground. Additional planks were installed along the area from the maintenance shed to sites #118 and #122, but no further. The sound mitigation effort should be extended the entire length of the existing fence and the gaps at the bottom of the fence should be fixed.

3. Parking Proposals

Much of the existing overflow/guest parking lot is proposed to be replaced with recreational areas such as community gardens, picnic areas, and dog park. Because of the requirements for the number of parking spaces per home spaces, the proposal is to allow on-street parking, which is not feasible, nor safe on many of the streets in the existing park. Mail delivery will be impacted in several of the proposed allowable on-street parking sites and emergency vehicle access and egress is problematic on cul-de-sacs (one short cul-de-sac proposes 6 on-street parking spaces, which is unacceptable).

We have expressed our concerns regarding the recreational proposals with Sun Communities in an attempt to come to a compromise regarding the existing parking lot, on-street parking, and necessary recreational space.

Please include these issues in your staff report and please let us know when the Planning Commission hearing is set. We look forward to participating.

Thank you,

Margene DeSmet
desmetmj@gmail.com

From: [Hilary Mosher](#)
To: [Jacobson, Rebecca](#); [Madrone, Steve](#); [Ford, John](#); [Tom Carpenter](#)
Subject: Ocean West expansion project
Date: Friday, August 06, 2021 1:00:10 PM
Attachments: [Service Reduction 20210806 0001.pdf](#)

Good Afternoon Rebecca-

I have just received notice of the upcoming Ocean West expansion public meeting. I am attaching a notice to Ocean West from many of its residents regarding multiple service reductions in the park that have occurred since Sun Communities took over. Please note that the residents who signed the letter represent only a sample of all the residents who are willing to sign.

Just today we have notified Sun, pursuant to Humboldt County Ordinance No. 2569, regulation 9101-13, of our intention to file with the County for reduction in rent for reduction in services if Sun continues their failure to maintain services in the park (see attached). I am sending this in regards to the public meeting because I think it's important for the County to be aware of Sun Communities' on-going and deliberate multi-year negligence in effectively maintaining the currently existing park as an important consideration before allowing any expansion.

-Hilary Mosher, Regional Manager, Zone A-1
Golden State Manufactured Home Owners League (GSMOL)
Representative of Ocean West Non-lease-holder Residents

From: [Hilary Mosher](#)
To: [Jacobson, Rebecca](#); [Madrone, Steve](#); [Ford, John](#); [Tom Carpenter](#)
Subject: Ocean West expansion project
Date: Friday, August 06, 2021 1:00:10 PM
Attachments: [Service Reduction 20210806 0001.pdf](#)

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-Hilary Mosher, Regional Manager, Zone A-1
Golden State Manufactured Home Owners League (GSMOL)
Representative of Ocean West Non-lease-holder Residents

From: [Hilary Mosher](#)
To: [Planning Clerk](#)
Subject: record # PLN-14268-CUP
Date: Wednesday, December 01, 2021 5:13:34 PM

Hello Planning Commission-

Please accept my gratitude to you for devoting the time you do to the Commission. It is greatly appreciated.

Regarding Sun Communities request for Conditional Use Permit #PLN-14268:

I currently represent dozens of residents of Ocean West Senior Park who have filed a formal complaint requesting an Administrative Hearing with the Humboldt County Planning Department against Sun Communities, under Humboldt County's Mobile Home Rent Stabilization Ordinance no. 2569, Chapter 9101, regulation 9101-13 "Reduction in Rent for Service Reductions". From the first month Sun Communities purchased Ocean West, they began multiple service reductions throughout the park. The complaint details 19 instances of service reductions such as failing to water our once lush lawns, chiseling off a significant part of our clubhouse for their office, and firing multiple maintenance workers so that there is significant deterioration of the entire park that existed when Sun bought it. We request that the Planning Commission refuse the current CUP until the hearing process is completed and Sun has addressed these outstanding issues. Of concern here is that this is a corporation uninterested in whether or not their neglect of the park will affect resident's property values nor their enjoyment of their habitat. The expansion they are envisioning will further damage existing roads and fences, and create an even more densely populated, relatively small space for so many people.

An additional concern is that the current expansion plan touts added recreational spaces but fails to mention that the plan is to locate all the recreational services in what is currently the clubhouse parking lot-- a VERY much-needed aspect of residents' ability to utilize the pared-down clubhouse for recreational purposes. The capacity for the clubhouse is 60 (used to be 90 before Sun pared it down). Under their proposed expansion plan, Sun says residents coming to a large gathering at the clubhouse can park on the streets instead of the parking lot. This is disingenuous. Firstly, street parking is prohibited by park rules because the roads are narrow and difficult for emergency responders to navigate, plus parked cars would block resident's mailboxes, prohibiting mail delivery. Lastly, if sixty people (out of a total population of more than 123) show up in their cars for an event, such as a holiday luncheon at the clubhouse, parking on the street would mean only a few cars could park within easy walking distance of the clubhouse entrance, the rest parking further and further away, making events unattendable for those of us suffering ambulatory difficulties (it *is* a senior park). It is simply not practical. There are more

than enough other areas that Sun could develop for recreational purposes without making the clubhouse (one of the very few current recreational services available) unusable because of lack of adjacent parking.

Additionally, Sun is proposing development of streets and walking paths in sensitive wetland areas, but have failed to provide an Environmental Impact study as to whether this development will have long-term negative effects such as erosion. We request that the Planning Commission not allow the expansion to move forward without an Environmental Impact study being done first.

Sincerely,

Hilary Mosher, Liaison, Ocean West Non-leaseholders

Regional Manager,
Zone A-1, Golden State Manufactured Home Owners League

resident, #33, Ocean West

Notes from question and comment portion of the **Ocean West Community Meeting** Wednesday August 18, 2021 5:30-6:40pm via Zoom. Typed from video recording of Zoom by assigned planner Rebecca Jacobson.

Mail delivery and existing parking:

Antonia Dobrec and Margene DeSmet: parking spaces within existing park will impede mail delivery- how will that be remedied? Previously, we could not park on the street and had overflow parking in the parking lot where the dog park and community garden area will be. Mail delivery will be impeded if parking will be on-street.

Erika: I did not know that parking was not allowed on street.

Antonia: Currently there is 20-25 parking spaces in the lot.

Erika: With the improvements there will be 7 spaces.

Trails SMA:

Antonia: Trails in SMA of Widow White Creek- North side of creek is currently swampy and there is a slope down to the creek, and the trail is not passable when wet. Wants to know what the setback rules are for trails within the SMA.

Cliff: There is a 100 foot setback from the edge of riparian vegetation on either side of the creek because it is a class I stream. The setback can be reduced if the specific findings are made, and the Planning Commission will be deciding that as it is part of the discretionary permit process.

Fence:

Antonia: East expansion lot, it looks like there will be a 6 foot vinyl fence on north and east side of expansion lot. There is a fence now on the west part between empty lot and existing lot. Will it remain?

Erika: the western fence will remain if residents want it to remain.

Antonia: I want it to remain, but want it repaired.

Gazebo:

Antonia: Gazebo confusion- heard different stories about it

Jessica: earlier drawings/plans had relocation of gazebo but at present, it will be removed

Antonia: it is a reduction in service.

Existing greenbelt:

Hillary Mosher: on east expansion side, it looks like green belt that wraps around the edge of the park that many residents use when tree branches are not blocking it will be removed.

Erika: The greenbelt being referred to is technically a property line setback. The greenbelt on the west side of the eastern expansion lot will not be touched. The fence line will remain. The fence on the south side will be removed to punch the road through.

Tree removal:

Hillary: which 50 trees will be taken out?

Jessica: the majority of trees that will be removed are for the road. The road alignment changed recently to better protect the stream corridor and existing redwoods. A couple extra cypress trees will be removed for trail visibility. The trail has little spurs to connect to the main trail. Many of the trees are unhealthy, non-native. The removal of the trees will enable a healthier stream system down the line because re-planting of native trees and other native vegetation including shrubs will be more of a native and healthy system than it is currently.

Emergency vehicles:

Linda Zimmerman and Linda Schafe #68: Ambulances and fire trucks come in quite regularly for people who fall or have accidents, and they need to be able to park. The proposed parking plan won't work.

Porous pavement of access road and SMA impacts:

Antonia: Road in front of #64, materials will be porous to mitigate runoff. How will the oil not go into the creek?

Erika: The road will be pervious, graded 2 feet above the flood elevation because it is in a flood zone. 18 inches-2 feet of rock underneath the pavement, so all of the oils and grease will go through the rock layer and filter it out but the water goes through.

Antonia: That doesn't seem very scientific. Was there an environmental impact study?

Erika: It is an approved method from the state water board of reducing runoff and protecting the stream. It has to get a permit from the water board.

Antonia: How far away is the road from the creek?

Erika: The closest part of the road to the creek is approx. 10-15 feet from the top of bank, and the rest of it is farther away. The curve and alignment of the road is designed to be the farthest away possible from the creek to reduce the impact to the creek.

Antonia: How is this work allowed when there is a 100 foot setback as mentioned before?

Cliff: All of this work being done in the setback is subject to a discretionary permit which the PC will consider if the impacts to the creek will be addressed, and if they haven't been addressed, then the PC won't approve the allowance of the road or work within the setback. The applicant is required to get a permit from the state water resources control board for anything that would impact water quality. Those measures would reduce that impact.

Antonia: Is the public allowed any input?

Cliff: Your input should be considered, and this is why this meeting is being held. You also can comment at the meeting and provide written comments.

Antonia: Should we give comments now?

Cliff: Start sending them now and we will send notices out when the hearing is scheduled. All comments received will be provided to the PC.

Sound mitigation and fence:

Hillary: Sound mitigation- existing new 2 units. A fence has been erected but no one has been out to test whether or not it mitigates the sound adequately. I've seen some sound mitigation fences, and this is not one I've seen. This is a wooden fence about 4 feet tall.

Cliff: An acoustical engineer did do a sound study that showed all noise was at or below 60 db which is the level required by our general plan.

Existing culvert and swampy trail:

Margene DeSmet: There is a concrete culvert from north to south that comes down on the north side of the creek from one of the cul de sacs within the park. If that's the primary source of the swamp that will be continued to be added through. How will that be changed and mitigated? The culvert pours out there into the ground. The homes on the north side of the creek all have a slope. Is there going to be a retaining wall? Because they are sliding now. Some people are losing part of their backyards already.

Jessica: The area where the trail will be is flat. The outer perimeter of the greenbelt area will not be touched, but we want to plant some buffer vegetation there. Good native landscaping can play a role in bank stabilization. The swampiness and the culvert- there are ways of building trails that have a good aggregate base that can help to prevent the trails from being swampy, like punch ins. We will look into the culvert question.

Margene: The runoff from the culvert could make the trail swampy.

Jessica: We will look into that when designing the trail.

Cypress trail proximity to homes:

Linda: The trails on the greenbelt by the fence on the north side- are you going to have any vegetation or trees between residents and the trail or will it just be the trail?

Jessica: Do you mean the existing completed loop trail or the new trail?

Linda: In between the fence and the big trees.

Jessica: The Cypress trail is what we're calling it. We have been trying to decide what to do about the fence. If we remove the fence we will have space to integrate landscaping. Our understanding is that the fence is important to the people whos homes back up against it.

Linda: Yes, the fence is important. I am wondering about the other side of the trail when going by people's backyards. Is there going to be any kind of trees planted in that area?

Jessica: The trail will be between the fence and the Cypress trees. On the other side of the Cypress trees, there will be space for bioretention basins. Within those basins, we will be able to do some planting. The required soil mix to meet the 100 year storm requirement may not allow trees from being established within those. Therefore, it will mostly be shrubs and grasses that will be planted, but they can grow up to three feet tall which can create a sense of buffer.

Linda: I am worried about people's privacy of backyards.

Jessica: We are keeping the fence up. We will put a space in the fence to create access for folks who live south of the trees.

Linda: I'm confused. Is the trail in front of the fence and in people's backyards?

Jessica: The trail is going to be in between the fence and the Cypress trees.

Erika: There is almost no development on the existing side of the fence line so for the northern expansion along the east and south fence line on the existing side where the existing houses are, there is no development or anything happening in those and similarly on the east side along the west fence line, there's no change happening on that side of the fence.

Entrance/exit:

Linda: I am not familiar with the roads because I'm new here. Where will the road come out for the new residents- on Murray Road?

Erika: No, there is an emergency access onto Murray Road for the western expansion. Given the proximity to the 101 off ramp, it is not allowed to be an everyday access. It is not allowed by Caltrans. It will be gated for emergency.

Cypress trail proximity to homes:

Antonia: When Linda was talking about the trails, it seemed like she was concerned with the proximity of the trails to the homes, particularly on the south side of the creek. It looks like it's further from the creek and closer to the homes. Right now if people walk there, if they do risking life and limb from gopher holes, they usually walk further away from people's homes because it would be intrusive. Same goes for the western expansion area. I know you said it's in between the fence and the Cypress trees, but it is very close to the existing homes.

Jessica: The trail will curve and go back and forth closer to the homes and away from the homes. Where it is closer to the homes is where there is less available space. We don't want to get too close to the bank of the creek and don't want to encourage erosion to the creek or create impacts to the creek so we are trying to find the happy medium which is why the buffer landscaping is so important. The denser the shrubbery between the trail and homes, the better that will feel for everyone. The area where the Cypress trail is, we are keeping the fence and we are doing that to minimize the impact to the residents who are there but also to give them access to this new amenity.

Antonia: On the cypress trail, it looks like it does weave in and out away and closer to homes. The one I'm concerned with is on the south side of the creek behind several home adjacent to the parking lot along that line.

Jessica: the trail behind the fence along the cypress area is very constrained because the fence inhibits any variation along the trail along the south face. Along the east side of the trail, there is a little more room for movement of the trail. We are making a judgement with how we are placing the trail. The buffer vegetation is very important to make it work.

Antonia: Can you tell us how close or far the trail will be from the homes or has it not been decided because are you trying to thread the needle between the creek and homes?

Jessica: It is a conceptual plan with room for adjustments before going into actual construction drawings. The narrowest spot is probably about 6-8 feet from the homes, but most parts are further away.

Antonia: you are talking about the south side of the creek?

Jessica: Yes.

Antonia: *talking among residents, mentions unit #125*

Antonia: We are just trying to figure out where the access from the new expansion on the west side comes into the park in two places: one of them is on its east side the other one is on its south side. It doesn't show it on the map I have where it's coming out on the south side.

Jessica: Are you referring to the trail access connection?

Antonia: Yes

Jessica: If you look at sheet L101, there is a callout for it and we are really trying to keep it very subtle so that it really is intended to be just a point of connection for people in the neighborhood to get there. There's a maintenance access through there right now.

Antonia: Right, we see the landscaping people go through there right now.

Antonia: Just to let you know, we've got 10 people here with me right now so they're participating in the meeting as well as those in their own homes