



COUNTY OF MENDOCINO

DEPARTMENT OF PLANNING AND BUILDING SERVICES

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SECOND SUPPLEMENTAL MEMORANDUM

DATE: NOVEMBER 4, 2025

TO: HONORABLE BOARD OF SUPERVISORS

FROM: LIAM CROWLEY, PLANNER II

SUBJECT: SECOND SUPPLEMENT TO MEMORANDUM REGARDING APPEAL OF COASTAL DEVELOPMENT PERMIT APPLICATION CDP_2024-0040 (CALTRANS)

Following publication of the Supplemental Memorandum, several events have occurred:

1. Caltrans has informed staff of three (3) minor revisions to the project description.
2. The appellant has submitted additional comments regarding the appeal.
3. The Gualala Municipal Advisory Council (GMAC) has notified staff of an upcoming presentation agendized for the November 6, 2025 GMAC meeting wherein the Friends of the Gualala River will present information regarding the chemical "6PPD-q" in stormwater runoff from downtown Gualala, including a Technical Memorandum dated May 24, 2025, which provides Best Management Practice (BMP) recommendations for the Gualala Streetscape Project in addressing potential impacts of 6PPD-q.

Therefore, staff is providing this Second Supplemental Memorandum to:

1. Analyze the consistency of the minor revisions to the project description with the Local Coastal Program (LCP) and existing environmental document and recommend a revised resolution which incorporates the revisions.
2. Respond to the additional comments submitted by the appellant.
3. Address the information provided by GMAC.

REVISIONS TO PROJECT DESCRIPTION: The information in this section has been categorized according to the letter and number within the previous memoranda to which it is most relevant.

(B)(1) Project Modifications: Following public notice of the appeal hearing and publishing of the associated staff memorandum, Caltrans informed staff of three (3) revisions to the project description as follows:

1. Exclusion of eight (8) foot wide strips of right-of-way on both sides of the highway. Instead, the width of right-of-way beyond the edges of sidewalks would vary from as little as five (5) feet to as much as one hundred fifteen (115) feet as shown in the attached Most Recent Cross Sections.
2. The northbound Radar Speed Feedback Sign (RSFS) would be relocated from Post Mile (PM) 0.3 to PM 0.62.
3. No Parking Signs would no longer be installed.

(B)(2) LCP Consistency of ROW Strip Exclusion: Eight (8) foot wide strips of right-of-way are mentioned in Gualala Town Plan (GTP) policy G3.6-9, but this is in reference to a streetscape design for local roads rather than the highway streetscape outlined in policy G3.6-4. There are no other references within the Coastal Element of the General Plan, Gualala Town Plan, or Coastal Zoning Code. The 2007 Gualala Community Action Plan and 2012 Refined Streetscape Design Plan do not mention the eight (8) foot strips. The 2009 Downtown Design Plan mentions eight (8) foot strips of right-of-way when discussing the provision of on-street parallel parking "pockets" in addition to bike lanes as a potential

solution to parking issues. The Design Plan notes that this option would likely require affected property owners to dedicate an additional eight (8) feet of right-of-way to accommodate the on-street parallel parking spaces. Caltrans has noted that the right-of-way through the Gualala core area is only sixty (60) feet wide. With other proposed elements of the project such as sidewalks, bike lanes, travel lanes, and two-way left-turn lanes, there is no additional space to accommodate an eight (8) foot right-of-way strip. Creating additional right-of-way would require more land acquisition at significant cost and may conflict with existing buildings in the core area. The exclusion of eight (8) foot strips of right-of-way along both sides of the highway is consistent with the Coastal Element, Gualala Town Plan, and Coastal Zoning Code (the "LCP"). There are no policies or regulations within the LCP that require this feature.

(B)(3) LCP Consistency of RSFS Relocation: Caltrans noted that the RSFS would be relocated further north due to safety concerns raised by Caltrans' maintenance division. According to Caltrans, there is not enough shoulder space for maintenance crews to pull over and safely work on the RSFS in its current location.

Relocating the RSFS is consistent with the LCP. Gualala Town Plan Policy G3.4-40 states that "all signage shall comply with the requirements established in the *"Sign Regulations" chapter of the Mendocino County Coastal Zoning Code.*" Mendocino County Code Section 20.476.035(A)(1) states that *"directional, warning or informational signs required or authorized by law which are erected by federal, state, county, municipal officials or special district officials"* are exempt from signage regulations. The RSFS is a warning sign installed by Caltrans that provides real-time speed feedback to motorists for safety purposes. As noted in the staff report dated June 26, 2025, Mendocino County Code Section 20.504.035(A)(3) states that *"security lighting and flood lighting for occasional and/or emergency use shall be permitted in all areas."* The proposed lighting is necessary for the safety of motorists. There are no Coastal Element policies relevant to the relocation of the RSFS.

(B)(4) LCP Consistency of No Parking Sign Removal: Caltrans noted that No Parking Signs were determined not to be warranted due to their redundancy in confirming existing rules of the road. Pursuant to Caltrans' Highway Design Manual Chapter 1001.3(i), California Vehicle Code Section 21211 *"prohibits anyone from stopping, parking, or loitering on a bike path if it impedes or blocks the normal movement of bicyclists."* Pursuant to the California Manual on Uniform Traffic Control Devices (MUTCD) Part 2A.01, *"signs are not typically used to confirm rules of the road."* Per MUTCD Part 2A.03, *"signs should be used only where justified by engineering judgement."* To this end, Caltrans made the following statement:

"After further discussion and analysis, the Design team determined that installing 'No Parking' signs is not warranted. The corridor no longer provides space for on-street parking due to the removal of shoulders, and posting signs every few hundred feet would create unnecessary visual clutter. In addition, there is no public parking available along the downtown corridor."

The exclusion of No Parking Signs is consistent with the LCP. There are no policies within the Coastal Element that require the installation of No Parking Signs in this area. Gualala Town Plan Policy G3.6-12 states that *"no on-street parking shall be permitted on Highway 1. County staff shall coordinate with Caltrans to develop appropriate signage."* The discussion above is evidence of Caltrans' continued coordination with County staff regarding appropriate signage. As noted above, Caltrans determined that signage was not warranted because the installation of bicycle lanes already deter on-street parking. The Coastal Zoning Code does not contain any regulations which require the installation of no parking signs in this location.

(B)(5) CEQA Review of Project Modifications: The exclusion of eight (8) foot strips of right-of-way (ROW) along each side of the highway would not result in any environmental impact because it would not create any physical change in the environment (14 CCR §15358). The removal of additional ROW would not result in any changes to other project elements such as the provision of sidewalks, crosswalks, bike lanes, etc. The exclusion of No Parking signs would not result in any environmental impact because it is the negation of a feature that is not necessary or warranted. The installation of No Parking signs would create a physical change that was previously determined not to be a significant effect, but the exclusion of this element means that no physical change would occur. The relocation of the RSFS would not result in any environmental impact because:

1. The RSFS would be located on the east side of State Route 1, and as such would not block any views of the Pacific Ocean. Therefore, no aesthetic impact would occur.
2. The new location of the RSFS would not displace any Prime, Unique, or Important Farmland, any existing agricultural use, any forest land or timberland, or conflict with any other agricultural policies or regulations.
3. Construction activities related to relocation would not result in any direct, indirect, or cumulatively significant pollutant emissions. Some particulate matter emissions may result from the removal and installation of the sign through soil disturbance, but the small size of the sign and existing implementation of Best Management Practices throughout the project would ensure that the change does not contribute significantly to emissions.
4. As shown in the Natural Environment Study, associated addenda, and ESHA Assessment, the new location of

the RSFS would not displace any sensitive habitat or directly take any sensitive species, would not be located within any riparian area or Habitat Conservation Plan, and would not otherwise conflict with policies related biological resources.

5. The relocation of the RSFS would not be a wasteful or inefficient consumption of energy resources because it is necessary for safety purposes, as described above.
6. The new location of the RSFS is not within any earthquake fault zone, historic landslide area or area with the potential for landslides, unstable geologic unit, expansive soil, or area of known paleontological or unique geological resources.
7. Relocation of the RSFS may result in minor greenhouse gas emissions during construction due to the operation of construction equipment, but this temporary impact would be offset by the reduction in greenhouse gas emissions due to implementation of emission-reducing features that promote the use of alternative methods of transportation such as cycling and walking.
8. Relocation of the RSFS would not result in the routine transport or disposal of any hazardous materials, nor is it expected to emit any hazardous materials. The new location of the RSFS is not on any list compiled pursuant to Government Code Section 65962.5. The new location is not within the jurisdiction of an airport land use plan and would not interfere with emergency response or evacuation because it would not physically block any travel lanes. The new location of the RSFS would not expose anyone to significant wildfire risks because it would not increase the existing amount of fuel in the vicinity or be located any closer to structures that may be occupied by people.
9. Relocation of the RSFS would have no impact on water quality because the implementation of BMPs would prevent the deposition of sediment into nearby riparian areas. The new location would not be within a flood, tsunami, or seiche zone.
10. Relocation of the RSFS would not physically divide any community or conflict with any other policies or regulations adopted for the purpose of avoiding or mitigating environmental effects.
11. The new location of the RSFS would not be within an area of any known significant mineral resources.
12. The relocation of the RSFS would not result in any substantial noise because the ongoing operation of the RSFS creates no noise and the related construction would occur during other project activities, contributing minimally to the noise generated by the project as a whole due to the small size of the sign and comparable simple methods of removal and relocation that would not require the use of heavy machinery or vibratory equipment.
13. Relocation of the RSFS would not induce population growth or displace any people or housing.
14. Relocation of the RSFS would not require the provision of any public services or recreational facilities because it would not induce population growth.
15. Relocation of the RSFS is consistent with policies and regulations addressing the circulation system as discussed above through discussions with Caltrans. The relocation would have no impact on Vehicle Miles Traveled, would reduce hazards, and would not interfere with any emergency access.
16. As described in the previously adopted Negative Declaration, Cultural Resource Compliance Memo, and existing conditions of approval adopted by the Coastal Permit Administrator, the project would have no impact on cultural, archaeological, or tribal cultural resources.
17. Relocation of the RSFS would not require the relocation of any utilities and would not create any new demand for water or sanitation services.

Pursuant to 14 CCR §15073.5, recirculation of the Negative Declaration is not necessary because the Negative Declaration has already been adopted by Caltrans, and the County of Mendocino serving as Responsible Agency need only consider the Negative Declaration and decide whether the Negative Declaration is adequate for use by the Responsible Agency. The County of Mendocino as Responsible Agency need not make any findings required by 14 CCR §15091 regarding significant environmental effects and mitigation measures because no significant effects were identified by Caltrans as Lead Agency and the Negative Declaration has been determined to be adequate for use by Mendocino County as the Responsible Agency. Regardless, recirculation is also not required because a substantial revision has not been made. A substantial revision has not been made because new significant effects have not been identified, and therefore no mitigation measures are necessary. As noted in 14 CCR §15073.5(c)(4), recirculation is not required when *“new information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration”*.

RESPONSE TO ADDITIONAL COMMENTS SUBMITTED BY APPELLANT OCTOBER 30, 2025: The information in this section has been categorized to match the lettering within the appellant's submittal.

(A) PUBLIC ACCESS POLICIES: The appellant argues that the elimination of parking is not in conformity with the public access and public recreation policies of Chapter 3 of the Coastal Act. The appellant cites several sections of Chapter 3 of the Coastal Act and argues that the County does not specifically discuss or make specific findings regarding these policies. However, both in the staff report presented to the Coastal Permit Administrator (CPA) and in the recommended resolutions presented to the Board of Supervisors (BOS), a recommended finding number seven (7) is provided regarding public access. The sections of the Coastal Act cited by the appellant are not specifically discussed within this finding because they are not relevant. The County's Local Coastal Program (LCP), including the Coastal Element of the General Plan, Gualala Town Plan, and Coastal Zoning Code, are the implementation of the Coastal Act within Mendocino County. When the LCP is adopted or amended, it must be certified by the Coastal Commission, and it must be found that the LCP is consistent with the Coastal Act. Therefore, it follows that the relevant policies within the LCP, which are discussed in finding number seven (7), are inherently consistent with the Coastal Act. This includes Gualala Town Plan policy 3.6-12, which specifically requires the elimination of on-street parking. Any effect that the implementation of this policy would have on public access and recreation would have occurred when the LCP was adopted and certified by the Coastal Commission. The same is true of all other policies within the Gualala Town Plan that established the desired highway streetscape.

The appellant states that *"there are two public bluff trail access points, one [a] few hundred feet south of the Surf Market and one generally in the middle of the town at the Surf Motel."* In this sentence, the appellant is referring to the Gualala Bluff Trail, which was established as vertical and lateral access through conditions of various permit approvals (permit numbers NCR-77-C-115, 80-P-75, 1-88-176, and 1-90-179). The Gualala Bluff Trail is now managed by the Redwood Coast Land Conservancy (RCLC). The appellant argues that *"the 92 informal on-street parking spots that are being removed as part of this project are heavily used by people that access the bluff trail and recreate on the coast."* However, the appellant does not provide any evidence that this is the case. It may be just as likely that those who utilize the Gualala Bluff Trail either (1) use the trail incidentally to their stay at the Surf Motel, Hotel Breakers, Vue Kitchen, Surf Market, or other businesses within the downtown Gualala area, which all contain their own private parking lots, (2) park within the tapered portion of State Route 1 just south of the Vue Kitchen near the interpretive signs and Mill Bend Preserve sign, which will not be eliminated by the proposed project, or (3) simply walk to the access points from nearby residential areas such as those along Ocean Drive or Sedalia Drive. Even if the informal parking to be lost is used by Gualala Bluff Trail users, the impact would be offset by other features of the project that improve public access to these points. Indeed, Public Resources Code Section 30252 states that *"the location and amount of new development should maintain and enhance public access to the coast by...(3) providing nonautomobile circulation within the development."* The installation of new bicycle lanes and sidewalks that intersect the vertical access points will provide alternative means of accessing the Gualala Bluff Trail that balances the Public Access goals of the Coastal Act with the Active Transportation goals of the State of California and MCOG.

(B) OTHER COASTAL ACT POLICIES: The appellant continues to argue that the reduction of parking will negatively impact access and use of the Gualala Bluff Trail. The appellant argues that the project will *"limit the ability of users to park in this area, which may negatively impact other areas along the coast because such users may be pushed out of this more urban area into a more isolated and environmentally sensitive area along the coast."* As noted in section (A) above, the reduction in parking will not negatively impact access and use of the Gualala Bluff Trail because (1) alternative methods of transportation will be provided that allow a broader range of citizens to access the trail, such as sidewalks and bicycle lanes, and (2) the informal parking area south of the Hotel Breakers will not be eliminated by the project. The appellant also argues that *"the lack of parking could lead to additional miles being driven along the coast, which is contrary to the County and Coastal Commission's professed policy of limiting vehicle miles driven."* This assertion fails to account for several equally likely scenarios in which the removal of parking does not increase Vehicle Miles Traveled (VMT). For example, a certain share of trips to the Gualala Bluff Trail might be considered "pass-by" trips, where users stop and use the Gualala Bluff Trail incidentally to a trip elsewhere along the coast. A certain share of trips may also be limited to the Gualala area, in which case the streetscape improvements offer walking and cycling as an alternative means of access to the trail, thus reducing VMT. The appellant further argues that the removal of on-street parking will *"significantly reduce the ability of automobiles and recreational users towing boats or trailers from parking in the area in order to access the coast, as there is no other suitable parking available."* However, as noted above, the portion of right-of-way south of the Hotel Breakers currently used for informal on-street parking would not be eliminated.

The appellant further argues that the removal of parking is inconsistent with Public Resources Code Section 30254, which states the following:

"Where existing or planned public works facilities can accommodate only a limited amount of new development, services of coastal-dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development."

This regulation is not applicable to the proposed project because it only prioritizes certain new types of development over others. For example, if a local water district had only a limited amount of water available to serve new development, this regulation would prioritize the development of the listed types over others. In the context of the proposed project, i.e. the “planned public works facility”, only future development would be evaluated to determine whether the newly constructed streetscape can accommodate such development, or whether such future development would preclude the development types listed above from utilizing the public services provided by the new streetscape. This regulation does not require the evaluation of the public works facility’s impact on existing development.

(C) TRAFFIC SPEED: The appellant argues that the removal of on-street parking is likely to increase traffic speed and make the highway more dangerous. The appellant cites Caltrans’ Traffic Calming Guide (see attachment E) and the Department of Transportation’s Federal Highway Administration Safety Programs for Speed Management Safety. However, the appellant does not take account of the various other traffic calming measures that would be incorporated into the project which are also referenced in Caltrans’ Traffic Calming Guide, including but not limited to speed feedback signs (*“FHWA cited 7 studies that ranged from a 2 MPH to 7 MPH speed reduction”*, page 6), flashing beacons (*“Crash Modification Factors (CMFs) show a significant reduction in crashes, which suggests the most extreme speeds were likely reduced (FHWA)”*, page 22), a road diet, also known as a two-way left-turn lane (*“two field studies measured reductions of 1-2 MPH for the 85th percentile speed (FHWA)”*, page 46), and traffic islands (*“1-8 MPH Reduction of 85th percentile speed depending on the degree of lane narrowing and the volume of traffic (FHWA)”*, page 60). When taken together, the various other traffic calming measures to be implemented by the project will more than offset any perceived speed increase due to the removal of on-street parking.

(D) REGULATORY TAKING: The appellant argues that an action will be “ripe” following the County’s approval of the Coastal Development Permit *“because the County’s no parking regulations will now be specifically applied to BLP’s use of its private property.”* This project is appealable to the Coastal Commission pursuant to multiple possible avenues listed in Mendocino County Code section 20.544.020(B) as well as Public Resources Code section 30625. Staff additionally refers back to section (F)(2) of the appeal memorandum and that parking will not be eliminated without the completion of Caltrans’ own acquisition and condemnation process.

(E) LANDSCAPING: The appellant continues to argue that landscaping must be included in the project, citing Gualala Town Plan Policies G3.4-22, -26, -27, -28, -29, -30, and G3.6-16.

Policy G3.4-22 is under the heading titled “On-site Landscaping”, which contrasts with Policies G3.4-26 through -30, which are under the heading titled “Street Landscaping”. Therefore, Policy G3.4-22 clearly refers to private developments and is not relevant to the development of the streetscape. Policy G3.4-26 states that *“landscaping along Highway 1 and local roadways shall provide an aesthetic complement to the pedestrian walkways and partial screening of parking areas and/or buildings.”* This policy does not require landscaping. It only requires that, in the event of landscaping, such landscaping shall provide an aesthetic complement. Policy G3.4-27 states that *“rather than developing a linear tree planting program, cluster landscapes, which form dense “landscape pockets” with tall, canopy trees, smaller understory trees and ground level shrubs and herbaceous plants, are recommended.”* This policy presents a recommendation, not a requirement. Policy G3.4-28 states that *“existing groves of trees should be retained and integrated with street landscaping plans, with consideration given to public safety.”* No trees would be removed as part of the project. Policy G3.4-29 states that *“landscaping along roadways shall be selected and sited to avoid blocking sight lines at intersections and curb cuts. Along utility rights-of-way, plantings shall not disrupt service or access to overhead or underground equipment.”* This policy does not require landscaping. It only requires that, in the event of landscaping, sight lines and service equipment is considered. Policy G3.4-30 states that *“Highway 1 medians and embankments should be landscaped with ground level shrubs and herbaceous plants. Plant materials with seasonal foliage and flower changes are encouraged. Plant materials shall be selected, in part, based on low maintenance and irrigation requirements. Landscaping within the Highway 1 right-of-way requires an encroachment permit from Caltrans.”* This policy does not require landscaping because it uses the word “should”. Policy G3.6-16 states that *“landscaping shall be provided along all pedestrian walkways to create attractive and usable pedestrian corridors. Landscaping shall be established and maintained in accordance with the “Design Guidelines” of the Gualala Town Plan.”* It is true that the proposed project will not provide landscaping along ALL pedestrian walkways. However, this policy does not contain any temporal or conditional requirements for the provision of landscaping, which might include statements such as: “landscaping shall be established simultaneously with the development of pedestrian walkways” or “prior to the development of X, landscaping shall be established...” Therefore, it is not necessary that the proposed development provide such landscaping when it has been shown to be infeasible at this time.

Regardless, in the absence of an LMA and the delivery of originally proposed landscaping, Caltrans will spread a native seed mix over the areas originally proposed for landscaping. The seed mix is comprised of locally native wildflowers, grasses, herbaceous plants, and shrubs, several of which are included in Appendix B of the Gualala Town Plan. The Gualala Town Plan does not specifically require that the type of landscaping originally proposed by Caltrans be implemented. The native seed mix should be thought of as “landscaping” within the meaning of the Gualala Town Plan. As discussed in the Supplemental Memorandum, the native seed mix is consistent with the Gualala Town Plan because it would provide an aesthetic complement, would not require the removal of any trees, would avoid blocking sight lines, and is comprised of locally native shrubs and herbaceous species that are inherently low-maintenance and low-irrigation

because they are locally native.

(F) RECIRCULATION OF THE NEGATIVE DECLARATION: The appellant argues that the removal of landscaping from the project should have resulted in an amendment of the Initial Study and recirculation of the document for review. The appellant cites Public Resources Code Section 21092.1 and 14 CCR §15088.5, but these regulations only apply to Environmental Impact Reports (EIRs), whereas a Negative Declaration (ND) was prepared for this project. Instead, 14 CCR §15073.5 regulates the recirculation of an ND prior to adoption. Regardless, as noted in section (B)(3) above, even this section of the CEQA Guidelines does not apply because the environmental document has already been adopted by Caltrans as the Lead Agency.

The appellant argues that the *“removal of landscaping from the project represents significant new information that effectively changed the project description and objectives in the Initial Study. This change in the Initial Study and project may result in a significant environmental impact...”* 14 CCR §15073.5 states that a “substantial revision” means:

(1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or

(2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

The appellant does not explain how the removal of landscaping presents a new, avoidable significant effect. Caltrans as lead agency did not determine that new mitigation measures or revisions were required prior to adoption of the ND. Additionally, the Final ND adopted in November 2023 notes in Chapter 1 notes that landscaping elements would be installed *“assuming a maintenance agreement is executed to maintain the landscaping. If a maintenance agreement is not executed, hardscaping would be installed.”* The ND project description already addresses the potential that landscaping may be removed.

STORMWATER AND 6PPD-q: The Technical Memorandum is dated May 24, 2025, after the adoption of the Negative Declaration by Caltrans as Lead Agency. The issues presented in the Technical Memorandum are not discussed in the comments attached to the Final Negative Declaration. Pursuant to 14 CCR §15096, prior to reaching a decision on the project, Mendocino County, as a Responsible Agency, must *“consider the environmental effects of the project as shown in the EIR or Negative Declaration. A subsequent or supplemental EIR can be prepared only as provided in Sections 15162 or 15163.”* 14 CCR §15162(c) provides the following:

“Once a project has been approved, the lead agency’s role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.”

Subdivision (a) provides that a subsequent Negative Declaration be prepared when:

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
 - a. *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - b. *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - c. *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project*

proponents decline to adopt the mitigation measure or alternative; or

- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Therefore, the new information provided by GMAC must be evaluated to determine if it provides evidence that a new significant environmental effect would occur that was not addressed in the prior Negative Declaration. The Technical Memorandum is summarized in an introductory paragraph as follows:

The Caltrans Streetscape Enhancement Project (Project) of State Route 1 in Gualala proposes road realignment and widening to improve traffic flow and pedestrian travel between Old State Highway and Ocean Drive. There are limited stormwater runoff water quality pollution prevention and design measures proposed in the project (County of Mendocino, 2025). Recent (2024-25) water quality sampling of urban runoff within the Project area by the CA Urban Streams Alliance – The Stream Team (The Stream Team) has identified concentrations of 6PPD-q that exceed action level concentrations in the Water Quality Control Plan for the North Coast Region (Basin Plan) and California North Coast Ocean Plan (Hamill, 2025). The compound 6PPD-q, found in tire grit, is highly toxic to coho salmon and steelhead (Ibid). Given the elevated concentrations of 6PPD-q in Project stormwater runoff to the Gualala River Estuary, which is important salmonid habitat, the Friends of Gualala River retained cbec to investigate opportunities to integrate or compliment water quality treatment Best Management Practices (BMPs) associated with the Project.

However, the Technical Memorandum does not discuss how the elevated levels of 6PPD-q are related to or worsened by the proposed project, nor does it evaluate whether existing project features would do enough to avoid or minimize any perceived impacts. Indeed, the project involves several features to treat stormwater such as the bioswale along the southern portion of the watershed. Therefore, staff concludes that the Technical Memorandum does not provide evidence of a new significant impact, and that the preparation of a subsequent Negative Declaration is not warranted.

RECOMMENDED ACTION: Staff recommends that the Board of Supervisors modify the Coastal Permit Administrator's (CPA's) approval of CDP_2024-0040 and approve the project in accordance with the attached Second Revised Recommended Resolution which would incorporate the modifications to the project description.

A Second Revised Alternate Resolution has also been prepared for modification of the CPA's approval that would include landscaping and would incorporate the modifications to the project description.

ATTACHMENTS:

- A. Second Revised Recommended Resolution
- B. Second Revised Alternate Resolution
- C. Most Recent Cross Sections
- D. May 24, 2025 Technical Memorandum
- E. Caltrans' Traffic Calming Guide