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Prepared January 22, 2026 for the February 4, 2026 Hearing

TO: Coastal Commissioners and Interested Persons

FROM: Shana Gray, Deputy Director, North Coast District and Statewide Planning
Melissa B. Kraemer, Coastal Program Manager

**SUBJECT: City of Fort Bragg LCP Amendment No. LCP-1-FTB-25-0064-1-Part D
(Housing Updates)**

SUMMARY OF STAFF RECOMMENDATION

The City of Fort Bragg is proposing LCP Amendment (LCPA) Application No. LCP-1-FTB-25-0064-1-Part D, which would amend the Implementation Plan (IP) portion of the City's certified LCP to (1) establish new regulations for Emergency Shelters, Group Homes, Low Barrier Navigation Centers, and Supportive Housing, (2) amend related code sections on Definitions and Land Use Tables & Permit Requirements, and (3) amend existing regulations for Density Bonus and Incentives Eligibility for affordable housing projects on non-vacant sites. The City's adopted ordinance with all proposed text changes is included as [Exhibit 2](#).

Local governments and the Commission are tasked with encouraging affordable housing that serves diverse communities while ensuring that coastal resources and public access are protected. The intent of the proposed amendment is to incorporate into the certified LCP various programs from the City's current Housing Element that the City is required by state law to implement. Thus, the proposed IP amendment adds Supportive Housing, Low Barrier Navigation Center, and Group Home as new use types allowed as permitted uses in multi-family residential and mixed-use zoning districts. Emergency Shelters currently are permitted in the General Commercial zoning district, and the proposed ordinance will not change this requirement. The proposed amendment will however set new standards for new Emergency Shelters per state law.

Specifying in the IP the new housing types as permitted uses and specifying standards and permit requirements for each use type allows the City to issue an administrative CDP (pursuant to existing certified IP provisions) for these types of housing projects when the specified standards are met. Thus, all such housing projects within the Coastal Zone will continue to be subject to a CDP, and, except for no minimum parking

requirement with supportive housing projects, such projects will be required to comply with all current development standards of the zone in which they are located. The zoning districts where these new housing types will be permitted generally are located on previously developed lands, in areas outside of the areas identified as having environmentally sensitive habitat areas, and on lands mostly located in the center of town (as the amendment does not apply to industrial lands of the Georgia Pacific Mill Site, which is west of Highway 1 and occupies nearly 40% of the City's coastal zone). And although the regulations impose no minimum parking requirement for units occupied by supportive housing residents if the development is located within one-half mile of a public transit stop, most multi-family residential and mixed-use areas of the City are not located directly near coastal access points, and coastal access areas at the north, south, and middle ends of the City each have dedicated parking areas for coastal access, and as such, these coastal access points are unlikely to be impacted as a result of the parking exceptions.

Finally, the proposed IP amendment simply adds an eligibility requirement for density bonuses and incentives related to redevelopment of non-vacant sites but does not change the existing LCP requirements that the incentives, concessions, waivers or reductions must be found consistent with all other applicable policies and provisions of the LCP and not create adverse impacts on coastal resources. Those requirements remain and will apply to the projects qualifying under the new eligibility, which would have to provide replacement housing for any low-income housing that is lost.

Therefore, staff recommend that the Commission find that the City's proposed amendments to the Implementation Plan, as submitted, conform with and are adequate to carry out the provisions of the certified Land Use Plan, and staff recommend approval of LCP-1-FTB-25-0064-1-Part D **as submitted**. The motion to accomplish this recommendation is found on [Page 5](#) of this staff report.

DEADLINE FOR COMMISSION ACTION

The City transmitted LCP-1-FTB-25-0064-1-Part D to the Commission on November 18, 2025, and the amendment application was deemed "submitted" on December 8, 2025. The deadline for Commission action on the proposed IP amendment application is March 6, 2026. Because the final action date falls prior to the Commission's March 2026 meeting dates, if the Commission fails to take a final action at this February Commission meeting (e.g., if the item is continued), then staff recommends that as part of such non-final action the Commission extend the deadline for final Commission action on the proposed amendment by one year. To do so, staff recommend a YES vote on the motion below. Passage of the motion will result in a new deadline for final Commission action on the proposed LCP amendment. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Alternate Time Extension Motion: I move that the Commission extend the time limit to act on City of Fort Bragg Local Coastal Program Amendment Number LCP-1-FTB-25-0064-1 to March 6, 2027, and I recommend a yes vote.

ADDITIONAL INFORMATION

For further information, please contact Melissa Kraemer at the Commission's North Coast District Office in Arcata at Melissa.Kraemer@coastal.ca.gov. If you wish to provide written comments, please do so via regular mail (directed to the North Coast District Office) or email (by emailing NorthCoast@coastal.ca.gov). Commission staff will distribute to the Commissioners any copies of written materials received from interested parties by 5:00 pm on the Friday before the scheduled Commission meeting.

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EXHIBITS

[Exhibit 1 – Zoning Map](#)

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I. Motion and Resolution

Staff recommend that the Commission, after public hearing, approve the Implementation Plan amendment as submitted. To accomplish this motion, staff recommend a **NO** vote on the foregoing motion. Failure of this motion will result in certification of the Implementation Plan amendment as submitted and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Motion:

I move that the Commission **reject** Implementation Plan Amendment No. LCP-1-FTB-25-0064-1-Part D as submitted by the City of Fort Bragg.

Resolution to certify the implementation plan amendment as submitted:

The Commission hereby **certifies** the City of Fort Bragg Implementation Plan Amendment LCP-1-FTB-25-0064-1-Part D as submitted and adopts the findings set forth below on grounds that the Implementation Plan amendment conforms with, and is adequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan amendment will meet the requirements of the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Plan amendment on the environment, or 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment.

II. Procedural Issues

A. Standard of Review

The standard of review for the proposed amendment to the Implementation Plan (Coastal Land Use & Development Code) of the City of Fort Bragg certified Local Coastal Program (LCP), pursuant to section 30513 and 30514 (regarding LCP amendments) of the Coastal Act, is whether the Implementation Plan as amended would be in conformance with, and adequate to carry out, the provisions of the certified Land Use Plan.

B. Public Participation

Section 30503 of the Coastal Act requires public input in preparation, approval, certification, and amendment of any LCP. Fort Bragg's Planning Commission held a

public hearing on the proposed amendment on May 14, 2025. The City Council held public hearings on the proposed amendment on June 9 and July 14, 2025. The ordinance was adopted on July 14, 2025. All hearings were noticed to the public consistent with sections 13551 and 13552 of Title 14 of the California Code of Regulations. Notice of the subject amendment has been distributed to all known interested parties.

C. Procedural Requirements

Pursuant to section 13544(b)(2) of Title 14 of the California Code of Regulations, if the Commission certifies the LCP amendment as submitted, no further City action will be necessary for the LCP amendment to immediately take effect. Should the Commission certify the LCP amendment subject to modifications, final approval by the City and a determination by the Executive Director of compliance with section 13544 of the Commission's regulations will be required for the amendment to take effect. Should the Commission deny the LCP amendment as submitted without suggested modifications, no further action is required by either the Commission or the City, and the proposed LCP amendment will not become effective.

III. Findings for approval of the IP amendment as submitted

The following findings support the Commission's approval of the proposed Implementation Plan Amendment as submitted. The Commission hereby finds and declares as follows:

A. Amendment Description & Background

The City of Fort Bragg is proposing LCP Amendment (LCPA) Application No. LCP-1-FTB-25-0064-1-Part D, which would amend the Implementation Plan (IP) portion of the City's certified LCP (referred to as the Coastal Land Use & Development Code) to (1) establish regulations for Emergency Shelters, Group Homes, Low Barrier Navigation Centers, and Supportive Housing, (2) amend related code sections on Definitions (sec. 17.100) and Land Use Tables & Permit Requirements (sec. 17.21.030 & 17.22.030), and (3) amend existing regulations for Density Bonus and Incentives Eligibility for affordable housing projects on non-vacant sites (sec. 17.31.030). Major components are discussed further below, and the City's adopted ordinance with all proposed text changes is included as [Exhibit 2](#).

1. Housing Updates

The proposed amendment adds new regulations and definitions for "Group Home," "Low Barrier Navigation Center," "Supportive Housing," and "Emergency Shelter." Proposed definitions of each are shown below:

Group Homes. Housing shared by unrelated persons with disabilities that provide peer and other support for their residents' disability related needs and in which

residents share cooking, dining, and living areas, and may, in some group homes, participate in cooking, housekeeping, and other communal living activities.

Low Barrier Navigation Center. A Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. A Low Barrier Navigation Center may be non-congregate and relocatable. “Low Barrier” means utilization of best practices to reduce barriers to entry, and may include, but not be limited to, the following: 1) allowing the presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth; 2) allowing pets, 3) providing space for the storage of possessions; and 4) providing privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms.

Supportive Housing. Housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community.

Emergency Shelter. Emergency shelter is housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. Emergency Shelter also includes other interim interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care. Emergency shelter does not include the emergency weather shelter which is regulated through the limited term permit process in all zoning districts.

The proposed amendment also amends the zoning tables of chapter 17.21.030 (Residential District Land Uses and Permit Requirements) and 17.22.030 (Commercial District Land Uses and Permit Requirements) to add each use as a new use type permitted in various residential and commercial zoning districts (except Emergency Shelters already are an allowed use under the certified IP in the General Commercial zoning district). Finally, the proposed amendment adds or updates chapters for each that include standards and permit requirements for each type of use.

2. Eligibility Updates for Density Bonus & Incentives

The City’s existing certified IP includes regulations for density bonus and other incentives to implement the requirements of State law (Government Code §§ 65583, 65913, and 65915, et seq.) and the Housing Element of the General Plan, by offering incentives for the development of housing that is affordable to the types of households and qualifying residents identified in Section 17.31.030 (Density Bonus Eligibility). Under the existing certified IP, to be eligible for a density bonus and other incentives, proposed housing developments must comply with various requirements related to affordability and minimum project size. The proposed amendment will add a new eligibility related to Government Code § 65915(c)(3)(A), which specifies that an

applicant may be eligible for a density bonus or incentives on a non-vacant property with affordable rental dwelling units, or one which had affordable rental dwelling units within the past five years, only if the proposed housing development replaces those units and meets certain affordability requirements. Essentially, such projects would either have to provide replacement housing for any low-income housing that is lost or the project would have to be built smaller without the density bonus or planning incentives.

B. Consistency Analysis

To approve the amendments to the IP, the Commission must find the IP, as amended, conforms with, and is adequate to carry out, the provisions of the land use plan (LUP) pursuant to section 30513 of the Coastal Act. As explained in the Findings below, the proposed IP amendment is in full conformity with, and would adequately carry out, the policies of the LUP.

Local governments and the Commission are tasked with encouraging affordable housing that serves diverse communities while ensuring that coastal resources and public access are protected. The intent of the proposed amendment is to incorporate into the certified LCP various programs from the City's current Housing Element (dated 2019) that the City is required by state law to implement.¹ This proposed LCP amendment addresses the following Housing Element programs (among others):

Program H-1.6.3: Redevelopment of Non-Vacant Sites: Require the replacement of housing units subject to the requirements of Government Code, section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or non-residential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to 1) non-vacant sites and 2) vacant sites with previous residential uses that have been vacated or demolished.

Program H-2.4.7 Supportive Housing: Revise the City's zoning ordinance so that it complies with AB 2162, which requires the City to allow supportive housing by right

¹ The City's 5th-cycle Housing Element (2019) is accessible from the City's website (HCD has placed the City on an eight year housing element cycle, and the City's next housing element is due in 2027): <https://webgen1files1.revize.com/fortbraggtmpca/Documents/Departments/Community%20Development/General%20Plan%20and%20Zoning%20Information/Inland%20Land%20Use,%20Development,%20and%20General%20Plan/Element%2010%20Housing%20Element%202019.pdf?t=202508050709070&t=202508050709070>.

in all multi-family zoning districts and in all mixed-use zoning districts.

Program H-2.8.7 Emergency Shelters Regulatory Changes. Consider revising the LUDC to ensure that emergency shelters are subject only to the following requirements (per State law): 1) maximum number of beds; 2) off-street parking based upon demonstrated need; 3) size and location of onsite waiting and intake areas; 4) provision of onsite management; 5) proximity to other shelters; 6) length of stay; 7) lighting; and 8) security during hours when the shelter is open.

Program H-2.8.10 Define Group Home. Revise the ILUDC and CLUDC to define group homes that serve 6 or fewer as a permitted use in all zones in which a single-family home is permitted, and to define group homes with 7 or more residents as an organizational house.

1. Housing Updates

Assembly Bill (AB) 2162 (Chiu, 2018), effective January 1, 2019, specifies, among other things, that transitional and supportive housing are a residential use of property subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Currently, supportive housing is regulated as multifamily housing, and the City requires a use permit in commercial and multifamily residential zoning districts for this type of housing. However, state law does not allow the City to require a use permit for supportive housing projects that meet certain conditions, and this use type currently is not defined or regulated under the certified LCP. Consistent with state law, the proposed IP amendment adds this housing type as new use type allowed as a permitted use (allowed by right) in the Medium-Density (RM), High-Density (RH), and Very High-Density Residential (RVH) zoning districts (and Zoning Map is included as [Exhibit 1](#)). The use type is also added as allowed as a permitted use in the Office Commercial (CO), Central Business District (CBD), General Commercial (CG), and Highway Commercial (CH) zoning districts where certain conditions are met related to affordability and number of units. For projects that deviate from standards in the commercial districts, a use permit may be granted. Consistent with state law, the proposed standards relate to affordability, income levels, number of units restricted to supportive housing units, density bonus and incentives eligibility, and no parking required for projects located within one-half mile of a “public transit stop.”

Assembly Bill (AB) 101, effective July 31, 2019, requires that a Low Barrier Navigation Center development be a use by-right in areas zoned for mixed uses and non-residential zones that permit multifamily uses if the Center meets specified requirements. AB 101 declares that Low Barrier Navigation Center developments are essential tools for alleviating the homelessness crisis in the state. Consistent with state law, the proposed IP amendment adds this housing type as new use type allowed as a permitted use (allowed by right for 50 or fewer units) in the RM, RH, RVH, CO, CBD,

CG, and CH zoning districts (same zoning districts where supportive housing is allowed). Projects with more than 50 units require a use permit.

Currently the City regulates Group Homes as it does as single-family residences, and the proposed amendment formalizes current practice as permitted by state law. Under the proposed amendment, the Group Home use type will be allowed as a permitted use in the same zoning districts where Supportive Housing and Low Barrier Navigation Center are allowed. To date, a Group Home with more than seven residents has been regulated under the Adult Day Care use type, which requires a use permit in multifamily zoning districts. Under the proposed amendment, a Group Home of seven or more residents will continue to require a use permit. Thus, the proposed amendment simply provides regulatory clarity but maintains the status quo for this type of housing in the City.

Emergency Shelters are currently permissible by right in the CG zoning district, and the proposed ordinance will not change this requirement. The proposed amendment will however set new standards for all new Emergency Shelters per state law, as the existing certified IP does not specify any standards for Emergency Shelters. Added standards related to location, maximum number of beds, parking, and on-site management, among others. Per government code section 65583(a)(4)(F) the City can require a use permit for new emergency shelters if the City can prove that the existing shelter can accommodate the needs of the community. The proposed amendment allows Emergency Shelters with a capacity of 30 occupants or fewer as a permitted use in the CG zoning district and greater than 30 occupants with approval of a use permit.

Specifying in the IP the new housing types each as permitted uses allowed in various zones and specifying standards and permit requirements for each use type allows the City to issue an administrative CDP (pursuant to existing certified IP section 17.71.045) for these types of housing projects when the specified standards are met. Thus, all such housing projects within the Coastal Zone will continue to be subject to a CDP, pursuant to the existing certified IP, which this amendment does not change. Except for parking, all housing types will be required to comply with all current development standards of the zone in which they are located, including all LCP policies and standards. Meeting existing development standards in the underlying zones will continue to protect coastal resources and ensure that these types of projects remain consistent with the scale and character of the surrounding development. The zoning districts where these new housing types will be permitted generally are located on previously developed lands, in areas outside of the areas identified as having environmentally sensitive habitat areas and on lands mostly located in the center of town (as the amendment does not apply to industrial lands of the Georgia Pacific Mill Site, which is west of Highway 1 and occupies nearly 40% of the City's coastal zone). But to the extent any of these lands may contain such resources, all of the certified LCP's coastal resource protection policies and standards would be applied to any housing project accommodated by this amendment.

Although the regulations impose no minimum parking requirement for units occupied by supportive housing residents if the development is located within one-half mile of a public transit stop, most multifamily residential and mixed-use areas of the City are not

located directly near coastal access points, in large part because the Mill Site is completely fenced and prohibits access to the coast. Coastal access points at the north, south, and middle ends of the Mill Site each have dedicated coastal access parking areas, and as such, these coastal access points are unlikely to be impacted as a result of the parking exceptions. Thus, the proposed amendment as submitted will encourage alternative and temporary housing types within the coastal zone while minimizing adverse impacts to public access.

Because any proposed housing project of any of the above housing types would have to be built in a manner consistent with the LCP and be protective of coastal resources and public access, the Commission finds that the proposed amendment as submitted conforms with and is adequate to carry out the coastal resource protection policies of the certified LUP.

2. Eligibility Updates for Density Bonus & Incentives

The key issues raised regarding density bonuses and incentives are the potential impacts to coastal resources should incentives include a reduction in development standards or other requirements in a manner inconsistent with the resource protection policies of the LUP. The Commission has, in general, found that the allowance for density bonuses can be an effective tool to provide for affordable housing when such housing can be accommodated in a manner otherwise consistent with the resource protection policies of the Coastal Act or a local government's certified LCP (see Coastal Act Section 30604(f)-(g)).

The existing certified LCP includes policies and standards that allow the City to grant incentives, such as exceedances of density and height limitations, if the City determines that the incentive(s) proposed will not have any adverse effects on coastal resources. Certified LUP Policy H-3.5 states in part (emphasis added):

Density Bonus Incentives: Continue to provide density bonuses to projects that provide a required percentage of total units affordable to very-low, low-income, median, and moderate-income households and for units meeting the special housing needs identified in this Element and as established in conformance with State law. Density ranges described in land use designations may be exceeded consistent with the provisions of Government Code Section 65915 to encourage affordable housing production pursuant to §65915 of the California Government Code (Density Bonuses) provided the density bonus will not have an adverse effect on coastal resources. Any housing development approved pursuant to Government Code Section 65915 shall be consistent with all applicable certified Local Coastal Program (LCP) policies and development standards. In reviewing a proposed density increase, the City shall identify all feasible means of accommodating the density increase and consider the effects of such means on coastal resources. The City shall only grant a density increase if the City determines that the means of accommodating the density increase proposed by the applicant does not have an adverse effect on coastal resources. If, however, the City determines that the means for accommodating the density increase

proposed by the applicant will have an adverse effect on coastal resources, the City shall not grant the density increase.

Similarly, existing certified IP section 17.31.040(A) specifies in part the following regarding the amount of a density bonus and the extent of other incentives allowed by a proposed housing development (emphasis added):

1. *Density ranges described in land use designations of the certified LCP may be exceeded consistent with the provisions of Government Code Section 65915 to encourage affordable housing production pursuant to §65915 of the California Government Code (Density Bonuses). In reviewing a proposed density increase, the City shall identify all feasible means of accommodating the density increase and consider the effects of such means on coastal resources. The City shall only grant a density increase if the City determines that the means of accommodating the density increase proposed by the applicant does not have an adverse effect on coastal resources. If, however, the City determines that the means for accommodating the density increase proposed by the applicant will have an adverse effect on coastal resources, the City shall not grant the density increase.*
2. ...
3. *A development shall be entitled to additional incentives or concessions as provided by State law, if the additional requirements of the State law (Government Code Section 65915(d)(2)) are met and only if it is determined that the means of accommodating the additional incentives or concessions would not have an adverse effect on coastal resources...*
4. *Any housing development approved pursuant to Government Code Section 65915 shall be consistent with all applicable certified Local Coastal Program policies and development standards.*

It's important to note that the above LCP provisions, and state density bonus law generally, are harmonious with the Coastal Act in a twofold manner. First, as cited above, these provisions contain a “savings clause” for coastal resources protection that requires qualifying projects to incorporate density bonuses, incentives, and waivers into projects in a way that avoids conflicts with the certified LCP/Coastal Act. Second, Coastal Act section 30604(f), reflected in LCP provisions cited above, in addition to encouraging housing opportunities for persons of low and moderate income,² prevents local governments or the Commission on appeal from requiring measures that reduce density below what is allowed by state density bonus law when reviewing a low- or moderate-income housing project unless it is found that the density cannot be

² Coastal Act section 30604(g) also declares “that it is important for the commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low and moderate income in the coastal zone.”

accommodated in a manner consistent with the certified LCP (or relevant Coastal Act policies serving as the standard of review for the project).

In this case the proposed IP amendment simply adds an eligibility requirement related to redevelopment of non-vacant sites but does not change the existing LCP requirements that the incentives, concessions, waivers or reductions must be found to be consistent with all applicable policies and provisions of the LCP and not create adverse impacts on coastal resources. Those requirements remain and will apply to the projects qualifying under the new eligibility.

IV. California Environmental Quality Act

As set forth in section 21080.9 of the California Public Resources Code, CEQA exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its activities and approvals necessary for the preparation and adoption of an LCP. Instead, the CEQA responsibilities are assigned to the Coastal Commission, and the Commission's LCP review and approval program has been found by the Resources Agency to be the functional equivalent of the environmental review required by CEQA, pursuant to CEQA Section 21080.5. Therefore, the Commission is relieved of the responsibility to prepare an EIR for each LCP.

Nevertheless, the Commission is required in approving an LCP amendment to find that approval of the proposed LCP as amended, does conform with CEQA provisions, including the requirement in CEQA Section 21080.5(d)(2)(A) that the amended LCP will not be approved or adopted as proposed if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant adverse impact which the activity may have on the environment [14 CCR §§13542(a), 13540(f), and 13555(b)].

The City's LCP amendment consists of an IP amendment. The Commission incorporates its findings on Coastal Act and LUP conformity into this CEQA finding as if set forth in full herein. As discussed throughout the staff report and hereby incorporated by reference, the IP amendment conforms with and is adequate to carry out the policies of the certified LUP. The Commission finds that approval of the IP amendment will not result in significant adverse environmental impacts within the meaning of CEQA. Therefore, the Commission finds that there are no other feasible alternatives or mitigation measures which would substantially lessen any significant adverse impact, either individual or cumulatively, which the activity may have on the environment [14 CCR §§ 13542(a), 13540(f), and 13555(b)].