

2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR for the Best Development Grocery Outlet Project (Project), were raised during the comment period. Responses to comments received during the comment period do not involve any new significant impacts or add “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

Sections 2.0 and 3.0 of this Final EIR include information that has been added to the EIR since the close of the public review period in the form of responses to comments and revisions.

2.2 LIST OF COMMENTERS

Table 2.0-1 lists the comments on the Draft EIR that were submitted to the City of Fort Bragg (City) during the 45-day public review period for the Draft EIR. The assigned comment letter or number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed. Letters received are coded with letters (A, B, etc.).

TABLE 2.0-1 LIST OF COMMENTERS ON DRAFT EIR

<i>RESPONSE LETTER</i>	<i>INDIVIDUAL OR SIGNATORY</i>	<i>AFFILIATION</i>	<i>DATE</i>
A	Alan Haack	Resident	10-28-22
B	Ali Van Zee	Resident	10-28-22
C	Annemarie Weibel	Resident	10-31-22
D	Annemarie Weibel	Resident	10-31-22
E	Anonymous	Resident	10-19-22
F	Anonymous	Resident	10-19-22
G	Carol Eshom	Resident	9-19-22
H	Carol Francois	Resident	10-28-22
I	Deborah Shook	Resident	10-30-22
J	Dobby Sommer	Resident	10-28-22
K	Mark Wolfe	Fort Bragg Local Business Matters	10-31-22
L	Gary McCray	Resident	9-18-22
M	Jacob Patterson	Resident	10-31-22
N	Jaen Treesinger	Resident	10-31-22
O	Karin Weyland	Resident	10-28-22
P	Leslie Kashiwada	Resident	10-31-22
Q	Linda Williams	Resident	10-29-22
R	Liz Helenchild	Resident	10-31-22

<i>RESPONSE LETTER</i>	<i>INDIVIDUAL OR SIGNATORY</i>	<i>AFFILIATION</i>	<i>DATE</i>
S	Mary Rose Kaczorowski	Resident	10-31-22
T	Mikael Blaisdell	Resident	10-11-22
U	Morgan Shook	Resident	10-31-22
V	Rebecca McDaniel	Resident	9-19-22
W	Robert Ross	Resident	10-28-22
X	Robert Zimmer	Resident	10-28-22
Y	Suzi Long	Resident	10-28-22
Z	Tess Albin-Smith	Resident	10-28-22
AA	Various	City Council Hearing	10-11-22

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the Best Development Grocery Outlet Project Draft EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Each letter is lettered or numbered (i.e., Letter A) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

From: alan haack <alanhaack@hotmail.com>

Sent: Friday, October 28, 2022 11:48 AM

To: Gurewitz, Heather <hgurewitz@fortbragg.com>

Subject: Generic Architecture And Cheap Discount Business Are Not Appropriate For Fort Bragg

After driving up Highway 1 from the Bay Area or coming to the coast by Highway 20, it's always a shock to enter Fort Bragg, looking more like East Los Angeles or low rent areas of San Jose. What happened to city pride? Why does Fort Bragg insist on being the ugliest town on the north coast?

The site being considered is a very prominent site at the southern entrance to the city. Putting up a low cost national chain store will tell visitors that Fort Bragg sees itself as a low-class junky city.

This store should not be a feature at the southern entrance to Fort Bragg. Building it is one more step in bringing this town down in terms of aesthetics and quality of retail.

Perhaps Fort Bragg doesn't mind being known as the anything goes junky town of the north coast. For those of us who care about Fort Bragg's future, it's discouraging and sad to know that this inappropriate building is being considered by the City. It should not be approved.

A-1

Response to Letter A: Alan Haack

Response A-1: The commenter states that Fort Bragg looks more like east Los Angeles or low rent areas of San Jose as one travels up Highway 1 or Highway 20 and asks rhetorical questions about City pride and the appearance of Fort Bragg. The commenter then notes that the site is a prominent site at the southern entrance to the city, and putting up a low-cost national chain store will tell visitors that Fort Bragg sees itself as a low-class junky city. The commenter continues to discuss visual concerns about the proposed Project and concludes that the proposed Project should not be approved.

While the comment does not address the adequacy of the Draft EIR, or compliance with CEQA, this comment is noted and will be forwarded to the decision makers for their consideration of topics beyond the Draft EIR.

From: Ali Van Zee <yourali747@gmail.com>
Sent: Friday, October 28, 2022 8:06 AM
To: Gurewitz, Heather <hgurewitz@fortbragg.com>
Subject: Grocery Outlet Comment

Hi Heather,

I'd like to submit my comment objecting to the City's plan to allow Grocery Outlet/Bargain Market take over property on S Franklin and North Harbor Drive.

What is the fascination this city has with big box stores? There is very little upside to consumers - who can already find inexpensive food items at our local Purity and Harvest Markets and our other big box store, Safeway. This store will be yet another environmental disaster for Fort Bragg. Paving over empty fields for parking lots increases heat-island effects and is a big driver of warming climate patterns. (Ref: https://www.fhwa.dot.gov/pavement/sustainability/articles/pavement_thermal.cfm) We have enough problems now that we can't yet fix as a result of a warming, drier climate!

Residents in Fort Bragg are under now constant water restrictions. How do we justify the drain on our existing water supply for this project?

B-1

How will this affect our already lagging recycling program? I don't see this answered in the Draft EIR.

Healthy competition is not a bad thing per se, but a store like Grocery Outlet rigs the system against its competition. How does it help Ft Bragg residents if our other markets shut down as a result?

Why are we, a small coastal community so in love with urbanization? I would venture to say that the majority of residents don't want to see that happen here in our town. Grocery Outlet isn't going to revitalize our city! Making Main St and Franklin more attractive, capping rent businesses need to pay are better ways to achieve that goal.

We are a tourist-driven economy. We are a tourist destination. Nobody wants to drive all the way up here only to find the same big box crap-filled behemoths they just left at home.

We don't need more cardiogenic food wrapped in non-recyclable plastic packaging here. How about, instead, supporting our local farms and existing stores so they can sell healthy food for less?

Our City Council gets quite a bit right, but they're way off the mark here.

Ali Van Zee
545 N Harold St
Fort Bragg, CA. 95437
510-517-6238

~We survive together, or not at all~

Response to Letter B: Ali Van Zee

Response B-1: The commenter expresses objection to the proposed Project and makes statements regarding big box stores. The commenter states that paving over empty fields for parking lots increases heat island effects and is a big driver of warming climate patterns. The commenter questions how do we justify the drain on our existing water supply for this Project, and how will this affect our already lagging recycling program. The commenter makes further statements regarding the merits of the proposed Project.

Most of the comment does not address the adequacy of the Draft EIR, or compliance with CEQA. These comments are noted and will be forwarded to the decision makers for their consideration of topics beyond the adequacy of the Draft EIR. There were, however, two environmental topics discussed: climate change and heat-island effects. Climate change is fully addressed in Section 3.4 Greenhouse Gas, Climate Change and Energy. Heat islands, however, was not specifically addressed in the Draft EIR, in part because the California EPA has not identified Fort Bragg as an area of California that is impacted by heat islands. Heat islands are an environmental topic that is monitored in communities by the California EPA through the Urban Heat Island Index. Heat islands are created by a combination of heat-absorptive surfaces (such as dark pavement and roofing), heat-generating activities (such as engines and generators), and the absence of vegetation (which provides evaporative cooling). It is well recognized that large urban areas often experience higher temperatures, greater pollution, and more negative health impacts during hot summer months, when compared to more rural communities. This phenomenon is known as the urban heat island.

In 2012 the California Legislature required the California EPA to develop an Urban Heat Island Index (AB 296, Chapter 667, Statutes of 2012) and to design it so that “cities can have a quantifiable goal for heat reduction.” In 2015, the CalEPA released a study entitled, “Creating and Mapping an Urban Heat Island Index for California” which defines and examines the characteristics of the urban heat island and, for the first time, created an Urban Heat Island Index to quantify the extent and severity of urban heat islands for individual cities. The study also produced Urban Heat Island Interactive Maps, showing the urban heat island effect for each census tract in and around most urban areas throughout the state. California EPA’s Urban Heat Island Index study has not shown that there is a significant increase in heat due to urban heat island effects in rural communities or suburban areas. As such, the California EPA has established a Urban Heat Island Index for urban communities with a higher likelihood of heat index problems. Fort Bragg is not considered an urban area, and is not identified by the California EPA as an area with heat island problems. Nevertheless, the City of Fort Bragg requires landscaping as a part of the proposed Project. The vegetation within the landscaping is intended to provide evaporative cooling to minimize the potential for heat island impacts which can result from increased heat-absorptive surfaces (such as dark pavement and roofing), and heat-generating activities (such as engines and generators). Overall, the potential for urban heat islands on the Project site, and in Fort Bragg as a whole, is considered low.

TECHNICAL COMMENTS: City of Fort Bragg Draft EIR (September, 2022)
 on the Best Development Grocery Outlet Project (GO)
 (SCH: 2022050308)
 Submitted by Annemarie Weibel
 10-31-2022

Introduction

I have many comments about this Draft EIR. If I did not address certain issues it does not mean that there are no issues as covering all issues based on the info presented in 916 pages is not an easy task. I do not have enough time or knowledge to submit more comments. I have lived on the Mendocino coast since 1978 and feel that I have more knowledge than some of the consultants that live in Southern California. Please be read my concerns I expressed in previous comments to the Planning Commission and the City Council as Leslie Kashwada PhD. and Jacob Patterson, attorney, asked you to do. Unfortunately the quality of this DEIR is just as bad as the MND. Many of the comments by Leslie Kashwada PHD. and Jacob Patterson about this project were not addressed well, or sometimes not at all (comments located in Appendix A).

The following comments address the City of Fort Bragg Draft Best Development Grocery Outlet Environmental Impact Report (DEIR) for the Project, dated September 2022. In summary, the DEIR presents (a) an incomplete project description, (b) relies on superannuated (outdated) and variously erroneous data and other information, (c) omits significant potential adverse environmental effects (including on coastal resources and public/recreational access) from analysis, (d) proposes measures that do not, or do not fully, mitigate identified significant adverse project effects, (e) impermissibly relies on deferred mitigation, and (f) omits available, likely feasible, project alternatives from analysis. As further indicated in the comments, below, the DEIR is inadequate to serve as the environmental information document required by CEQA, and therefore should be substantially revised and recirculated for public review and comment.

C-1

DEIR section 2.1 PROJECT LOCATION (Electronic Page 37/916 ff.) erroneously states that “the Project site is located ... in the City’s Coastal Zone and is appealable to the California Coastal Commission because it is within 300 feet of what is considered a coastal bluff. Properties within the Coastal Zone are regulated by the Coastal Land Use and Development Code (CLUDC), also known as Fort Bragg Municipal Code (FBMC) Title 17. The NOP sent to the State clearinghouse indicates that the proposed Project can not be appealed to the California Coastal Commission.

UTILITIES AND SERVICES (40) “The proposed Project would connect to existing City infrastructure to provide water, sewer, and storm drainage utilities. The Project would be served by the following existing service providers: 1. City of Fort Bragg for water.”
 When plans were made for the Hare Creek mall there was supposedly only 1% of water left for the mall and the Avalon Hotel & Conference Center. The water that is stored by the city is not new water. Once it is gone, it is gone. Since 2015 most years do to the drought, and possibility of saltwater intruding into the watersheds that provide water to the city, there were water restrictions. I do not see that changing even with a desalination plant. The fact that the GO sells prepackaged food does not change the fact that they still need water for the construction (was not explained), and for irrigation and bathrooms. What is the capacity of the water system serving the GO? What is the water serving program for this site? How can Utilities and Service Systems b be mitigated?

C-2

Water (41) lists that “a new six-inch fire connection would be constructed to the east of the existing connection. A total of three fire hydrants with valve lines are proposed for fire suppression on the site.” Earlier city documents indicated that of all the areas in Fort Bragg the neighborhood surrounding the hospital had issues with water pressure. This area is also the area that has grown very much with the 69-unit Danco Buildings, the new apartment complexes and townhouses along Cypress Street, the new Crisis Respite Center on 517 Cypress Street along with the new Parents and Friends housing unit on Cypress Street, and the low income senior housing on Cypress Street. How is that possible with the low water pressure?

Wastewater (41) How can Utilities and Service Systems c be mitigated? What is the wastewater plant’s average dry and wet weather flow capacity? At what capacity is the plant operating? Are there plans for expansion for the wastewater plant and infrastructure?

Stormwater Drainage (41) This comment is very vague: “For example, bioretention facilities would be sized to capture and treat runoff from the proposed impervious surfaces produced by the 24-hour, 85th percentile rain event.” Are bioretention facilities planned? How could Utilities and Service Systems be mitigated? What capacity would the stormwater drainage system be operating at? We all know that along with the droughts we can have “atmospheric rivers” flood areas and considering that this property is next to a Special Review and Runoff Area leading to the Noyo River is concerning.

C-2
cont'd

Other Utilities and Services (41) C&S Waste Solutions would provide solid waste collection services. How could Utilities and Service Systems d be mitigated? I am concerned with the enormous amount of waste created by GO as everything is packaged. I am concerned both about their waste and also the waste that shoppers leave behind or take home and then dispose off and create more waste than they did in the past. Fort Bragg has a huge problem with waste. The new transfer station north of town is not built yet. They will not accept buy back, nor hazardous waste. The Caspar transfer station on 409, nor the Albion transfer station are offering these services. What is the capacity of the Ukiah landfill? Are there requirements for diversion of construction and demolition waste? We are told that the building is moldy. What proof do we have? We are told it might have asbestos. Would that not have been checked out before it became a Social Services Building? How many trips would it take to deliver the asbestos to a Superfund site? How much asbestos is there? It seems before this project gets approved the mold and asbestos issue needs to be checked out.

Aesthetic & Visual Resources (63) “The distant ocean views define much of the character of the City by visually identifying it as a coastal town.” You can see these views of the harbor, the Noyo River, and the ocean from the Project site and even if you can not see it from every corner of the site you know it is there. You can see the horizon, you can see the geology of the surrounding area.

Policy CD-1.4 New development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads or public viewing areas to the maximum feasible extent.

CD-2.2 Large Commercial Development: Ensure that large commercial development, such as shopping centers, big box retail, and mixed use development, fits harmoniously with the scale and design of existing buildings and streetscape of the City.

C-3

Chapter 17.38, Signs, of the City’s Coastal Land Use and Development Code aims to:
A. Avoid traffic safety hazards to motorists, bicyclists, and pedestrians, caused by visual distractions and obstructions;

B. Promote the aesthetic and environmental values of the community by providing for signs that do not impair the attractiveness of the City as a place to live, work, and shop;
 C. Provide for signs as an effective channel of communication, while ensuring that signs are aesthetically proportioned in relation to adjacent structures and the structures to which they are attached;

C-3
 cont'd

Consistent with Appendix G of the CEQA Guidelines, the proposed Project will have a significant impact on aesthetics if it will have a substantial adverse effect on a scenic vista. In my mind it does.

2.4 PROJECT CHARACTERISTICS AND DESCRIPTION

Building Architecture and Signage (39)

“The building will be composed of elements and details representative of Fort Bragg’s architectural heritage, as the Applicant’s chosen design elements were influenced by Fort Bragg’s downtown architecture. The window and door treatments give homage to the smaller shops along the main downtown street’s detailing as well as the Hardie Board (wood composite) wood paneling, masonry, and providing a variety of the materials on the elevations to add visual interest. Rooflines of the building would align with buildings on adjacent properties to avoid clashes in building height.” In my mind these words are good PR, but in no way does the architecture please aesthetically. In other communities planning commission would not approve of this cookie cutter version and consider it aesthetically pleasing. I do not no matter what words were chosen to let people believe it is.

C-4

Illuminated signs (39)

“The monument sign would have 15 sf of branding on each side, in addition to the unbranded base. Additionally, an 83.3-sf illuminated channel sign would be located on the sign parapet along the front elevation of the building.” I find these signs not pleasing from an aesthetical viewpoint and believe that the 83.3-sf illuminated channel sign could be seen from a potentially scenic Highway. We already have enough corporate businesses lined up on Hyw1 or within the viewshed.

Air Quality (107) mentions that “heavy-duty trucks are a common source of Diesel Particulate Matter (DPM), in contrast to passenger vehicles (such as light-duty cars and trucks). It has come to my attention that currently we are not only having gasoline prices go through the roof, but we might have no access to diesel anymore.

If we have no fuel, we will have no trucks. With no trucks, we will have no goods on the GO’s shelves. On October 14th, 2022 it was said the United States had only a 25-day supply of diesel left. Why build a GO if we have no fuel to deliver goods. Instead we could sell locally produced organic food that is in season and raise a generation of healthy people versus offering corporate produced fattening food full rich on salt and sugar causing people to become overweight. We do not need a store that promotes Pepsi, Coca Cola, and Nestle products and all wrapped up to cause more trash.

<https://finance.yahoo.com/news/us-now-just-25-days-160000619.html>

C-5

Biological Resources (111) should have been done at various times throughout the year and not only on March 29, 2022 and April 20, 2022 to assess the habitat, evaluate potential for special status species, test for aquatic resources/wetlands, and to verify/validate conditions and assessments reported in past studies and regulatory databases. I support all Leslie Kashiwada’s statements, especially in regards to wetlands, bats, and protection of the trees. Even the past studies by De Novo do not thoroughly evaluate wetlands, bats, and protection of the trees. We know there should be a buffer of a 100 ft. next to wetlands. The photos and letters Leslie Kashiwada provided indicate that there are plants that indicate the presence of wetlands. The bat study needs to happen before the final EIR gets published.

C-6

Landscaping (39/40) “Currently, four ornamental trees are located in the northwestern portion of the Project site, and additional ornamental trees are located along the South Street frontage.” It is concerning that there is no promise made to save these established trees that provide habitat for potentially threatened and endangered animals, and could provide a landing spot for migratory birds. It takes a long time to grow trees in this climate considering salt air and wind and new trees might not make it. Based on the IS biological Resources a – i mitigations should address this issue. Also Aesthetics b lists damage to trees. Policy OS-14.3 suggests Minimize Disturbance of Natural Vegetation and includes their root structure.

C-6

2.0 PROJECT DESCRIPTION 2.0-4 (39/40) Draft Environmental Impact Report – “Best Development Grocery Outlet trees could be preserved as part of the proposed landscaping plan; however, it is likely that tree removal in some capacity would be required.”

cont'd

Policy CD-1.11: New development shall minimize removal of natural vegetation. Existing native trees and plants shall be preserved on the site to the maximum extent feasible.

Policy OS-5.1. Native Species: Preserve native plant and animal species and their habitat. Policy OS-5.2. To the maximum extent feasible and balanced with permitted use, require that site planning, construction, and maintenance of development preserve existing healthy trees and native vegetation on the site.

As far as wildlife is concerned read also Leslie Kashiwada’s comments about crows vs. ravens. This example makes clear that the expertise of these biologists needs to be questioned. Just like Jacob Patterson in his photo and written documents in the record showed we have much wildlife here that local people know about and see. Biologists who fly into the area for a day won’t know about them or might not see them that day. I also saw a blue heron on this property, but had no camera with me to take a photo. We know that more than gophers are seen on this property at times. By putting a concrete parking lot and the GO on that property the seven special-status invertebrates, the five special-status amphibians, one special-status reptile, four special-status mammals, eight special-status birds, as well as the 55 special-status plants that are documented within the six-quadrangle area according to the CNDDDB that could potentially be found on that site might not be seen anymore on the Project site.

C-7

OS-15.2 Protect and Restore Open Space: During the development review process, protect and restore open space areas such as wildlife habitats, view corridors, coastal areas, and watercourses as open and natural.

C-8

There is no way possible that the mitigations set in place would protect these plants and animals and therefore has a significant effect on the environment.

GREENHOUSE GASES, CLIMATE CHANGE AND ENERGY 3.4 (147) Please see comments received by City Council meeting Oct. 11, 2022 by Mary Rose Kaczorowsky about GO and pollution and climate impacts. I agree with her comments.

Please also see my comments under Air Quality in regards to availability and affordability of diesel for the trucks.

C-9

THRESHOLDS OF SIGNIFICANCE (ENERGY CONSERVATION) (172) Consistent with Appendices F and G of the CEQA Guidelines, energy-related impacts are considered significant if implementation of the proposed Project would do the following:

• Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation;

Goal 3: To improve our public spaces so the street, road and transportation system meets the needs of all surface transportation modes, including vehicular, bicycle, pedestrian and transit. This goal can not be met as the intersection of North Harbor Drive and Hwy 1/Noyo Bridge will not be safe. Also pedestrians who live in the neighborhood need more sidewalks than proposed to be safe (Goal 8).

C-9
cont'd

Both Goal 5: Provide a safe transportation system and enable rapid and safe evacuation and emergency response and Goal 7: Provide a safe and efficient transportation network, connecting local community roads and major transportation corridors and meeting the transportation needs of the communities served by these facilities can not be met by this DEIR. Nowhere in the document was it explained that South Street is also the street used most often by ambulances. Also the police/sheriff mostly use Cypress Street. Also South Street has a big dip at the intersection of S. Franklin Street and makes maneuvering hard.

Landuse 3.5 (187) “Urban decay” or “blight” will happen even more than it already happened in Fort Bragg where about 20 businesses have been vacant since at least 2015. To move yet another formula business into town will only make this situation worse. It might help the city temporarily to have more tax revenues, but they will loose it from another similar venue. It will be even worse, as another food business like Purity Market who is in the center of town where people often walk to, very likely will have to close down. Instead more people will drive to this area of town away from downtown. The decision to move in GO most likely will provoke a chain reaction of store closures and long-term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake.

I read in the DEIR that this Project will provide employment-generating uses that will promote employment and economic development, while providing retail grocery opportunities. The 15-25 employees and 2 managers will not help employment in this town. The jobs will be minimum wage part time jobs with no benefits, no maternity leave, or sick leave. The money does not stay in this town, goes to a corporate business somewhere else. There is no housing that is available or affordable, not even for doctors, lawyers, and teachers. Where is the housing for your employees? LU-4.1 Formula Businesses and Big Box Retail: Regulate the establishment of formula businesses and big box retail to ensure that their location, scale, and appearance do not detract from the economic vitality of established commercial businesses and are consistent with the small town, rural character of Fort Bragg. This project is not consistent.

C-10

LU-4.4 Standards for Commercial Uses in Residential Areas: Commercial uses in and adjacent to residential areas shall not adversely affect the primarily residential character of the area. This project is detrimental and lowers the land value at a minimum for the 5 residences to the east and the 3 properties that might be built on in the near future (2 on the east side and 1 on the west side) and will be growth inducing.

LU-10.4: Ensure Adequate Services and Infrastructure for New Development. Development shall only be approved when it has been demonstrated that the development will be served with adequate water and wastewater treatment. Lack of adequate services to serve the proposed development shall be grounds for denial of the development. This project as far as water and waste water is concerned is not consistent with LU-10.4. See my comments also in regards to utilities and services copied here.

C-11

Water (41) lists that “a new six-inch fire connection would be constructed to the east of the existing connection. A total of three fire hydrants with valve lines are proposed for fire suppression on the site.” Earlier city documents indicated that of all the areas in Fort Bragg the neighborhood surrounding the hospital had issues with water pressure. This area is also the area that has grown very much with the 69-unit Danco Buildings, the new apartment complexes and townhouses along Cypress Street, the new Crisis Respite Center on 517 Cypress Street along with the new Parents and Friends housing unit on Cypress Street, and the low income senior housing on Cypress Street. How is that possible with the low water pressure?

Wastewater (41) How can Utilities and Service Systems c be mitigated? What is the wastewater plant’s average dry and wet weather flow capacity? At what capacity is the plant operating? Are there plans for expansion for the wastewater plant and infrastructure?

(198) Neither PF-1.1: All new development proposals shall be reviewed and conditioned to ensure that adequate public services and infrastructure can be provided to the development without substantially reducing the services provided to existing residents and businesses, nor PF-1.2: Ensure Adequate Services and Infrastructure for New Development. No permit for development shall be approved unless it can be demonstrated that such development will be served upon completion with adequate services, including but not limited to potable water; wastewater collection, treatment and disposal; storm drainage; fire and emergency medical response; police protection; transportation; schools; and solid waste collection and disposal; as applicable to the proposed development are consistent with this Project.

See also my comments under Utilities and Services about Stormwater Drainage (41) This comment is very vague: “For example, bioretention facilities would be sized to capture and treat runoff from the proposed impervious surfaces produced by the 24-hour, 85th percentile rain event.” Are bioretention facilities planned? How could Utilities and Service Systems be mitigated? What capacity would the stormwater drainage system be operating at? We all know that along with the droughts we can have “atmospheric rivers” flood areas and considering that this property is next to a Special Review and Runoff Area leading to the Noyo River is concerning.

Other Utilities and Services (41) C&S Waste Solutions would provide solid waste collection services. How could Utilities and Service Systems d be mitigated? I am concerned with the enormous amount of waste created by GO as everything is packaged. I am concerned both about their waste and also the waste that shoppers leave behind or take home and then dispose off and create more waste than they did in the past. Fort Bragg has a huge problem with waste. The new transfer station north of town is not built yet. They will not accept buy back, nor hazardous waste. The Caspar transfer station on 409, nor the Albion transfer station are offering these services. What is the capacity of the Ukiah landfill? Are there requirements for diversion of construction and demolition waste? We are told that the building is moldy. What proof do we have? We are told it might have asbestos. Would that not have been checked out before it became a Social Services Building? How many trips would it take to deliver the asbestos to a Superfund site? How much asbestos is there? It seems before this project gets approved the mold and asbestos issue needs to be checked out.

Both Stormwater Drainage and Waste are not consistent with PF-1.1 & PF-1.2. This project will also create a bigger need for emergency medical response and police protection do to the fact that alcohol and tobacco will be sold. Many homeless people will be frequenting the GO on their way to the beach/ocean. This is not consistent.

C-11
cont'd

C-12

<p>See my comments about OS-5.2 under Biological Resources. Also OS-5.3 would require site planning and construction to maintain adequate open space to permit effective wildlife corridors for animal movement between open spaces would not be consistent as the fences, parking lot, streets, traffic from cars & trucks would not be attractive for wildlife, and basically no corridors would be available to them. This is not consistent.</p>	<p>C-13</p>
<p>The Goal for Runoff Reduction (206). In Developments of Special Water Quality Concern, the post development peak stormwater runoff discharge rate shall not exceed the estimated predevelopment rate for developments where an increased discharge rate will result in increased potential for downstream erosion or other adverse habitat impacts.</p> <p>This is not consistent as the property is located next to a special review and runoff sensitive area and the Project does not consider that with drought we can also have atmospheric rivers.</p>	<p>C-14</p>
<p>C-2.6: Traffic Studies for High Trip Generating Uses: Traffic studies shall be required for all major development proposals, including but not limited to, drive-through facilities, fast food outlets, convenience markets, major tourist accommodations, shopping centers, commercial development, residential subdivisions, and other generators of high traffic volumes that would affect a Level of Service. Traffic studies shall identify, at a minimum: (b) other known and foreseeable projects and their effects on the street system.</p> <p>Many of the projects are known by the community as well as future foreseeable projects, but are not addressed in this DEIR. I have listed them precisely under other topics.</p> <p>CD-2.2 Large Commercial Development: Ensure that large commercial development, such as shopping centers, big box retail, and mixed use development, fits harmoniously with the scale and design of existing buildings and streetscape of the City. In my mind there is nothing harmonious about this cookie cutter ugly development.</p> <p>CD-2.5 Scenic Views and Resource Areas: Ensure that development does not adversely impact scenic views and resources as seen from a road and other public rights-of-way. As both signs would be visible it would have a negative affect as far as scenic view is concerned, and also compared with the beauty of this area, a big attraction to many eco-tourists it would impact the scenic view.</p> <p>CD-5.1 Parking Location: Wherever feasible, locate parking facilities to the rear of the development so that the building facade is contiguous with the street frontage, and parking areas are hidden from the street. Unfortunately the current design does not hide the ugly parking lot. With 3 parcels a way could have been found to hide the parking lot especially as this GO is placed along N. Harbor Drive, the access to the heart of Fort Bragg. Other than the coastal trail this is the only major attraction in Fort Bragg enjoyed by locals and visitors alike.</p> <p>SF-6.1 Demand for Police Services: Review development proposals for their demand for police services and implement measures to maintain adequate police services. Police services are hard to come by in this town with many homeless, drug addicted people who often suffer from mental health issues and offering “cheap food”, alcohol and tobacco only exasperate the situation. Countywide we are lacking enough police services.</p> <p>As far as noise is concerned I pity those who own property next to the GO. They already have to put up with the sirens from ambulances, but in addition now have the noise from cars & trucks in relation to the GO.</p>	<p>C-15</p>

Issues in regards to **transportation and circulation** I already addressed above. Please see comments received by City Council meeting Oct. 11, 2022 by Mary Rose Kaczorowsky about GO about traffic and safety. I concur with her comments. I also concur with comments made by Mikael Blaidsdell (neighbor) on this occasion about transportation and circulation issues.

CIRCULATION, TRANSPORTATION, AND PARKING (40)

Confusing/contradictory information: "Parking area with 53 parking spaces would be constructed on the south side of the Grocery Outlet building including two RV spaces on the western side of the lot and one motorcycle parking space. Four electric vehicle parking stalls will be provided with the required wiring for charging facilities to be installed in the future. Additionally, six clean air vehicle priority parking spots will be provided. Further, an internal system of walkways and crosswalks would be provided, as well as two bicycle parking racks."

C-15
cont'd

The total # of parking spaces listed in the NOP submitted to the State Clearinghouse lists a 47-space parking lot.

As far as I can tell the drawings for the Project did not include places where shopping carts could be kept.

The fact that there are two entries to the store and the traffic would endanger people walking to and from the store has not been solved even though the Planning Commission insisted on that.

This environmental consultant gave a lowball cost estimate to prepare this DEIR and had already been working with the developer. The outcome is as bad as the outcome with the previous attempt to bring a GO to Fort Bragg. My fears of a superficial analysis also addressed to the city council on 3-13-2022 when the scope of work for the RSP for the EIR was only addressed in a consent calendar item and the city council members refused to talk about it even though they were asked by more than 1 person to allow input carried over to the current feeling I have now after having read the 916 pages. You used mostly old studies. I am very disappointed. You mentioned that you needed to address the Mandatory Findings of Significance, but omitted them. The areas Hazards and Hazardous Materials should have been addresses as you received a letter by DTSC. Hydrology & Water Qualities also should have been addresses as all these have affects that are very significant.

C-16

I will send my comments to the Planning Commission and City Council to Heather to forward to you, but it will be after the deadline.

Sincerely, Annemaire Weibel

Response to Letter C: Annemarie Weibel

Response C-1: The commenter provides introductory comments regarding their review of the Draft EIR. The commenter also states that the Draft EIR states that the proposed Project is appealable to the California Coastal Commission because it is within 300 feet of what is considered a coastal bluff. The commenter concludes by stating that the Notice of Preparation (NOP) indicates that the proposed Project cannot be appealed to the California Coastal Commission.

Please see Responses C-2 through C-15 regarding the specific listed concerns.

The information in the Draft EIR is technically accurate. The City acknowledges the commenter's interest in appealing the proposed Project.

Response C-2: The commenter makes statements regarding water supplies for other projects in the City. The commenter questions: "What is the capacity of the water system serving the GO? What is the water serving program for this site? How can Utilities and Service Systems be mitigated?" The commenter also makes statements regarding water pressure. The commenter then asks how the proposed water connections and water valve lines are possible with low water pressure.

The commenter poses the following questions regarding wastewater and stormwater drainage: "How can Utilities and Service Systems be mitigated? What is the wastewater plant's average dry and wet weather flow capacity? At what capacity is the plant operating? Are there plans for expansion for the wastewater plant and infrastructure? Are bioretention facilities planned? [...] How could Utilities and Service Systems be mitigated? What capacity would the stormwater drainage system be operating at?"

Further, the comment expresses concern regarding the amount of solid waste created by the proposed Project, and poses the following questions: "What is the capacity of the Ukiah landfill? Are there requirements for diversion of construction and demolition waste? We are told that the building is moldy. What proof do we have? We are told it might have asbestos. Would that not have been checked out before it became a Social Services Building? How many trips would it take to deliver the asbestos to a Superfund site? How much asbestos is there?"

Impacts associated with water, stormwater drainage, wastewater, and solid waste are discussed in Section 3.8, Utilities and Services Systems, of the Draft EIR. As discussed in Impact 3.8-5 on pages 3.8-16 and 3.8-17, the City supplies treated potable water at a rate of approximately 78 gallons/1,000 square-foot (SF) of commercial space. The proposed Project is estimated to demand 1,288 gallons per day utilizing this average rate. The rates identified in the 1986 Water System Study and Master Plan were slightly higher, showing a rate of 1,656 gallons per day/gross acre of commercial. Utilizing this higher rate, the proposed Project could demand 2,699 gallons per day. However, this water demand is likely an overestimation as the proposed Project would not have onsite food preparation

or processing as all food arrives pre-packaged. For these reasons, this is considered a conservative estimate. The City has adequate capacity in their appropriations, storage, and treatment ability to serve the additional demand under either water demand rate.

Water supply analyses within the Municipal Service Review and Sphere of Influence Update indicate that the City has sufficient water supply to serve the projected buildout of the City of Fort Bragg as currently zoned within the existing City Limits through 2040. An amendment to the existing zoning or General Plan land use designation is not proposed for the Project and therefore is consistent with the water supply analysis of the City of Fort Bragg Municipal Service Review.

Water bills from comparable Grocery Outlet stores in Northern California were also reviewed to estimate the proposed Project water demand. The average Grocery Outlet Store uses 300 to 450 gallons of water per day (109,500 to 164,250 gallons per year) in both domestic water for the store and irrigation water for the landscaping. The Grocery Outlet store average use is considerably lower than was estimated using the average commercial space rate.

Appendix D of this Final EIR includes the water utility bills for the Willits Grocery Outlet location. The meter reading dates included in the appendix are January 18, 2022 to September 19, 2022. The appendix also includes a table on page 17 which shows the average water usage in gallons per day. As shown, the average water usage for the Willits Grocery Outlet from January 18, 2022 to September 19, 2022 was 357.50 gallons per day.

Overall, impacts related to water supply as a result of the proposed Project would be less than significant; as such, mitigation is not required.

As discussed in Impact 3.8-2 on pages 3.8-7 and 3.8-8, the Wastewater Treatment Plant (WWTP) has a facility design flow capacity of 1.0 million gallons per day (mgd) (average dry weather treatment capacity), 4.9 mgd (peak daily wet weather treatment capacity), 2.2 mgd (average monthly wet weather treatment capacity). In 2016, the District's average daily flow volume was 0.842 mgd. The approximately 0.001 mgd of wastewater generated by the proposed Project accounts for 0.12 percent of the total WWTP capacity.

As discussed in Impact 3.8-6 on pages 3.8-24 and 3.8-25 of the Draft EIR, installation of the proposed Project's storm drainage system will be subject to current City of Fort Bragg Design Specifications and Standards. The proposed storm drainage collection and detention system will be subject to the SWRCB and City of Fort Bragg regulations, including: Fort Bragg Storm Drain Master Plan, 2004; Phase II, NPDES Permit Requirements; NPDES-MS4 Permit Requirements; and LID Guidelines.

The proposed stormwater infrastructure is discussed in Chapter 2.0, Project Description of the Draft EIR. As discussed, on-site drainage will be managed utilizing post-construction Low Impact Development (LID) site design measures and Best Management Practices (BMPs). For example, bioretention facilities would be sized to capture and treat runoff from the proposed impervious surfaces produced by the 24-hour, 85th percentile rain

event. Additionally, landscaped areas would be provided throughout the site to encourage natural stormwater infiltration. Perimeter improvements, such as sidewalk curbs, gutters, pervious pavement, and landscaping would be required to convey flows from the Project site to the existing Caltrans stormwater drainage system located west of the Site on State Highway 1, which does not currently exist in the vicinity of the site. The proposed preliminary grading and drainage plan is shown in Figure 2.0-8. The proposed storm water management plan is shown in Figure 2.0-9. As shown in the figures, two retention areas would be located along the western site boundary.

As discussed in Impact 3.8-7 on pages 3.8-28 and 3.8-29, Redwood Waste Solutions would provide solid waste collection services to the Project site, where solid waste would be collected from a trash bin enclosure to be installed in the western portion of the Project site. Solid waste is taken to the Potrero Hills Landfill. The addition of the volume of solid waste associated with the proposed Project is estimated to be 50.4 pounds per day using a Supermarket rate from CalRecycle of 3.12lbs/1,000sf/day (Table 3.8-6). As discussed in Section 3.8 of the Draft EIR, the additional solid waste would not cause an exceedance of the Potrero Hills Landfill's maximum permitted throughput of 4,330 tons per day. The Potrero Hills Landfill has a remaining capacity of 13,872,000 cubic yards. Solid waste would not be disposed of at the Ukiah Landfill.

With respect to asbestos, the Mendocino County Air Quality Management District regulates asbestos under two different programs. The Federal Clean Air Act National Emissions Standards for Hazardous Air Pollutants (NESHAP) contains requirements for Renovation and Demolition of existing structures (including notification forms). The California Air Resources Board Air Toxic Control Measures for Naturally Occurring Asbestos regulations tend to effect new construction and grading activities. Further, during any disturbance of asbestos-containing material (ACM) on the Project site, the CAL OSHA worker health and safety regulations would apply regardless of friability or quantity disturbed. If there is greater than 100 square feet of ACM which will be affected by the demolition, a California Licensed Contractor who is registered with CAL OSHA for asbestos would be hired. The regulations regarding asbestos are found in Title 8 CCR Section 1529, and also include formal notification requirements to CAL OSHA at least 24 hours prior to removal. Removal would be conducted with the material(s) kept in a wetted state in order to contain dust and hazardous emissions.

Air toxics regulations under the Clean Air Act specify work practices for asbestos to be followed during demolitions and renovations of all facilities, including, but not limited to, structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). The regulations require a thorough inspection where the demolition or renovation operation will occur. The regulations require the owner or the operator of the renovation or demolition operation to notify the District before any demolition, or before any renovations of buildings.

The rule requires work practice standards that control asbestos emissions. Work practices often involve removing all asbestos-containing materials, adequately wetting all

regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable, as the regulation explains in greater detail. These work practice standards are designed to minimize the release of asbestos fibers during building demolition or renovation, waste packaging, transportation and disposal.

Response C-3: The commenter states that views of the harbor, Noyo River, and ocean from the Project site are visible, and reproduced City General Plan Policy CD-1.4, Policy CD-2.2, and Chapter 17.38 of the City's Municipal Code. The commenter concludes by stating that, "Consistent with Appendix G of the CEQA Guidelines, the proposed Project will have a significant impact on aesthetics if it will have a substantial adverse effect on a scenic vista. In my mind it does."

Impacts associated with aesthetics are discussed in Section 3.1, Aesthetics and Visual Resources, of the Draft EIR. Specifically, impacts associated with scenic vistas are discussed in Impact 3.1-1 on pages 3.1-6 through 3.1-9. As discussed, the proposed Project would not have a substantial adverse effect on a scenic vista. Per Map CD-1 of the City's Community Design Element of the Coastal General Plan, the proposed Project is not located in an area designated as having "potential scenic views toward the ocean or the Noyo River". The Project site is not located "along the ocean" or within a "scenic coastal area" within the meaning of Coastal General Plan Policy CD 1.1, which provides that "[p]ermitted development shall be designed and sited to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance scenic views in visually degraded areas." Rather, the Project site is located on the landward side of State Highway 1, and there is intervening visually obtrusive commercial development between the site and State Highway 1.

Response C-4: The commenter quotes information from the Project Description of the Draft EIR regarding building architecture and signage. The commenter then states that they don't think the architecture or illuminated sign are aesthetically pleasing, and believes the illuminated sign could be seen from a potentially scenic highway.

Impacts associated with aesthetics are discussed in Section 3.1, Aesthetics and Visual Resources. As discussed, neither of the two highways near the Project site, State Highway 1 and State Highway 20, are state scenic highways. Per Caltrans Scenic Highway System Lists, State Highway 1 and State Highway 20 are eligible state scenic highways, although they have not been designated as scenic (Caltrans, 2019).

While the majority of the comment does not address the adequacy of the Draft EIR, or compliance with CEQA, this comment is noted and will be forwarded to the decision makers for their consideration of topics beyond the adequacy of the Draft EIR.

Response C-5: The commenter provides comments regarding diesel particulate matter and diesel fuel supply.

While the comment does not address the adequacy of the Draft EIR, or compliance with CEQA, this comment is noted and will be forwarded to the decision makers for their consideration of topics beyond the adequacy of the Draft EIR.

Response C-6: The commenter states that habitat evaluations should have been done at various times throughout the year and not only on March 29, 2022 and April 20, 2022, and expresses support for Leslie Kashiwada's statements. The commenter states that the past studies by De Novo do not thoroughly evaluate wetlands, bats, and protection of the trees. Additionally, the commenter states that "it is concerning that there is no promise made to save these established trees that provide habitat for potentially threatened and endangered animals, and could provide a landing spot for migratory birds." The commenter quotes General Plan policies OS-14.3, CD-1.11, OS-5.1, and OS-5.2.

The site was surveyed multiple times throughout spring and fall as part of the recent and previous biological resources and wetland surveys. As discussed in Section 3.3, Biological Resources, field surveys were completed by De Novo Planning Group Principal Biologist Steve McMurtry on March 29, 2022 and April 20, 2022. Additionally, as part of the Biological Review completed for the proposed Project (Wildland Resource Managers, August 2019), the Project site was visited by Wildland Resource Managers staff on August 9, 2019. Further, a Wetland Report (Wildland Resource Managers, March 2021) was completed for the Project site because the on-site soil is mapped as hydric. As part of the Wetland Report, the Project site was visited on the afternoon of March 15, 2021 by Wildland Resource Managers' principal biologist for the purpose of determining if wetlands, of any type, are present at the site.

As discussed on page 3.3-6 of Section 3.3, Biological Resources, of the Draft EIR, sightings and other evidence of wildlife at the Project site was very limited. Gopher mounds were evident in the southern parcel, and two crows were seen perched on the abandoned building and then flew south off-site within a minute after the surveyor's arrival. No other wildlife was seen during the surveys. There were no scat, guano, nests, burrows, whitewash, or trails of any kind found on the site. No sensitive species were detected on the site during the field visits.

With respect to wetlands, see Impact 3.3-4 in Section 3.3. As discussed, there are no visible streams, wet swales, wetland, or other aquatic feature on the Project site. The NRCS Web Soil Survey (2022) maps the Project site as "Urban Land." It was found that there are three minor soil components (3%) with a hydric soil rating that can occur within this map unit. Given that there was a potential for soil inclusions of the minor components with a hydric rating, six soil test pits were dug and soils were tested for hydric characteristics by De Novo Planning Group in 2022. The soil test included the use of an Alpha-alpha-Dipyridyl solution to confirm the presence of ferrous (Fe++) iron in soils. Ferrous iron is an indicator of reducing conditions and the possibility of aquatic conditions. Ferrous was not present in the soils tested in the six test pits, and there was no other soil characteristics that would suggest that there are aquatic conditions present on the Project site. All six test pits had sandy loam. It is also noted that the Fort Bragg Wetland Report