

This section shows the minor edits and changes to the Draft EIR. These modifications resulted from responses to comments received during the public review period for the Draft EIR, as well as City staff-initiated edits to clarify the details of the project.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis that would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5.

These changes are provided in revision marks with underline for new text and ~~strike-out for deleted text~~.

3.1 REVISIONS TO THE DRAFT EIR

0.0 EXECUTIVE SUMMARY

The following change was made to page ES-1 of the Draft EIR:

On February 2, 2022, legal counsel for the Project applicant, the Best Development Group (Best), wrote a letter to the City Council mentioning the litigation and requesting that the City Council rescind the earlier approvals for the Project and commence preparation of an EIR. During its meeting on February 28, 2022, the City Council rescinded its prior actions approving the Project and directed City staff to proceed with preparation of an EIR. On May 19, 2022, the City issued a Notice of Preparation (NOP) for the Project.

The following change was made to page ES-2 of the Draft EIR:

This Draft EIR addresses environmental impacts associated with the proposed Project that are known to the City of Fort Bragg because they were raised during the initial public review period for the MND for the Project and subsequent public hearings, in the lawsuit over the Project, or in comments responding to the NOP, or because they otherwise emerged during preparation of the Draft EIR. The text of this Draft EIR discusses impacts associated with aesthetics, air quality, biological resources, greenhouse gas emissions, land use, noise, transportation and circulation, and utilities. The remaining issues required to be addressed under CEQA are dealt with primarily in the Initial Study Checklist attached as Appendix A to this Draft EIR.

The following change was made to page ES-5 of the Draft EIR:

3.0 REVISIONS

<i>ENVIRONMENTAL TOPIC</i>	<i>PROPOSED PROJECT¹</i>	<i>NO PROJECT (NO BUILD) ALTERNATIVE</i>	<i>BUILDING REUSE ALTERNATIVE</i>	<i>DECREASED DENSITY ALTERNATIVE</i>
<i>SECTION 3.8, UTILITIES AND SERVICE SYSTEMS</i>				
UT Impact 3.8-1	LS	Less	Equal	Less
UT Impact 3.8-2	LS	Less	Equal	Less
UT Impact 3.8-3	LS	Less	Equal	Less
UT Impact 3.8-4	LS	Less	Equal	Less
UT Impact 3.8-5	LS	Less	Equal	Less
UT Impact 3.8-6	LS	Less	Equal	Less
UT Impact 3.8-7	LS	Less	Less	Less

1.0 INTRODUCTION

The following change was made to page 1.0-1 of Chapter 1.0 of the Draft EIR:

On February 2, 2022, legal counsel for the Project applicant, the Best Development Group (Best), wrote a letter to the City Council mentioning the litigation and requesting that the City Council rescind the earlier approvals for the Project and commence preparation of an EIR. During its meeting on February 28, 2022, the City Council, through its adoption of Resolution 4517-2022, rescinded its prior actions approving the Project, and thereby essentially directed City staff to proceed with preparation of an EIR. On May 19, 2022, the City issued a Notice of Preparation (NOP) for the Project.

The following changes were made to page 1.0-7 of Chapter 1.0 of the Draft EIR:

The City of Fort Bragg received seven written comment letters on the NOP for the proposed Project. A copy of the letters is provided in Appendix A of this Draft EIR. The commenting agency/citizen is provided below.

- California Department of Toxic Substances Control (June 17, 2022);
- Jacob Patterson (June 8, 2022 and June 14, 2022);
- Janet Kabel (May 19, 2022);
- Leslie Kashiwada (June 20, 2022);
- Renz Martin (June 18, 2022);
- Sherwood Valley Band of Pomo Indians (June 1, 2022).

2.0 PROJECT DESCRIPTION

The following changes were made to page 2.0-3 of the Draft EIR:

Building Architecture and Signage

The proposed Project would include 51,650 sf (1.18 acres) of hardscape areas that would be covered with the proposed store, parking lot, accessways or sidewalks, and driveways. As shown in Figure 2.0-5, the retail building would be located in the northern portion of the site with parking in the south portion.

The retail grocery store would be a maximum of 28 feet tall at the top of the proposed canopy and a maximum of 23 feet tall at the top of the proposed parapet. The proposed building includes

differentiated treatments along the base, mid-section, and top along the three facades facing public streets. Windows would remain clear glass for lighting a view out, and the roofline on the corner cut-off entrance is also unique to the other rooflines for additional visual interest. The building will be composed of various elements and details which were influenced by Fort Bragg's downtown architecture and the City's Citywide Design Guidelines. 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. Architectural perspectives of the proposed building are shown in Figure 2.0-6.

3.1 AESTHETICS AND VISUAL RESOURCES

The following changes were made to pages 3.1-6 and 3.1-7 of Section 3.1 of the Draft EIR:

The proposed Project would replace an existing structure with one of approximately the same size. The proposed retail store would occupy a similar location to the existing structure on the northern portion of the Project site, where views looking to the west toward the Pacific Ocean are blocked by the existing Super 8 hotel, west of the Project site, which is the direction in which the Pacific Ocean and landscapes immediately adjacent to the coast are located. There are limited views of the Pacific Ocean through the Project site from S. Franklin Street along the north boundary as these views extend through numerous parcels, including an existing Chevron gas station and the undeveloped Mill Project site to the west of State Highway 1. A distant keyhole view of the ocean from the public right of way is interrupted by two large trees, which obscure pedestrians' and drivers' views of the ocean and skyline. This view is very small, distant, and fragmented. Also as the view is located across multiple parcels the 'keyhole' view may be shaped by the future development patterns of these intervening sites. For Example, the vacant Mill Project site could be re-developed under existing zoning as a lumber mill. As noted previously, the City has engaged in preliminary planning for the potential re-development of the Mill Site for other uses. Future development of the site could occur if the site is rezoned through a Local Coastal Program Amendment. At some time in the future a new structure could completely block the existing distant keyhole view through the Chevron Station, across highway 1, through the mill site to the ocean.

The market's public entrance would face South Franklin Street mid-block. The proposed building parapet height would be approximately 24 feet above sidewalk level on the south side and just over 25 feet at the north side due to the lower sidewalk elevation on the north side. The proposed building setback from South Street is 18 feet and 7 inches from the property line. The proposed building setback from South Franklin Street is 10 feet. The West side of the building adjacent to the motel would be setback 24 feet and 1 inch, which is in excess of the required 20 feet setback. A mature cypress tree along the West site boundary would be protected during construction and retained.

There are currently vacant parcels across the street to the north and the east. There is also a vacant parcel between the Chevron and the Project site. The surrounding neighborhood land uses include Highway Visitor Commercial to the west and south, General Commercial to the north and east, and Office Commercial to the Northeast. One block further to the east is Low Density Residential, and High Density Residential uses are located four blocks to the east.

The following changes were made to page 3.1-8 of Section 3.1 of the Draft EIR:

Consistent with the General Plan, the immediate neighborhood is zoned for commercial uses and may be developed over time. The proposed building is slightly shorter than the existing building. As noted above, the proposed building parapet height would be approximately 24 feet above sidewalk level on the south side and just over 25 feet at the north side due to the lower sidewalk elevation on the north side. The existing buildings in the Project area are either one or two stories in height. Many buildings of similar height are located within the immediate area and include: Super 8 by Wyndham, Harbor Lite Lodge, The Seabird Lodge, Mountain Mike's Pizza, Safeway, and Accu-Tech Auto Body. Additionally, the zoning code allows Buildings of similar height on South Street and South Franklin Street on currently vacant lots.. Additionally, planting street trees at regular intervals on both sides of the streets is a cost-effective visual intervention. Street trees that are spaced regularly on both sides of the street increasingly contribute to the sense of visual enclosure and affect the aspect ratio and visual definition as they mature.

3.2 AIR QUALITY

The following changes were made to page 3.2-20 of Section 3.2 of the Draft EIR:

The proposed Project would be both a direct and indirect source of air pollution. Direct sources of pollution include area, energy, and water and waste sources, due to development of the on-site building and associated infrastructure. As discussed in Section 3.7, Transportation and Circulation, of the Draft EIR, due to the re-routing of existing trips from the Willits Grocery Outlet to the proposed Fort Bragg Grocery Outlet, VMT would decrease as a result of the Project.

The following changes were made to pages 3.2-21 and 3.2-22 of Section 3.2 of the Draft EIR:

It should also be noted that the proposed Project would reduce net VMT (i.e., to lower VMT compared with the baseline condition), which would imply that the results in Table 3.2-8 likely represent an overestimate for project net mobile emissions. The *CEQA VMT Analysis* indicated that based on the location of competing stores, the Grocery Outlet Store's most likely effect on regional travel is to slightly reduce the length of trips from areas south of the river off of SR 20 or SR 1 that are today made northbound, and to offer another option for shopping trips made by residents of areas to the north. The regional effect on VMT is likely to be small, but generally will be reduced by offering a closer option for northbound traffic. It is noted that testimony offered at the Planning Commission supported the conclusion that the Grocery Outlet Store would reduce regional VMT. More specifically, many speakers described driving to the existing Grocery Outlet Store in Willits and stated that they would patronize the new store in Fort Bragg if it were built. As provided in the *CEQA VMT Analysis* prepared by Fehr & Peers, the re-routing of even less of 1% of the current trips from Fort Bragg to the existing Willits Grocery Outlet (located approximately 35 miles from Fort Bragg) would result in a net decrease in VMT for the proposed Project both baseline (2022) and future year (2030) conditions.

3.3 BIOLOGICAL RESOURCES

The following change was made to page 3.3-1 of Section 3.3 of the Draft EIR:

This section describes the regulatory setting, regional biological resources, and impacts that are likely to result from Project implementation. The analysis contained in this section is intended to be

at a Project-level, and covers impacts associated with the conversion of the entire site from a partially developed lot to a retail use. This section is based in part on the following: *Fort Bragg Coastal General Plan* (City of Fort Bragg, July 2008), *California Natural Diversity Database* (CDFW 2022), *USFWS Information Planning and Consultation System* (IPAC) (USFWS 2022), March 28 and April 20, 2022 Field Surveys (De Novo Planning Group, 2022), and a review of previous studies performed on the Project site (the *Grocery Outlet Fort Bragg, California Property Biological Review* (Wildland Resource Managers, August 2019), the *Grocery Outlet Fort Bragg Wetland Report* (Wildland Resource Managers, March 2021).

The following change was made to page 3.3-2 of Section 3.3 of the Draft EIR:

Field investigations were performed on foot using transects. Habitat was recorded, and the Project site was inspected for the presence, or potential for presence of wildlife. This includes a search for evidence of animal signs (i.e. scat/tracks, guano, etc.). Test pits were dug in six locations to view the soil profile and test for hydric soil characteristics. Alpha-alpha-Dipyridyl solution was used on test pit soils to confirm the presence or absence of ferrous (Fe++) iron in soils (test for reducing conditions and the possibility of aquic conditions). Visibility during the survey was considered good. Weather conditions were mostly clear skies, winds of approximately 8 miles per hour, and temperatures of 64 degrees Fahrenheit. Tools used during the field investigations included a Trimble GeoExplorer XH Handheld (sub-foot unit), 30-meter tape measure, diameter tape, Kestrel 3000 Weather Station, spade, Dutch auger, Munsell color chart, Vortex 20-60x80 spotting scope, and Swarovski 10x42 binoculars. The results of this survey are incorporated into this section.

The following changes were made to page 3.3-4 of Section 3.3 of the Draft EIR:

Vegetation

The majority of the vegetation is limited to the southern-most parcel. Even here, vegetation is sparse and limited to approximately two-thirds of the property as the middle of the area is bare soil. Plant species identified in the southern parcel are listed in Table 3.3-1. The Project site contains mostly plants that are classified as associated of uplands (Upland-UPL and Facultative Upland – FacU), however, there are two species of plants that are Facultative, meaning they are equally likely to occur in an upland or wetland. The north parcel is well over 98 percent covered by a paved parking lot and portions of the vacant building. There is a row of planted shrubbery along the north side of the parking area that includes butterfly bushes, California rose, Himalayan blackberry, pampas grass, and four ornamental trees. Rhododendrons are also found on the east side of the existing building.

The following changes were made to page 3.3-5 of Section 3.3 of the Draft EIR:

The NRCS Web Soil Survey (2022) identifies the Project site as “Urban land.” This soil map unit is made up of mostly urban developed land, but can have several minor components (3%) within the map unit including: Biaggi, Shinglemill, Gibney, Tregoning, Tropaquepts, Heeser, Cabrillo, and Harecreek. Three of these soil units (Shinglemill, Tregoning, and Tropaquepts) have a hydric soil rating within the landforms of marine terraces and depressions. The other soil units do not have a hydric rating. 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 (De Novo Planning Group, 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 aquic 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 aquic conditions present on the Project site. All six test pits had sandy loam.

It is also noted that the *Fort Bragg Wetland Report* (Wildland Resource Managers, March 2021) provides the same conclusions that there are no aquatic resources present on the Project site. That study included four additional test pits. As such, ten total soil test pits were completed (six by De Novo Planning Group in 2022, and four by Wildland Resource Managers in 2021).

The following changes were made to page 3.3-6 of Section 3.3 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 or ravens 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.

The following changes were made to page 3.3-29 of Section 3.3 of the Draft EIR:

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 aquic 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 aquic conditions present on the Project site. All six test pits had sandy loam (De Novo Planning Group, 2022). It is also noted that the *Fort Bragg Wetland Report* (Wildland Resource Managers, March 2021) provides the same conclusions that there are no aquatic resources present on the Project site. That study included four test pits.

3.4 GREENHOUSE GASES, CLIMATE CHANGE, AND ENERGY

The following changes were made to page 3.4-2 through page 3.4-4 of Section 3.4 of the Draft EIR:

The effects of increasing global temperature are far-reaching and extremely difficult to quantify. The scientific community continues to study the effects of global climate change. In general, increases in the ambient global temperature as a result of increased GHGs are anticipated to result in rising sea levels, which could threaten coastal areas through accelerated coastal erosion, threats to levees and inland water systems and disruption to coastal wetlands and habitat.

Sea level has risen approximately seven inches during the last century and it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels (California Environmental Protection Agency, 2010). If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or failure of species to migrate in time to adapt to the perturbations in climate, could also result. Under the emissions scenarios of the Climate Scenarios report (California Environmental Protection Agency, 2010), the impacts of global warming in California are anticipated to include, but are not limited to, the following.

Public Health

Higher temperatures are expected to increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation are projected to increase from 25% to 35% under the lower warming range and to 75% to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures will increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

Water Resources

The State's water supplies are also at risk from rising sea levels. An influx of saltwater would degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water. In Fort Bragg, Madsen Hole located in the Noyo River is where the intake pipe is located that provides fresh water to the City of Fort Bragg. Fresh water comes downstream and meets the tidal water from the ocean. When tides come in, salt water is pushed up river near intake pipes, putting the city's water supply at risk. Because of the inflow of the tidal water, the City has installed desalination equipment to reduce the salinity of the water. This helps ensure that the water quality of the fresh water that services the City of Fort Bragg. This issue is likely to be exacerbated as sea levels rise due to climate change, over the long term.

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures will increasingly threaten the State's coastal regions. Under the higher warming scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats.

3.5 LAND USE AND PLANNING

The following changes were made to page 3.5-1 of Section 3.5 of the Draft EIR:

This section describes the existing land uses on the Project site and in the surrounding area, describes the applicable land use regulations, and evaluates the environmental effects of implementation of the proposed Project related to land use. Information in this section is based on the following reference documents: *Grocery Outlet Urban Decay Analysis in Fort Bragg, California* (ALH Urban & Regional Economics, 2023), *Fort Bragg Coastal General Plan* (City of Fort Bragg, July 2008), the *City of Fort Bragg Citywide Design Guidelines* (City of Fort Bragg, 2022) and the Fort Bragg Municipal Code (City of Fort Bragg, 2021).

The following changes were made to pages 3.5-30 through 3.5-34 of Section 3.5 of the Draft EIR:

The following discussion is based on the Urban Decay Study (ALH Urban & Regional Economics, 2023) completed for the proposed Project. See Appendix J of this Draft EIR for the complete Study.

PROPOSED GROCERY OUTLET STORE AND PRIMARY MARKET AREA CHARACTERISTICS

The proposed Grocery Outlet store is would serve a primary market area along coastal Mendocino County, extending from Cleone to the north and Point Arena to the south. This area has a population base of 21,384 people and 9,565 households with average household incomes in 2022 of \$84,331.

The Grocery Outlet store is estimated to achieve annual sales of \$6.5 million during its first year of operations, comprising \$2.3 million in perishable goods and \$4.2 million in non-perishable goods. Prices at Grocery Outlet are generally 40% to 70% below conventional retailers and 20% below the leading discounters.

The primary market area households are estimated to generate demand for \$258.5 million in annual retail sales, including \$40.1 million in food and beverage store sales. Overall, as of 2021, the area is characterized by retail sales leakage in all major retail categories except food and beverage stores, building materials and garden equipment, and gasoline stations. The attraction in food and beverage stores comprise 60% of all food and beverage sales, where the retail leakage in all other categories range from -12% to -78% of sales. The high leakage amounts generally indicate that the primary market area is under-retailed relative to the demand generated by its population base.

EXISTING POTENTIAL COMPETITIVE STORES

There are a select number of stores in Fort Bragg, nearby Mendocino, and the general primary market area environs that might be competitive to varying degrees with the proposed Grocery Outlet because of the availability of overlapping merchandise. These stores are a subset of the following categories of stores: Grocery Stores; Natural Food Stores; Other Stores with Substantial Food and Beverage Sales; Convenience Stores; and Gas Station Convenience Stores. There are nine grocery facilities distributed throughout different residential neighborhoods and commercial establishments in the community, including: Safeway (660 South Main Street), Harvest Market (171 Boatyard Drive), Purity Supermarket (242 North Franklin Street), Nello's Market and Deli (860 North Main Street), La Mexicana Market (116 S. Main Street), Down Home Foods (115 S. Franklin Street), Colombi Market and Deli (647 E Oak Street), B&C Grocery (401 E. Oak Street) and El Yuca (242 North Mcpherson Street).

Of all these stores, the existing stores that are anticipated to have more food and related sales overlap with Grocery Outlet relative to other area stores include the full-service grocery stores, of which there are four (including one in Mendocino), and the general merchandise store Dollar Tree. The Natural Food Stores, Convenience Stores, Other Stores with Substantial Food and Beverage Sales (excluding Dollar Tree), and Gas Station Convenience Stores are not anticipated to experience much, if any competitive overlap.

GROCERY OUTLET IMPACT ON THE RETAIL MARKET

Based on the estimated Grocery Outlet store sales by type of retail, and the volume of sales estimated to be supported by primary market area residents, the proposed Fort Bragg Grocery Outlet store will need to capture only 2.1% of primary market area food and beverage sales to achieve stabilized sales consistent with national Grocery Outlet store performance standards. This is a very small capture rate. The capture rate is higher for non-perishable primary market area sales; however, these sales categories are estimated to have existing retail leakage in the primary market area. Thus, no sales impact is anticipated among stores selling non-perishable goods comparable to Grocery Outlet, as the recapture of these sales will reduce the existing leakage, making the primary market area's retail base stronger.

These findings suggest that the existing primary market area for food and other stores selling goods in common with Grocery Outlet are unlikely to experience strong individual store sales impacts resulting from the operations of the proposed Grocery Outlet Store. If sales are diverted from any existing stores resulting from Grocery Outlet's operation, they will be dispersed among many of the stores, such that no one store is likely to experience sales loss sufficient to significantly impact store sales. The full-service orientation and unique offerings at the existing grocery stores will help insulate them from the nominal amount of competitive food item sales anticipated at Grocery Outlet. Moreover, these stores have established customer bases. Accordingly, they will have the ability to modify their product mix to maximize sales in products not available at Grocery Outlet General yet targeted to meet the needs of its loyal customers.

Grocery Outlet does not exactly duplicate the market niche or product focus of any of the primary market area stores, although it is closest to Dollar Tree in its discount orientation, as well as nonperishable product offerings. However, given Grocery Outlet's relatively low levels of projected sales, Dollar Tree's pronounced general merchandise orientation, there is unlikely to be even a noticeable impact on Dollar Tree following the Grocery Outlet's opening.

EVALUATION OF URBAN DECAY

There are a range of commercial retail building or retail space vacancies scattered throughout the primary market area. Most of the vacancies are in Fort Bragg, and especially Downtown Fort Bragg or at The Boatyard Shopping Center. The vacancies are primarily located in small, older buildings, with many vacant for extended periods of time, such as two or more years. Many of the identified vacancies have been vacant since prior to the COVID-19 pandemic, or even earlier. However, many of the vacancies are not being actively marketed. This is evidenced by the lack of signage on the properties with commercial broker names, phone numbers, or even owner contact information. The physical condition of the vacancies varies, with some in well-kept condition and others appearing more rundown, or in less manicured condition, such as peeling paint in need of refreshing. None of the vacancies, however, exhibit classic signs of urban decay, such as graffiti, boarded up doors or windows, broken windows, or excessive trash. Moreover, despite the presence of some long-term commercial vacancies, there are indications of recent retail leasing activity in Fort Bragg.

Further, fieldwork conducted in March through May 2022 indicated there were no significant signs of litter, graffiti, weeds, or rubbish associated with existing commercial nodes and corridors in Fort

Bragg, with only a few isolated instances of small amounts of fast food-related trash near some commercial properties. It is noted that the City has reported some issues with transient populations at the on-site vacant building in the past. The City of Fort Bragg Code Enforcement Department receives a limited number of complaints pertaining to commercial properties, and most of these complaints do not pertain to issues associated with urban decay.

CONCLUSION

The study analysis completed as part of the Urban Decay Study does not suggest any retailers would be at risk of losing retail sales sufficient to result in store closure leading to increased commercial vacancy as a result of Grocery Outlet's development, and thus there would likely be no risk for their properties to erode into conditions leading to urban decay. Yet, if such an event were to occur, there is no indication from the market that urban decay would result from such a store closure. Even properties that have been closed for longer periods of time, up to four years or more, continue to be maintained in reasonable condition and, most importantly, are not indicative of urban decay. Thus, real estate market conditions in Fort Bragg do not appear to be conducive to urban decay.

Therefore, pursuant to the existing market conditions, projected retail supply and demand conditions, and Grocery Outlet project orientation, the Urban Decay Study concludes that there is no reason to consider that development of the proposed Grocery Outlet store would cause or contribute to urban decay.

For the reasons listed above, the proposed project is not expected to result in urban decay in the City of Fort Bragg. This is a *less than significant* impact.

3.6 NOISE

The following changes were made to pages 3.6-7 and 3.6-8 of Section 3.6 of the Draft EIR:

Consistent with Appendix G of the CEQA Guidelines and CEQA case law, the Project will have a significant impact related to noise if it will result in:

Generation of a temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, as outlined below:

- Non-transportation noise that exceeds 55 dBA L_{eq} / 75 dBA L_{max} during daytime (7 A.M. to 10 P.M.) hours, excluding temporary construction noise.
- Non-transportation noise that exceeds 45 dBA L_{eq} / 65 dBA L_{max} during daytime (7 A.M. to 10 P.M.) hours, excluding temporary construction noise.

Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of ambient conditions, as outlined below; and/or

- An increase in temporary construction noise levels of more than 12 dBA at existing residential receptors located around the project site,
- A permanent increase in operational noise that would:

- cause the L_{dn} in existing residential areas to increase by 3 dB or more;
- cause the L_{dn} in existing residential areas to increase by 2 dB or more if the L_{dn} would exceed 70 dB; or
- cause the L_{dn} resulting exclusively from project-generated traffic to exceed an L_{dn} of 60 dB at any existing residence.

Generation of excessive groundborne vibration or groundborne noise levels, as outlined below.

- A threshold of 0.20 in/sec p.p.v. at sensitive receptors.

Determination of a Significant Increase in Noise Levels

TEMPORARY CONSTRUCTION NOISE IMPACTS

With temporary noise impacts (construction), identification of “substantial increases” depends upon the duration of the impact, the temporal daily nature of the impact, and the absolute change in decibel levels. Per the City of Fort Bragg Municipal Code, construction activities operating between 10 p.m. and 7 a.m. which create a noise disturbance at the property boundary of a residence are prohibited and would be considered a significant impact.

The City has not adopted any formal standard for evaluating temporary construction noise which occurs within allowable hours. For short-term noise associated with Project construction, Saxelby Acoustics recommends use of the Caltrans increase criteria of 12 dBA (Caltrans Traffic Noise Protocol, 2020), applied to existing residential receptors in the project vicinity. This level of increase is approximately equivalent to a doubling of sound energy and has been the standard of significance for Caltrans projects at the state level for many years. Application of this standard to construction activities is considered reasonable considering the temporary nature of construction activities.

The following changes were made to pages 3.6-14 and 3.6-15 of Section 3.7 of the Draft EIR:

The loudest phase of construction would be grading at 86 dBA Leq at 50 feet. Saxelby Acoustics used the SoundPLAN noise model to calculate noise levels at the nearest sensitive receptors in terms of the City’s daytime (Leq) noise level criterion. The results of the construction noise analysis are shown graphically on Figure 3.6-6 (demolition) and Figure 3.6-7 (grading). A summary of the noise prediction results for each phase of construction are shown in Table 3.6-9. Receptor locations are shown on Figure 3.6-6.

A summary of the noise prediction results for each phase of construction are shown in Table 3.6-11. Receptor locations are shown on Figure 3.6-6.

TABLE 3.6-9: PREDICTED CONSTRUCTION NOISE LEVELS BY PHASE

RECEIVER (USE)	MEASURED DAYTIME NOISE LEVEL, LEQ ¹	PREDICTED CONSTRUCTION NOISE LEVEL, LEQ	TOTAL NOISE LEVEL (AMBIENT + CONSTRUCTION)	CHANGE
<i>DEMOLITION - BUILDING</i>				
R1 (Residential)	56.0 dBA	63.7	64.4	8.4
R2 (Residential)	56.0 dBA	65.5	66.0	10.0
R3 (Residential)	56.0 dBA	67.8	68.1	12.1
R4 (Residential)	56.0 dBA	62.2	63.1	7.1
R5 (Residential)	56.0 dBA	59.5	61.1	5.1
<i>DEMOLITION - FOUNDATION</i>				

RECEIVER (USE)	MEASURED DAYTIME NOISE LEVEL, LEQ ¹	PREDICTED CONSTRUCTION NOISE LEVEL, LEQ	TOTAL NOISE LEVEL (AMBIENT + CONSTRUCTION)	CHANGE
R1 (Residential)	56.0 dBA	68.7	68.9	12.9
R2 (Residential)	56.0 dBA	70.5	70.7	14.7
R3 (Residential)	56.0 dBA	72.8	72.9	16.9
R4 (Residential)	56.0 dBA	67.2	67.5	11.5
R5 (Residential)	56.0 dBA	64.5	65.1	9.1
<i>SITE PREPARATION</i>				
R1 (Residential)	56.0 dBA	67.5	67.8	11.8
R2 (Residential)	56.0 dBA	68.6	68.8	12.8
R3 (Residential)	56.0 dBA	69.8	70.0	14.0
R4 (Residential)	56.0 dBA	68.6	68.8	12.8
R5 (Residential)	56.0 dBA	67.3	67.6	11.6
<i>GRADING</i>				
R1 (Residential)	56.0 dBA	68.5	68.7	12.7
R2 (Residential)	56.0 dBA	69.6	69.8	13.8
R3 (Residential)	56.0 dBA	70.8	70.9	14.9
R4 (Residential)	56.0 dBA	69.6	69.8	13.8
R5 (Residential)	56.0 dBA	68.3	68.5	12.5
<i>BUILDING CONSTRUCTION</i>				
R1 (Residential)	56.0 dBA	67.5	67.8	11.8
R2 (Residential)	56.0 dBA	68.6	68.8	12.8
R3 (Residential)	56.0 dBA	69.8	70.0	14.0
R4 (Residential)	56.0 dBA	68.6	68.8	12.8
R5 (Residential)	56.0 dBA	67.3	67.6	11.6
<i>PAVING</i>				
R1 (Residential)	56.0 dBA	65.5	66.0	10.0
R2 (Residential)	56.0 dBA	66.6	67.0	11.0
R3 (Residential)	56.0 dBA	67.8	68.1	12.1
R4 (Residential)	56.0 dBA	66.6	67.0	11.0
R5 (Residential)	56.0 dBA	65.3	65.8	9.8
<i>ARCHITECTURAL COATING</i>				
R1 (Residential)	56.0 dBA	57.5	59.8	3.8
R2 (Residential)	56.0 dBA	58.6	60.5	4.5
R3 (Residential)	56.0 dBA	59.8	61.3	5.3
R4 (Residential)	56.0 dBA	58.6	60.5	4.5
R5 (Residential)	56.0 dBA	57.3	59.7	3.7

¹ AS MEASURED AT SITE ST-1.

SOURCE: FHWA, ROADWAY CONSTRUCTION NOISE MODEL (RCNM), JANUARY 2006; SAXELBY ACOUSTICS, 2022.

The following changes were made to pages 3.6-18 and 3.6-19 of Section 3.6 of the Draft EIR:

Construction Noise: During the demolition and construction phases of the proposed Project, noise from construction activities would add to the noise environment in the immediate Project vicinity. Based upon the Table 3.6-9 data, the proposed Project is predicted to generate construction noise levels of up to 72.9 dBA Leq. This would equal an approximate noise increase of up to 16.9 dBA over ambient noise conditions at the closest sensitive receptor. Therefore, additional noise control measures would be required to limit the noise increase to 12 dBA, or less. In order to reduce construction noise levels, evaluation of an 8-foot-tall temporary noise barrier was modeled. The results of the construction noise analysis are shown graphically on Figure 3.6-8 (demolition) and

Figure 3.6-9 (grading). A summary of the noise prediction results for each phase of construction are shown in Table 3.6-10. Receptor locations are shown on Figure 3.6-6.

TABLE 3.6-10: PREDICTED CONSTRUCTION NOISE LEVELS PHASE – WITH TEMPORARY CONSTRUCTION NOISE BARRIER

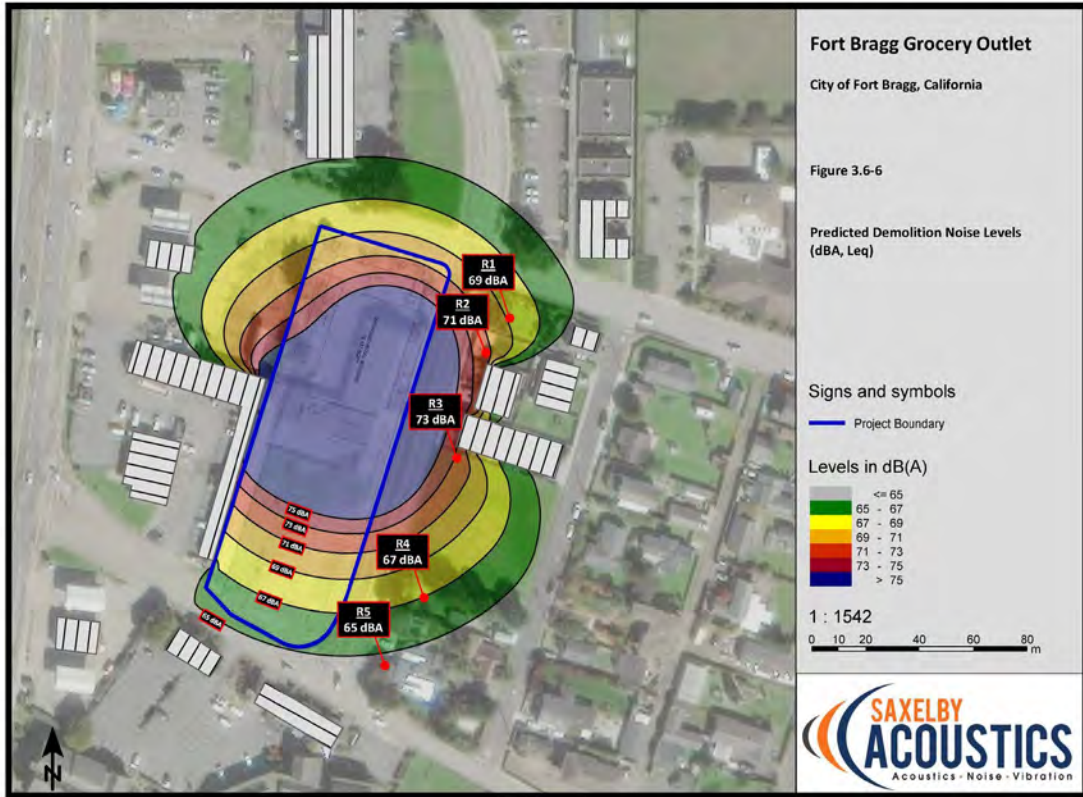
RECEIVER (USE)	MEASURED DAYTIME NOISE LEVEL, LEQ ¹	PREDICTED CONSTRUCTION NOISE LEVEL, LEQ	TOTAL NOISE LEVEL (AMBIENT + CONSTRUCTION)	CHANGE
<i>DEMOLITION - BUILDING</i>				
R1 (Residential)	56.0 dBA	59.9	61.4	5.4
R2 (Residential)	56.0 dBA	61.0	62.2	6.2
R3 (Residential)	56.0 dBA	62.6	63.5	7.5
R4 (Residential)	56.0 dBA	59.4	61.0	5.0
R5 (Residential)	56.0 dBA	57.7	59.9	3.9
<i>DEMOLITION - FOUNDATION</i>				
R1 (Residential)	56.0 dBA	64.9	65.4	9.4
R2 (Residential)	56.0 dBA	66.0	66.4	10.4
R3 (Residential)	56.0 dBA	67.6	67.9	11.9
R4 (Residential)	56.0 dBA	64.4	65.0	9.0
R5 (Residential)	56.0 dBA	62.7	63.5	7.5
<i>SITE PREPARATION</i>				
R1 (Residential)	56.0 dBA	64.5	65.1	9.1
R2 (Residential)	56.0 dBA	65.2	65.7	9.7
R3 (Residential)	56.0 dBA	66.4	66.8	10.8
R4 (Residential)	56.0 dBA	65.4	65.9	9.9
R5 (Residential)	56.0 dBA	64.3	64.9	8.9
<i>GRADING</i>				
R1 (Residential)	56.0 dBA	65.5	66.0	10.0
R2 (Residential)	56.0 dBA	66.2	66.6	10.6
R3 (Residential)	56.0 dBA	67.4	67.7	11.7
R4 (Residential)	56.0 dBA	66.4	66.8	10.8
R5 (Residential)	56.0 dBA	65.3	65.8	9.8
<i>BUILDING CONSTRUCTION</i>				
R1 (Residential)	56.0 dBA	64.5	65.1	9.1
R2 (Residential)	56.0 dBA	65.2	65.7	9.7
R3 (Residential)	56.0 dBA	66.4	66.8	10.8
R4 (Residential)	56.0 dBA	65.4	65.9	9.9
R5 (Residential)	56.0 dBA	64.3	64.9	8.9
<i>PAVING</i>				
R1 (Residential)	56.0 dBA	62.5	63.4	7.4
R2 (Residential)	56.0 dBA	63.2	64.0	8.0
R3 (Residential)	56.0 dBA	64.4	65.0	9.0
R4 (Residential)	56.0 dBA	63.4	64.1	8.1
R5 (Residential)	56.0 dBA	62.3	63.2	7.2
<i>ARCHITECTURAL COATING</i>				
R1 (Residential)	56.0 dBA	54.5	58.3	2.3
R2 (Residential)	56.0 dBA	55.2	58.6	2.6
R3 (Residential)	56.0 dBA	56.4	59.2	3.2
R4 (Residential)	56.0 dBA	55.4	58.7	2.7
R5 (Residential)	56.0 dBA	54.3	58.2	2.2

¹ AS MEASURED AT SITE ST-1.

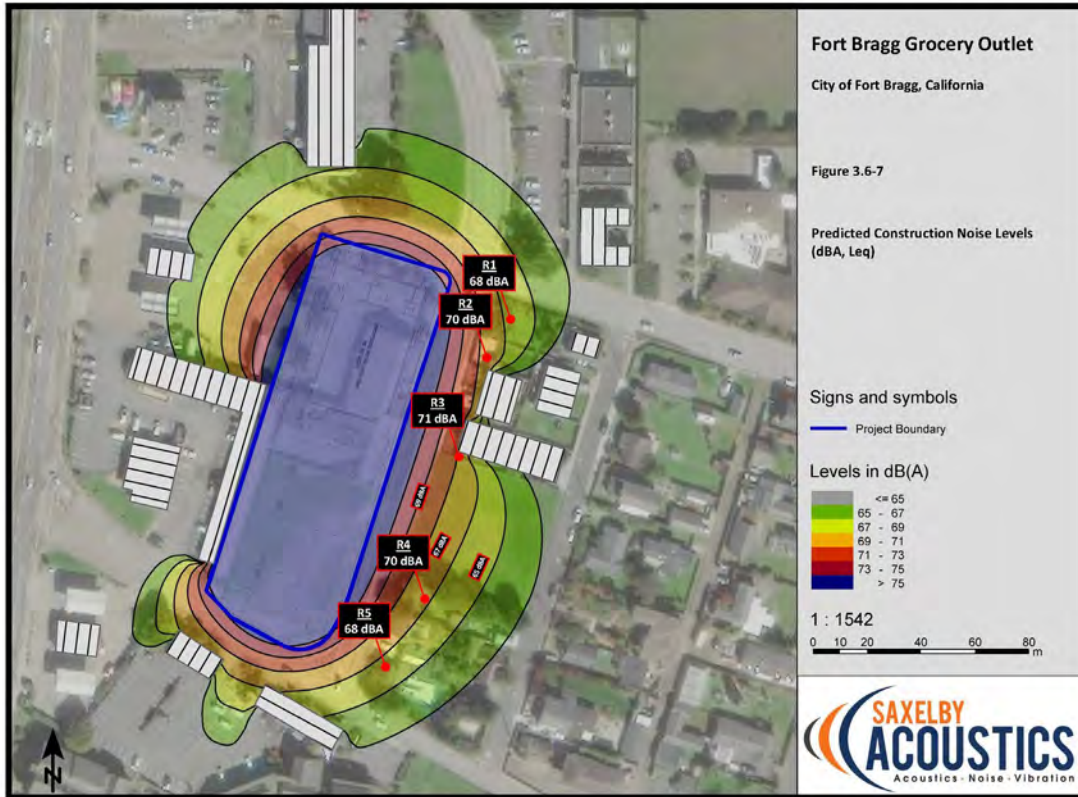
SOURCE: FHWA, ROADWAY CONSTRUCTION NOISE MODEL (RCNM), JANUARY 2006; SAXELBY ACOUSTICS, 2022.

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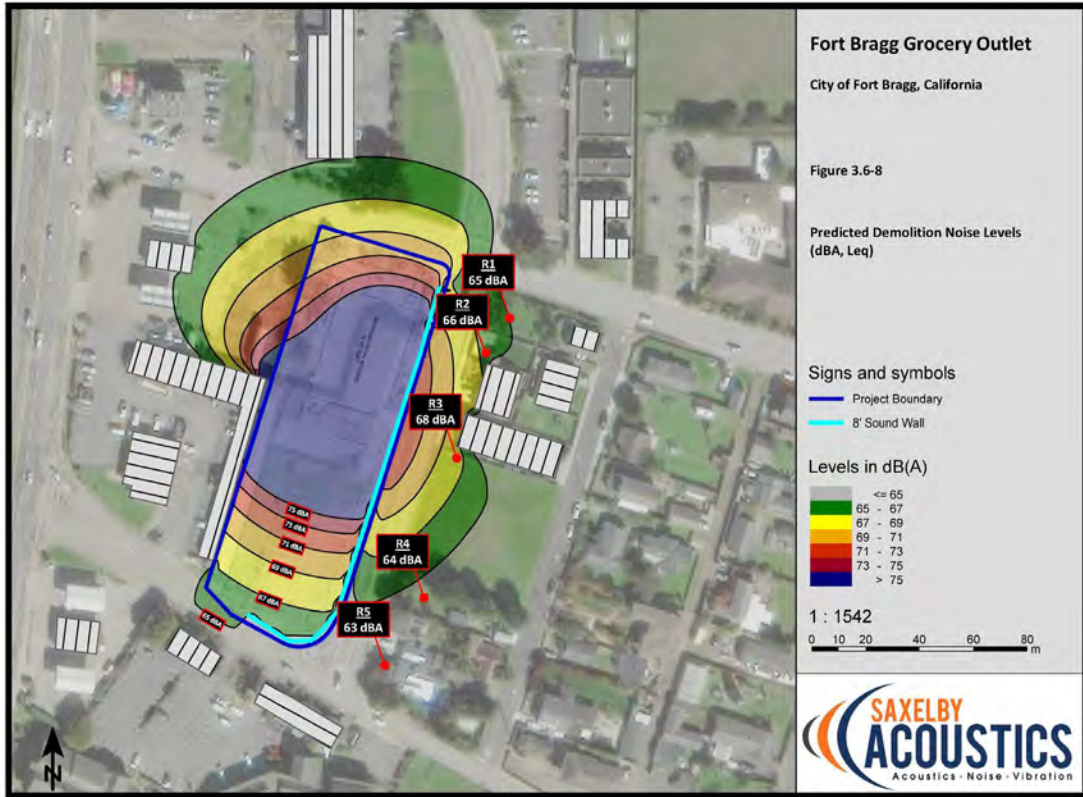
Additionally, Figures 3.6-6 and 3.6-7 in Section 3.6 were revised. The revised figures are shown below:

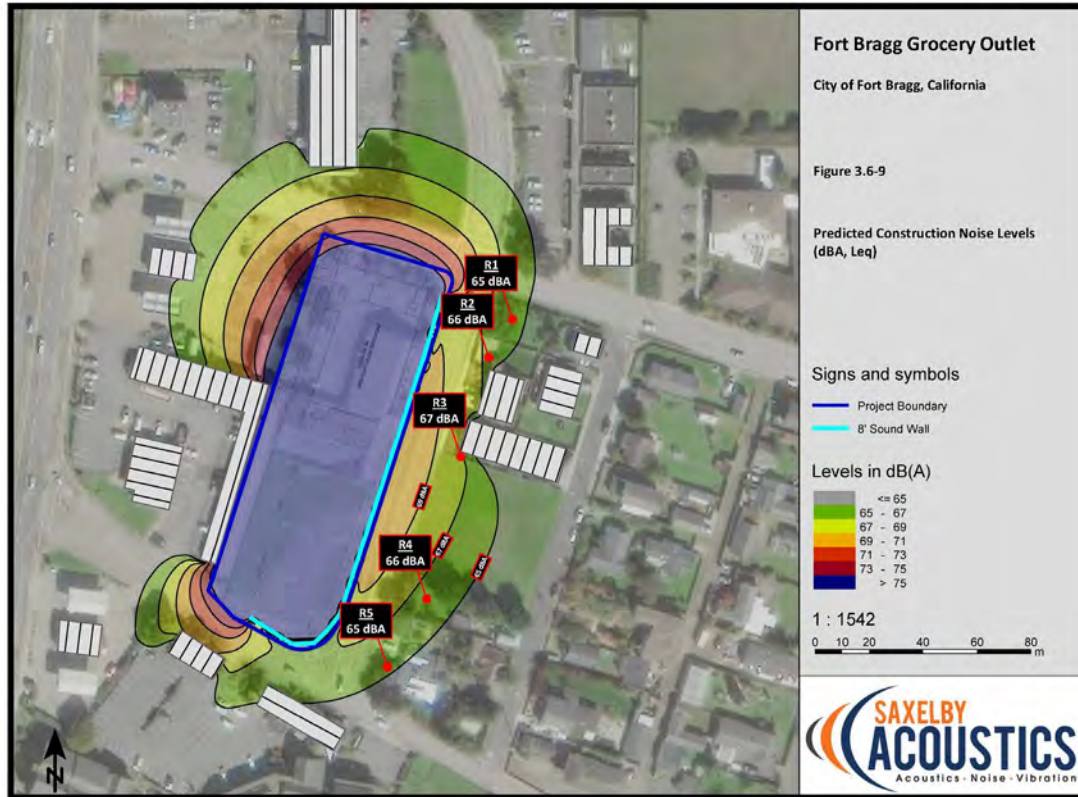


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Further, two new noise-related figures, Figures 3.6-8 and 3.6-9, were added to Section 3.6. These new figures are shown below:





3.7 TRANSPORTATION AND CIRCULATION

The following change was made to page 3.7-2 of Section 3.7 of the Draft EIR:

This section analyzes the potential environmental impacts of the proposed Project on the transportation system. This section identifies the potential transportation impacts of future buildout of the Project and recommends mitigation measures to lessen their significance. Information in this section is derived primarily from the following (as well as other information described in this section):

- *Letter RE: Grocery Outlet Store, Fort Bragg, CA: Assessment of Effects of Change in Traffic Control at SR 1/N. Harbor Drive Intersection;*
- *Final Memorandum RE: Fort Bragg Grocery Outlet Project – CEQA VMT Analysis (Fehr & Peers, 2022);*
- *Traffic Impact Analysis for Grocery Outlet Store, Fort Bragg, California (KD Anderson & Associates, Inc., 2019);*
- *Addendum to Traffic Impact Analysis for Grocery Outlet Store, Fort Bragg, California (KD Anderson & Associates, Inc., 2021);*
- *Fort Bragg Coastal General Plan (City of Fort Bragg, July 2008);*
- *City of Fort Bragg 2009 Bicycle Master Plan (November 2009);*
- *State of California, Governor’s Office of Planning and Research (OPR), Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR, December 2018);*

- *Trip Generation Manual, 10th Edition* (ITE, 2017); and
- *Trip Generation Handbook, 3rd Edition* (ITE, 2017).

The following changes were made to page 3.7-5 and 3.7-6 of Section 3.7 of the Draft EIR:

Traffic Volume Counts. The periods for intersection analysis were selected based on review of the hourly results from daily traffic volume counts. For this study during the weekday p.m. peak hour (4:00 to 6:00 pm) and Saturday midday peak hour (noon to 2:00 pm) were the highest volume periods. The highest hourly traffic volume period within each two hour window was identified as the peak hour and used for this analysis.

Figure 3.7-1 illustrates the intersection turning movement count data for study intersections. This figure also notes the geometric layout of each intersection and the location of traffic controls. This data has been used to determine the operating Level of Service (LOS) at each intersection.

As indicated in Table 3.7-2, each intersection delivers a peak hour Level of Service that satisfies minimum City of Fort Bragg requirements. It is worthwhile to note that at the SR 1 / North Harbor Drive intersection a few left turns and through traffic movements were made contrary to posted turn prohibitions. These movements were initially excluded from the LOS calculations completed in the original traffic analysis by KD Anderson & Associates in 2019. It is noted, however, that the turn prohibitions have since been removed. As such, in 2022, KD Anderson & Associates revised the LOS analysis to reflect changes in traffic movement prohibitions which occurred after 2019. The data in Table 3.7-2 and throughout this section reflects current conditions.

TABLE 3.7-2: EXISTING INTERSECTION LEVEL OF SERVICE

INTERSECTION	CONTROL	WEEKDAY PM PEAK HOUR			SATURDAY PEAK HOUR		
		MIN	OBSERVED		MIN	OBSERVED	
			LOS	AVERAGE DELAY (SEC/VEH)		LOS	AVERAGE DELAY (SEC/VEH)
SR 1 - Main Street / Cypress Street	Signal	D	B	14	D ¹	B	13
Cypress Street / Franklin Street	AWS	C	B	12	C	A	9
SR 1 – Main Street / South Street	WB Stop	D	B	11	D ¹	B	11
Southbound left turn Westbound approach			C	20		C	17
South Street / Franklin Street	NB/SB Stop	C	A	7	C	A	7
Westbound left turn			A	8		A	7
Eastbound left turn			B	12		B	11
Northbound approach Southbound approach			B	12		B	11
SR 1 – Main Street / N Harbor Drive	WB Stop	D	B	11	D ¹	B	11
Northbound left turn			B	11		B	12
Southbound left turn			C	17		D	26
Eastbound approach ² Westbound approach ²			B	14		D	29
N. Harbor Drive / Franklin Street	AWS	C	A	8	C	A	9

¹ LOS F ACCEPTED ON SATURDAY SUMMER PEAK HOUR

² EXISTING LEFT TURN AND THROUGH TRAFFIC CONTRARY TO POSTED TRAFFIC CONTROLS IS NOT INCLUDED IN LOS CALCULATION

BOLD INDICATES CONDITIONS IN EXCESS OF ADOPTED STANDARD.

SOURCE: K DANDESON & ASSOCIATES, 2022.

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The following changes were made to page 3.7-7 of Section 3.7 of the Draft EIR:

The volume of traffic occurring at unsignalized intersections was compared to peak hour traffic warrants, and the results are noted in Table 3.7-4. As shown, the current volume at the SR 1 (Main Street) / South Street intersection is close to satisfying warrants, but the volumes at this location remain below the minimum requirements for the side street approach (i.e., 100 vph). On Saturday, the peak hour volumes at the SR 1 (Main Street) / North Harbor Drive intersection reach the level that satisfy peak hour warrants, but because all of the side street approach volume was turning right,, a traffic signal is not justified.

TABLE 3.7-4: CURRENT TRAFFIC SIGNAL WARRANTS

INTERSECTION	WEEKDAY PM PEAK HOUR			SATURDAY PEAK HOUR		
	VOLUME (VPH)		WARRANT MET? ¹	VOLUME (VPH)		WARRANT MET? ¹
	MAJOR	MINOR		MAJOR	MINOR	
Cypress Street / Franklin Street	533	179	No	404	102	No
SR 1 – Main Street / South Street	2,277	88	No	2,224	78	No
South Street / Franklin Street	237	143	No	238	63	No
SR 1 – Main Street / N Harbor Drive	2,330	72	No	2,338	130	Yes
N Harbor Drive / Franklin Street	299	69	No	382	89	No

¹BASED ON RURAL PEAK HOUR VOLUME WARRANT ONLY
SOURCE: KDANDERSON & ASSOCIATES, 2020.

The following changes were made to page 3.7-10 of Section 3.7 of the Draft EIR:

TABLE 3.7-6: DIRECTIONAL TRIP DISTRIBUTION (PRIMARY TRIP)

DIRECTION	ROUTE	PERCENTAGE OF NEW TRIPS
North	SR 1 north of Cypress Street	36%
	Franklin Street north of Cypress Street	10%
East	Harbor Dr., South St. and Cypress St. east of Franklin St.	4%
South	SR 1 south of Noyo River	50%
Total		100%

SOURCE: KDANDERSON & ASSOCIATES, 2019.

Pass-by trips will be drawn from traffic already passing the site as part of other trips. In this case, because the volume of traffic on Main Street (SR 1) is much greater than that occurring on Franklin Street or North Harbor Drive adjoining the site, it has been assumed that pass-by traffic will mainly be diverted from the state highway. Because the volume of peak hour traffic headed northbound and southbound on SR 1 is relatively even, pass-by trips have been assumed to be diverted equally from each direction.

Background Traffic Assumptions. Based on the configuration of the local circulation system, motorists traveling northbound on Franklin Street and turning left onto westbound South Street are the most logical candidates for diversion to N. Harbor Drive. KD Anderson & Associates conservatively assumed that all of this traffic originated to the east on N. Harbor Drive and, instead of turning onto Franklin Street to reach South Avenue, would instead stay on N. Harbor Drive and turn left at SR 1. The TIA (2019) identified 17 such vehicles in the weekday p.m. peak hour and 31

vehicles in the Saturday peak. Figure 1 in Appendix I identifies the resulting background traffic volumes with the new traffic control.

Grocery Outlet Store Traffic. The TIA (2019) identified the share of Project trips that would have left the site and headed south, either as primary trips made specifically to visit the site or as pass-by trips drawn from traffic already on SR 1. Review of the proposed Project site plan indicates that the Project's N. Harbor Drive driveway would provide the shortest path to southbound SR 1. This analysis conservatively assumes that all of the Project traffic headed south uses this driveway and the SR 1 / N. Harbor Drive intersection. Figure 2 in Appendix I presents the assignment of GOS trips assuming left turn access is available at the SR 1 / N. Harbor Drive intersection. As shown, 36 Project trips make the left turn in the weekday p.m. peak hour and 41 Project trips make the left turn in the Saturday peak hour. Figure 3 in Appendix I presents the sum of adjusted background traffic and these Project trips under the "Existing Plus Project with Left Turn Access" condition.

Cumulative Traffic Volumes. The TIA (2019) identified future cumulative traffic volumes assuming regional growth and occupancy of identified approved projects. The same assumptions noted above were made to redirect future cumulative traffic to the SR 1 / N. Harbor Drive intersection, and the results are noted in Figure 4 in Appendix I. Project trips were superimposed onto the adjusted cumulative base, and the results are noted in Figure 5 in Appendix I.

The following changes were made to page 3.7-14 and 3.7-15 of Section 3.7 of the Draft EIR:

Traffic Signal Warrants

The volume of traffic occurring at each intersection with development of the project was again compared to the CA MUTCD peak hour signal warrant thresholds. Table 3.7-11 presents approach Existing and Existing plus Project traffic volumes and peak hour warrant results for conditions with left turns permitted at the SR 1 / N. Harbor Drive intersection. As indicated, with or without the Project, the forecast traffic volume on Saturday continues to satisfy peak hour traffic signal warrants at that intersection. However, with the addition of Project traffic, the volumes during the weekday p.m. peak hour also reach the level that satisfies those warrants.

TABLE 3.7-9: EXISTING PLUS GROCERY OUTLET STORE INTERSECTION LOS

INTERSECTION	CONTROL	WEEKDAY PM PEAK HOUR					SATURDAY PEAK HOUR				
		MIN	EXISTING		EX PLUS PROJECT		MIN	EXISTING		EX PLUS PROJECT	
			LOS	AVERAGE DELAY (SEC/VEH)	LOS	AVERAGE DELAY (SEC/VEH)		LOS	AVERAGE DELAY (SEC/VEH)	LOS	AVERAGE DELAY (SEC/VEH)
SR 1 - Main Street / Cypress Street	Signal	D	B	14	B	14	D ¹	B	13	B	13
Cypress Street / Franklin Street	AWS	C	B	12	B	12	C	A	9	B	10
SR 1 – Main Street / South Street											
Southbound left turn	WB Stop	D	B	11	B	12	D ¹	B	11	B	12
Westbound approach			C	20	C	20		C	17	C	17
South Street / Franklin Street											
Westbound left turn	NB/SB Stop	C	A	7	A	7	C	A	7	A	7
Eastbound left turn			A	8	A	8		A	7	A	7
Northbound approach			B	12	B	13		B	11	B	11
Southbound approach			B	12	B	13		B	11	B	11
SR 1 – Main Street / No Harbor Drive											
Northbound left turn	WB Stop	D	B	11	B	11	D ¹	B	11	B	11
Southbound left turn			B	11	B	12		B	11	B	12
Eastbound approach ²			C	17	C	24		B	13	D	26
Westbound approach ²			B	14	D	26		C	16	D	29
No Harbor Drive / Franklin Street	AWS	C	A	8	A	8	C	A	9	A	9

¹ LOS F ACCEPTED ON SATURDAY SUMMER PEAK HOUR.

² EXISTING LEFT TURN AND THROUGH TRAFFIC CONTRARY TO POSTED TRAFFIC CONTROLS IS NOT INCLUDED IN LOS CALCULATION.

BOLD INDICATES CONDITIONS IN EXCESS OF ADOPTED STANDARD. **HIGHLIGHTED** VALUES ARE A SIGNIFICANT IMPACT.

SOURCE: K DANERSON & ASSOCIATES, 2022.

The following changes were made to page 3.7-17 of Section 3.7 of the Draft EIR:

TABLE 3.7-11: EXISTING PLUS GROCERY OUTLET STORE TRAFFIC SIGNAL WARRANTS WITH LEFT TURN ACCESS PERMITTED AT SR 1/N. HARBOR DRIVE INTERSECTION

INTERSECTION	EXISTING			EXISTING PLUS PROJECT		
	VOLUME (VPH)		WARRANT MET? ¹	VOLUME (VPH)		WARRANT MET? ¹
	MAJOR	MINOR		MAJOR	MINOR	
<i>WEEKDAY PM PEAK HOUR</i>						
Cypress Street / Franklin Street	533	179	No	544	180	No
SR 1 – Main Street / South Street	2,277	71	No	2,297	91	No
South Street / Franklin Street	237	143	No	265	149	No
SR 1 – Main Street / No Harbor Drive	2,313	90	No	2,341	137	Yes
No Harbor Drive / Franklin Street	205	69	No	299	69	No
<i>SATURDAY PEAK HOUR</i>						
Cypress Street / Franklin Street	404	102	No	416	102	No
SR 1 – Main Street / South Street	2,224	47	No	2,245	69	No
South Street / Franklin Street	207	63	No	242	94	No
SR 1 – Main Street / No Harbor Drive	2,207	164	Yes	2,238	216	Yes
No Harbor Drive / Franklin Street	382	89	No	387	89	No

¹BASED ON RURAL PEAK HOUR VOLUME WARRANT ONLY

SOURCE: KDANDERSON & ASSOCIATES, 2022.

The following changes were made to page 3.7-18 and 3.7-19 of Section 3.7 the Draft EIR:

NO PROJECT CONDITIONS

Future conditions without the project were reviewed as noted in the text which follows.

Levels of Service. Peak hour intersection Levels of Service were recalculated for the future background condition assuming no change to current intersection geometries. Table 3.7-12 presents the intersection Level of Service results from the TIA (2019) assuming that left turns onto SR 1 were prohibited at the SR 1 / N. Harbor Drive intersection. Table 3.7-13 compares the Year 2040 Levels of Service at study area intersections with and without the Project assuming left turn access is allowed at the SR 1 / N. Harbor Drive intersection. Again, the length of delays is less than had been projected in the TIA (2019) on the westbound approach to the SR 1 / South Street intersection with the diversion of traffic to N. Harbor Drive. As shown in Table 3.7-12, the TIA (2019) indicated that the addition of Project traffic resulted in LOS E conditions at this location with the left turn prohibition in place. While the minimum LOS D standard had been exceeded, General Plan policy had allowed the City to accept LOS F condition on peak summer weekends. With traffic diverted to N. Harbor Drive, the General Plan’s minimum LOS D standard is no longer exceeded at the South Street intersection on Saturday.

Alternatively, the length of delays at the SR 1 / N. Harbor Drive intersection are longer under cumulative conditions if left turns are allowed. As indicated in Table 3.7-13, the westbound approach to the SR 1 / N. Harbor Drive intersection operates at LOS D in the p.m. peak hour with the addition of Project trips. This result satisfies the City’s minimum LOS D standard. On Saturday, the westbound approach operates at LOS D without the Project and at LOS E with the Project. LOS E exceeds the General Plan’s minimum LOS D standard, but as noted in the General Plan, the City of Fort Bragg is allowed to accept LOS F during peak hours during peak summer weekends. Thus, the

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Project' effect during summer Saturday peak hour conditions would be acceptable under that policy.

The following changes were made to page 3.7-21 of Section 3.7 the Draft EIR:

TABLE 3.7-13: YEAR 2040 PLUS GROCERY OUTLET STORE INTERSECTION LOS WITH LEFT TURNS PERMITTED AT SR 1 /N. HARBOR DRIVE

INTERSECTION	CONTROL	WEEKDAY PM PEAK HOUR					SATURDAY PEAK HOUR				
		MIN	YEAR 2040 BASE		BASE PLUS PROJECT		MIN	YEAR 2040 BASE		BASE PLUS PROJECT	
			LOS	AVERAGE DELAY (SEC/VEH)	LOS	AVERAGE DELAY (SEC/VEH)		LOS	AVERAGE DELAY (SEC/VEH)	LOS	AVERAGE DELAY (SEC/VEH)
SR 1 - Main Street / Cypress Street	Signal	D	B	19	B	19	D ¹	B	16	B	17
Cypress Street / Franklin Street	AWS	C	B	15	B	15	C	B	11	B	11
SR 1 – Main Street / South Street Southbound left turn Westbound approach	WB Stop	D	B	13	B	13	D ¹	B	13	B	13
			D	27	D	30		D	22	D	26
South Street / Franklin Street Westbound left turn Eastbound left turn Northbound approach Southbound approach	NB/SB Stop	C	A	7	A	8	C	A	7	A	7
			A	8	A	8		A	7	A	7
			B	13	B	14		B	11	B	12
			B	14	B	15		B	11	B	12
SR 1 – Main Street / No Harbor Drive Northbound left turn Southbound left turn Eastbound approach ³ Westbound approach ³	WB Stop	D	B	12	B	12	D ¹	B	12	B	12
			B	13	B	13		B	13	B	13
			D	30	D	31		B	33	B	34
			C	22	D	30		C	26	E	36
No Harbor Drive / Franklin Street	AWS	C	A	9	A	9	C	A	9	A	9

¹ LOS F ACCEPTED ON SATURDAY SUMMER PEAK HOUR

BOLD INDICATES CONDITIONS IN EXCESS OF ADOPTED STANDARD. **HIGHLIGHTED** VALUES ARE A SIGNIFICANT IMPACT

SOURCE: KDANDERSON & ASSOCIATES, 2022.

The following changes were made to page 3.7-22 and 3.7-23 of Section 3.7 the Draft EIR:

Traffic Signal Warrants. Table 3.7-15 notes Year 2040 background traffic volumes and identifies the status of resulting peak hour traffic signal warrants. As indicated, without the proposed Project, the projected traffic volumes at the SR 1 / N. Harbor Drive intersection satisfy peak hour warrants during both the weekday p.m. and Saturday peak hour. That remains true with the addition of Project trips, but the projected volume also satisfies peak hour warrants on Saturday at the SR 1 / South Street intersection. As a practical matter, it is very unlikely that Caltrans would elect to install signals at both intersections as they are only about 400 feet apart.

TABLE 3.7-15: YEAR 2040 PLUS GROCERY OUTLET STORE TRAFFIC SIGNAL WARRANTS WITH LEFT TURN ACCESS PERMITTED AT SR 1/N. HARBOR DRIVE INTERSECTION

INTERSECTION	YEAR 2040			YEAR 2040 PLUS PROJECT		
	VOLUME (VPH)		WARRANT MET? ¹	VOLUME (VPH)		WARRANT MET? ¹
	MAJOR	MINOR		MAJOR	MINOR	
<i>WEEKDAY PM PEAK HOUR</i>						
Cypress Street / Franklin Street	625	215	No	640	216	No
SR 1 – Main Street / South Street	2,630	90	No	2,650	118	Yes
South Street / Franklin Street	295	170	No	323	176	No
SR 1 – Main Street / N Harbor Dr	2,673	106	Yes	2,701	141	Yes
N Harbor Drive / Franklin Street	345	80	No	350	80	No
<i>SATURDAY PEAK HOUR</i>						
Cypress Street / Franklin Street	486	125	No	501	125	No
SR 1 – Main Street / South Street	2,575	65	No	2,596	97	No
South Street / Franklin Street	245	85	No	294	116	No
SR 1 – Main Street / N Harbor Dr	2,560	188	Yes	2,591	226	Yes
N Harbor Drive / Franklin Street	445	105	No	450	105	No

¹ BASED ON RURAL PEAK HOUR VOLUME WARRANT ONLY
SOURCE: KDANDERSON & ASSOCIATES, 2022.

Plus Project Conditions. Year 2040 conditions with the addition of Grocery Outlet Store were evaluated and the significance of project impacts was determined.

Level of Service. As noted in Table 3.7-13, the addition of project trips increases delays somewhat and at one intersection the operating Level of Service will be in excess of the LOS D minimum. At the SR 1 (Main Street) / South Street intersection the Level of Service on the westbound approach will drop to LOS E in the weekday p.m. peak hour and in the peak Saturday hour. LOS E exceeds the weekday p.m. peak hour standard of LOS D, but is accepted under the General Plan policy for peak summer conditions.

Peak Queues. As noted in Table 3.7-14, the project will add westbound left turns at the SR 1 (Main Street) / Cypress Street intersection, and the 95th percentile queue may increase by about 10 feet during peak periods. However as noted in the discussion of existing plus project impacts,

the queue will continue to extend into the transition area between the left turn lane and the adjoining TWLT lane but will not spillover into the adjoining through lane. Because the through travel lane is not affected, the project's impact is not significant for purposes of compliance with the Coastal General Plan Circulation Element.

Traffic Signal Warrants. Table 3.7-16 notes Year 2040 Plus Project traffic volumes and identifies the status of resulting peak hour traffic signal warrants. As indicated, peak hour traffic signal warrants would be satisfied at the same intersections identified under the background Year 2040 conditions. The SR 1 (Main Street) / South Street intersection would carry volumes that satisfy warrants in both the weekday p.m. peak hour and Saturday peak hour, while the SR 1 (Main Street) / North Harbor Drive intersection satisfies peak hour warrants in the Saturday peak hour.

The following changes were made to page 3.7-25 of Section 3.7 the Draft EIR:

Table 3.7-13 also presents the Levels of Service occurring during the weekday p.m. peak hour with the Grocery Outlet Store as these treatments are pursued. As indicated, prohibiting left turns would result in LOS C at the intersection. While traffic diverted will likely make a right turn before making a u-turn at Cypress Street, the SR 1 (Main Street) / Cypress Street intersection would still operate at LOS C with this additional traffic. The cost to sign and stripe the intersection for these new controls would be minimal. Either a traffic signal or roundabout would yield LOS A, a Level of Service that satisfies the City's minimum standard, but the feasibility of either option at an intersection that is only 700 feet from the Cypress Street traffic signal will need to be confirmed. The cost of a traffic signal on the state highway would likely be about \$500,000, depending on the extent of ancillary intersection improvements required under Caltrans standards. The cost to retrofit an existing intersection to a two-lane roundabout would likely be in the range of \$1.5 to \$2.5 million.

Because any improvements within the state right of way require Caltrans approval, it is important to consider the steps needed to gain approval for any mitigation. Caltrans policy regarding applicable traffic controls has recently been expanded based on **Traffic Operations Policy Directive 13-02**. This directive requires that Caltrans consider the relative merits of alternative traffic controls when it becomes necessary to stop traffic on state highways. Roundabouts are the default intersection control, but all-way stops and traffic signals are to be considered. The policy directive requires preparation of an **Intersection Control Evaluation (ICE)** to determine the preferred traffic control. A preliminary ICE report would consider issues such as comparative traffic operations, right of way requirements, effects on adjoining access, etc. City of Fort Bragg preferences amongst feasible alternatives can also be considered. After an applicable solution is identified and funded, work would be completed in the Caltrans right of way under an encroachment permit from Caltrans.

Mitigations. The Grocery Outlet Store project proponents should contribute their fair share to the cost of regional circulation improvements by paying adopted fees and making frontage improvements. In addition, the project should contribute its fair share to the cost of cumulatively needed improvements to the SR 1 (Main Street) / South Street intersection.

Table 3.7-17 notes the Grocery Outlet Store project's relative contribution to future traffic volumes at each study intersection based on the method recommended in Caltrans traffic study guidelines. As shown, project trips represent 16.1% of the future new traffic at the SR 1 / South Street intersection. Assuming a \$500,000 traffic signal, the project's contribution could be \$84,500.

3.0 REVISIONS

TABLE 3.7-17: FAIR SHARE CALCULATION

LOCATION	WEEKDAY PM PEAK HOUR TRAFFIC (VPH)					FAIR SHARE <i>(C-B)/(C-A)</i>
	EXISTING	YEAR 2040		PROJECT ONLY	NET FUTURE GROWTH	
		NO PROJECT	PLUS PROJECT			
A	B	C	C-B	C-A	<i>(C-B)/(C-A)</i>	
SR 1 / Cypress St	2,392	2,780	2,827	47	435	10.8%
Cypress St / Franklin St	815	965	989	24	175	13.7%
SR 1 / South St	2,365	2,740	2,812	72	447	16.1%
South St / Franklin St	458	559	655	96	197	48.7%
SR 1 / No Harbor Dr	2,413	2,788	2,851	63	438	14.4%
No Harbor Dr / Franklin St	363	425	430	5	67	7.5%

SOURCE: KDANDERSON & ASSOCIATES, 2019.

The following changes were made to pages 3.7-48 and 3.7-49 of Section 3.7 the Draft EIR:

The relevant applicable analysis scenarios were analyzed using the methodologies described above, and the VMT analysis results are summarized in Table 3.7-18. The results in Table 3.7-18 indicate that the Project would result in a net increase in VMT over baseline conditions. However, the model considers a very limited amount of re-routing of Fort Bragg residents that currently go to the Grocery Outlet store located in Willits for grocery shopping. As such, the VMT calculation was adjusted for re-routing.

According to information provided by Grocery Outlet, over the last 12 months (June 2021 to June 2022), around 9% of the people that visit their Willits store come from Fort Bragg. Considering that the length of a one-way trip from Fort Bragg to the Willits Grocery Outlet store is approximately 35 miles, and one mile from Fort Bragg to the Project, 990 VMT is equivalent to the re-routing of 30 one-way trips or 15 round trips from the Willits Grocery Outlet store to the Project store. Per the Institute of Transportation Engineers *Trip Generation Manual, 11th Edition*, a grocery store such as the one in Willits generates approximately 3,500 daily one-way trips.

Therefore, in conclusion, the re-routing of less of 1% of these trips would result in a net decrease in VMT for both baseline (2022) and future year (2030) conditions. Table 3.7-19 shows the adjusted VMT results accounting for a trip redistribution from the Willits Grocery Outlet to the Fort Bragg Grocery Outlet of 1% and 9%.

TABLE 3.7-18: PROJECT EFFECT ON VMT AFTER INITIAL MODELING (WITHOUT RE-ROUTING)

ANALYSIS HORIZON YEAR	SCENARIO	SCENARIO VMT
Model Base Year 2009	No Project	659,672
	Plus Project	658,755
	Year 2009 Delta	-917
Model Future Year 2030	No Project	763,620
	Plus Project	764,610
	Year 2030 Delta	+990
Interpolated Baseline Year 2022 Delta		+ 263

SOURCE: FEHR & PEERS, 2022.

TABLE 3.7-19: PROJECT EFFECT ON VMT ACCOUNTING FOR TRIP REDISTRIBUTION FROM WILLITS GROCERY OUTLET TO FORT BRAGG GROCERY OUTLET

ANALYSIS HORIZON YEAR	SCENARIO	SCENARIO VMT (1% REDISTRIBUTION)	SCENARIO VMT (9% REDISTRIBUTION)
Model Base Year 2009	No Project	659,672	659,672
	Plus Project	657,565	648,045
	Year 2009 Delta	-2,107	-11,627
Model Future Year 2030	No Project	763,620	763,620
	Plus Project	763,420	753,900
	Year 2030 Delta	-200	-9,720
Interpolated Baseline Year 2022 Delta		-927	-10,447

SOURCE: FEHR & PEERS, 2022.

The following changes were made to page 3.7-50 of Section 3.7 the Draft EIR:

The Project does not propose any new roadways or transportation facilities that would be inconsistent with applicable design standards for the City of Fort Bragg. As discussed above, the Site is accessed on the north end via a paved entrance to South Street, and an existing dirt driveway runs across the southern parcel from S. Franklin Street to N. Harbor Drive. The proposed project includes construction of new, defined entrances to S. Franklin Street and N. Harbor Drive on the south and east end of the Site to accommodate the retail store entrance. The existing driveway on the north end of the Site would be removed as part of the project. The project will additionally include an internal system of walkways and crosswalks to provide pedestrian connectivity between the parking lot, building, and sidewalk. A sidewalk would be constructed along the South Street, S. Franklin Street, and N. Harbor Drive frontages, as required by City standards to provide pedestrian access around the Site, and where required, existing sidewalks would be upgraded to meet City standards. The City standards which the Project would be subject to are designed to prevent hazards due to geometric design features. Additionally, it is noted that the proposed Project would be subject to a Special Condition which requires stop signs at all four points of the intersection at South Street and South Franklin. The Applicant will be legally bound to comply with Special Conditions, and the City will be bound to enforce them.

3.8 UTILITIES AND SERVICE SYSTEMS

The following changes were made to page 3.8-25 of Section 3.8 the Draft EIR:

About half of the Project site is currently impervious from the existing paved surface and building. The other half of the Project site is currently pervious and would need storm drainage control. Current City requirements require the Project applicant to install storm drainage infrastructure that meets standards and specifications of the City of Fort Bragg (i.e., City of Fort Bragg Design Specifications and Standards). Prior to the issuance of a building or grading permit, the Project applicant would be required to submit a drainage plan to the City of Fort Bragg for review and approval. The plan would be an engineered storm drainage plan that calculates the runoff volume and describes the volume reduction measures, if needed, and treatment controls used to reach attainment consistent with the Fort Bragg Storm Drain Master Plan and City of Fort Bragg Design Specifications and Standards. Overall, drainage impacts would be reduced to **less than significant**.

4.0 OTHER CEQA-REQUIRED TOPICS

The following changes were made to page 4.0-6 of Chapter 4.0 the Draft EIR:

The relevant Mendocino County Air Quality Management District (MCAQMD) CEQA operations-related criteria-pollutant emissions thresholds of significance are as follows: 54 pounds per day of oxides of nitrogen (NO_x), 54 pounds per day of reactive organic gases (ROG), 82 pounds per day of PM₁₀, 54 pounds per year of particulate matter of 2.5 microns or less in size (PM_{2.5}); 10 tons per year of NO_x, 10 tons per year of ROG, 10 tons per year of PM₁₀, and 10 tons per year of PM_{2.5}. Moreover, the MCAQMD has issued clarification (in a December 2013 Advisory) that MCAQMD's indirect and permitting rules allow 125 tons per year of CO. The MCAQMD's criteria-pollutant emissions thresholds of significance were specifically developed to identify projects that would generate a cumulative impact related to criteria pollutant emissions. Those projects that would exceed the MCAQMD's criteria-pollutant emissions thresholds of significance are therefore assumed to generate a cumulative impact on the region's air quality, while those projects that would generate emissions below the MCAQMD's criteria-pollutant emissions thresholds of significance would not have a significant air quality impact.

The following changes were made to pages 4.0-11 and 4.0-12 of Chapter 4.0 the Draft EIR:

The proposed Project would not conflict with any of the GHG reduction measures contained with the CARB's 2017 Scoping Plan Update and the MCOG's RPT. Moreover, the proposed Project is anticipated to reduce overall VMT, when accounting for even a modest trip redistribution from the VMT currently generated from trips from Fort Bragg to the Willits Grocery outlet. Therefore, the proposed Project would be consistent with the State GHG reduction targets, and would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. For the reasons discussed above, implementation of the proposed Project would have a **less than significant** cumulative impact relative to this environmental topic. As such, impacts related to geologic and soil resources would result in a **less than cumulatively considerable** contribution.

The following changes were made to page 4.0-25 of Chapter 4.0 the Draft EIR:

The cumulative context for cumulative impacts on solid waste facilities includes the Redwood Waste Solutions service area. Redwood Waste Solutions provides weekly curbside residential and commercial garbage, recycling, and green waste collection within the City of Fort Bragg. Waste collected by Redwood Waste Solutions is taken to a transfer station in Willits for processing and transport. The waste is then disposed of at the Potrero Hills Landfill. The disposal facility has a maximum daily permitted throughput capacity of 4,330 tons per day.

5.0 ALTERNATIVES TO THE PROPOSED PROJECT

The following changes were made to pages 5.0-14 and 5.0-15 of Chapter 5.0 the Draft EIR:

The Decreased Density Alternative would result in development on the Project site, but the development would be reduced with 0.49 acres remaining in its current condition. The 0.49 acres that would remain undeveloped would be located in the southern portion of the site, which is largely undeveloped. As such, because a portion of the area not currently developed would remain open and undeveloped, the open and undeveloped area would retain whatever biological values are associated with that condition. The same mitigation measures required for the proposed Project

would be required for this alternative. For this reason, the Decreased Density Alternative would have a somewhat reduced impact to the proposed Project.

6.0 REPORT PREPARERS

No changes were made to Chapter 6.0 of the Draft EIR.

7.0 REFERENCES

The following changes were made to page 7.0-6 of Chapter 6.0 the Draft EIR:

City of Fort Bragg. 2022. Fort Bragg Citywide Design Guidelines. Available at: <https://www.city.fortbragg.com/departments/community-development/general-plan-zoning-information/citywide-design-guidelines>.

City of Fort Bragg. 2022. Fort Bragg Municipal Code. Current through Ordinance 981, passed April 25, 2022.

City of Fort Bragg. 2022. Fort Bragg Fire Department. Accessed March 2022. Available at: <https://fortbraggfire.specialdistrict.org/>.

City of Fort Bragg. 2021. Agenda Item Summary. July 26, 2021.

City of Fort Bragg. 2021. Agenda Item Summary Report. May 26, 2021.

City of Fort Bragg. 2021. Agenda Item Summary Report. June 9, 2021.

City of Fort Bragg. 2020. Initial Study and Environmental Checklist for Best Development Grocery Outlet. December 2020.

City of Fort Bragg. 2014. City of Fort Bragg Design Guidelines – Chapter 2 Commercial District Design Guidelines. Accessed March 2022. Available at: <https://www.city.fortbragg.com/home/showpublisheddocument/2544/637726447452770000>.

City of Fort Bragg. 2002. Fort Bragg General Plan Revision Draft Environmental Impact Report. August 2002.

City of Fort Bragg. 2002. Fort Bragg General Plan Revision Final Environmental Impact Report. November 2002.

The following change was made to page 7.0-7 of Chapter 6.0 the Draft EIR:

Superior Court of California, County of Mendocino. Petition for Writ of Mandate (Case No. 21CV00652), FB Local Business Matters and Leslie Kashiwada vs. City of Fort Bragg. August 24, 2021.

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