



P.O. Box 102 • Round Mountain, CA 96084

Response to Comments; As Requested by Best Development Group, Sacramento, CA June 21, 2021

Introduction:

At the request of Best Development Group (BDG), in August of 2019 Wildland Resource Managers (WRM) conducted a site review of their Fort Bragg property located on the west side of South Franklin Street in south central Fort Bragg, California for the purpose of assessing the soils, vegetation, wetlands and wildlife habitats present at the site. Findings of that visit were reported by WRM in a Biological Report submitted that same month. Subsequent to the submittal, the City of Fort Bragg requested additional information for on-site wetland capabilities. To address the City's request, WRM re-visited the site in March 2021 to assess any wetland features. The results of that site visit were reported to BDG that same month in WRM's report "Fort Bragg Wetland Report."

In June 2021 BDG forwarded portions of comments on the initial study and environmental checklist that were submitted by Dr. Leslie Jan Kashiwada relating to WRM's biological review and wetland report. BDG requested WRM address Dr. Kashiwada's comments which we are happy to do.

Responses to comments:

Comment 1. Biological Study – Biota:

Item 1: The commenter opines "the biological study was very superficial and severely lacking as a thorough effort to characterize the environment of the proposed site." The purpose of a biological review (BR) is to provide the project proponent and the regulatory authority under CEQA enough information to make a determination as to the project's compliance with Federal, State, County and City regulations. This purpose is different than that of an Environmental Impact Report which may be required to assess management options if there is a potential for the project to have significant impacts to natural resources. After review of the BR the City did request additional information concerning the potential wetland resource which was provided. Subsequent to that the City approved the project. Thus, the biological report was sufficient to identify issues and provide the regulatory authority with the necessary information to reach a decision.

Item 2: Commenter describes the biological report: Comment noted.

Item 3: The commenter correctly notes that the BR identified the possibility of bats utilizing the abandoned building on the site and a night survey was not done due to inclement weather conditions. To address this and in accordance with Mitigation Measure BIO 1 contained in the CEQA MND: “a bat survey shall be conducted prior to demolishing the existing building on-site.”

Comment 2. Biological Study – Soils:

The commenter notes that a one-day survey was done at the end of summer during the dry season and suggest surveys should be done at various times of the year. As requested by the City, WRM revisited the site in March of 2021 for the specific purpose of addressing the possibility of wetlands being present. March is an opportune month for wetland assessment as it is in the later portion of the rainy season and soils at that time of year should be hydrated. The March survey followed Army Corp of Engineers wetland evaluation protocol for the region and looked for the presence of hydrophytic vegetation, hydric soil and wetland hydrology. While some hydrophytic vegetation was found at one of four test sites, no hydric soil or wetland hydrology was found and therefore that site did not meet ACOE criteria for a wetland presence. These findings were reported in the March wetland report.

Thank you for the opportunity to address DR. Kashiwada’s concerns. If you have additional questions, please contact:

Steven J. Kerns, Principal and Certified Wildlife Biologist

Wildland Resource Managers

Phone: (530) 472-3437

Email: skerns7118@aol.com

Walnut Main Partnership
2443 Fair Oaks Blvd. No. 384
Sacramento, CA 95825
Phone 916-847-8002
Fax 916-244-4425
michelle@affinito.net

June 21, 2021

City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437

Re: Appeal of approval of Grocery Outlet Development

Dear City Council Members and Staff,

In response to the appeal of the Grocery Outlet building approval about reusing the building instead of tearing it down. Here is a history and some items that should explain why the 25-year-old building should be torn down and rebuilt.

- Dec-1996 Building was built for the County of Mendocino to be used as a Social Services Building for offices and classrooms. It is an L-shaped building situated on one lot with the building to the South of the lot and the parking to the North of the building at the corner of S. Franklin and South Street.
- Jan-2012 County of Mendocino vacates building.
- Dec-2012 Start negotiating lease with Dollar Tree and after negotiations and signed agreement start permit process with City of Fort Bragg, would be using building with major remodeling.
- Aug-2014 City of Fort Bragg declines the permit, Dollar Tree terminates contract.
- Dec-2014 Listed property with all lots for sale or lease locally with Greg Burke of Mendo Realty.
- Feb-2015 Dan Turner expressed interest on behalf of a client, did not come to fruition.
- Mar-2015 Mendocino Coast Hospitality House announce in press, we approached City of Fort Bragg to use this property. City of Fort Bragg decided to put Hospitality House at Old Coast Hotel.
- Mar -2015 Fort Bragg Library was interested in expanding, approached, property did not meet their needs.

- Oct – 2015 Approached Grocery Outlet and they said using current building would be too difficult and were not interested.
- Nov -2015 Approached Shopko Department Store about plans and would need to add 1,000 sq. ft. and did not move forward because could not use current building and would not move forward if could not tear down old building and reconfigure where building is placed on the three lots.
- 2016-2017 multiple individuals looked at building with their contractors for multiple housing conversion and senior home, all said the build out to reconfigure the existing building was too expensive.
- Noyo Marine Center looked and declined.
- Medical Group looked and declined.
- Ukiah Group looking for temporary overnight shelter for abused individuals looked and declined.
- Potential buyer looked to put in a mini storage, told not complaint with zoning so declined.
- Buyer wanted to conduct boat repair and was told by City it would be a challenge and declined.
- Multiple buyers expressed interest in manufacturing, light manufacturing and marijuana growing, not compliant with zoning a the time and all declined.
- Auto Body Shop wanted to see about lease option – ended up not interested.
- Trailer and RV repair group declined because the conversion and height of the interior was going to be too expensive.
- Oct-2018 Started negotiations with Grocery Outlet and would use all three lots between N. Harbor Drive and South Street on S. Franklin Building, tear down, and resituate where building is located to optimize use, access, and parking on property.

The original use of the property was for an office building, only using one of the lots available, and was configured for that purpose. Most of the businesses interested in the property would need all three lots and the configuration of the office building in the middle of the three lots would not work.

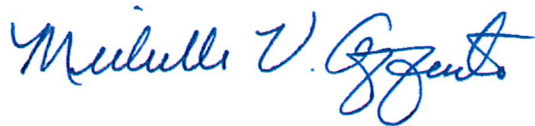
Building is now 25 years old, built with materials that do not comply with current building codes, environmentally outdated, in need of a new roof, new HVAC, new electrical, new plumbing, new lighting at the very least. To convert this building for any other use or buyer has proved to be too extensive and expensive for the myriad of users that been interested or been approached about the property. This building has been vacant for more than 9 years, it is a

target for being broken into, graffiti and the stealing of electricity and water. There has been no real interest that do not require tearing this building down.

We believe that Grocery Outlet will be a valuable member of the community, taking a declining property and replacing it with an upgraded beautiful building, creating a quality locally owned business with local, good paying jobs, creating more jobs in support of the business in maintenance, upkeep, and repairs required for a running business. Additionally Grocery Outlet will keep business in Fort Bragg and create competition that could benefit all citizens of Fort Bragg, especially those living on limited incomes.

Our family respectfully requests that the City of Fort Bragg decline the appeal and move forward with the Grocery Outlet Development.

Sincerely,



Michelle V. Affinito
Partner/Controller
Walnut Main Partnership

RECEIVED

JUN 15 2021

CITY OF FORT BRAGG
CITY CLERK

FOR CITY USE ONLY:

File # 387-21/C

Date Filed: 6.15.2021

Received by: Jlemos

APPEAL OF PLANNING COMMISSION DECISION

APPELLANT(S): Leslie Kashiwada

MAILING ADDRESS: 17050 Boice Lane

CITY: Fort Bragg STATE & ZIP CODE: CA 95437

TELEPHONE #: (707) 964-7653 FAX #: Kashiwa@mcn.org

**Describe the action being appealed and state the reasons for the appeal.
(You may attach a letter or other exhibits to describe or justify this appeal.)**

See attached
2-page statement
6-page public comments

APPELLANT(S) SIGNATURE: Leslie Kashiwada

DATE: 14 June 2021

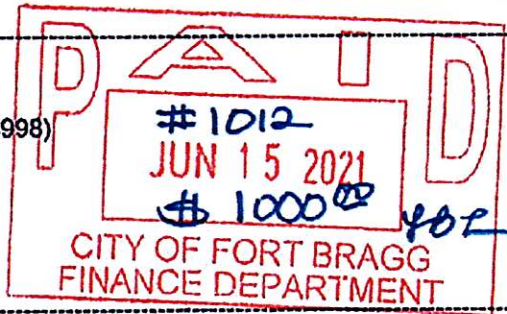
DATE: _____

FOR CITY USE ONLY:

Fee Paid \$1,000.00 \$1,000.00 (#110-0000-3998)

Receipt # 00435728

Date: 6.15.2021



Notice of Public Hearing:

Mailed () Date: _____

Published () Date: _____

Posted () Date: _____

CITY COUNCIL ACTION:

DATE: _____

Approve: _____

Deny: _____

Table: _____ Until _____

Receive & File: _____

To: Fort Bragg City Council
Re: Appeal of Planning Commission Decision on Grocery Outlet
Date: 14 June, 2021
From: Leslie Kashiwada

I am filing this appeal because the Planning Commission was provided a seriously flawed draft IS/MND – one that did not follow CEQA protocols – and was asked to approve a project that was not consistent with many of the City's Coastal General Plan policies applicable to this project. As a consequence, the Planning Commission was not able to make a truly informed decision about the project and the proposed mitigation measures and special conditions.

The grounds for my appeal are summarized below and incorporate, by reference, the concerns and objections noted in prior public comments submitted by me and other members of the public. These grounds include that the required findings for approval of the CEQA document and project permits cannot be made because they are incomplete and are not supported by substantial evidence, particularly General Findings 3, 4 and 5; all of the CEQA findings; CDP Findings 1, 3, 5, 6, 7 and 8; and all of the Design Review Findings described in the approval resolution.

In order for the Planning Commission or the City Council to evaluate proposed mitigation, the MND needs to include well-documented studies with relevant findings, including adverse impacts, and contain sound analyses. Instead, this MND contained many unsupported assertions and analyses without adequate documentation, and some of the supporting studies were woefully deficient, including the supplemental studies and reports that were prepared subsequent to the public review period for the draft IS/MND. Almost as notable as the findings and analyses that were included, were the findings and analyses that were not included (see below). Particularly egregious was the statement that all public concerns were irrelevant and therefore dismissed without appropriate revisions to actually address the legitimate concerns presented in those comments.

I am attaching my previous public comments about this project and will just list most of the relevant issues below:

Building Re-Use versus New Building: not analyzed or addressed

Biological Study – Biota: Issues not adequately addressed, and supplemental study not helpful or informative

Biological Study – Soils: Issues not adequately addressed, and supplemental study not helpful or informative

Water Usage: Issues not adequately addressed

Water System Infrastructure: Issues not adequately addressed

Storm Water Drainage: Issues not adequately addressed

Leslie Kashiwada

Appeal of Planning Commission Decision on Grocery Outlet (continued)

① Traffic Study and Pedestrian Safety: The vehicle traffic impact was acknowledged as actually significant, yet the study stated that impact could not be mitigated, so there was no serious attempt to analyze various mitigation options. The Planning Commission added special conditions to try to address these concerns, but the special conditions concerning pedestrian safety on Franklin Street and the parking lot should have been included in the MND along with supporting analysis of the pedestrian safety issues, which is distinct from analysis concerning vehicle traffic control measures based on traffic warrants. In addition, the Fair Share contribution to Main Street traffic control improvements does not include an implementation time line as required by Policies C-1.4 and C-1.5.

②

③

Economic Analysis: Issues not addressed

Conclusion: Refer to the conclusions in my attached comments.

This appeal does not assert that this project is not worthwhile or potentially approvable. It is rather to make a strong statement about the breach in CEQA and permit review processes, which were procedurally and substantively deficient. I respectfully request that the City Council accept my appeal and direct City staff to fix the MND by addressing the legitimate concerns expressed in public comments and by incorporating the Planning Commission's special conditions that relate to CEQA impact areas as mitigation areas. It should then be recirculated for public review and comment prior to reconsideration of the permits (a process that may determine a full EIR is prudent if the revised MND cannot address all the documented issues). Informed decision making is not only required but it is the right thing to do to make sure we aren't approving projects without first making every effort to mitigate all environmental impacts and ensure full consistency with applicable policies and regulations.

Best Development Grocery Outlet Bargain Market May 26, 2021
Comments submitted by Leslie Jan Kashiwada, Ph.D., kashiwa@mcn.org

The staff report for this project recommends adoption of the resolution approving Coastal Development Permit, Design Review, Merger, and adopting the Initial Study MND pursuant to all the evidence presented, both oral and documentary, and further based on findings and conditions state therein.

I am surprised that this recommendation includes adoption of the Initial Study MND, without significant change or new evaluation. In particular, I found the dismissal of community concerns to be disconcerting, especially the statement that, 'These comments have been considered and none of these comments change the conclusions of the Mitigated Negative Declaration. Additionally, no further changes to the project were made as a result of these comments.

For this reason, I am resubmitting my comments about the shortfalls of the Initial Study MND, with the following additional input:

Building Re-Use versus New Building: See my comments below. There was no substantive discussion of this aspect of the project, even though adaptive re-use of existing building is a stated policy with the Coastal General Plan.

Biological Study – Biota: See my comments below and those submitted by CDFW. A token Wetland Report was prepared to supposedly address the issues brought up by CDFW. This consisted of one afternoon in March 2021. Given the current extreme drought conditions, it is not surprising that wetland conditions were not detected. And the four test locations were placed well away from the area that is most likely to sustain wetland conditions in non-drought years (this is the area where an engineered swale is proposed). None of the other concerns brought up in my comments or by CDFW were addressed.

Water Usage: See my comments below. Currently the city does not have sufficient water to support any new development.

4
5
6
7
Traffic Study: See my comments below. This project will increase traffic and the city should be prepared for an increase in vehicular and pedestrian accidents. This is especially true if the left turn prohibition on North Harbor Drive is removed. I personally know of a serious t-bone collision from someone turning left onto Hwy 1 from Safeway, and we will likely see many more of those types of accidents with this development. Unfortunately, any serious collision in the vicinity of this project will impede the ability of emergency vehicles to move freely to the accident, and potentially to impede movement of emergency vehicles to the south.

Economic Analysis: See my comments below. Any development of this size needs to include an unbiased economic analysis of benefits and losses. This is a loss to existing businesses, but a gain for local residents. This was not addressed. There will be an impact on similar businesses, but with a benefit of additional shopping options to residents (perhaps resulting in fewer trips to Willits or Ukiah). There will be some additional jobs, but how many and at what pay level? This was not addressed. Most jobs in this kind of store are part-time and do not pay benefits. Is this the kind of jobs the city wants to support? This can't be analyzed because no information was provided.

Many of the deficiencies are the result of ignoring existing policies, poorly supported analyses, errors of omission (and commission), and wishful thinking. The job of the Community Development Department should be to require full, accurate analyses, which the Planning Commission and City Council can use to make decisions about approving or denying permits. In this case, and others, it seems city staff and helping developers jump through required "hoops" with little critical assessment of whether or not the actual information needed to make an informed decision was provided. City staff should represent the citizens of the community as much as developers.

-Leslie Kashiwada

Initial Study and Environmental Checklist for Best Development Grocery Outlet Bargain Market
Jan 20, 2021

Comments submitted by Leslie Jan Kashiwada, PhD, kashiwa@mcn.org

Building Re-Use versus New Building

The Initial Study indicates that the project proposes to tear down the old Social Services Building (16,436 sq ft) and build a new building (16,157 sq ft) with a very different footprint and much greater visual impact. Given that adaptive re-use of existing buildings is a stated policy within the Coastal General Plan, this study needs to discuss the feasibility of repurposing and retrofitting the existing building, including a cost-benefit analysis of re-using the existing building versus demolition with a new building.

Biological Study - Biota

The site doesn't appear very interesting biologically, but the Biological Study was very superficial and severely lacking as a thorough effort to characterize the environment at the proposed site. The biological study consisted of one day on site (August 9) including a plant inventory (methodology not provided, but likely just a presence/absence survey) and visual evidence of animal activity (noting only gopher mounds and a crow). No mention was made of insects, reptiles or amphibians. The proposed night survey for bats (potentially roosting in the old building) was not conducted because of weather. In addition, the survey only included the south lot. The pine and mature cypress trees on the western edge of the northern lot were lumped in with "shrubby planted around the edges." There was no mention of the habitat provided by these trees (more on this below). The study recommended a follow-up survey on bats and the Initial Study mentions a bat survey will be required as a mitigation (page 10). There is no indication of when that survey will be conducted; only that, if bats are found, then CDFW will be consulted. That study

should be done sooner rather than later in order to settle this issue before more time and money are spent on the project.

The proposal makes no effort to retain existing trees on the western edge of the northern lot, and only mentions new landscaping. The new landscaping includes Monterey cypress, but it will be many decades before any of them reach maturity, if they ever do. Because Monterey cypress trees have spreading limbs, these trees may be kept trimmed in a way that will not develop the habitat provided by the mature trees currently on site. In addition, because Monterey cypress is not native to the area, there should be an effort to find more appropriate native evergreens to use for landscaping. The existing trees (see photos below) should be retained to the maximum extent possible, and the study should address how this objective can be achieved. New trees should only be planted where there are currently no trees, or where an existing tree has to be removed, and they should be substantial in size.

Biological Study - Soils

The biological study noted that the soils are hydric, but no wetland species were found. However, the date of the one-day survey was at the end of the summer (dry season) and therefore those conclusions are at best preliminary, pending further surveys done at a variety of times throughout the year. A one-day survey does not provide sufficient data for a complete characterization of any site, no matter how uninteresting or disturbed.

Water Usage

The Initial Study notes that the change of site usage from offices to retail will include increased water use (especially given that the existing building has been vacant for over a decade). The report discusses the City's water supply (page 68), but there is no analysis of the amount of water the project will need and how that need will be met given that the City has had repeated water rationing during the dry season (even with several water storage reservoirs, which only store water - they do not produce new water). For comparison, KASL Consulting Engineers produced a Water Model Study for the 2015 Hare Creek Project MND, which noted that the average day demand would be 8,260 gpd (peak hour demand of 23,128 gpm). Although not directly comparable (The Hare Creek Project was much larger), most of that water use was allocated to a Grocery Outlet Bargain Market. The city's own water analysis shows that a minimal rise in sea level in conjunction with king tides will produce multiple days where the water system will not be able to draw water because of saltwater intrusion. This kind of in-depth look at water use and availability is essential for every proposed project that will depend on the City for its water supply, including this one.

Water System Infrastructure

The Initial Study barely mentions the capacity of City water system (infrastructure) to serve the needs of the project. On page 4 (and page 67) it states that "The existing

impacts. However, I do not think those improvements are viable for the following reasons:

8 10
9 11
10 12
11 13
12 14
13 15
14 16
15 17
16 18
17 19
18 20
19 21
20 22
21 23
22 24
23 25
24 26
25 27
26 28
27 29
28 30
29 31
30 32
31 33
32 34
33 35
34 36
35 37
36 38
37 39
38 40
39 41
40 42
41 43
42 44
43 45
44 46
45 47
46 48
47 49
48 50
49 51
50 52
51 53
52 54
53 55
54 56
55 57
56 58
57 59
58 60
59 61
60 62
61 63
62 64
63 65
64 66
65 67
66 68
67 69
68 70
69 71
70 72
71 73
72 74
73 75
74 76
75 77
76 78
77 79
78 80
79 81
80 82
81 83
82 84
83 85
84 86
85 87
86 88
87 89
88 90
89 91
90 92
91 93
92 94
93 95
94 96
95 97
96 98
97 99
98 100
99 101
100 102
101 103
102 104
103 105
104 106
105 107
106 108
107 109
108 110
109 111
110 112
111 113
112 114
113 115
114 116
115 117
116 118
117 119
118 120
119 121
120 122
121 123
122 124
123 125
124 126
125 127
126 128
127 129
128 130
129 131
130 132
131 133
132 134
133 135
134 136
135 137
136 138
137 139
138 140
139 141
140 142
141 143
142 144
143 145
144 146
145 147
146 148
147 149
148 150
149 151
150 152
151 153
152 154
153 155
154 156
155 157
156 158
157 159
158 160
159 161
160 162
161 163
162 164
163 165
164 166
165 167
166 168
167 169
168 170
169 171
170 172
171 173
172 174
173 175
174 176
175 177
176 178
177 179
178 180
179 181
180 182
181 183
182 184
183 185
184 186
185 187
186 188
187 189
188 190
189 191
190 192
191 193
192 194
193 195
194 196
195 197
196 198
197 199
198 200
199 201
200 202
201 203
202 204
203 205
204 206
205 207
206 208
207 209
208 210
209 211
210 212
211 213
212 214
213 215
214 216
215 217
216 218
217 219
218 220
219 221
220 222
221 223
222 224
223 225
224 226
225 227
226 228
227 229
228 230
229 231
230 232
231 233
232 234
233 235
234 236
235 237
236 238
237 239
238 240
239 241
240 242
241 243
242 244
243 245
244 246
245 247
246 248
247 249
248 250
249 251
250 252
251 253
252 254
253 255
254 256
255 257
256 258
257 259
258 260
259 261
260 262
261 263
262 264
263 265
264 266
265 267
266 268
267 269
268 270
269 271
270 272
271 273
272 274
273 275
274 276
275 277
276 278
277 279
278 280
279 281
280 282
281 283
282 284
283 285
284 286
285 287
286 288
287 289
288 290
289 291
290 292
291 293
292 294
293 295
294 296
295 297
296 298
297 299
298 300
299 301
300 302
301 303
302 304
303 305
304 306
305 307
306 308
307 309
308 310
309 311
310 312
311 313
312 314
313 315
314 316
315 317
316 318
317 319
318 320
319 321
320 322
321 323
322 324
323 325
324 326
325 327
326 328
327 329
328 330
329 331
330 332
331 333
332 334
333 335
334 336
335 337
336 338
337 339
338 340
339 341
340 342
341 343
342 344
343 345
344 346
345 347
346 348
347 349
348 350
349 351
350 352
351 353
352 354
353 355
354 356
355 357
356 358
357 359
358 360
359 361
360 362
361 363
362 364
363 365
364 366
365 367
366 368
367 369
368 370
369 371
370 372
371 373
372 374
373 375
374 376
375 377
376 378
377 379
378 380
379 381
380 382
381 383
382 384
383 385
384 386
385 387
386 388
387 389
388 390
389 391
390 392
391 393
392 394
393 395
394 396
395 397
396 398
397 399
398 400
399 401
400 402
401 403
402 404
403 405
404 406
405 407
406 408
407 409
408 410
409 411
410 412
411 413
412 414
413 415
414 416
415 417
416 418
417 419
418 420
419 421
420 422
421 423
422 424
423 425
424 426
425 427
426 428
427 429
428 430
429 431
430 432
431 433
432 434
433 435
434 436
435 437
436 438
437 439
438 440
439 441
440 442
441 443
442 444
443 445
444 446
445 447
446 448
447 449
448 450
449 451
450 452
451 453
452 454
453 455
454 456
455 457
456 458
457 459
458 460
459 461
460 462
461 463
462 464
463 465
464 466
465 467
466 468
467 469
468 470
469 471
470 472
471 473
472 474
473 475
474 476
475 477
476 478
477 479
478 480
479 481
480 482
481 483
482 484
483 485
484 486
485 487
486 488
487 489
488 490
489 491
490 492
491 493
492 494
493 495
494 496
495 497
496 498
497 499
498 500
499 501
500 502
501 503
502 504
503 505
504 506
505 507
506 508
507 509
508 510
509 511
510 512
511 513
512 514
513 515
514 516
515 517
516 518
517 519
518 520
519 521
520 522
521 523
522 524
523 525
524 526
525 527
526 528
527 529
528 530
529 531
530 532
531 533
532 534
533 535
534 536
535 537
536 538
537 539
538 540
539 541
540 542
541 543
542 544
543 545
544 546
545 547
546 548
547 549
548 550
549 551
550 552
551 553
552 554
553 555
554 556
555 557
556 558
557 559
558 560
559 561
560 562
561 563
562 564
563 565
564 566
565 567
566 568
567 569
568 570
569 571
570 572
571 573
572 574
573 575
574 576
575 577
576 578
577 579
578 580
579 581
580 582
581 583
582 584
583 585
584 586
585 587
586 588
587 589
588 590
589 591
590 592
591 593
592 594
593 595
594 596
595 597
596 598
597 599
598 600
599 601
600 602
601 603
602 604
603 605
604 606
605 607
606 608
607 609
608 610
609 611
610 612
611 613
612 614
613 615
614 616
615 617
616 618
617 619
618 620
619 621
620 622
621 623
622 624
623 625
624 626
625 627
626 628
627 629
628 630
629 631
630 632
631 633
632 634
633 635
634 636
635 637
636 638
637 639
638 640
639 641
640 642
641 643
642 644
643 645
644 646
645 647
646 648
647 649
648 650
649 651
650 652
651 653
652 654
653 655
654 656
655 657
656 658
657 659
658 660
659 661
660 662
661 663
662 664
663 665
664 666
665 667
666 668
667 669
668 670
669 671
670 672
671 673
672 674
673 675
674 676
675 677
676 678
677 679
678 680
679 681
680 682
681 683
682 684
683 685
684 686
685 687
686 688
687 689
688 690
689 691
690 692
691 693
692 694
693 695
694 696
695 697
696 698
697 699
698 700
699 701
700 702
701 703
702 704
703 705
704 706
705 707
706 708
707 709
708 710
709 711
710 712
711 713
712 714
713 715
714 716
715 717
716 718
717 719
718 720
719 721
720 722
721 723
722 724
723 725
724 726
725 727
726 728
727 729
728 730
729 731
730 732
731 733
732 734
733 735
734 736
735 737
736 738
737 739
738 740
739 741
740 742
741 743
742 744
743 745
744 746
745 747
746 748
747 749
748 750
749 751
750 752
751 753
752 754
753 755
754 756
755 757
756 758
757 759
758 760
759 761
760 762
761 763
762 764
763 765
764 766
765 767
766 768
767 769
768 770
769 771
770 772
771 773
772 774
773 775
774 776
775 777
776 778
777 779
778 780
779 781
780 782
781 783
782 784
783 785
784 786
785 787
786 788
787 789
788 790
789 791
790 792
791 793
792 794
793 795
794 796
795 797
796 798
797 799
798 800
799 801
800 802
801 803
802 804
803 805
804 806
805 807
806 808
807 809
808 810
809 811
810 812
811 813
812 814
813 815
814 816
815 817
816 818
817 819
818 820
819 821
820 822
821 823
822 824
823 825
824 826
825 827
826 828
827 829
828 830
829 831
830 832
831 833
832 834
833 835
834 836
835 837
836 838
837 839
838 840
839 841
840 842
841 843
842 844
843 845
844 846
845 847
846 848
847 849
848 850
849 851
850 852
851 853
852 854
853 855
854 856
855 857
856 858
857 859
858 860
859 861
860 862
861 863
862 864
863 865
864 866
865 867
866 868
867 869
868 870
869 871
870 872
871 873
872 874
873 875
874 876
875 877
876 878
877 879
878 880
879 881
880 882
881 883
882 884
883 885
884 886
885 887
886 888
887 889
888 890
889 891
890 892
891 893
892 894
893 895
894 896
895 897
896 898
897 899
898 900
899 901
900 902
901 903
902 904
903 905
904 906
905 907
906 908
907 909
908 910
909 911
910 912
911 913
912 914
913 915
914 916
915 917
916 918
917 919
918 920
919 921
920 922
921 923
922 924
923 925
924 926
925 927
926 928
927 929
928 930
929 931
930 932
931 933
932 934
933 935
934 936
935 937
936 938
937 939
938 940
939 941
940 942
941 943
942 944
943 945
944 946
945 947
946 948
947 949
948 950
949 951
950 952
951 953
952 954
953 955
954 956
955 957
956 958
957 959
958 960
959 961
960 962
961 963
962 964
963 965
964 966
965 967
966 968
967 969
968 970
969 971
970 972
971 973
972 974
973 975
974 976
975 977
976 978
977 979
978 980
979 981
980 982
981 983
982 984
983 985
984 986
985 987
986 988
987 989
988 990
989 991
990 992
991 993
992 994
993 995
994 996
995 997
996 998
997 999
998 1000

2) South Street is the primary access for ambulances to the hospital. Putting any kind of traffic control on South Street at South Franklin Street could negatively impact this access route.

Unfortunately, neither the Traffic Study nor the Initial Study address the issue of intersection improvement feasibility. In addition, despite the recommendation of the Traffic Study, the Initial Study did not indicate any responsibility on the part of the developer to pay for any road improvements (independent of feasibility). Is the City willing to let LOS worsen, including more accidents in the affected intersection, especially on Highway One and South Street? The issue of using VMT instead of LOS as a measure of impact is something the Initial Study said the county and city need to address (pages 61 and 62), but I think these metrics are only indicators, and likely not very good ones for area like the proposed site which has complex intersections.

Note on Zoning

The zoning is mostly described as Highway Visitor Commercial (pg 1, 3, 7, 46, Figure 2: Land Use Designation Map), but the Site Map lists zoning as General Commercial (pg 89).

Economic Analysis

This Initial Study goes through a checklist of CEQA evaluations, but an Economical Analysis is not included. Perhaps it was not a required part of the report, but it should be. Before progressing further with this project, the impact on existing grocery stores must be analyzed. Can the community support another grocery store or will one of the existing full-service stores go under? Are the anticipated tax receipts from the proposed Grocery Outlet Bargain Market offset by loss of tax receipts at the other stores? If so, by how much?

In addition, the Initial Study indicates that the store will be operated by 15 to 25 full-time staff and 2 managers. What are the salary ranges for these full-time employees? My research shows that there will be corporate pressure to staff the store at the lowest possible level and that many of those employees will be part-time to avoid paying benefits that often come with full-time employment (a quick scan of reviews about pay and benefits indicates that even full-time workers don't receive benefits: <https://www.indeed.com/cmp/Grocery-Outlet/reviews?ftopic=paybenefits>). I recommend the City conduct an analysis of the employment practices of the other large local franchise stores (Safeway, Dollar Store, Rite Aid, CVS in Fort Bragg and Grocery Outlet

water connection on South Street includes a 6-inch fire service line and is proposed to be the main water service to the building, with a new 6-inch fire connection to be constructed to the east of the existing connection. A total of three (3) fire hydrants with valve lines are proposed for fire suppression on the Site." Note: page 67 says there will be a new 8-inch fire connection. The KASL Water Model Study referenced above relied on a report taken from the City of Fort Bragg, Phase 1 Water Facilities Study: Existing Water Collection, Distribution and Capacity, Nov 2013 for a baseline of existing system demands. The Phase 1 Water Facilities Study noted some areas of low water pressure that might not meet demand on the south end of town, particularly at fire hydrants. Is this no longer an issue or will adding a new 6-inch (or 8-inch) fire connection further reduce water pressure in the area? Has any new data been produced that show water pressure at fire hydrants meets all current applicable requirements?

Storm Water Drainage

Storm water drainage is addressed in a very perfunctory way (page 5 and page 69). The Initial Study states that the swale and "bioretention facilities [are] sized to capture and treat runoff from the proposed impervious surfaces produced by the 24 hour 85th percentile rain event..." The study does not address runoff that exceeds this percentile. No system can retain all the water that might result from an atmospheric river dumping massive amounts of water in a short period of time. Because the site is in close proximity to the Noyo River and the Pacific Ocean there needs to be a Water Quality Management Plan that addresses these significant events, which will be more common in the coming years.

Traffic Study

8 The findings of the Traffic Study were not fully addressed in the Initial Study. In fact, the Initial Study concluded that would be a less than significant impact on transportation (based on VMT instead of LOS). I work in the harbor and make a right turn at North Harbor Drive every weekday on my way to the CDFW office (excluding this pandemic period). I usually drive out via South Franklin Street across South Street and take a left turn at the 4-way stop at Cypress Street. This affords me the safety of a left turn at the traffic light at Cypress Street onto Highway One. Crossing South Street at South Franklin Street (a 2-way stop) can be a challenge and the increased traffic brought about by this proposed project will only make it worse. In addition, I regularly see people illegally turning left onto Highway One from the Arco Station (signage at North Harbor Drive indicates "no left turn") and turning left onto Highway One from South Street, an action that is allowed but often harrowing.

9 This proposed project would bring significantly more trips from both the north and the south and the Traffic Study indicated that LOS will worsen. The Traffic Study recommended improvements at several intersections to help mitigate those negative

Bargain Market in Willits) to determine the most realistic employment model for the store. Relevant metrics would include square footage of retail space, number of check-out stations (staffed and self-serve), employee classifications with both full-time and part-time salary ranges (and which, if any, are covered by a union contract), the number of full- and part-time employees in each classification, and turnover in each classification.

Conclusion

This Initial Study is sorely deficient. While it ticks off “required” boxes, it does not provide the most important information for City Staff, the Planning Commission, or the City Council to make a truly informed decision about this project. We should want smart, forward-looking economic development using a wide perspective on how the different parts of the local economy work together. Merely describing the bare minimum required by law, with no analysis of interdependent factors and cumulative impacts can lead to hollowing out the local economy. The pandemic has devastated our local businesses, and I encourage using a very critical eye on proposed development by non-local corporations. There is a plethora of research showing that this type of development extracts more from the local economy than it brings to it. Instead, I encourage the City to propose pro-active measures to support and foster local businesses. Unfortunately, the Fort Bragg Community Development Department is minimally staffed and only has the capacity to react to applications by property owners with the money to go through the permitting process. This makes the City



low-hanging fruit for large corporations to bring franchise businesses to town, which will turn us into Anywhere, USA.

Date Printed: 06/15/2021 11:36
Receipt Date: 06/15/2021 11:36 AM
Receipt No. 00435728

City of Fort Bragg
416 N Franklin St
Fort Bragg, Ca 95437
(707) 961-2825
www.fortbragg.com

CR		1,000.00
Appeal		
Appeal Fee Gro		
cery Outlet		1,000.00
<hr/>		
Total		1,000.00
Cash		0.00
Check	10	1,000.00

Change 0.00

Leslie Kashiwada
Customer #: 016805

Cashier: counter
Station: CH1298