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TO: Marie Jones, Fort Bragg Planning Commission & City Council Fort Bragg, CA

FROM: Tahoe Design & Engineering
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DATE: June 24th, 2025

SUBJECT: Rationale for Not Requiring a New Traffic Impact Study for the Proposed 83-Unit Apartment Complex at 1151 South Main Street, Fort Bragg, California 95437

Dear Ms Jones, Honorable Planning Commission Members & City Council Members,

This memorandum is submitted to clarify the rationale behind the determination that a new comprehensive Traffic Impact Study (TIS) is not warranted for the proposed 83-unit apartment complex located at 1151 South Main Street, Fort Bragg, California 95437. This conclusion is based on a thorough review of the project's characteristics, existing traffic conditions, relevant city policies, and guidance from the California Department of Transportation (Caltrans). Our assessment indicates that the proposed development will not generate impacts exceeding established thresholds that would necessitate such a study.

Our decision is rooted in several key factors, aligning with standard traffic engineering practices and local regulatory requirements:

1. **Project Trip Generation Falls Below Established Thresholds:** Traffic Impact Studies are typically triggered when a proposed development is projected to generate a "significant" number of new daily or peak-hour vehicle trips that could substantially alter traffic flow or degrade intersection performance. Based on established methodologies from the Institute of Transportation Engineers (ITE) "Trip Generation, 10th Edition," the proposed 83-unit multifamily project is estimated to generate a modest **44 peak-hour vehicle trips** (translating to approximately 0.54 trips per unit during peak periods) and **less than 406 total vehicular trips per day**.

   This projected traffic load is consistently considered insufficient to reduce the Level of Service (LOS) at any of the surrounding intersections below acceptable operational levels as defined by City standards. Therefore, by this primary trip generation criterion, a comprehensive Traffic Impact Study is not required.

2. **Project Location and Precedent from Prior Analyses:** While projects located in sensitive areas—such as those near congested intersections, schools, hospitals, or within specific urban planning zones—might warrant a TIS even with lower trip generation, this project's context does not meet such triggers. Crucially, a prior traffic study conducted for the previously proposed AutoZone project serves as a relevant precedent. That study analyzed a development with a comparable predicted number of daily trips (with 81 peak-hour trips) and

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concluded that it would result in only minor, allowable LOS impacts, without warranting new traffic signalization or exceeding existing queue length capacity.

The traffic study conducted on the AutoZone project showed a minimal impact on LOS. Given that the proposed apartment complex is projected to generate fewer daily and peak-hour trips than the AutoZone development, the justification for waiving a new TIS remains consistent with previously established policy and findings. The current project is not expected to result in an LOS drop below the minimum threshold articulated in the Coastal General Plan.

3. **Current Intersection Performance Aligns with Local General Plan Standards:** The City's Coastal General Plan mandates that new projects consider their impact on Level of Service (LOS), which qualitatively measures traffic operating conditions with grades from "A" (best) to "F" (worst). Our City's Coastal General Plan allows the LOS for signalized and all-way-stop intersections along Highway 1 to decline to LOS D, and for side-street stop-sign controlled intersections to LOS D (or LOS F under very specific low-volume conditions).

   Crucially, our Public Works Department's experienced traffic personnel have confirmed that the relevant intersections currently operate at healthy LOS levels (typically B, C, and A). These existing conditions are well above the maximum allowable LOS D specified in the City's Coastal General Plan. Given the low trip generation of the proposed apartment complex, it is not anticipated to cause a decline in LOS that would breach these established thresholds. Furthermore, current traffic analysis indicates none of these intersections presently warrant a new level of traffic control, such as signalization or all-way stops.

4. **Alignment with Caltrans' Emphasis on Vehicle Miles Traveled (VMT):** Under modern environmental review processes, particularly CEQA in California, there is a strong emphasis on Vehicle Miles Traveled (VMT) and air quality impacts rather than solely relying on LOS. In this context, Caltrans reviewed the proposed project and concluded that a new traffic study was not warranted. Their determination was based on the project's location within the city, which is expected to **result in a reduction in overall VMT**. Caltrans' focus is predominantly on reducing VMT and enhancing safety within the state transportation network. They indicated that the project would have minimal impacts on Highway 1 intersections.

   While Caltrans did suggest the City pursue funding (via MCOG) to address pre-existing ADA accessibility gaps in the broader area, this was explicitly *not* recommended as a condition of approval for this specific developer, as there is no direct legal nexus to compel off-site improvements that predate the project. The project's positive impact on VMT by enabling residents to live closer to services and jobs further supports its environmental compatibility regarding traffic.

Conclusion:
Based on the cumulative evidence from trip generation analysis, the precedent set by previous projects in the immediate vicinity, the existing robust Levels of Service at study intersections relative to City Coastal General Plan standards, and alignment with Caltrans' contemporary focus on VMT and safety, we conclude that a new, dedicated Traffic Impact Study is not required for the proposed apartment complex. The project's estimated traffic contributions are well below the thresholds that

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would necessitate such an extensive analysis, and existing data supports its minimal impact on the local transportation network.

We believe that proceeding without a new TIS is consistent with established engineering principles and the City's adopted policies.

Sincerely,

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