

## Lemos, June

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**From:** Jacob Patterson <jacob.patterson.esq@gmail.com>  
**Sent:** Tuesday, July 2, 2019 11:41 AM  
**To:** Lemos, June  
**Subject:** Public Comment -- 7/8/19 CC Mtg. Item 5B

Councilmembers and Staff,

You may want to pull Item 5B for discussion so you can modify it if you think it would be prudent to do so. I would like to suggest minor modification of the scope of work document for the Mill Site LCP amendment traffic study.

First, I suggest that the study include an optional intersection connection at Main and Maple Streets. The draft circulation plan doesn't currently include this intersection but it actually physically exists and is likely to be necessary to serve development in the southern half of the Mill Site, particularly the Mill Site Industrial/Employment areas. It is not currently included in part because of assumptions that it would conflict with the potential daylighting of Maple Creek. However, I believe there is no actual conflict because a daylighted Maple Creek could include a bridge on W. Maple Street and the actual creek path is actually a little to the south in the wooded riparian area. This access point is the traditional and historic point of entry for the former mill and it is an existing road that should be studied because it will likely improve the circulation analysis and emergency access to the Mill Site.

Second, in addition to Main and Maple, I think the intersections selected should be expanded to include Spruce and Stewart, Elm and Stewart, and Hwy 1 and Ocean View Drive. These intersections are impacted by existing traffic conditions and will likely be focal points for altered traffic patterns based on the land use map for the northern half of the Mill Site. I expect they may need to be adjusted.

Third, MCOG just released their County-wide pedestrian needs and engineering feasibility study. The plan includes many changes to relevant intersections that should be factored into the analysis because they will have impacts to transportation flow and distribution. In fact, some projects are actually in the pipeline and they may conflict with potential mitigation measures or transportation management recommendations so the consultants should at least be aware of them. Likewise for the City's recent transportation plan.

Fourth, although updates to the CEQA guidelines no longer focus on LOS as a definitive threshold of significance, the City of Fort Bragg continues to include this analysis in the Coastal and Inland General Plans so a traffic study that doesn't include LOS in addition to the current approach of VMT wouldn't be consistent with our General Plan. CEQA thresholds of significance are determined at the local level and until we update our local policies and guidelines, we need to continue to apply the analysis called for in our Coastal General Plan. The methodology is a little unclear as written (e.g., "While automobile delay (Level Of Service – LOS) and congestion will no longer be treated as a significant impact under CEQA...". In my opinion, delay and congestion actually are still potentially significant impacts for our local environmental reviews for projects until we update our governing documents but LOS is treated as a distinct step in the scope of work called Traffic Congestion Analysis. In my opinion, we have to analyze traffic issues using our current LOS and VMT according to the updated State guidance so the scope of work should include both analyses as potentially significant impacts, which is only implied by the current wording and how it is divided.

Finally, since the land use maps and southern circulation are not yet tentatively approved by the Planning Commission or City Council, the traffic analysis should be based on those aspects once they are updated based

on actual direction concerning the southern half of the Mill Site. Luckily, this wouldn't delay the traffic counts since collecting that data is based on actual current conditions and only the resulting analysis depends on the projections from the build out analysis and the layout of the circulation element. Those items can likely be dealt with in the near future but that understanding should be explicit in the scope of work.

Regards,

--Jacob