

June 3, 2021

Mr. Terry Johnson
BEST DEVELOPMENT GROUP
2580 Sierra Boulevard, Suite E
Sacramento, CA 95825

RE: ADDENDUM TO TRAFFIC IMPACT ANALYSIS FOR GROCERY OUTLET STORE, FORT BRAGG, CA

Dear Mr. Johnson:

As requested, KD Anderson & Associates has prepared this addendum to our October 22, 2019 Traffic Impact Analysis (TIA) for a Grocery Outlet Store in Fort Bragg, California. While both Caltrans and the City of Fort Bragg have reviewed and concurred with the findings of the TIA, this addendum is intended to address questions raised by commissioners at the May 26, 2021 Planning Commission Meeting and summarize information in the TIA addressing these questions, including:

1. What are the traffic effects of the Grocery Outlet Store project at locations on Franklin Street and the relative need for improvements to local streets in Fort Bragg to ensure safety for motorists, bicyclists and pedestrians?
2. What are the Grocery Outlet Store project's impact to regional VMT and the significance of that impact under the California Environmental Quality Act, and is additional analysis needed?

Grocery Outlet Store Project's Effects on City Streets

Traffic Study Area. The TIA investigated background traffic conditions and project impacts across a broad area selected in consultation with City staff and Caltrans. In addition to Main Street (SR 1) the TIA also looked at:

- Cypress Street
- N. Harbor Drive
- South Street
- Franklin Street

Traffic volume count data was collected over a three day period in the summer of 2019 before COVID-19 travel restrictions, and peak hour intersection traffic counts were conducted during the weekday evening peak traffic hour and the peak hour of Saturday at these locations off of SR 1:

1. Franklin Street / Cypress Street
2. Franklin Street / South Street
3. Franklin Street / Harbor Drive

Analysis Methods. As directed by Fort Bragg’s General Plan and Caltrans guidelines the adequacy of the circulation system is measured at intersections, although daily traffic count data was also provided in the report for roadways between intersections. Intersection operations and impacts were evaluated based on capacity calculations / operating Level of Service and MUTCD requirements for traffic control devices (i.e., stop signs and signals). We also considered pedestrian and bicyclist safety based on factors such as conflicting traffic volumes and sight distance.

Current Conditions on City Streets. *Franklin Street (Major Collector)*, *South Street (Minor Collector)* and *North Harbor Drive (Local Street)* are all two-lane roadways, with 25 mph speed limits. Table 1 presents current daily traffic volumes on these streets.

TABLE 1 DAILY TRAFFIC VOLUMES ON FORT BRAGG STREETS				
Street	Location	Daily Traffic (vpd)		
		Thursday 7/18/2019	Friday 7/19/2019	Saturday 7/20/2019
Franklin Street (Major Collector)	Cypress Street to South Street	3,540	3,500	2,400
	South Street to N. Harbor Drive	1,940	2,200	1,930
South Street (Minor Collector)	Main Street to Franklin Street	2,450	2,350	1,670
N. Harbor Drive (Local Street)	Main Street to Franklin Street	2,490	2,950	3,200

City Street Intersections Near Grocery Outlet. The *South Street / Franklin Street intersection* is a four-way intersection controlled by a stop sign on northbound and southbound Franklin Street approaches. Each approach has a single travel lane. A crosswalk is striped across the north Franklin Street leg, and there is a streetlight on the northeast corner.

The *North Harbor Drive / Franklin Street intersection* is a “tee” controlled by an all-way stop. The North Harbor Drive approaches are single travel lanes, but the Franklin Street approach has as separate right turn lane. There are no crosswalks striped at the intersection, and a streetlight is present on the southeast corner of the next nearest intersection.

Pedestrian Facilities. Pedestrians were included in the intersection traffic counts. There are sidewalks in many locations on the streets surrounding the project. Sidewalk is present at these locations:

- both sides of Franklin Street from a point about 250 feet south of South Street northerly to Cypress Street
- east side of Franklin Street for 100 feet north of North Harbor Drive
- both sides of Cypress Street
- both sides of South Street

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- north side of North Harbor Drive from SR 1 to the project site (230 feet)
- south side of North Harbor Drive from SR 1 to 160 feet east
- east side of Main Street (SR 1)

Crosswalks are striped at intersections as noted earlier, and ADA ramps have been provided at most locations.

Bicycle Facilities. Bicyclists were included in intersection traffic counts. The SR 1 along the Pacific coast is a popular area for recreational cyclists. The *City of Fort Bragg 2009 Bicycle Master Plan (2009)* outlines the location and nature of existing bicycle facilities in the community. Bicycle facilities are categorized within three classifications:

- Class I Bikeway: trails or paths that are separated from automobile traffic,
- Class II Bikeway: bicycle lanes that are on street but delineated by striping, and
- Class III Bikeway: bicycle routes where bicycles and automobiles share the road.

There are currently Class II striped bicycle lanes on the east and west side of Franklin Street north of South Street to the Oak Street intersection.

Main Street (SR 1) is designated a Class III bike route through Fort Bragg.

The plan suggests that South Street and North Harbor Drive south of Woodward Street should be developed as Class II bike routes.

Transit Facilities. The Mendocino Transit Authority (MTA) provides transit service to the Mendocino and Sonoma county areas. Two routes pass the project site. Route 5 (Braggabout) and Route 60 (The Coaster) traverse the community and have a stop near the County Social Services building at the South Street / Franklin Street intersection. Route 5 provides service on one-hour headways from 7:00 to 6:00 p.m. Monday thru Friday, with service extending to 8:30 on Saturdays. Route 60 runs four circuits on weekdays at 7:30 a.m., 11:57 a.m., 2:57 p.m. and 3:57 p.m., and this route also extends later on Saturdays.

Grocery Outlet Store Effects on City Streets. Table 1 presents the effects of the Grocery Outlet Store at City street intersections around the project. As shown, the addition of project traffic would not appreciably increase the length of delays already occurring at City street intersections, and the resulting Levels of Service meet the City's minimum requirements (i.e., LOS C or better). There is no need for capacity related improvements.

Need for Traffic Controls. Decisions regarding the installation of all traffic control devices in Fort Bragg, such as traffic signals and all-way stops are made by the City based on the requirements of the Manual of Uniform Traffic Control Devices (MUTCD) and engineering judgement. As noted in Table 2, the addition of Grocery Outlet Store trips does not result in traffic volumes that reach the level that would warrant a traffic signal at any intersection on City streets.

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The need for an all-way stop at the Franklin Street / South Street intersection was raised at Planning Commission Meeting, and the projected traffic, pedestrian and bicycle volumes were reviewed based on MUTCD requirements for an all-way stop. In July 2019 a total of 13 and 4 pedestrians crossed the intersection during the weekday p.m. and Saturday peak hour, respectively, while a total of 8 p.m. and 4 Saturday peak hour bicyclist were counted. These counts could conceivably double with the project. While the intersection would operate safely with current controls, the projected peak hour automobile, bicycle and pedestrian volumes indicate that the intersection may reach the level that satisfies MUTCD warrant requirements for an all-way stop, but analysis of MUTCD requirements over an 8 hour period would be required for confirmation.

Since the intersection is projected to operate acceptably with current traffic controls, an all-way stop is not required due to an impact created by the Grocery Outlet Store, but the City of Fort Bragg could elect to install an all-way stop at their discretion.

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**TABLE 1
 EXISTING PLUS GROCERY OUTLET STORE INTERSECTION LEVEL OF SERVICE ON CITY STREETS**

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)
Cypress Street / Franklin Street	AWS	C	B	12	B	12	C	A	9	B	10
South Street / Franklin Street	NB/SB Stop	C	A	7	A	7	C	A	7	A	7
Westbound left turn			A	8	A	8		A	7	A	7
Eastbound left turn			B	12	B	14		B	11	B	12
Northbound approach			B	12	B	13		B	11	B	11
Southbound approach											
No Harbor Drive / Franklin Street	AWS	C	A	8	A	8	C	A	9	A	9

AWS is All-Way Stop. NB/SB Stop indicated stop signs on the northbound and southbound approaches only

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**TABLE 2
 EXISTING PLUS GROCERY OUTLET STORE TRAFFIC SIGNAL AND ALL WAY STOP WARRANTS**

Intersection	Weekday PM Peak Hour				Saturday Peak Hour			
	Volume (vph)		MUTCD Warrant Met?		Volume (vph)		MUTCD Warrant Met?	
	Major Street	Minor Street	MUTCD Warrant Met?		Major Street	Minor Street	MUTCD Warrant Met?	
			All-Way Stop ¹	Traffic Signal ²			All-Way Stop ¹	Traffic Signal ²
Cypress Street / Franklin Street	556	180	Existing	No	429	102	Existing	No
South Street / Franklin Street	289	135	Yes ²	No	314	94	No	No
North Harbor Drive / Franklin Street	299	69	Existing	No	387	89	Existing	No

¹ Section 2B.07 Multi-Way Stop Applications
² further analysis of conditions over 8-hrs is required under MUTCD

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Pedestrian Impacts. Some Grocery Outlet Store employees or customers will elect to walk to and from the site, as there is residential or commercial development near the site. However, sidewalk exists on the streets adjoining the site, and with frontage improvements installed by Grocery Outlet Store, sidewalks will generally provide a complete path of travel to and from the site. There are two locations where gaps in the pedestrian system may remain, including:

- The south side of South Street from Franklin Street easterly to Myrtle Street (150 feet)
- The north side of North Harbor Drive between Franklin Street and Myrtle Street (100 feet)

The gaps exist at locations where it appears that residences were constructed prior to the City of Fort Bragg requiring frontage improvements. Privately maintained landscaping exists near the road. The availability of right of way to construct improvements is unknown.

While it is not the responsibility of the project proponents to install sidewalks along these areas it would be appropriate for the City of Fort Bragg to consider installing NO PARKING signs in the area to preserve the edge of roadway for pedestrians.

Bicycle Impacts. The use of bicycles may be an option for employees or customers to the site. Typically, grocery stores do not attract large numbers of cyclists due to the need to carry goods purchased, however it is likely that current bicycle activity by visitors to the Mendocino coast leads to greater use of that mode in the community. The number of cyclists associated with this project is not likely to create any appreciable safety impacts on adjoining streets, as Class II bike lanes exist on Franklin Street north of the site, and Franklin Street along the project frontage is wide enough to accommodate shared bicycle and automobile activity. While the project's off-site impact is not significant, applicable short-term bicycle storage facilities should be installed on site, as required by the City of Fort Bragg.

Transit Impacts. Project employees or customers will be able to use MTA service as it already passes the project site and stops near the corner of South Street and Franklin Street. The project's impact is not significant, and mitigation is not required.

Vehicle Miles Traveled (VMT) Impacts

Background. Starting in July 2020 SB 743 required agencies to move from a Level of Service based impacts analysis under CEQA to analysis based on regional Vehicle Miles Traveled (VMT). Current direction regarding methods to identify VMT and comply with state requirements is provided by the California Governor's Office of Planning and Research (OPR)' December 2018 publication, *Technical Advisory on Evaluating Transportation Impacts in CEQA*. In addition, in June 2020 the Mendocino Council of Governments (MCG) published its *Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study*. Which provided perspective in support of OPR guidance.

The OPR advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. Again, OPR provides this Technical Advisory as a resource for the public to use at their discretion. OPR is not enforcing or attempting to enforce any part of the recommendations contained herein. (Gov. Code, § 65035 ["It is not the intent of the

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Legislature to vest in the Office of Planning and Research any direct operating or regulatory powers over land use, public works, or other state, regional, or local projects or programs.”].)

OPR provides this direction for retail projects:

***Retail Projects.** Generally, lead agencies should analyze the effects of a retail project by assessing the change in total VMT because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns.*

OPR also provides guidance regarding **Screening Thresholds** that would allow agencies to quickly identify when a project should be expected to cause a less-than significant impact without conducting as detailed study. OPR states:

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.

Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-specific information, such as market studies or economic impacts analyses that might bear on customers’ travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.

The traffic study 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. This conclusion is consistent with the OPR presumption that the VMT effects of locally serving retail uses of 50,000 sf or less may be considered to be less than significant.

Testimony offered at the Planning Commission supported the conclusion that the Fort Bragg Grocery Outlet Store would reduce regional VMT. Many speakers described driving to the existing Grocery Outlet Store in Willets and stated that they would patronize the new store in Fort Bragg. This redistribution of current traffic to a closer Grocery Outlet Store is consistent with OPR guidance.

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Similarly, the Grocery Outlet Store representative also provided supporting testimony. Based on their experience, the entry of Grocery Outlet Store into any community does not increase the amount that people eat. What it does do is redistribute the current shopping pattern, but based on Bureau of Labor Statistics analytics, community grocery consumption remains the same regardless of the number of grocers servicing the area. That dynamic supports the notion that the entry of Grocery Outlet actually lowers VMT and traffic congestion as consumers travel choices tend to favor convenience. Thus, the entry of any new grocer will tend to reduce travel as consumers located near the new location will gravitate to that new location making shorter trips. While traffic studies may conservatively describe trips to the Grocery Outlet Store as “new”, there is an offsetting reduction in trips to the pre-existing grocery providers.

Thank you again for your review of these materials. Please feel free to contact me at (916) 660-1555 if you have any questions or need additional information.

Sincerely Yours,

KD Anderson & Associates, Inc.

A handwritten signature in black ink, appearing to read 'K Anderson', with a long horizontal flourish extending to the right.

Kenneth D. Anderson, P.E.
President