From: Beth Burks <beth.burks@hcaog.net>
Sent: Tuesday, November 05, 2024 3:45 PM
To: Acevedo, Megan
Subject: Re: VMT report
Attachments: Stf rpt_Major Transit Stop- RTP amendment.pdf; Resolution 24-01 Amending RTP for Major Transit Stops.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Megan,
Here are my comments. They are a mix of technical questions and a couple typos.

Overall, I found the background discussion on SB 743 and CEQA thresholds very useful and clear. I think that is a great resource to have for people coming up to speed on VMT issues as they relate to CEQA.

- pg 18- "Humboldt County February 2024 Page 12 of 26" seems to be extraneous at the end of the first column
- pg 28 A potential clarification for this discussion is that HCAOG has amended the RTP and adopted a list of Major Transit Stops. The staff report and resolution that includes the stops and discussion is attached.
- pg 30 and general comment- Several sections note that projects should be consistent with the RTP. RTP VMT reduction targets are included in Appendix A. Can Fehr and Peers include an explanation of why the VMT reduction targets in the RTP don't set regional VMT thresholds? Same question holds true for the screening discussion on page 31. If the projects need to be consistent with the RTP as it states in the 4th bulet of section 5.1.1, do we need to be adding specifics about the RTP VMT reduction targets in the screening tool? Is there risk to having these targets in the RTP while jurisdictions are adopting different targets?
- pg 30- last sentence of second column seems to be incomplete "However, the ARB's 2022 Scoping Plan."
- pg 32- To make it more locally relevant, it would be great if they could include a discussion of intersection improvements. We have many transportation projects that are essentially safety and intersection efficiency projects, but because they technically improve the level of service we often get feedback that they are capacity increasing and will induce demand. If there is anything Fehr and Peers can add to address this, it would be helpful when evaluating the more common types of road improvements that we see here. We don't typically wrestle with roadway capacity increasing projects such as added lanes.
- pgs 36 through 38- the test cases all include as the first question, *Is the project consistent with the General Plan and Regional Transportation Plan?* But the response only answers the General Plan part of the question. This takes me back to my third bullet. It would be helpful to clarify in these test cases how consistency with the RTP is concluded.

- Pg 40 Section 7.1.2 - item 4- we don't have any commuter rail stations so I suggest modifying this to be locally relevant or if it only applies to commuter rail, removing this from the project - scale strategies.

Please let me know if you would like to discuss any of these comments.

Thanks,

Beth

HUMBOLDT COUNTY ASSOCIATION OF GOVERNMENTS
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AGENDA ITEM 6a
HCAOG Board Meeting
January 18, 2024

DATE: January 9, 2024
TO: HCAOG Policy Advisory Committee (PAC)
FROM: Beth Burks, Executive Director
SUBJECT: **Amendment to Regional Transportation Plan to define Major Transit Stops**

STAFF REPORT

Contents:

Staff's Recommended Action:

1. Introduce the item as an action item;
2. Allow staff to present the item;
3. Receive public comment;
4. Discuss item and consider making the motion:
   "The PAC recommends the HCAOG Board adopt Resolution 24-01 amending the Regional Transportation Plan, *VROOM 2022-2042*, to include defined major transit stops."

Staff Summary:

Over the last two years several housing related bills were passed through the State legislature with the intent to increase the speed and affordability of housing production. Among them was Assembly Bill 2097. AB 2097 was passed in September 2022 and prohibits a public agency from imposing any minimum automobile parking requirement on any residential, commercial, or other development project, as defined, that is located within $^{1}/_{2}$ mile of public transit, as defined.

In the context of this bill, the definition of public transit relies on section 21155 of the Public Resources Code. "A major transit stop is as defined in Section 21064.3, except that, for purposes

of this section, it also includes major transit stops that are included in the applicable regional transportation plan."

For reference, Section 21064.3 defines a major transit stop that meets any of the following:

(a) An existing rail or bus rapid transit station.
(b) A ferry terminal served by either a bus or rail transit service.
(c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Because Humboldt County does not have transit stops that meet the above definition, only transit stops that we include in our Regional Transportation Plan (RTP) would be subject to AB 2097 provisions.

Our current RTP, VROOM 2022-2042 was adopted in January 2022, prior to the passage of AB 2097, so we did not contemplate including/identifying major transit stops during that update.

Because there would be immediate benefits to identifying major transit stops, staff is recommending a phased approach. Initially defining specific stops that have the highest level of use. At a later time, an expanded definition could be considered. This could occur as part of the 2026 VROOM update, or prior.

The following specific stops are proposed to be included in the RTP as major transit stops due to their high level of use:

Stop Name	**Sum of Avg Day Total Alighting (On+ Off)**
CAL POLY LIBRARY CIRCLE	565
BAYSHORE MALL	344
ARCATA TRANSIT CENTER	316
F ST AND HARRIS ST	282
COLLEGE OF THE REDWOODS	231
EUREKA TRANSIT CENTER	210
VALLEY WEST BLVD. (MCDONALDS)	175

A full list of average daily passenger alighting is included for all transit systems operated by Humboldt Transit Authority.

The stops that would be included in the amendment of the RTP are within the Cities of Eureka and Arcata, except for the stop at College of the Redwoods. Community Development Staff at Eureka, Arcata and the County have reviewed these locations and are in favor of them being included.

For future consideration Staff will work with all member jurisdictions to see if there is interest in developing a definition of major transit stops that would consider more data such as ability to transfer to other routes and frequency of service. There is also potential to consider a lower number of average daily alighting, which may be appropriate for lower population areas or communities where very few stops are available.

Staff recommends approval of Resolution 24-01 to amend the RTP to include the specific transit stops listed above as major transit stops.

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RESOLUTION 24-01
RESOLUTION OF THE HUMBOLDT COUNTY ASSOCIATION OF GOVERNMENTS AMENDING THE 2022 REGIONAL TRANSPORTATION PLAN

WHEREAS, the Humboldt County Association of Governments (HCAOG), in its official capacity as the designated Regional Transportation Planning Agency (RTPA), is responsible for preparing and implementing the Humboldt County Regional Transportation Plan; and

WHEREAS, on January 20, 2022, *VROOM 2022-2042,* was adopted by the HCAOG Board and this document is the current Regional Transportation Plan; and

WHEREAS, since the time of adoption, Assembly Bill 2097 has been approved to promote housing production by reducing parking requirements within ½ mile of major transit stops, which includes those identified in the Regional Transportation Plan; and

WHEREAS, HCAOG has identified transit stops with the most use in our region and vetted those with the applicable jurisdictions; and

WHEREAS, *VROOM 2022-2042* includes policies to promote and support infill housing near transit stops;

NOW, THEREFORE, BE IT RESOLVED, that Humboldt County Association of Governments, as the RTPA, amends the Regional Transportation Plan, *VROOM 2022-2042* to include the following major transit stops:

- Cal Poly Library Circle, Arcata
- Bayshore Mall, Eureka
- Arcata Transit Center
- F St and Harris St, Eureka
- College Of the Redwoods
- Eureka Transit Center, H Street, Eureka
- Valley West Blvd. (McDonalds), Arcata

PASSED AND ADOPTED by the Humboldt County Association of Governments, in the City of Eureka, County of Humboldt, State of California, this 18th day of January 2024, by the following vote:

AYES: MEMBERS: Johnson, Jones, Madrone, Bergel, White, Torgensen, West

NOES: MEMBERS: none
ABSENT: MEMBERS: Orr
ABSTAIN: MEMBERS: none

Attest:

Beth Burks, HCAOG Executive Director

Mike Johnson, HCAOG Chair

California Department of Transportation

DISTRICT 1
P.O. BOX 3700 | EUREKA, CA 95502–3700
(707) 445-6600 | FAX (707) 441-6314 TTY 711
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February 21, 2025

1-HUM-General
Humboldt VMT Study

Ms. Megan Acevedo
Community Development Department
County of Humboldt
3015 H Street
Eureka, CA 95501

Dear Ms. Acevedo:

Thank you for giving Caltrans the opportunity to review and comment on the Humboldt County Vehicle Miles Traveled (VMT) Study, which establishes thresholds of significance as well as a methodology for conducting CEQA analysis. The study was prepared by Fehr & Peers, who has considerable experience in the subject matter.

Caltrans submitted preliminary comments on November 15, 2024, which we now request to rescind. Our initial comments expressed concern with the use of StreetLight as a data source. While the Caltrans Division of Transportation uses StreetLight data for planning purposes, our concern was that the data may be used as a basis for preliminary design of road or other transportation facilities. StreetLight data should not be used for "apples-to-apples" comparisons with data collected from actual traffic counts. We advise the County not to use StreetLight data for engineering purposes. StreetLight data is not recommended for use in bicycle and pedestrian analysis.

The Study's approach to complying with the SB 743 requirements for CEQA would appear to be based on sound principles. We have not evaluated the proposed web-based VMT tool identified in the Study and cannot offer any input on its accuracy or effectiveness.

The following comments apply to VMT analysis of land use projects only; VMT analysis of transportation projects has not been considered. Caltrans uses the Transportation Analysis Under CEQA guidance for evaluating State Highway projects: <https://dot.ca.gov/programs/esta/sb-743/resources>.

The County approach to VMT thresholds should reconcile how their VMT threshold contributes to state goals for GHG reduction mentioned above and discuss how it is helping to meet these goals.

Senate Bill 743 (2013, Steinberg) revised some of the provisions in CEQA to more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions. The preferred metric for achieving these objectives is Vehicle Miles Traveled (VMT). While VMT is focused on vehicle travel, the goal of reducing VMT growth focuses upon changing development patterns (e.g., land use mix and density) together with providing more pedestrian, bicycle, and transit infrastructure. These factors contribute to people living closer to their destinations and having multiple travel choices. Due to a persistent struggle to obtain high-quality data in rural regions, we support the use of General Plan and zoning ordinances to facilitate low-VMT development patterns and transportation systems.

The limited availability of high-quality data for Humboldt County may limit the region's effectiveness in a dependence upon site-specific VMT analyses for regulating land use-generated VMT, particularly on an *ad hoc* basis. Shifting the burden of cost for assuring VMT reduction strategy compliance to individual housing developments may impact the attainment of regional housing goals.

VMT Reduction Strategies
The largest reductions in VMT (and resulting emissions reductions) derive from regional and city policies related to land use location efficiency and infrastructure investments that support transit, walking, and biking.

Of the Report's ten recommended VMT reduction strategies, we offer the following observations:

- The greatest benefits in VMT reduction are expected to be achieved in Humboldt County through the increase in residential and job density increases. New residential development that adheres to General Plan goals, policies, standards, and implementation measures may facilitate VMT reduction at little or no cost to individual residential developments, particularly for infill sites. This assumes that no mitigation fee program is implemented by the County.
- Based on lessons learned in other parts of California, Transit-Oriented Development (TOD) may be less likely to achieve the benefits cited in the Report due to both the higher-cost of TODs in terms of housing

affordability and the existing limitations of regional transit service. This observation is not intended to discourage the use of TODs.
- Parking management strategies will work best to reduce VMT if coupled with improvements in transit service or other VMT-reducing travel modes, such as car-share and micro-mobility programs.

Impact Fee Programs tend to be effective where development occurs at a rapid pace and where supplemental sources of funding make up a significant share of the budget to implement the Capital Improvement Plan (CIP). Mitigation fee programs may be obligated to expend the fees collected within a relatively short timeframe or the mitigation fees may need to be returned. Please review the California Mitigation Fee Act (California Government Code Section 66000) for more information on this topic.

Using the large urban regions of California as a test-case for establishing mitigation banking or exchanges in Humboldt County, there may be financial limitations for amassing the capital needed to build low-VMT infrastructure that make these programs infeasible. Additional study on this topic would be needed prior to considering the use of VMT banks or exchanges.

Caltrans did not conduct a full peer review of the Humboldt County VMT Study. The above comments should be considered advisory. Additional information about Caltrans policies and practices related to reducing VMT can be found online at: <https://dot.ca.gov/programs/esta/sb-743/resources>.

We request to receive access to the online VMT tool for Humboldt County to ensure that our evaluations and determinations of VMT impacts are consistent with those of the region. We offer to partner with the County and region to ensure that the best available data and practices are employed to meet Statewide VMT goals and targets.

Please contact me with questions or for further assistance with the comments provided at (707) 684-6879 or by email: <jesse.robertson@dot.ca.gov>.

Sincerely,

Jesse G. Robertson

JESSE ROBERTSON
System Planning & Local Development Review
Caltrans District 1