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RE: North McKay Ranch Subdivision Project Draft Environmental Impact Report

Mr. Estlow:

The Coalition for Responsible Transportation Priorities (CRTP) and Environmental Protection Information Center (EPIC) have reviewed the North McKay Ranch Subdivision Project (“project”) Draft Environmental Impact Report (DEIR). Generally, we consider the project location to be less than ideal for housing development, as it is located at the suburban-wildland interface, distant from services and employment centers. This will result in a car-oriented neighborhood, generating significant unnecessary vehicle miles traveled (VMT) and little use of other modes of transportation. We submit the following specific comments.

Vehicular Traffic Analysis Inadequate

The DEIR relies largely on an analysis of vehicular level of service (LOS). As the document itself notes, impacts to LOS and other measures of congestion will no longer be considered environmental impacts under CEQA as of July 1, 2020. Instead, transportation impacts will be measured in terms of vehicle miles traveled (VMT). The main reason use of LOS is being replaced by VMT under CEQA is because the use of LOS encourages over-building of vehicle-serving infrastructure which in turn induces more vehicular traffic. In contrast, use of vehicle miles traveled (VMT) allows mitigation measures which reduce VMT by shifting mode share. The Governor’s Office of Planning and Research has thoroughly documented the disadvantages of using LOS and the benefits of VMT.¹ Yet the DEIR persists in focusing almost all of its analysis on LOS. We urge the County to abandon use of LOS under CEQA once and for all, both in this DEIR and other future processes.

The DEIR also attempts a VMT analysis, but it lacks analytical rigor and fails to provide reasonable support for its conclusion. The DEIR identifies the state’s significance threshold of 15% lower VMT per capita than existing development, admits that the project “would like have an average VMT per capita greater than the City of Eureka average,” but then guesses that it

¹ Governor’s Office of Planning and Research. 2018. Key Resources on SB 743: Studies, Reports, Briefs and Tools. Available at <https://opr.ca.gov/ceqa/updates/sb-743/>.

would have a lower VMT per capita than the “regional average.” On the basis of that reasoning alone, the DEIR concludes that the project’s VMT impacts are less than significant.

The project clearly and unequivocally proposes a suburb of the City of Eureka. The appropriate population for VMT comparison is therefore the city and its immediately adjacent neighborhoods, not the largely rural surrounding region. Furthermore, the population of the region is not evenly distributed. A significant majority of the regional population actually lives in or around the relatively dense communities of McKinleyville, Arcata, Eureka and Fortuna. Thus, the fact that “the proposed project site is closer to the urbanized portion of the City of Eureka than most areas of the region”—the sole fact cited by the DEIR to justify the conclusion of less than significant VMT impacts—is irrelevant to any *per capita* regional comparison. Given the distribution of regional population, it is almost certain that the project’s residents will have equal or greater per capita VMT, and in any case not less than 15% less than average. Therefore, the project’s VMT impacts are clearly significant under the state’s standard.

Humboldt County’s 2017 Regional Transportation Plan also contains a specific objective to “Reduce motor vehicle miles traveled (VMT) and lower GHG emissions.” Thus, by failing to reduce VMT, the project also conflicts with this local plan, creating an additional significant impact.

The significance of the VMT impacts requires the project to adopt feasible mitigation measures. One of the most effective VMT mitigations for a project in this location would be to provide for a dense mixture of local commercial and residential development, reducing the need for at least some of the trips for services and employment.² Unfortunately, the small area of commercially zoned property provided in the project is not sufficient for this purpose.

Other potential VMT mitigation measures are similarly weak or missing entirely. Provision of complete, connected bicycle and transit networks would be effective mitigation measures,³ but these are completely lacking. These issues are discussed in greater detail below.

The project also fails to include any other transportation demand management (TDM) measures, which would serve as VMT mitigation. Notably, General Plan Policy C-P11 requires residential subdivisions resulting in 15 or more dwelling units to comply with County TDM programs. Potential TDM measures the project could adopt include:

- Provision of free bus passes to residents
- Car-share and bike-share programs
- Reducing the number of parking spaces provided

² Frank, Lawrence D. and Gary Pivo. Impacts of mixed use and density on utilization of three modes of travel: single-occupant vehicle, transit, and walking. *Transportation Research Record* 1466: 44-52.

³ For biking: Schoner, Jessica E. and David M. Levinson. 2014. The missing link: Bicycle infrastructure networks and ridership in 74 US cities. *Transportation* 41(6): 1187-1204.

For transit: Idris, Ahmed Osman, Khandker M. Nurul Habib and Amer Shalaby. 2015. An investigation on the performances of mode shift models in transit ridership forecasting. *Transportation Research Part A: Policy and Practice* 78: 551-565.

Bicycle and Transit Impact Analysis Inadequate

The project proposes no bicycle facilities whatsoever. The DEIR concludes on p.3.16-20 that the project would not “conflict with a program, plan, ordinance, or policy addressing” bicycle facilities on the basis of the fact that the 2012 Humboldt Regional Bicycle Plan does not propose any bicycle facilities in the immediate project area. This conclusion is erroneous in multiple respects:

- The Humboldt Regional Bicycle Plan was updated in 2018. The 2018 Update is the relevant document, not the 2012 Update.
- The project conflicts with the 2018 Update’s goals, including the following: “In all urbanized areas, bikeways shall be established in new construction and reconstruction projects unless bicyclists are prohibited by law from using the roadway or the cost of establishing bikeways would be excessively disproportionate to the need or probable use; or where sparse population or other factors evidence an absence of need of paved travelways.”
- The project conflicts with the 2017 Regional Transportation Plan (VROOM) “Balanced Mode Share/Complete Streets” Objective, which is described as follows: “Maximize multi-modal access to the roadway system and eliminate barriers to non-motorized transportation. Expand and maintain a regional network of inter-connected pedestrian and bicycle facilities for active transportation. Support and implement projects and policies that increase biking and walking, especially for short trips, first/last mile transit trips, and school trips. Create safe and effective walking and bicycling facilities that create neighborhood connectivity and continuity.”
- General Plan Policy C-P1 calls for the “development of a circulation system that supports...access to higher density residential areas, local commercial facilities, neighborhood parks and schools, while maintaining maximum bicycle and pedestrian connectivity.” General Plan Policy C-P28 calls for bicycle facilities in new subdivisions, including connecting new neighborhoods to existing neighborhoods. The project conflicts with both of these policies by failing to provide any bicycle connectivity.

Similarly, the project proposes no transit facilities or connectivity. The DEIR notes that the nearest bus stops to the project are 0.5 miles and 1-1.2 miles away, and apparently concludes that because the project is not on top of an existing or planned bus route, it does not “conflict with a program, plan, ordinance, or policy addressing” transit. In fact, by failing to provide any reasonable access to transit, the project conflicts with adopts plans and policies as follows:

- The 2017 Regional Transportation Plan contains an objective to “Expand and improve local and interregional transit services to improve mobility for people in Humboldt County.” The project lacks any expansion or improvement of transit to serve future residents.
- The 2017 Regional Transportation Plan contains an objective to “Coordinate long-range transit planning with land use policy, environmental policy, and development projects to help achieve a balanced transportation system.” The project does not coordinate with local transit planning in any way.

- General Plan Policy C-P24 states that “the County shall support HCAOG’s long term transit planning with the goal of increasing the percentage of public transit trips compared to automobile trips.” By conflicting with the above-referenced Regional Transportation Plan objectives (and their supporting policies), the project conflicts with this policy as well.
- General Plan Policy C-P1 calls for the “development of a circulation system that supports...access to higher density residential areas, local commercial facilities, neighborhood parks and schools, while maintaining maximum bicycle and pedestrian connectivity.” The project does not provide such access for non-drivers.

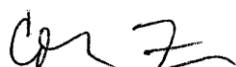
Greenhouse Gas Mitigation Inadequate

The DEIR notes that the largest source of project greenhouse gas (GHG) emissions is transportation. It further concludes that the project’s GHG emission impact is significant. Yet it proposes no transportation-related mitigation measures. As described above, provision of bicycle and transit facilities and connectivity, additional commercial uses, and TDM measures would all reduce VMT and thus GHG emissions. Some or all of these measures must be adopted as GHG mitigation measures.

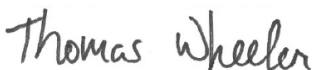
In conclusion, the DEIR’s analysis of vehicular, bicycle and transit impacts are all inadequate, along with its proposed GHG mitigation measures. The project’s VMT impacts, bicycle impacts, and transit impacts are all significant. The project must provide bicycle and transit facilities, connect with existing networks, and adopt other TDM measures as mitigation.

Thank you for your consideration of our comments.

Sincerely,



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