



June 1, 2017

Mayor, Vice-Mayor and City Council Members  
City of Arcata  
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**RE: Central Arcata Areawide Traffic Impact Study**

Dear Mayor Ornelas, Vice-Mayor Pereira, and Council Members:

We understand that you will soon be considering the Central Arcata Areawide Traffic Impact Study (TIS), particularly the proposed Traffic Impact Fee Mitigation Program and proportionate share calculations. We would like to take this opportunity to provide some comments on the TIS and the proposed Mitigation Program. We understand that there was a previous public comment period for the TIS. However, we also understand that the current document is still considered a draft and will not be finalized without further consideration by the Council.

*Traffic Impact Fee Mitigation Program*

We are pleased that the TIS considered bicycle, pedestrian and transit modes in developing the list of projects to be funded by the Mitigation Program, and that some of these projects could improve safety for bicyclists and pedestrians. However, we are troubled that the Mitigation Program is also proposed to fund projects which increase vehicular capacity, notably the re-striping at Alliance Road & Sunset Avenue. We are also concerned that the conceptual roundabout plans presented for Alliance Road & Sunset Avenue and for Sunset Avenue & LK Wood Boulevard, while they may represent an improvement over current conditions for pedestrians and bicyclists, were designed primarily to reduce vehicular congestion and could be better designed if a higher priority were given to non-vehicular modes.

At Alliance Road & Sunset Avenue, the proposed “mini-roundabout” poses several potential problems. We anticipate that the small diameter of the roundabout combined with the fact that all of the proposed islands are “fully mountable” would result in a failure to reduce vehicular speed—drivers would simply mount the islands instead of slowing down for the curves—and/or unpredictable driver behavior. Both of these possible outcomes increase safety hazards for bicyclists and pedestrians. Drivers often approach this intersection at a relatively high rate of speed, particularly southbound on Alliance Road, and the lack of a stop sign or true physical barriers to slow them down would likely



make it difficult for bicyclists to merge into the traffic circle safely and for pedestrians to safely utilize the crosswalks.

The proposed roundabout at Sunset Avenue & LK Wood Boulevard is much more thoughtfully designed from an active transportation perspective. However, it appears from the conceptual rendering in the TIS that bicyclists coming from or going to the north on LK Wood Boulevard would not be accommodated by the protected bikeway and would instead have to merge onto the traffic circle. Furthermore, and exacerbating this problem, there is no clear way for bicyclists to transition between the traffic circle and the protected bikeway. These deficiencies should be corrected before moving forward with the project.

Arcata's General Plan Goals C, F and G and Policies T-4 and T-5 all call for an increase in non-vehicular mode share, and the 2010 Bicycle & Pedestrian Master Plan calls for a dramatic increase in non-motorized modes to 50% by 2020. If the City is to achieve these laudable goals, it must prioritize infrastructure design which puts bicycles and pedestrians first (along with transit). The proposed Mitigation Program not only fails to do so, but—in prioritizing projects which reduce vehicular congestion—will actually lead to more vehicular travel (see "Methodological Considerations" below for more detailed analysis).

We urge you to reconsider the list of projects to be funded by the Mitigation Program, as follows:

- Replace proposed vehicular infrastructure with better bicycle, pedestrian or transit infrastructure. For example, instead of adding car lanes at Alliance Road & Sunset Avenue, for example, consider providing striped or raised (non-mountable) barriers for protection of bicyclists.
- Fund projects which increase the completeness and connectivity of the existing and proposed trail network. The only projects currently proposed for funding by the Mitigation Program which would improve conditions for bicyclists and pedestrians are those which provide protection from vehicular traffic. While such improvements are needed, a more proactive approach toward non-vehicular infrastructure is also warranted. Projects could range from ensuring better connectivity of the trail fragments proposed to be constructed by several of the developments to contributions of funds toward completion of the Humboldt Bay Trail.
- Fund effective transportation demand management (TDM) strategies and projects. The TIS proposes several possible TDM strategies, ranging from car share programs to on-site education, but does not include any of these strategies in the list of projects to be funded by the Mitigation Program. These measures are much more likely to be effective if fully funded by the developers and coordinated by the City than if left to individual developers and property managers to implement.

Regarding the proportionate share calculations, current calculations are based on projected vehicular trip generation rates. We suggest that the City incentivize the developers to design for bicycles, pedestrians, and transit by implementing a system of credits against Mitigation Program fees for



measures which will reduce those trip generation rates. This is an opportunity to encourage standard improvements such as covered/enclosed bicycle parking as well as innovative programs such as unbundling parking and housing costs. However, undoubtedly the most important action which could be taken in this regard is reduced vehicular parking—including waivers of the City’s parking minima if necessary. Ample free parking is proven to induce driving and thus runs counter to the City’s adopted goals and plans.

### *Methodological Considerations*

We do not know the extent to which you plan to consider aspects of the TIS other than the Mitigation Program. However, we urge you to revisit the study’s methodology, for the following reasons:

- a. The TIS uses an outdated approach to impact assessment which is inconsistent with the City’s General Plan.
- b. The TIS uses problematic trip generation rates.

The study uses Level of Service (LOS) to assess impacts. A four-year-old state law (SB 743, 2013) will soon prohibit use of LOS in assessing transportation impacts under CEQA, although it has not yet been fully implemented. The CEQA Guidelines update to implement SB 743 is not complete yet, but it’s clear that it will require the use of Vehicle Miles Traveled (VMT) instead of LOS.

The main reason use of LOS is being phased out under CEQA is because its use encourages over-building of vehicle-serving infrastructure which in turn induces more vehicular traffic. In contrast, use of VMT allows mitigation measures which will reduce VMT by shifting mode share. For example, the current SB 743 guidance provides that new bicycle and pedestrian facilities can mitigate a development’s transportation impacts by shifting trips from car to bike or foot, as can reduced parking by discouraging trips by car (see above).

The use of LOS in the TIS is even less appropriate given that the City does not have an adopted LOS standard which mandates its use, as some jurisdictions do. In fact, the particular way LOS is used is explicitly inconsistent with the City’s General Plan. The study uses AM & PM peak hour LOS as a basis for determining the need for improvements. However, General Plan Policy T-4 states that the City should design a street system which “maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays” (emphasis added). In other words, peak hour LOS should be largely disregarded, not used as the basis for improvements. In the absence of an adopted LOS standard, and with all of the well understood shortcomings of LOS, we do not believe that its use in the traffic study is defensible.

We also take issue with the study’s use of standard Institute of Traffic Engineers (ITE) trip-generation rates for the land uses proposed. These rates are based on studies of existing land uses. However, if Arcata is successful in pursuing the officially adopted goals and policies described above aimed at shifting trips to non-vehicular modes, then use of standard ITE trip-generation rates will over-estimate traffic and thus lead to unnecessary vehicular improvements. We are aware that the developer of The Village has argued that rates used for its development were too high, and that TIS authors dismissed



this concern and justified use of the higher rate in part because it is more “conservative.” However, being conservative is not a virtue when the results are counterproductive—i.e., more vehicular infrastructure at greater expense which induces more car travel.

It is also worth noting that trip generation rates are at least partly determined by the amount of parking provided, yet the TIS does not consider parking at all.

Finally, there is no attempt in the TIS to provide trip-generation rates for bicycle and pedestrian trips. The study pays lip service to the idea that many of the developments will serve college students and other demographics who will bike or walk if possible, but the assessment is entirely qualitative. We urge that the TIS analyze bicycle and pedestrian trips in a more rigorous, quantitative manner.

In sum, we urge you to take the following actions:

1. Revisit the methodology of the TIS and assess impacts in terms of VMT rather than LOS.
2. Insist on a more rigorous and quantitative assessment of non-vehicular transportation impacts in the TIS.
3. Modify the list of projects to be funded by the Mitigation Program—and therefore the cost calculations—to minimize increased vehicular capacity, maximize increased bicycle, pedestrian and transit capacity, and include effective TDM projects and strategies.
4. Incentivize design for bicycles, pedestrians and transit with a system of credits against Mitigation Program fees for appropriate measures, including reduced vehicular parking.

Thank you for your consideration of our comments. Please don't hesitate to contact us if you should have any questions.

Sincerely,

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*on behalf of*  
Coalition for Responsible Transportation Priorities