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RE: Comments on Proposed Revised Draft Environmental Impact Report (RDEIR) for Draft Humboldt County General Plan

Mr. Miller:

The Coalition for Responsible Transportation Priorities (CRTP) is an organization whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. CRTP appreciates the opportunity to comment on the proposed Revised Draft Environmental Impact Report (RDEIR) for the County’s General Plan Update (GPU). Our comments are as follows:

Level of Service & Vehicle Miles Traveled

The use of vehicular Level of Service (LOS) as a primary tool for assessing transportation impacts of the GPU leads is extremely problematic. LOS is an outdated metric which is increasingly recognized as leading to unintended consequences when used to measure the impacts of development and to determine appropriate mitigation. One researcher succinctly summarizes: “The use of LOS is often criticized for its bias towards automobiles at the expense of bicycling, transit, and walking, and it complicates smart growth or compact development.”¹ We agree with this criticism.

Furthermore, the use of LOS and other measures of automobile congestion to assess transportation impacts leads to mitigation measures which add automobile capacity to the road system. This tendency can be seen in the list of circulation system improvements in Table 3.5-6 of the RDEIR, which consists of additional roadway construction projects meant to relieve congestion. However, there is a growing consensus in transportation planning that adding capacity induces new travel and does not reduce congestion. We highly recommend that the

¹ Henderson, Jason. 2011. “Level of service: the politics of reconfiguring urban streets in San Francisco, CA.” Journal of Transport Geography 19(6): 1138-1144.



literature on induced travel be carefully reviewed and considered. A recent policy brief for the National Center for Sustainable Transportation, appropriately titled “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion,” contains a concise summary.²

The fact that the RDEIR considers “unacceptable LOS on roadways in the County” (Impact 3.5.3.2) to be a potentially significant impact of the GPU leads to counterproductive and internally inconsistent mitigation measures. Other than some Transportation Demand Management (TDM) strategies which the RDEIR itself admits would be difficult to implement effectively (p.3.5-21), these mitigation measures are designed to decrease congestion—i.e., increase speed of travel—by adding capacity, and will therefore induce additional vehicle miles traveled (VMT). This is an inevitable result of any project which decreases congestion by adding capacity, because the increased speed of travel resulting from such projects is what actually induces additional VMT.³ Meanwhile, increased VMT is considered a significant and unavoidable impact of the GPU. This internal inconsistency within the RDEIR should be addressed by replacing LOS with VMT as the primary vehicular impact measure.

The RDEIR shows that Humboldt County already has a high VMT per capita and that the GPU will exacerbate this problem. Tables 3.5-4a and 3.5-4b project VMT to increase at nearly twice the rate of population increase through 2040, and at nearly three times the rate in the near term (through 2028). At p.3.5-19, the RDEIR attributes not only current high VMT but future disproportionate VMT growth to “already established auto-oriented land use patterns.” However, this defies common sense. Existing land use patterns influence but do not dictate the pattern of future development—that is in large part the purpose of the GPU. Similarly, there is no fixed correlation between “levels of development” and VMT, as implied on p.3.5-19 of the RDEIR. Rather, it is the type and pattern of development which determines the impacts on VMT.

In this case, a review of the GPU’s proposed land use maps and circulation system improvements make it clear that increased VMT will be the result of growth planned largely for the outskirts of population centers—in other words, sprawl. But instead of proposing to mitigate increased VMT by modifying the land use planning in the GPU which causes it, the only proposed mitigation measure which even mentions land use limits itself to the consideration of

² Handy, Susan. October 2015. “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion.” National Center for Sustainable Transportation. Available online at http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf.

³ Cervero, Robert. 2003. “Road Expansion, Urban Growth, and Induced Travel: A Path Analysis.” *Journal of the American Planning Association* 69(2): 145-163.



future land use decision making. In other words, the RDEIR adopts an aspirational and largely unenforceable mitigation measure in place of a concrete and meaningful one.

Additionally, Proposed GPU Policy C-P5, establishing a minimum LOS for county roadways, is likely to ensure additional capacity increases and thus VMT increases for the life of the General Plan. An effective mitigation measure for increased VMT would be removal of Policy C-P5.

VMT is used as a “measure of congestion” in the RDEIR (p.3.5-20) and the discussion of VMT impacts beginning at p.3.5-18 is largely limited to congestion, but it is a much more meaningful indicator than that. The California Governor’s Office of Planning and Research (OPR) is currently in the process of implementing SB 743 (2013) by replacing LOS in the CEQA Guidelines with VMT. As OPR notes in its latest proposal, “vehicle miles traveled directly relates to emissions of air pollutants, including greenhouse gases, energy usage, and demand on infrastructure, as well as indirectly to many other impacts including public health, water usage, water quality and land consumption.”⁴ While the amendments to the CEQA Guidelines are not yet in effect, the current draft and supporting analysis are instructive, and it would behoove the RDEIR to follow the draft to the greatest extent possible.

In sum, the RDEIR should shift its focus away from LOS impacts. Further, the conclusion that increased VMT is an unavoidable impact of the GPU is not supportable. Reasonable mitigation measures which modify the GPU’s proposed policies, land use maps and circulation improvements while still accommodating population growth and achieving the GPU’s other goals could effectively mitigate VMT increases and must be adopted, as opposed to the speculative and unenforceable mitigation measures currently proposed.

Active Transportation & Transit

In summarizing the benefits and costs of different transportation modes, the RDEIR lists only “travel time, effort, convenience, and expense” (p.3.5-1), leaving out such critical considerations as safety, health, and greenhouse gas (GHG) emissions. It is thus perhaps unsurprising—but nevertheless unacceptable—that modes which may take more time but which promote greater health and safety and lower GHG emissions such as walking, bicycling and transit are given substantially less serious consideration than automobiles in the RDEIR. For example, the list of “issues affecting the County road system” (p.3.5-2) does not include anything about the capacity, safety or effectiveness of the road system for non-vehicular users. This is despite the fact that the document discusses in some detail how deficient the County’s

⁴ Governor’s Office of Planning and Research. January 2016. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Available online at https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf.



current bicycle and pedestrian infrastructure is, and the County's high rate of serious accidents involving bicyclists and pedestrians is also separately identified and discussed (p.3.5-12).

Furthermore, while vehicular travel impacts are extensively and quantitatively measured and discussed, and the GPU's proposed Policy C-P25 directs the County to adopt objective bicycle and pedestrian LOS/Quality of Services standards for County roads, the RDEIR makes no attempt to use any such standards to identify or measure the GPU's impacts on active transportation.

Without such objective measures, it is unclear how the RDEIR can come to conclusions such as that the GPU would increase walking and bicycling trips (p.3.5-31). It is important to note, however, that since the RDEIR *does* show that the GPU will result in increased vehicular trips regardless of whether bicycle and pedestrian trips will increase, the "hazards to roadway users" identified at this point in the RDEIR are real. Vehicles are the primary type of roadway users which pose a safety hazard.

In fact, the increase in vehicle trips and VMT creates a serious risk of decreased safety for all roadway users and a significant impact under CEQA. The RDEIR concludes on p.3.5-33 that safety impacts would be less than significant on the basis of the GPU's proposed goals and policies to promote safe multimodal transportation and encourage better design for bicycle, pedestrian and transit infrastructure. However, these aspirational policies do not outweigh the safety threat of additional VMT. Furthermore, the GPU's prioritization of the convenience of vehicular road users over the safety of non-vehicular road users is made clear by the use of the vague and permissive words "should" and "if possible" in proposed Policy C-P5, which states that road improvements to address congestion "should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible." This analysis applies equally to the RDEIR's conclusion that impacts to the performance or safety of bicycle, transit and pedestrian facilities will be less than significant.

In sum, the RDEIR must provide greater attention and analysis to non-vehicular transportation impacts. Furthermore, conclusions that the roadway safety and multimodal safety and performance impacts of the GPU are less than significant are not supportable and must be revisited.

Outdated Analysis and Trucking Impacts

The GPU process has taken many years, and we understand the difficulty of keeping the analyses in the RDEIR up to date. Nevertheless, it is not acceptable for the RDEIR to rely on documents and analyses which are substantially outdated and reflect conditions which no longer prevail. For example, the RDEIR explicitly relies on a reports from 2002 and 2008 to describe "existing transportation system conditions" (p.3.5-1). At p.3.5-5, the RDEIR also relies



on the County's 2008 Regional Transportation Plan (RTP) for a list of "regionally significant streets and roadways," despite the fact that the RTP was completely overhauled in 2014. Characterizing current conditions based on documents which are 15 years old and 9 years old, respectively, and categorically out of date, simply cannot lead to supportable impact assessment.

One glaring example of outdated analysis is the claim that Humboldt County is "dependent on logging and heavy commercial truck traffic to sustain its economy" (p.3.5-5). While logging and truck transportation still play a role in the local economy, the County can no longer be said to depend on them. The most recent Census data (2015) show that the entire forestry & agriculture sector provides only 2.3% of the County's payroll and 1.6% of its employment. Even adding this sector to manufacturing, wholesale, transportation and warehousing—the other main industries dependent on heavy trucks—produces only 16% of the payroll and 13% of the employment.

The RDEIR recognizes that "a key concern for the County is the impact of heavy truckloads on deteriorating County roads" (p.3.5-9), but provides no analysis of the GPU's impact on truck traffic or County road maintenance and repair. Indeed, the word "truck" appears only once in the entire Section 3.5.3 on transportation impacts and mitigation measures, and there is no discussion at all of the GPU's impacts on efforts to maintain and repair County roads. This lack may be partly explained by the incorrect assumption that the County is still heavily dependent on industries like logging—and that therefore there is no reasonable way to limit or control heavy truck traffic. Regardless, the RDEIR must be amended to include an analysis of truck traffic and maintenance/repair impacts, along with any needed mitigation.

Thank you for your consideration of our comments.

Sincerely,

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