



November 10, 2017

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**RE: Comments on The Village Student Housing Project DEIR**

Mr. Loya:

The Coalition for Responsible Transportation Priorities (CRTP) has reviewed the Draft Environmental Impact Report (DEIR) for The Village Student Housing Project (“project”). Although we appreciate some of the transportation-related design features of the project, we have concluded that the DEIR does not adequately assess the transportation-related impacts of the project and does not require all appropriate and feasible mitigation. The following comments detail the reasons for these conclusions. We also refer you to our June 1, 2017 comments on the Central Arcata Areawide Traffic Impact Study (TIS). We incorporate those comments here by reference, and reiterate some of them for emphasis below.

**I. The project is intended to minimize vehicular trips and encourage walking, bicycling and transit, but the transportation impact assessment assumes standard vehicular trip generation rates.**

Several of the listed project objectives are explicit about the intent to reduce vehicle usage and increase other modes of transportation, including (p.1-14):

- “Maximize student housing development within walking distance of Humboldt State University to reduce impacts of traffic and parking on local roads and significantly reduce carbon footprint”
- “Assist the City with the implementation of the Community Greenhouse Gas Reduction Plan by constructing energy-efficient buildings and promoting alternative modes of transportation through pedestrian and bicycle improvements”
- “Expand opportunities to increase ridership of the Arcata and Mad River Transit System”
- “Improve connectivity to the existing City trail system, parks neighborhoods, and schools”

There are numerous other statements throughout the DEIR which specifically assert that elements of the project's location and design will reduce use of vehicles and increase walking, bicycling, and transit use, including:

- p.1-18, p.3-22 & p.3-31: "It is anticipated that this increased connectivity will encourage residents to walk or bike to HSU instead of driving."
- p.1-18: "Due to The Village's close proximity (0.5 miles) to the Humboldt State campus, it is expected that most of its residents will either walk or ride their bicycles to school, which will serve to mitigate traffic and parking congestion in the surrounding neighborhoods. For those Village residents that may have additional transportation needs, the applicant will work closely with the City of Arcata and the Arcata-Mad River Transit System to provide bus service directly to The Village."
- pp.1-18,19: "The applicant proposes to implement a car and bike share program at the student housing community for residents who do not have cars or bikes. The program is intended to encourage carpooling, reduce vehicle miles traveled, encourage alternative modes of transportation, and reduce the number of cars and bikes that are stored at the site."
- p.2.7-11 & p.2.8-13: "The close proximity of the project site to existing educational and employment centers will encourage the use of alternative modes of transportation by future residents which will reduce vehicle miles traveled..."
- p.2.8-15: "The proposed project will promote a balanced transportation system by providing convenient access to pedestrian, bicycle, and bus transit facilities. This will help to reduce vehicle miles traveled and associated vehicular emissions."

In spite of all of these statements, the TIS, which is incorporated into the DEIR as Appendix L and is the basis for most of the document's transportation impact analysis, uses the standard Institute of Transportation Engineers (ITE) trip-generation rate for the land use proposed. As noted by UCLA urban planning professor Donald Shoup, these rates "measure the average number of vehicle trips observed at a few suburban sites with plentiful free parking but no public transit, pedestrian amenities, or TDM programs."<sup>1</sup> However, if the DEIR is correct in its statements asserting that future residents of the project will tend to walk, bike, or use transit rather than drive cars, then use of standard ITE trip-generation rates will over-estimate traffic and thus lead to unnecessary vehicular improvements. We are aware that the project developer has argued that the ITE trip generation rate is too high, and that TIS authors dismissed this concern and justified use of the 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.

The DEIR should use a lower trip generation rate to avoid internal inconsistency and to avoid requiring the construction of unnecessary and counterproductive vehicular improvements.

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<sup>1</sup> Shoup, Donald. 2011. *The High Cost of Free Parking*. American Planning Association Planner's Press. p.43.

**II. Vehicular Level of Service (LOS) is used to measure transportation impacts in spite of the lack of adopted LOS standard, while no comparable analysis is performed for other modes of transportation. This leads to the identification of inappropriate mitigation measures.**

The DEIR 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 overbuilding 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, and reduced parking can mitigate impacts by discouraging trips by car.

Thus, LOS is increasingly recognized as an inappropriate measure of transportation impacts under CEQA. The use of vehicular LOS is even less appropriate for a project such as The Village which is intended to encourage alternative forms of transportation (see Section I above). And it is still less appropriate given that the City does not have an adopted LOS standard which mandates its use, as some jurisdictions do.

The DEIR explicitly acknowledges at p.3-15: "The Arcata General Plan Transportation Element does not establish a Peak Hour LOS that is defined as generally acceptable. The W-Trans Traffic Study used an operational standard of LOS C (Appendix L; Pg. 13). However, this is not an adopted standard by the City of Arcata. The Arcata General Plan Transportation Element (Policy T-1a) encourages investment in alternative modes of transportation (e.g., bikeways, etc.) as a priority over increasing vehicular capacities of streets." Nevertheless, the DEIR goes on to identify mitigation measures to increase the vehicular capacity of streets on the basis of the imagined requirement to improve future LOS. For example, at p.3-15: "As noted in Table 3-4, design improvements are recommended to achieve LOS C or better at the intersection of Foster Ave/Alliance Rd which includes restriping the Alliance Road approaches." And at p.3-17: "With these conditions, an additional improvement was recommended to achieve an LOS C at the Foster Avenue/Alliance Road intersection."

As we noted in our June 1, 2017 comments on the TIS, some of these improvements not only increase vehicular capacity, but could pose safety risks to other road users. For example, the (already completed) restriping at Alliance Road & Sunset Avenue requires northbound bicyclists to cross a lane of turning vehicular traffic, exposing them to greater risk. Please refer to our earlier comments for additional detail.

Furthermore, the particular way LOS is used in the TIS 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.” In other words, peak hour LOS should be largely disregarded, not used as the basis for improvements.

The DEIR’s use of vehicular LOS in spite of the many reasons not to use it, and in spite of the lack of any adopted LOS standard for the City of Arcata, contrasts strikingly and inexplicably with the document’s assertion that the lack of any adopted non-vehicular standards prevents a similar analysis for other forms of transportation: “The City has not adopted a standard including LOS to measure [non-vehicular] transportation impacts, so no quantitative standard could be applied to the results of the analysis” (p.3-21 & p.3-30).

The DEIR should measure transportation impacts using VMT rather than LOS. If vehicular LOS continues to be used, a comparable assessment of impacts to non-vehicular forms of transportation must also be included. Mitigation measures must not increase vehicular capacity, but rather must reduce VMT by discouraging vehicle use and encouraging walking, bicycling, and use of transit.

### **III. The DEIR fails to acknowledge the significance of VMT increases.**

The only project impact which the DEIR concludes will be significant or potentially significant when proposed mitigation measures are incorporated is the impact to LOS at certain intersections (see for example Table 1-3). As discussed in Section II above, using LOS to measure impacts is inappropriate, so this proposed impact should be revisited. However, if LOS is replaced with a more appropriate rubric such as VMT as the primary measure of transportation impacts, the impacts would still be significant.

The DEIR reports an increase resulting from the project of 4.42 million VMT annually (p.1-28 & p.5-9). This number is likely too high as a result of the use of an inappropriately high trip generation rate (see Section I above). Nevertheless, the increased VMT caused by the project would be significant without further mitigation. The DEIR cites Policy T-2 of the Arcata General Plan, which calls for a reduction in VMT (p.3-30), but fails to acknowledge that the substantial increase in VMT caused by the project will conflict with this policy.

The DEIR states that in spite of the project’s stated intent to encourage future residents to walk to bike the short distance to campus (see Section I above), “it is anticipated that the majority of vehicle trips will occur between HSU and the project site” (p.5-9). These anticipated trips represent hundreds of thousands or even millions of additional VMT which could be easily reduced through additional mitigation measures to discourage driving and encourage walking and biking.

It must also be noted that the DEIR’s Finding 3.6 (p.3-29 et seq.) fails to address the Arcata 2010 Bicycle & Pedestrian Master Plan’s goal of a dramatic increase in non-motorized modes to 50% by 2020. The DEIR must estimate the mode share of trips caused by the project in order to determine if it will conflict with this policy.

The DEIR must acknowledge the significance of the VMT increases caused by the project and adopt additional mitigation measures to decrease vehicular mode share.

#### **IV. The DEIR underestimates the significance of the transportation-related pollution resulting from the project.**

Table 2.8-1 of the DEIR shows that transportation will account for 80% of the project's greenhouse gas (GHG) emissions, and the document more generally acknowledges that: "Among the pollutants that may be generated by the proposed project, those of greatest concern are emitted by motor vehicles during construction and operation" (p.2.7-3).

The DEIR also acknowledges: "Based on an updated community-wide GHG emissions inventory conducted in 2007, City of Arcata staff estimates that the City's GHG reduction target has not been achieved within the residential, commercial, and industrial sectors" (p.2.8-8 & p.2.8-13). But in spite of the increased VMT and resulting GHG emissions projected, the project is said not to conflict with the City's Community Greenhouse Gas Reduction Plan which established this target (p.2.8-15). While some of the project's features do comport with the Plan, the evidence presented in the DEIR shows that the project will increase the severity of existing Plan non-compliance in the absence of further mitigation.

The DEIR also claims that vehicular transportation improvements identified as mitigation measures will reduce congestion and, therefore, reduce pollution from automobiles (p.2.7-11 & p.2.8-12). This is not a supportable conclusion. Because decreased congestion induces travel demand and leads directly to increased VMT,<sup>2</sup> these projects are likely to actually increase VMT, and the argument is specious. Therefore, the level of pollution from the project is more significant than acknowledged.

The DEIR must acknowledge that the project's transportation-related pollution is significant and will conflict with the City's GHG reduction target, and must propose additional mitigation.

#### **V. The DEIR does not address the impacts of the placement of vehicle and bicycle parking on the project site.**

The proposed site plan for the project (Figure 1E) and landscape plan (Figure 1F) show housing structures entirely surrounded by asphalt parking lots and drive aisles. Only three pedestrian paths are proposed to cross the parking areas (none of which lead to the Eye Street entrance which the DEIR anticipates will be a primary access point for bicyclists and pedestrians [see for example p.3-22]). This layout creates an "island" effect. Rows of parked cars will separate the project's future residents from surrounding neighborhoods, leading to more isolation of students from the rest of the community. It also creates a more intimidating and less safe environment for pedestrians and bicyclists, and may therefore reduce the potential for residents and visitors to use these modes.

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<sup>2</sup> Cervero, Robert. 2003. "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis." Journal of the American Planning Association 69(2): 145-163.

The project should be commended for providing substantially more bicycle parking than required. However, there is insufficient detail on the plans provided to evaluate the quality or placement of the bicycle parking. In particular, information presented in the DEIR appears to indicate that a substantial amount of the bicycle parking may be indoors and on upper floors: “Each floor of the proposed four-story buildings will have 20 bicycle parking spaces” (p.1-17 & p.2.8-15). If this is the case, the project must provide a convenient way for bicyclists to get their bicycles to these parking spaces. If not, these spaces will be little used and will not provide a significant incentive to use this mode of transportation.

The DEIR must assess the impacts of the placement of both vehicular and bicycle parking on the mode share of trips generated by the project and on the surrounding community and provide mitigation for any potentially significant impacts.

**VI. The DEIR does not require the one feasible mitigation measure which would likely reduce all transportation impacts below the level of significance: the unbundling of parking from residential unit rents.**

Building and maintaining parking spaces add substantial amounts to the cost of housing, and including “free” parking with apartment rent inevitably leads to higher rents. Therefore, “unbundling” the cost of parking from the cost of residential units—renting them separately—can significantly *decrease* residential rents. It is also recognized by experts as one of the most effective ways of discouraging driving,<sup>3</sup> and is recognized as a mitigation measure for reducing VMT in the draft SB 743 CEQA Guidelines amendments. It also therefore creates an “incentive to lessen driving,” as called for in Arcata’s Community Greenhouse Gas Reduction Plan.

As described in Section I above, The Village is intended to house students, is located very close to campus and commercial areas, and has access to pedestrian and bicycle facilities and transit services. All of these factors and many of the other design elements described above decrease demand for vehicles and therefore parking, and increase the price sensitivity of that demand. The project is thus ideally suited to unbundling as a mitigation measure.

Charging future residents of the project separately for parking will have the following effects on transportation impacts:

- reduce the number of parking spaces needed and allow more flexibility in design of parking areas;
- reduce the number of vehicular trips generated;
- reduce VMT;
- reduce GHG and other emissions;
- increase non-vehicular mode share.

It will also have the following benefits not directly related to transportation:

- reduce housing costs for students;

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<sup>3</sup> See for example Shoup 2011.

- provide additional area on the site to be used for green space or other amenities, or potentially even additional housing units.

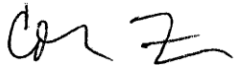
A market study should be performed to demonstrate the demand for parking from potential future residents once parking costs are unbundled from residential unit rents. Such a study should be the basis for deciding how many parking spaces the project actually provides.

The project currently proposes to provide 369 parking spaces (p.1-17), which is in excess of 50% greater than the minimum number required by the Arcata Land Use Code. If a market study shows that unbundling would reduce demand for parking below the minimum number of spaces required by the Land Use Code, then the project should apply for and be granted an exception from that requirement. The project is already planning to apply for a Type "B" Planned Development Permit in order to allow for exceptions to the Code's requirements relating to height and private recreation space (p.1-33). This type of permit would also allow exceptions from parking requirements (Arcata Land Use Code Sections 9.72.070.D.2 and 9.72.070.B.3.b). Granting such an exception would support Arcata's General Plan Goals C, F and G and Policies T-4, T-5 and AQ-2, which call for an increase in non-vehicular mode share and decreased VMT, and the 2010 Bicycle & Pedestrian Master Plan.

The DEIR should require as a mitigation measure the unbundling of parking from residential unit rents, and the number of vehicular parking spaces provided should be limited to the number the market demands when unbundled.

Thank you for your careful consideration of our comments.

Sincerely,



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