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*via email:* rholmlund@ci.eureka.ca.gov

**RE: Comments on Draft Environmental Impact Report (DEIR) for City of Eureka 2040 General Plan Update**

Mr. Holmlund:

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 Draft Environmental Impact Report (DEIR) for the City's 2040 General Plan Update (GPU). Our comments are as follows:

*Infill & Densification*

Three of the seven significant and unavoidable impacts identified in the DEIR (Impacts 3.3-1, 3.3-3 and 3.12-1) relate directly to vehicle miles traveled (VMT). Impact 3.12-1 is an impact to VMT per se, while Impacts 3.3-1 and 3.3-3 are impacts to air quality related to PM<sub>10</sub> which the DEIR specifically identifies as largely a result of increased VMT (p.3.3-45). Significantly reducing VMT requires dense, mixed-use development patterns, as well as directing new development toward already urbanized areas. The GPU does contain policies designed to encourage this kind of infill and densification, as the DEIR correctly notes. However, the DEIR is incorrect in concluding that there is no additional mitigation which could reduce VMT (and thus also PM<sub>10</sub> air quality impacts) below the level of significance.

We strongly support the following features and policies of the GPU, which will encourage denser infill development:

- Policy LU-1.2 ("Compact Form")
- Policy LU-2.12 ("Building Intensity")
- Policy LU-5.3 ("High Density Housing")

- Policy LU-5.4 (“Location”)
- Policy LU-6.2 (“Infill First”)
- Policy M-1.6 (“Dense Development”)
- Policy CS-3.4 (“Accessible School Sites”)
- Policy U-5.2 (“Energy Conserving Land Use Practices”)
- Increased density and intensity in many of the proposed land use designations (e.g., p.2-21 et seq.)

However, in contrast to these policies, we note that the vast majority of residential land in the city will continue to be restricted to low densities under the GPU (e.g., p.5-8). In fact, Policy LU-5.5 (“Existing Neighborhoods”) appears to be focused largely on maintaining the low-density nature of most of Eureka’s residential areas and preventing any densification beyond the development of Accessory Dwelling Units. The lack of any densification of the approximately one-third of the City’s (non-water) land area currently devoted to low-density residential neighborhoods severely limits the potential effectiveness of the policies noted above.

The failure to allow or provide for any densification of these neighborhoods is also perhaps the most important reason the GPU has failed to limit per capita VMT sufficiently, as they constitute a significant portion of the “existing development patterns of the area” and the resultant “continued reliance on automobile travel” (p.3.12-40). Furthermore, there is no reason that some additional housing densification and mixed-use development could not be allowed in these neighborhoods. Therefore, the GPU could and should provide for some additional densification and mixed-use development of low-density residential neighborhoods in order to mitigate impacts to VMT and air quality.

### *Sea Level Rise*

Dense infill development is of little use in reducing VMT, or achieving any other public purpose, if it is at a high risk of damage or destruction from natural or otherwise predictable events or causes. We are concerned that much of the GPU’s proposed dense infill development is directly in the path of expected sea level rise (SLR). We do not have confidence in Policy SL-1.8 (“Protection Management Strategy”), which calls for protecting “developed areas and areas designated for urban uses” from SLR “until such time as the magnitude of sea-level rise is such that the protection management strategy can no longer be achieved.” Current SLR protections make it hard to imagine the City being able to defend its entire shoreline through the GPU planning horizon.

We do believe that protecting some of the most valuable portions of the shoreline—likely Downtown and Old Town—from sea level rise will likely be technically and financially feasible. However, the City will have to prioritize. We are particularly concerned with the areas north and south of Downtown and Old Town, much of which the GPU targets for infill development, but which is at high risk of inundation from SLR and will likely not be feasible to protect.

We encourage the City to direct infill development away from areas which it cannot have the reasonable expectation of being able to protect from SLR for the foreseeable future. The threat of SLR increases the importance of densifying existing inland low-density residential neighborhoods.

### *Encouraging Walking, Bicycling & Transit*

As noted above, three of the significant and unavoidable impacts identified in the DEIR relate directly to VMT. Another critical factor in reducing VMT is shifting transportation modes away from personal vehicles and toward walking, bicycling and transit.

We strongly support the following policies in the GPU, which are designed to encourage residents, workers and visitors to Eureka to move from place to place by foot, by bicycle, or by transit:

- Policy LU-1.3.g (“encourages people to walk, bike or use transit”)
- Policy LU-1.3.h (“...plazas, boardwalks, trails...”)
- Policy LU-1.14 (“Public Realm”)
- Policy LU-1.19 (“Pedestrian Oriented Design”)
- Policy LU-5.2 (“Parking Access for Residential Uses”)
- Policy LU-5.5.d (“...infilling sidewalk gaps...”)
- Policy AG-1.8 (“McKay Tract Community Forest”)
- Policy AQ-1.7 (“Large Employers”)
- Policy AQ-1.10 (“Non-Motorized Transportation”)
- Policy AQ-1.11 (“City Employee Incentives”)
- Policy M-1.2 (“Investment in Alternative Modes”)
- Policy M-1.7 (“Consider All Users of Transportation System”)
- Policy M-2.9 (“Multi-modal Access”)
- Goal M-3 and supporting policies (“a system of walkways, bikeways and bicycle parking facilities...”)
- Goal M-4 and supporting policies (“coordinated transit service...”)

Policy M-1.2 is particularly important, as it calls for prioritizing investment in non-vehicular modes in order to level the playing field among modes (left decidedly unlevel by the last century of car-dominated transportation planning). We also commend the City for including Policy M-1.8 (“Slowing Traffic”), which will help to make our communities safer for people walking and bicycling, and Policy E-7.4 (“Strategic Street Closures”), which has the potential to transform parts of the Core Area into culturally and economically vibrant pedestrian zones.

However, we have noted two important omissions in the treatment of bicycles and pedestrians in the GPU. First, Policy M-3.8 calls for bicycle parking to be installed “in areas generating substantial bicycle traffic and at major public facilities.” In fact, bicycle parking must be required

even in areas which do not currently generate substantial bicycle traffic, because secure parking is a major part of the infrastructure which supports and encourages bicycling. Limiting bicycle parking infrastructure to areas which already see high levels of bicycling will not serve the GPU's many other goals and policies which encourage more transportation by bicycle.

Second, we think it is critically important that the DEIR include descriptions of the high levels of vehicular collisions with bicyclists and pedestrians in Eureka. The city has some of the highest rates of such collisions in the state, but the current description of the bicycle & pedestrian system (p.3.12-10 et seq.) contain no mention of this critical fact.

In addition to addressing Eureka's bicycle and pedestrian safety problem, the GPU's many strong policies in support of walking, bicycling and transit will surely reduce per capita VMT. However, some of these measures could be strengthened, as described above, to further mitigate Impacts 3.3-1, 3.3-3 and 3.12-1.

#### *Vehicular Parking*

Abundant free parking has been shown to encourage driving, among many other negative impacts to the urban landscape. We applaud the City for recognizing the problems associated with providing too much parking and working to reduce parking requirements for new development and reuse projects (e.g., p.5-4).

We strongly support the following policies to reduce the requirement to devote valuable space to free parking for private vehicles:

- Policy LU-1.10 ("Parking Standards for Existing Buildings")
- Policy LU-1.17 ("Parking")
- Policy LU-2.1.d ("...reduced or eliminated parking requirements")
- Policy LU-2.6 ("Parking for Urban Uses")

We also strongly support the creation and utilization of Parking Assessment Districts, as suggested in Policies LU-2.5 ("Parking Analyses and Fundraising") and LU-3.5 ("Henderson Center"). These Districts reduce the public subsidy required to maintain parking for private vehicles and reduce the incentive to drive, and in many places they have been very successful at raising money to improve local neighborhoods.

All of these policies, and any others which reduce the availability or increase the cost of parking, should be considered to reduce the severity of Impacts 3.3-1, 3.3-3 and 3.12-1. Finally, we support Policy M-5.5 ("Alternative Fuel Vehicle Parking") and Policy AQ-1.4 ("Off-Street Parking") to encourage the use of zero-emission vehicles. These policies will also reduce the severity of Impacts 3.3-1 and 3.3-3.

### *Level of Service, Congestion Management and Road Capacity*

Aside from the lack of densification of most residential neighborhoods in the city (see above), the other main factor contributing to the GPU's failure to adequately reduce VMT per capita is the continuation of outmoded congestion management goals and policies.

Policy M-2.2 ("Traffic Management") and Policy M-2.10 ("Congestion Relief") call for the reduction of traffic congestion and delays. These policies may be reasonable if they are pursued by means of reducing the number of cars on the road (reducing VMT). However, if they instead result in building increased vehicular capacity or modifying infrastructure to allow existing traffic volumes to flow more quickly, they will be entirely counter-productive. It is well established that increased capacity and increased travel speed induces travel demand and leads directly to increased VMT.<sup>1</sup>

Unfortunately, it appears that the GPU intends to manage congestion by increasing capacity and travel speed. Almost all of the planned future improvements to the road system identified in the DEIR at p.3.12-33 et seq. add vehicular capacity, a fact explicitly recognized when they are referred to at p.3.12-38 ("the planned changes in the transportation system that would increase capacity").

Furthermore, Policy M-2.3 ("Level of Service Standard") doubles down on the City's use of outmoded Level of Service (LOS) standards for vehicular transportation management. Use of LOS to assess traffic impacts has been shown to lead to the construction of increased capacity, which in turn leads directly to more traffic (increased VMT). For this reason, the State of California is transitioning to the use of VMT rather than LOS to measure transportation impacts, and the use of VMT in CEQA proceedings will be required by all jurisdictions by January 1, 2020. At that time, it would appear that Policy M-2.3, which calls for the use of LOS in evaluating development proposals, would be in direct conflict with state law. The same may apply to Policy M-2.4 ("Vehicle Miles Traveled"), which calls only for the City to "consider the applicability" of using VMT to assess transportation impacts.

The use of LOS in the DEIR itself to assess the transportation impacts of the GPU (p.3.12-35 et seq.) is similarly problematic, and for the same reasons. Additionally, this analysis assumes an "adequacy" standard of LOS C. However, it is not at all clear why this should be the case, since the existing General Plan's standards cannot logically be applied to the project (as its entire purpose is to update and modify the existing General Plan), and the GPU itself is not yet in effect. Thus, there is no logical justification for the use of LOS to determine the significance of the GPU's transportation impacts.

This analysis further points out the flaw in the DEIR's conclusion that impacts to VMT and to PM<sub>10</sub> (the latter in large part a result of VMT impacts) are "significant and unavoidable." In fact, replacing the policies which promote LOS and traditional congestion management via capacity

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<sup>1</sup> Cervero, Robert. 2003. "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis." *Journal of the American Planning Association* 69(2): 145-163.

increases with policies which promote VMT as the standard for measuring impacts and which further promote lower-emission modes of transportation could help mitigate these impacts to a less than significant level.

However, it is also clear that the VMT analysis performed in the DEIR is inadequate. The analysis assesses only VMT “using roads within the City of Eureka” (p.3.12-39), but development in the city has huge impacts on traffic outside its limits. The city’s high “job density” compared to its population (p.2-4) results in a large population of commuters, and its status as the county seat also generates a significant amount of travel for services from outside the city. The DEIR must analyze the GPU’s impact on VMT overall, rather than arbitrarily drawing a boundary at the City limits.

Finally, we must note that Policy AQ-1.8 (“Localized Concentrated Air Pollution”) relies partly on the false premise that reducing congestion will reduce air pollution. In fact, as we have demonstrated, reducing vehicle delays will simply lead to more driving and thus more pollution. Furthermore, the DEIR itself demonstrates that intersections in Eureka do not result in hotspots of such toxic pollutants as carbon monoxide (p.3.3-47). The proposal contained in Policy AQ-1.8 to reduce pollution by synchronizing traffic lights is a red herring.

#### *Freight Transportation*

We applaud the City for Policy M-8.3 (“Shipping”), which encourages short-sea shipping as a freight transportation strategy. Short-sea shipping has the potential to replace a significant fraction of the truck trips in and out of our region with a lower-cost, lower-emission mode of transportation. However, we oppose Policy E-5.2 (“Alternative Goods Movement”) as currently written, as it calls for an expansion of highway and rail freight which would be both economically and environmentally unsustainable. Expanding the use of highway freight also exacerbates the GPU’s impact on VMT.

Additionally, we encourage the DEIR to include analysis of the pending legislative approval of SB 1029, the Great Redwood Trail Act, which would dramatically change the environment for local freight rail by dissolving the North Coast Railroad Authority and railbanking its rights-of-way.

In sum, we applaud the GPU for its many policies in support of dense infill development; walking, bicycling, and use of transit; and reduction of free and abundant parking. However, the DEIR notes that these policies have not effectively reduced the GPU’s impact to VMT below the level of significance, nor the resultant air quality impacts. Therefore, the City must implement additional measures to mitigate these impacts. The most important mitigation measures available include: (1) planning for increased density and mixed-use development in existing low-density residential neighborhoods; and (2) abandoning LOS, capacity increases, and other

outmoded congestion management tools in favor of explicit VMT-reduction plans and measures.

Thank you for your consideration of our comments.

Sincerely,

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