



October 26, 2018

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via email: rmenanno@ci.eureka.ca.gov
cc: rholmlund@ci.eureka.ca.gov

RE: Comments on Proposed Caltrans 4th Street Safety Upgrade Coastal Development Permit

Ms. Menanno:

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 Caltrans application for a Coastal Development Permit (CDP) for the proposed 4th Street Safety Upgrade (“project”). Our comments are as follows:

Major Project

This project would significantly alter the streetscape of a large portion of downtown Eureka. As such, we believe it should be considered a major project and be subject to additional scrutiny and public review. **Thus, we urge the Development Services Director to utilize the discretion afforded by Eureka Municipal Code Section 156.100(B)(2) and refer the project to the Planning Commission for action.**

Should the Development Services Director choose not to refer the project to the Planning Commission, we urge denial of the CDP, for reasons enumerated below.

Not a Safety Project

We strongly object to the characterization of this project as a “safety upgrade.” We support many aspects of the project focused on pedestrian safety, including additional bulbouts, high-visibility crosswalks, ADA-accessible curb ramps, and the new traffic signal at the intersection of 4th Street and L Street. However, it also removes some existing pedestrian infrastructure, notably existing crosswalks at several intersections. Furthermore, it is undeniable that the main impact of the project will be to add an additional lane to a segment of 4th Street. **Wider streets**

with more lanes of traffic are more dangerous for pedestrians (as well as bicyclists), which runs counter to the purported purpose of the project.

This is not just a semantic issue. Caltrans attempts to justify the project as a pedestrian safety upgrade because 4th Street has a real and well-documented pedestrian safety problem. According to UC Berkeley's Transportation Injury Mapping System, of the four people killed or severely injured in collisions in the project area in the last 10 years, all have been pedestrians. Regardless of what the project is named, increasing the danger to pedestrians and bicyclists is unacceptable.

Inadequate Environmental Review

The project has claimed a Categorical Exemption from the California Environmental Quality Act (CEQA). Specifically, it claims a "Class 1" exemption, which applies to "the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use" (14 CCR 15301). Adding an additional lane to an urban thoroughfare is a major alteration of the existing facility, and will result in expanded use (see below). **Therefore, the project does not qualify for a Categorical Exemption and must pursue an Environmental Assessment and likely an Environmental Impact Report to comply with CEQA.**

The reason the project will result in expanded use is because the added lane will increase the capacity of the street and induce additional vehicular travel.¹ Increased driving will result in a number of environmental impacts, including additional air and water pollution and greenhouse gas emissions. Furthermore, one of the main reasons more capacity results in more driving is that initially, increased capacity causes faster travel times.² Thus, the project will also likely result in a temporary increase in traffic speed, which will further increase the danger of pedestrian collisions.

Inconsistency with General Plan(s)

The project is inconsistent with provisions of both Eureka's old General Plan, which was in effect when the CDP application was submitted, and the new General Plan, which is in effect now. Specifically:

- The project design does not consider or accommodate the needs of bicyclists, as required by Policy 3.C.1 of the old Plan's Transportation Element, nor have the City and Caltrans apparently coordinated to address these issues as required by Policy 3.C.5.

¹ See for example Handy, Susan. 2015. Increasing Highway Capacity Unlikely to Relieve Traffic Congestion. Available at http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf.

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

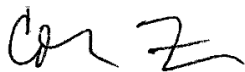
- The project conflicts with the new Plan’s policy of coordinating with Caltrans to improve the safety of crossings of Highway 101 (Policy M-3.10).
- The project design conflicts with the new Plan’s requirement for pedestrian-friendly streetscapes (Policy LU-1.14) and its requirement to “consider the needs of pedestrians and bicyclists in all new or reconstructed streets” (Policy M-3.5).
- The project will induce additional driving, which is inconsistent with the new Plan’s requirement to “plan for and secure adequate funding for interjurisdictional non-motorized transportation facilities to help reduce greenhouse gas emissions” (Policy AQ-1.10).
- The project will make it more difficult and less safe for pedestrians and bicyclists to cross 4th Street, which is in conflict with the new Plan’s policy of promoting “the provision of multi-modal access to activity centers” including downtown (Policy M-2.9).

It is also worth noting that this project is funded by the State Highway Operations and Protection Program (SHOPP). However, SHOPP funds cannot legally be used for projects which add a lane to the state highway system, as this one does (California Government Code Section 14526.5).

We hope that true pedestrian safety measures for 4th Street can be developed by Caltrans in the future. Such measures could include some of those featured in the current project, such as bulbouts and high-visibility crosswalks, as well as other measures, such as reducing (rather than increasing) the number of lanes, reducing lane widths, increasing shoulder widths, making traffic signals more pedestrian-responsive, and widening crosswalks. In the meantime, we urge you to either deny this CDP or refer it to the Planning Commission for further scrutiny.

Thank you for your consideration of our comments.

Sincerely,



Colin Fiske

Executive Director

Coalition for Responsible Transportation Priorities

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