CRTP
Coalition for Responsible Transportation Priorities

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RE: Environmental Assessment for Trinidad Rancheria Economic Development Corporation Hotel Development Project

Mr. Broussard and Mr. Hall:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the Trinidad Rancheria Economic Development Corporation hotel development project ("project"). The mission of the Coalition for Responsible Transportation Priorities (CRTP) is to promote transportation solutions which protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. Therefore, we address our comments on the EA to the project's transportation-related impacts.

Relationship of the Project to the Proposed Highway 101 Interchange

The EA identifies a proposed new interchange on Highway 101 as a mitigation measure for the project's traffic impacts. In fact, building the proposed interchange has been an objective of the Cher-Ae Heights Indian Community of the Trinidad Rancheria (Tribe) for many years, in order to "support the future growth" of the area, in the words of the Trinidad Area Freeway Master Plan Study Report (Report). In other words, the Tribe views the interchange as a prerequisite for and necessary corollary to the hotel, not a mitigation measure. The two planned developments, hotel and interchange, are inextricably bound and must be considered as a single project under NEPA.

The importance of including the interchange in the definition of the project is highlighted by the fact that it appears likely on its face that the interchange will occupy a bigger footprint and have more impacts than the hotel in many areas of analysis, including land resources, air quality and greenhouse gas, biological resources, transportation and circulation, land use, noise, and growth induction. Identifying the interchange as mitigation for the project and then failing to analyze its impacts is both inaccurate and insufficient under NEPA.

Furthermore, the identification of a potentially significant traffic impact and of the proposed interchange as mitigation for that impact is based on a deeply flawed underlying analysis. The EA cites the Humboldt County General Plan as its source for the metric (vehicular level of service, or LOS) and the significance threshold (LOS C) for traffic impacts. However, the project is not subject to the Humboldt County General Plan and the use of LOS as a measure of transportation impacts is flawed and outdated. Use of LOS leads to mitigation measures which add automobile capacity to the road system; however, there is now a consensus in transportation planning that adding capacity induces new travel and does not effectively reduce congestion. We highly recommend that the 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.[1] The California Governor's Office of Planning and Research also offers a significant set of resources explaining the state's abandonment of LOS in favor of vehicle miles traveled (VMT).[2] In short, using LOS as the basis for measuring transportation impacts is not supported by the best available research, and the project's traffic impact should be measured in terms of VMT instead.

Even assuming *arguendo* that LOS is an appropriate tool for measuring the project's transportation impacts, the Report upon which the EA relies to identify those impacts and subsequent mitigation measures is also flawed and unreliable for that purpose. Although presenting itself as an analysis of transportation infrastructure options for supporting "future growth" in and around the Tribe's lands, the Report admits that the actual "objective of this study is to analyze transportation operations associated with the new interchange" (p.18). In other words, the Report does not identify the interchange as the best mitigation for the transportation impacts associated with the hotel and other planned development, but rather assumes from the outset that the interchange is needed and sets out to justify that conclusion.

This bias is clear throughout the Report. The only intersections projected to drop below LOS C in the Report are those immediately at and adjacent to the existing Trinidad interchange, yet no serious consideration is given to redesigning these interchanges—such as through the use of roundabouts—in ways which could address the perceived traffic problem with much lower costs and impacts than a new interchange. Furthermore, no consideration at all is given to the possibility of eliminating the perceived impact by lowering the number of vehicular trips through transportation demand management (TDM) strategies, through construction of bicycle and pedestrian amenities, or through provision of shuttles for hotel and casino patrons.

[1] 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.

[2] See "Transportation Metrics: Disadvantages of LOS and Auto Delay" at http://www.opr.ca.gov/ceqa/updates/sb-743/.

Projection of Vehicular Traffic Impacts

There are many problematic methods and assumptions in the EA's projections of future vehicular traffic and its impacts. The EA claims at p.1-2 that the project will "reduce visitor trips on local roadways by providing additional overnight accommodations." There is no attempt to justify this assertion, which flies in the face of the logical conclusion that, in the absence of effective mitigation, a major new hotel is almost certain to increase trips. In fact, the EA itself goes on to predict at p.3-25 that the project will increase traffic on Highway 101 by over 600 cars per day (a greater than 6% increase).

Effective mitigation of this traffic increase and related impacts would require better bicycle and pedestrian amenities—such as the proposed extension of the Hammond Trail over the Little River to the south of the project—and better transit, such as the provision of a cheap or free shuttle between the new hotel and local transportation centers and other destinations. (Such shuttles are already provided by other local hotels and casinos.) Instead, the EA states at p.3-19 that since there is no public transportation stop at the casino now, there will never be one in the future. This assumption is inaccurate and self-defeating.

Finally, the EA's assessment of the air quality impacts of traffic generated by the project is based on the use of "default assumptions for trip generation rates…for residential land uses" in the CalEEMod software program. A hotel is not a residential land use, and traffic projections based on residential trip generation rates are unlikely to be accurate.

Cumulative Impacts

The EA claims that the project's contribution to transportation-related greenhouse gas (GHG) and other emissions is not significant because "technology advancements resulting in an increase in fuel efficiency will, on average, result in a decrease of mobile source emissions" (p.4-2). This is entirely speculative. Future technological advances cannot be accurately predicted. Indeed, at this moment, the U.S. Department of Transportation and Environmental Protection Agency are taking comments on a proposal to roll back previously approved increases in national fuel economy standards.[3] Furthermore, the way that future technological changes will affect driving patterns is unknown, but there is a real chance that driving could increase. For all of these reasons, the most reasonable conclusion is that any project such as this one which will measurably increase driving in the short term may also have a significant cumulative effect on emissions in the long term.

Additionally, the EA's assessment of growth-inducing impacts does not account for the impacts of the proposed Highway 101 interchange. As Cervero (2003) summed up the research, "real estate development gravitates to improved freeways."[4] Therefore, any freeway development which increases speed or access must be analyzed for growth-inducing effects. And as noted above, the proposed interchange must be considered part of the project for purposes of the EA.

[3] See https://www.nhtsa.gov/corporate-average-fuel-economy/safe.

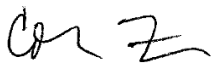
[4] Cervero, Robert. 2003. Road expansion, urban growth and induced travel: A path analysis. Journal of the American Planning Association 69(2): 145-163.

Finally, the cumulative impact analysis cites a 2012 Humboldt County document as justification for its planning horizon year of 2032. This is unsupportable. The EA cannot adopt a 14-year planning horizon on the basis of a 20-year planning horizon which is now six years old. The planning horizon for the cumulative impact analysis should extend to at least 2038.

In sum, the EA uses the wrong tool to measure transportation impacts, and the proposed interchange is not a necessary mitigation measure for the project. However, if the interchange is to be constructed, it must be considered part of the project and its many impacts analyzed. Additionally, methodological flaws related to the projection of future traffic and the cumulative impacts of the project must be addressed, and mitigation measures including TDM and encouragement of alternative modes of transportation should be adopted. In light of the substantial additional assessment required, we strongly encourage you to prepare an Environmental Impact Statement for the project.

Thank you for your consideration of our comments.

Sincerely,



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