



August 9, 2019

David Loya, Community Development Director
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RE: Creek Side Homes Draft Environmental Impact Report

Mr. Loya:

The Coalition for Responsible Transportation Priorities (CRTP) has reviewed the Creek Side Homes Draft Environmental Impact Report (DEIR). Generally, we consider the project site to be an appropriate location for housing development, and we support the active transportation amenities and conservation easement proposed as part of the project—both of which will contribute to better land use planning and development in the future. However, we remain concerned about some of the project’s transportation-related impacts and the DEIR’s failure to adequately assess and mitigate for them. To that end, we submit the following comments. 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.

Transportation Impact Analysis Flawed

The DEIR relies largely on an analysis of vehicular level of service (LOS) to reach the conclusion that the project has significant and unavoidable transportation impacts. The LOS metric is outdated and inappropriate. To quote from our own 2017 comments on the TIS:

The main reason use of LOS is being phased out under CEQA is because its use encourages over-building of vehicle-serving infrastructure which in turn induces more vehicular traffic. In contrast, use of VMT [vehicle miles traveled] allows mitigation measures which will reduce VMT by shifting mode share...

The use of LOS in the TIS is even less appropriate given that the City does not have an adopted LOS standard which mandates its use, as some jurisdictions do. In fact, the particular way LOS is used 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” (emphasis added). In other words, peak hour LOS should be largely disregarded, not used as the basis for improvements. In the absence of an adopted LOS standard, and with all of the well understood shortcomings of LOS, we do not believe that its use in the traffic study is defensible.

The DEIR also incorrectly calls VMT a “relatively new methodology” and claims that “OPR has not yet adopted CEQA Guidelines regarding this methodology and implementation of the

methodology is not required at this time” (DEIR p.3-24). In fact, Section 15064.3 of the CEQA Guidelines, which specifies use of VMT, was adopted in December 2018. Although the phase-out of LOS is not strictly required until January 1, 2020, its continued use mere months before the deadline is counterproductive.

Furthermore, the DEIR demonstrates a fundamental misunderstanding of VMT analysis. It states that “The VMT analysis resulted in a finding of ‘No Impact’ to any of the study intersections” (DEIR p.3-24). This statement is nonsensical. VMT does not measure impacts to particular intersections; it measures the overall amount of driving. This lack of understanding is troubling and undermines confidence in even the cursory VMT analysis provided.

Finally, the DEIR fails to consider the impacts of the project’s design on the mobility and safety of its senior population. Many seniors cannot safely drive, yet the site plan reflects a car-centered design. Many seniors move slowly and/or require the use of assisted mobility devices, yet the assisted living facility is surrounded by parking spaces and driving lanes that will pose a hazard to residents leaving the building if they do not immediately enter a vehicle. These impacts should be identified and mitigated as appropriate.

Failure to Consider Reasonable Mitigation Measures

The project proposes 55% more parking than required by the City of Arcata’s Land Use Code. Abundant free parking is a well-documented cause of induced driving. However, the DEIR fails to assess the impact of the amount of parking provided on the project’s traffic generation rates, or to consider reduced parking as a mitigation measure for traffic impacts, which are currently identified as significant and unavoidable.

Nor does the DEIR consider certain other transportation demand management (TDM) strategies to reduce the project’s vehicular trip generation rate. Instead, the DEIR assumes 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.”¹

The project’s proposed TDM strategies, which largely relate to construction of new bicycle and pedestrian facilities, will certainly lower the project’s vehicular trip generation rate somewhat. The impact of these measures should be incorporated into the DEIR’s analysis. Moreover, additional TDM strategies—particularly ones focused on the project’s senior population—must be considered as reasonable and effective mitigation measures for this project’s traffic impacts. Such strategies include:

- Free shuttle service for residents and visitors between the project and major nearby destinations, including the Arcata Transit Center
- Provision of free bus passes to residents
- Car-share and bike-share programs

¹ Shoup, Donald. 2011. *The High Cost of Free Parking*. American Planning Association Planner’s Press. p.43.

- Unbundling of parking costs from residential rents (i.e., charging separately) for the senior assisted-living facility
- Reducing the number of parking spaces provided

Higher-Density Alternatives Not Adequately Analyzed

The DEIR identifies two project alternatives which would increase the density of residential development on the project site. However, both were eliminated from further consideration as a result of a preliminary conclusion that they would result in additional significant impacts related to traffic, wastewater, air pollution and greenhouse gas (GHG) emissions, and stormwater runoff. We believe that this preliminary conclusion is likely incorrect. While it is true that increasing the future residential population of the project site would likely increase some impacts *in the immediate vicinity of the site*, the housing shortage in central Arcata means that denser housing in this location would likely be occupied by people moving from more dispersed locations where their impacts on traffic, air pollution, wastewater, and so forth are even greater. Therefore, the *net* impacts of denser development in this relatively central location are likely lower, and these higher-density alternatives should be further analyzed and considered.

Inadequate Greenhouse Gas Emission Mitigation

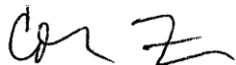
The DEIR proposes mitigating the project's otherwise significant GHG emissions by buying carbon offsets. In the hierarchy of mitigation measures, offsets are a last resort, and should only be employed when impact avoidance measures are not feasible. In this case, many feasible avoidance measures have not been employed.

Transportation is by far the largest source of project GHG emissions (DEIR Table 2.8-2). The TDM strategies identified above are all potentially effective and feasible mitigation measures for the project's transportation-related GHG emissions which must be employed prior to consideration of offsets.

Energy consumption is the second-largest source of project GHG emissions, and there are similarly feasible avoidance measures for reducing these emissions which have not been considered or employed. Such measures include heating with electric heat pumps instead of natural gas and construction of rooftop solar panels.

Thank you for your consideration of our comments.

Sincerely,



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