



February 7, 2020

California Coastal Commission
1385 Eighth Street, Suite 130
Arcata, CA 95521

RE: Permit Amendment No. 1-18-1078-A1 (Caltrans, Humboldt County)

Dear Commissioners:

On behalf of our many members and supporters in Humboldt County and across the North Coast, the Coalition for Responsible Transportation Priorities (CRTP), Humboldt Baykeeper, the Northcoast Environmental Center (NEC), and the Environmental Protection Information Center (EPIC) submit the following comments on Caltrans' application to amend its permit for the proposed Eureka-Arcata Route 101 Corridor Improvement Project ("project").

Impact to Safe Coastal Access for Bicyclists and Pedestrians

The proposed permit amendment will result in the reduction of approximately 340 feet of northbound shoulder from 12 feet to 4 feet in width. The staff report asserts that "the proposed change in shoulder width will not result in significant adverse impacts on coastal access for bicyclists," and attempts to provide several justifications for this conclusion. We strongly disagree with the conclusion, for the following reasons:

- The staff report characterizes 340 feet of highway as "a minor amount." While 340 feet can indeed seem like a short distance when traveling in a vehicle at 50 mph or more, it is a much more significant distance for bicyclists and pedestrians. In this case, the segment has particular importance as a refuge from the high-stress environment imposed by 4-foot shoulders on either side of it. The amendment would eliminate this refuge by creating an uninterrupted road segment of approximately a mile with only 4 foot shoulders.
- The staff report asserts that "four feet is generally accepted as a safe shoulder width standard for bicyclists traveling in the same direction." This assertion is not accurate. Caltrans' Highway Design Manual Section 1002.1 allows 4-foot shoulders to provide some level of access for bicycles on non-bike routes, but Section 1003.3 specifies that designated bike routes such as this one should indicate a "higher degree of service" than other roads. Furthermore, a better standard for what is "generally accepted" as safe for bicycle travel is the Global Street Design Guide produced by the National Association of City Transportation Officials and the Global Designing Cities Initiative. That Guide calls for a minimum width of 6 feet (1.8 meters) for unprotected bike lanes, and for such lanes to only be used on streets with speeds below 25 mph (40 kph). The Guide does not even contemplate an unprotected bicycle shoulder on a high-speed road such as this, but clearly the width should be significantly greater.
- The staff report claims that this is not a "substantial cycling recreational corridor" and that few bicyclists will use it after the Humboldt Bay Trail is complete. In our comments on the original

project's permit application last year, we asked for the Commission to require Caltrans to provide alternate bicycle and pedestrian access to the Humboldt Bay Trail from the east side of Route 101 anywhere it intends to close the highway median. The Commission did not apply this condition. Therefore, although completion of the project will coincide with completion of the Humboldt Bay Trail on the west side of the highway, bicyclists (and to a lesser degree pedestrians) with destinations on the east side of the highway will likely continue to use the northbound shoulder. As a major designated bicycle route, Route 101's northbound shoulder will also see regular use from touring cyclists and others who are unaware of the Bay Trail or how to access it. Furthermore, both shoulders are needed to preserve alternate north and south routes for bicyclists and pedestrians in the event of temporary closures—for example, from storm damage—of the Bay Trail. For all of these reasons, significant bicycle use of the northbound shoulder cannot be dismissed.

- Finally, the staff report argues that the new “auxiliary lane” will itself provide protection for bicyclists from fast-moving traffic on the highway. This claim flies in the face of reason. The new lane would be a continuous conflict zone, with vehicles merging in and out at highway speeds. Drivers would be distracted by the chaotic, high-speed environment and would likely pay little attention to the shoulder or people in it. The new lane would create a new hazard for bicyclists in the shoulder, not an added protection.
- The staff report does not address use of the shoulder by pedestrians, despite the fact that pedestrians are allowed on this highway segment, use it frequently, and are even more vulnerable than bicyclists.

For all of these reasons, we conclude that the new “auxiliary lane” proposed by the permit amendment would significantly decrease safety and comfort for bicyclists and pedestrians and thus impair coastal access.

CEQA, NEPA, and Coastal Act Implications

The Final Environmental Impact Report/Statement (FEIR/S) contains a concise description of the project: “The proposed project would improve safety and reduce operational conflicts and traffic delays at Route 101 intersections between Eureka and Arcata by: Eliminating left turn traffic movements/conflicts; Extending or constructing right-turn acceleration and deceleration lanes” (p.25).

The proposed permit amendment would eliminate an acceleration lane and a deceleration lane and replace them with a single continuous “auxiliary lane” between Bracut and the Bayside Cutoff. A new through-lane is categorically different from lengthened acceleration/deceleration lanes, as demonstrated by the following distinction made in the FEIR/S: “It should be noted that the proposed project would not add additional through lanes that would increase the traffic carrying capacity of Route 101” (p.170). Furthermore, the Commission's own 2013 Consistency Certification relied heavily on the conclusion that “the project would not increase highway capacity and was [therefore] an allowable use for wetland fill.” Now, however, the proposed permit amendment does create a new through-lane from one highway entrance to another, which will increase capacity. This is a substantial departure from the original project description and from the Commission's findings in support of its Consistency Certification.

Furthermore, the creation of an additional continuous lane of traffic creates additional impacts not considered in the FEIR/S. Decades of transportation research demonstrate conclusively that increasing capacity by adding lane-miles to a highway results in more driving.ⁱ The result of the proposed project

changes, therefore, would have a pervasive effect on the traffic volume modeling contained in the FEIR/S, which Caltrans relied on to reach multiple conclusions relating to human environment impacts. The fact that the new continuous lane would connect Bracut and Bayside also suggests that a growth impact analysis for each of these areas should be performed. The Commission's 2013 Consistency Certification found that the project "would not induce growth in a manner inconsistent with the Coastal Act." However, in the adopted FEIR/S, Caltrans performed a growth impact analysis only for the Indianola area.

In sum, we ask that you deny the application to amend the project's permit for the following reasons:

1. The amendment will significantly degrade safe coastal access for bicyclists and pedestrians.
2. The amendment significantly changes the project described in the FEIR/S, undermines the findings of the Commission's Consistency Certification, and introduces substantial new impacts beyond those analyzed under the adopted FEIR/S. The amendment therefore cannot be approved without first recirculating the EIR/S and revisiting the Consistency Certification.

Thank you for considering our comments.

Sincerely,

Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org

Jennifer Kalt
Director
Humboldt Baykeeper
jkalt@baykeeper.org

Larry Glass
Executive Director
Northcoast Environmental Center
larry@yournec.org

Tom Wheeler
Executive Director and Staff Attorney
Environmental Protection Information Center (EPIC)
tom@wildcalifornia.org

ⁱ See for example: Handy, Susan and Marlon G. Boarnet. 2014. Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions: Technical Background Document. California Air Resources Board. Available at: https://ww3.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_bkgd.pdf.