



August 13, 2020

Humboldt County Planning Commission  
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Commissioners:

Thank you for the opportunity to comment on the proposed Transportation Analysis Process for implementing new CEQA Guidelines based on Senate Bill (SB) 743. As you know, the new process will require transportation impacts to be measured in terms of vehicle miles traveled (VMT) rather than vehicular congestion or level of service (LOS), as has been the common practice in the past. We strongly support the state's move to VMT for transportation impact analysis under CEQA, and we want to ensure that the County's implementation plan is effective and accomplishes the state's aims. If done well, VMT assessment will help us do our part as a coastal county threatened by extremely high rates of sea level rise to reduce greenhouse gas emissions, and help us combat the crisis of traffic injuries and deaths in our communities. Unfortunately, the proposed VMT screening criteria and thresholds will be neither effective nor defensible without substantial revisions.

### **Trips and Miles Are Not Interchangeable**

The screening criteria based on a specific number of projected trips per day—for “small projects” both inside and outside of Urban Services Areas—are not appropriate. We appreciate that these are derived from suggestions in the VMT Technical Advisory released by the Governor's Office of Planning and Research (OPR). However, these statewide recommendations don't apply very well to our area. Humboldt County's development patterns are extremely heterogeneous, ranging from dense urban form to extremely rural. That means there is extreme variability in trip lengths. In other words, using trips as a proxy for is VMT highly problematic, even when urban service boundaries are factored into the analysis. In fact, Appendix 1 of the Advisory makes it clear that a "trip-based" approach to assessing VMT means measuring VMT from predicted trips, not replacing a VMT analysis with a trip analysis. In a nod to areas like ours, the Advisory notes that "clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development." That is certainly true here and should be reflected in the screening criteria.

### **Smaller Stores Can Generate Long Trips in Humboldt County**

The suggestion that any store smaller than 50,000 square feet should be automatically considered to generate less-than-significant VMT is not defensible. We recognize that the VMT Technical Advisory suggested 50,000 square feet as a threshold for "regional-serving" retail. However, this was suggested as a consideration in VMT analysis, not as an initial screening criterion. The Technical Advisory further states that "lead agencies will best understand their own communities" and should assess projects accordingly, rather than applying a one-size-fits-all approach. The county should recognize that the



50,000 square foot threshold is meant for retailers in areas with much larger populations than ours. While "big box" stores this size certainly do have a big catchment area, a store does not have to be a big box to have a large catchment area. In Humboldt County, a much smaller store than that can draw customers from around the entire region.

### **Projects in Remote Areas Generate Greater VMT**

The screening maps for "Low VMT" areas defy common sense and good planning practice. The residential map appears to identify practically all parts of the county where people actually live as "Low VMT," and the commercial map covers most areas where commercial facilities are or could be built, however rural or remote. No defensible screening tool would screen out residential or commercial projects in areas like Carlotta or Kneeland or Weitchpec, for example, by assuming they won't generate much driving. Yet all these areas and many other remote spots would be screened out by the currently proposed maps. The proposed Process does not identify the threshold used to identify these areas, but it is clear that either the threshold is unreasonably high or the data used to generate the maps are fatally flawed.

### **Countywide Averages Are Irrelevant in Urbanized Areas**

We strongly object to using countywide VMT averages as the basis for all significance thresholds. Countywide averages are undoubtedly skewed by extremely high VMT for a relatively small number of people living in the more remote areas. For that reason, the countywide average makes sense as a basis for calculating the threshold for more rural areas, but not for urbanized areas. The only procedure that makes sense for more urban areas is comparing the project's VMT to VMT in the community where it's located. For example, a project in Cutten or Myrtle town should be compared to Eureka area VMT, and a project in Bayside should be compared to Arcata area VMT.

For the same reason, the proposed procedure for determining the significance of VMT from commercial cannabis operations is indefensible. Comparing projects in urbanized areas to the countywide average, while comparing projects in non-urbanized areas to the average in the local community is exactly the opposite of the approach dictated by data and logic.

To further reduce the influence of outliers on the data, it would be advisable to use medians rather than averages when developing thresholds for urbanized areas.

### **Relative Location Matters**

The proposed Process cites evidence that affordable housing near employment centers produces low VMT. We agree. However, the screening criterion proposed does not take proximity to employment centers into account. Particularly in a region like ours, location of affordable housing is key, and projects cannot be screened out if they're distant from employment centers.

Similarly, the commercial cannabis cultivation screening criterion must be modified to include location relative to services, in addition to on-site housing. On-site housing on its own is not sufficient to assume less-than-significant VMT, because home-work trips are not the only trips employees will make.



### **People and Households Are Not the Same Thing**

Throughout the proposed Process document, household VMT and per capita VMT seem to be used interchangeably, despite the fact that many individuals can live in a single household. The significance threshold for residential projects says it is based on per resident VMT, for example, but the average and threshold proposed for comparison is measured per household. Using household data as the basis for calculating per capita VMT impact thresholds is an error which, if uncorrected, will drastically underestimate impacts.

### **The County Requires Too Much Parking to Assume Low VMT**

The proposed Process is correct in concluding that providing abundant parking will encourage driving even for a project near a major transit stop. However, it is incorrect in concluding that meeting but not exceeding the county's parking requirements is evidence that parking is not abundant and that a project can therefore be screened out of further transportation impact analysis. The county's parking requirements are premised on the assumption that all land uses are primarily vehicle-serving, and meeting them provides more than enough parking spaces to encourage driving. Either the parking requirements should be lowered or the screening criterion should require a variance to provide fewer parking spaces than the code otherwise requires.

Thank you for considering our comments.

Sincerely,

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