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Ms. Burks, Mr. Willor and Mr. Robertson:

As stakeholders in the Eureka Broadway Multimodal Corridor Plan (“Plan”), we are writing to comment on the draft Plan recently released for public review.

As we have made clear in our letters dated March 24, 2020, August 7, 2020 and November 3, 2020, rapidly and effectively addressing the bicycle and pedestrian safety crisis on Broadway is our top priority. Therefore, we continue to encourage your agencies to direct all available resources to implementing the near-term safety improvements outlined in our letter dated November 3, 2020. The draft Plan estimates the full construction period for the Preferred Concept at 20 years (p.88), and the City of Eureka simply can’t wait that long for significant safety improvements.

We believe that the Preferred Concept was preordained based on the preconditions, performance measures, and screening criteria chosen at the outset of the planning process. We object to the inclusion of congestion relief as a project precondition, because it unnecessarily constrains options to improve safety and multimodal mobility—both of which we believe are far more important objectives. We further find fault with several aspects of the justification



offered for the Preferred Concept, and instead ask your agencies to consider an enhanced version of the “Improve Broadway” alternative.

We submit the following specific comments on the draft Plan.

Congestion Relief Should Not Be a Project Precondition

The draft Plan is intended to lay the groundwork for future grant applications, particularly to the state’s Solutions for Congested Corridors Program (p.3). This led to the selection of project objectives (p.9) and performance measures (p.10 et seq.) which include congestion relief. The inclusion of congestion relief as a necessary project condition significantly constrained consideration of options for improving safety and multimodal mobility, the project’s other main objectives. For example, the draft Plan states that the Preferred Concept was selected because it accomplishes these other objectives “without unacceptably increasing congestion” (p.ii). In other words, the perceived imperative to relieve congestion in conjunction with safety and other multimodal improvements precluded consideration of reducing vehicular capacity on Broadway without adding compensatory capacity on a parallel route. The congestion relief imperative virtually guaranteed that couplets would be chosen as the Preferred Concept.

There are many potential sources of funding for safety and multimodal improvements on Broadway which do not require consideration of congestion relief, including the State Highway Operation and Protection Program (SHOPP), the State Transportation Improvement Program (STIP), the Highway Safety Improvement Program (HSIP), the Active Transportation Program (ATP), and a variety of local and private funding sources. Notably, many of these funding sources could be used for both near-term and longer-term improvements to the existing Broadway right-of-way. We strongly encourage you to amend the draft Plan to remove congestion relief as a project precondition, objective and performance measure, and reconsider the project alternatives and Preferred Concept in this new light.

We strongly suspect that such a re-analysis would result in a different Preferred Concept—namely, “Improve Broadway” (Table 5.3, p.50). This is both because the “Improve Broadway” alternative did not score well on Vehicle Operations, but more importantly because this alternative did not score well on safety and multimodal criteria due to the self-imposed mandate against removing any vehicular capacity. Some reduction in vehicular capacity in the northern segment of the corridor would allow for such improvements as full buffered bike lanes.

We further question the assessment of the “Improve Broadway” and couplet alternatives against the other established Screening Criteria (Table 5.3, p.50), as follows:

- The assessment indicates that the “Improve Broadway” alternative would have a negative impact on “Directionality/Path of Travel,” while the couplet alternatives would have little or no impact. While some of the potential features of the “Improve Broadway”



alternative could restrict vehicular access to certain destinations, it is hard to imagine that these impacts would be greater than those resulting from turning Broadway into a one-way street in the couplet alternatives. The “Improve Broadway” alternative should be ranked equal to or better than the couplet alternatives for this Screening Criterion.

- The assessment rates the “Improve Broadway” alternative as only slightly positive in terms of its ability to avoid sensitive areas. In fact, this alternative inherently avoids all sensitive areas, and should be given the “significant improvement” rating.
- The assessment indicates that the “Improve Broadway” alternative will have no substantial impact on waterfront access. In fact, this alternative would result in significant improvements to safety and comfort for bicycles and pedestrians crossing Broadway, which is currently a major barrier to waterfront access. This alternative should receive a positive impact rating for waterfront access.
- The assessment indicates that the couplet alternatives have “Community & Stakeholder Support.” In fact, environmental stakeholders generally oppose these alternatives due to coastal wetland impacts, and the Plan itself indicates that a majority of business stakeholders oppose these alternatives as well (p.17). The couplet alternatives should receive neutral or negative ratings for community and stakeholder support.

Inconsistent Assessment of Feasibility in Competing Alternatives

The draft Plan argues that due to right-of-way constraints, the “Improve Broadway” alternative would be limited to Class II bike lanes in the middle segment (p.52). In contrast, the Preferred Concept includes Class IV bike lanes in the middle segment, even where there is no couplet proposed and the improvements are limited to the existing right-of-way (p.62). This makes it clear that Class IV bike lanes are in fact feasible in the middle segment in the “Improve Broadway” alternative.

It is also critical to note that many of the desirable features included in the detailed Preferred Concept description—ranging from improved pedestrian crossings to improved bus stops to improved lighting and much more—are also perfectly feasible in the “Improve Broadway” alternative. The inclusion of these features in the Preferred Concept description, but not the “Improve Broadway” alternative, provides the misleading impression that they are not feasible in the latter alternative. See also our comments on Performance Measure and Screening Criteria assessments above.

Preferred Concept Justification

We identified several problematic assumptions built into the draft Plan’s cost-benefit analysis and other justifications for the Preferred Concept, as follows:

- The transit mode shift assessment assumes a 30-minute increase in bus frequency on routes along Broadway (p.75). We fully support increased transit frequency. However, such a change is not to our knowledge part of this project, nor are the ongoing operating expenses associated with such a change included in the cost-benefit analysis



or eligible uses of the contemplated project funding sources. Such a dramatic increase in frequency would doubtless increase ridership, regardless of infrastructure changes. Assuming it as part of the project leads to a substantial overestimate of likely mode shift, unless there is an undisclosed plan for funding it included in the project.

- It is not clear from our review of the draft Plan (including Appendix E) whether wetland mitigation and contamination remediation costs are included in the estimate of overall project costs. These costs will unquestionably be a substantial portion of the total project cost, but we do not believe that there is sufficient information available at this time to accurately estimate them. Therefore, we question the accuracy of the overall project cost estimate.
- The draft Plan claims that the couplets contemplated in the Preferred Concept “provides an opportunity to establish north-south connectivity redundancy that could aid circulation in the event of an evacuation or emergency response scenario” (p.88). However, the proposed couplets do not increase the overall number of vehicular through-travel lanes in the corridor. Therefore, it is unclear how they would provide redundancy or aid circulation beyond the existing infrastructure in the corridor.
- The draft Plan claims that the couplets “could protect the commercial and residential properties landward that are currently vulnerable to mid- to late-century sea level rise projections” (p.88). It is unclear to us how a new urban street would provide protection against sea level rise.
- The draft Plan claims that in the northern segment of the corridor, the "lack of roadway width does not allow for including bicycle and [pedestrian] safety improvements within the existing roadway" (p.63). This is one of the primary justifications for using a couplet to obtain additional right-of-way. However, it is not true that there is no room for any bike and pedestrian safety improvements within the northern Broadway right-of-way. There is room for Class II bike lanes even without removing any through-travel vehicle lanes, and most bike and pedestrian crossing safety improvements are not reliant on additional right-of-way. See also our comments above about congestion relief as a project precondition.

Bike Lanes in Couplets

Figure 8.1 of the draft Plan appears to suggest that the Preferred Concept does not include bicycle infrastructure on the southbound side of the two proposed couplets. While we understand that there may be an intention to include bi-directional bike access on Broadway, bicycles would still require access to destinations on Koster Street and the other couplet street, should the Preferred Concept be built. It is unacceptable to build new streets without providing bicycle infrastructure.

The Value of Time

The draft Plan’s cost-benefit analysis assumes a high cost associated with vehicular delay, but does not consider delays for people walking, biking, or riding the bus. The time of people using



these modes of transportation is also valuable, and their travel times are strongly affected by variables such as signal timing, safe crossing locations, and the feasibility (or not) of traveling directly to a destination based on available infrastructure. The impacts of the project on travel times of people using all transportation modes should be calculated, and the value incorporated into the cost-benefit analysis.

Thank you for considering our comments.

Sincerely,

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