



April 26, 2021

Jesse Willor, City Engineer
City of Eureka
531 K Street
Eureka, CA 95501

sent via email: jwillor@ci.eureka.ca.gov

RE: Comments on Bay to Zoo Trail Draft Initial Study/Proposed Mitigated Negative Declaration

Dear Mr. Willor:

We strongly support the Bay to Zoo Trail (“project”), and we appreciate the opportunity to comment on the project’s draft Initial Study/Proposed Mitigated Negative Declaration (ISMND). We believe that this project will produce major community and environmental benefits. However, we have some concerns regarding the ISMND in the areas of transportation safety, vehicular/active transportation trip generation, and boardwalk design. We believe that addressing these concerns will help maximize the project’s benefits.

Safety Features for Vulnerable Road Users

Most of the planned project involves a separated Class I multiuse trail which presents a safe and comfortable environment for people walking, biking and rolling. However, safety concerns arise where the proposed route crosses major streets as well as the portion of the route south of Russ Street, where the trail is proposed to become a Class III bicycle facility combined with improved sidewalks.

- **Crossings:** The proposed provision of safety features at the crossings of Myrtle Avenue and Buhne Street, including “street lights, signage, curb extensions, median refuge islands, high visibility crosswalks” (p. 9-62) is both necessary and appropriate. We strongly encourage the project to also provide all of these features at the busy Harris Street trail crossing location. Also, the proposed provision of rectangular rapid flashing beacons (RRFBs) is likely not sufficient to allow safe crossings on these three busy streets. Drivers are not required to stop for a RRFB, and many fail to do so, so that on busy streets at peak hours there will be few safe crossing opportunities for trail users. Sight-impaired trail users in particular have a hard time using RRFBs effectively, since they require a user to accurately gauge the stopping/yielding behavior of multiple vehicles. We strongly encourage the project to replace RRFBs with Pedestrian Hybrid Beacons (PHBs), which bring traffic to a full stop and allow safe and reliable crossings for all trail

users. Although current peak hour traffic counts are not available, the data which are available¹ suggest that Myrtle Avenue, Harris Street, and Buhne Street would meet the PHB “warrant” found in Section 4F of the California Manual on Uniform Traffic Control Devices (MUTCD).

- **Trail Route South of Russ Street:** The ISMND indicates that south of Russ Street, trail users on bicycles will be expected to share the road with motorized vehicles and will be provided with no infrastructure beyond “sharrows” and signage. This portion of the trail route would run on busy Dolbeer Street and includes street segments used by motorized vehicles to access St. Joseph’s Hospital, Washington Elementary School, and the Sequoia Park Zoo, among other major destinations. These street segments are heavily used by emergency vehicles, school buses, cars and trucks, presenting hazards to bicyclists which we believe are unacceptable for a designated city trail. “Sharrows” provide little protection for bicyclists, and some evidence suggests they may actually increase bicycle-involved collisions.² The trail should either be re-routed or provide separated, buffered Class IV bicycle facilities on Dolbeer Street.

The project’s primary purpose is “to improve safety and connectivity for non-motorized and motorized travelers between the Eureka Waterfront Trail/Humboldt Bay Trail and the inland residential areas surrounding several Eureka City Schools campuses, Sequoia Park, and the Sequoia Park Zoo” (p. 1-2). The safety features of major street crossings and of the trail route south of Russ Street will be critical to the project’s success at achieving this purpose. Failure to provide adequate safety features in these areas could also result in a significant impact under CEQA by substantially increasing transportation hazards due to design features and/or incompatible uses.

We disagree with the ISMND’s conclusion that the project could not increase hazards due to geometric design features because it does not alter road or street geometry (p. 9-62). The CEQA checklist does not limit consideration of “geometric design features” to streets and roads, and logically that consideration should apply to any transportation facility, including trails.

Even more importantly, the ISMND does not consider the potential increase in hazards cause by incompatible uses. Construction of the project will substantially increase the number of people walking, biking and rolling along the proposed route. Without sufficient safety improvements, these uses may not be incompatible with existing heavy motor vehicle traffic at the crossings of Myrtle Avenue, Buhne Street and Harris Street, and on Dolbeer Street south of Russ Street.

Maximizing Mode Shift and Avoiding Vehicular Trip Generation

The project description calls for a 40-stall parking lot on Myrtle Avenue for trail users. Presumably this is intended for recreational trail users, since transportation/commuting trail users will generally not be driving partway to their destination in order to bike or walk the rest of the way. Access to recreational opportunities is important. However, one of the key benefits of the city’s plans to extend the regional trail network through additional neighborhoods is providing comfortable access to recreational walking, biking and rolling close to home, mitigating the need to drive to recreational destinations. Recent

¹ https://ci.eureka.ca.gov/depts/pw/engineering/transportation/traffic_counts.asp

² Ferenchak, Nicholas and Wesley Marshall. 2019. Advancing health cities through safer cycling: An examination of shared lane markings. *International Journal of Transportation Science and Technology* 8(2): 136-145.

research confirms the commonsense fact that parking availability encourages driving.³ Therefore, providing 40 parking spaces will likely induce additional driving trips.

If the parking lot remains as proposed, the ISMND should account for the driving trips it will generate in its assessments of the project's air quality impacts (p. 9-5 et seq.), energy use impacts (pp. 9-30 & 9-31), greenhouse gas emissions (p. 9-36 et seq.), or transportation impacts (p. 9-61 et seq.). Currently, the only place induced driving trips by recreational trail users are addressed is in Section 9.17 on transportation impacts, which describes such new trips as a "minor amount" (p. 9-61) and relies on any such increase in trips being "offset by increased non-motorized travel" (p. 9-62). Elsewhere, the ISMND concludes that "[p]roject operation and maintenance would generate less than one traffic trip per week on average" (p. 9-36; see also pp. 3-8 and 9-9)—but a 40-stall parking lot presumes that on many days the project will generate substantially more than 40 car trips in a single day.

Preferably, in order to avoid inducing additional vehicle miles traveled and therefore causing air quality, energy, and climate impacts, the project should reduce or eliminate the proposed parking lot. There is sufficient on-street parking capacity along the proposed trail route, as well as along the route of the connected Waterfront Trail, to accommodate recreational users without a new parking lot.

Additionally, to ensure that the trail's mode shift effect on commuters offsets any induced motor vehicle travel by recreational users, the project should incorporate the following design elements:

- Provide dark-sky compliant pedestrian-scale lighting along the entire route, particularly those segments which are isolated from other well-lit urban areas. Much commuting occurs under dark or low-light conditions, and many potential bicycle and pedestrian commuters will avoid poorly lit trails due to perceived safety issues.
- Ensure that the trail design allows for comfortable shared use by people using the full range of pedal-powered vehicles—including bicycles pulling trailers and adult tricycles—side by side with pedestrians.

Boardwalk Design

The ISMND notes the risk of temporary flooding of Segment 1 due to sea level rise, but downplays its importance (p. 7-1). While recreational users are not sensitive to temporary flooding—they will simply avoid the trail and return when it's dry—commuters require a high level of reliability. Even relatively infrequent temporary flooding can reduce the perceived reliability of the trail and deter potential commuter use. Segment 1 should be designed to prevent reasonably foreseeable temporary flooding from sea level rise, king tides, and storm activity over the life of the boardwalks.

We are also concerned with the impacts of the boardwalk design on sensitive species, particularly Humboldt Bay owl's clover. Figure 7A of the Biological Resources Report appears to show that while one of the proposed boardwalks directly impacts a dense area of Humboldt Bay owl's clover, potential alternate routes which are immediately adjacent could avoid those impacts. We request that this boardwalk be relocated to avoid or reduce impacts to Humboldt Bay owl's clover.

³ Millard-Ball, Adam, Jeremy West, Nezanin Rezaei and Garima Desai. 2021. What do residential lotteries show us about transportation choices? Urban Studies.

Thank you for your consideration of our comments. Again, we strongly support the project, and hope that our comments will be used to help maximize community and environmental benefits.

Sincerely,

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