



December 1, 2022

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**RE: Comments on Student Housing Project Draft Environmental Impact Report (DEIR)
(SCH Number 2022030008)**

Dear Ms. Clem:

The Coalition for Responsible Transportation Priorities (CRTP) has reviewed the Student Housing Project Draft Environmental Impact Report (DEIR) (SCH Number 2022030008). We recognize the urgent need for student housing and the appropriateness of the location near both the Cal Poly Humboldt campus and downtown Arcata. Therefore, we support this project in concept. However, we have identified certain deficiencies in the DEIR, and we therefore submit these comments so that the document can be amended and the project improved before final adoption.

Impact on Vehicle Miles Traveled

The DEIR concludes that the project will not have a significant impact on vehicle miles traveled (VMT) under CEQA Guidelines Section 15064.3(b), but does not provide sufficient information to support the per capita VMT estimate for future project residents nor to justify the selected significance threshold.

The DEIR uses the Humboldt County Association of Governments (HCAOG) Travel Model to estimate the project's per capita VMT. However, the document nowhere reveals what inputs were used to generate the estimate. Appendix E, the Transportation Impact Study, merely says that "the proposed project was input into the HCAOG Travel Model." However, the DEIR is unclear about key details which would affect VMT, including:

- At p.2-17, the DEIR says that there will be an on-site "bus/shuttle stop." Yet at p.3.11-10, it says "existing transit services would adequately accommodate any increase in demand" and "the project would not alter any existing transit stops." Whether there will be an on-site transit stop, and what kind (bus or shuttle), on what route, and with what connections, are all key details influencing the likelihood of transit ridership that the DEIR does not provide. We further note that the project cannot commit to an on-site bus stop without prior consultation with the relevant transit agency (Arcata & Mad River Transit Service or Humboldt Transit Authority).
- In various places, the DEIR says that the project will provide "indoor" bike parking (e.g., pp.1-1, 2-13), while in others it does not specify that the parking will be indoors (e.g., p.2-8). This may seem like a minor discrepancy, but in fact, the availability of specifically indoor (i.e., weather-protected and secure) bike parking is critical to facilitating resident bike ownership and use.

- At p.2-18, the DEIR states that reducing peak-hour traffic by providing flexible work schedules is a VMT reduction measure. In fact, changing the timing of trips may reduce congestion, but it has no effect on VMT.
- Scoping comments submitted by us as well as those submitted by Caltrans point out the key influence of free residential parking on VMT. However, the DEIR makes no mention of the relationship between parking and VMT. Although the project is not subject to the City of Arcata's land use regulations, it is notable that the project provides substantially more parking than required by those regulations, suggesting it may result in higher per capita VMT.
- The DEIR suggests that the project's design will encourage bicycle and pedestrian transportation, but also admits that "based on the conceptual nature of the site plan, it is not possible to conclude that pedestrian and bicycle safety in the vicinity of the project site would be sufficient" (p.3.11-12). Unsafe, uncomfortable, or merely inconvenient conditions for walking or biking make these modes much less likely to be used, and the DEIR does not provide sufficient information to judge likely mode choice. See below for additional discussion of this issue.

The DEIR notes that VMT modeling results were also used in the assessment of air quality, greenhouse gas, and energy impacts, heightening the importance of providing sufficient justification for the results. The EIR must specify the inputs used to obtain the VMT estimate for the project, and must provide enough detail about transit service and the site plan to judge the appropriateness of those inputs. We further strongly urge Cal Poly Humboldt to reduce the number of parking spaces provided and increase housing proportionately.

Additionally, the baseline per capita VMT calculation used in the DEIR to calculate the significance threshold is not appropriate. The DEIR uses countywide per capita VMT as the baseline. As we pointed out in our scoping comments, the baseline should include only the Arcata-Eureka-McKinleyville area, which "encompasses both the vast majority of the university's student and employee residential catchment area as well as all areas potentially feasible for the development of future student housing." HCAOG, whose Travel Demand Model the DEIR employed, made exactly the same request. Yet the DEIR ignored both comments and used countywide VMT as a baseline instead.

The attempted justification for this choice is misleading at best. The DEIR points out that the limits of the analysis area "should not be arbitrarily truncated at political boundaries" (p.3.11-9). This is not what we nor HCAOG suggested, but exactly what the DEIR itself does by using county boundaries. The DEIR also points out that many students live outside the city limits of Arcata, which is exactly why we and HCAOG suggested using the greater Humboldt Bay region. Very few students live in remote eastern and southern Humboldt, where per capita VMT is very high. Using the county boundaries for the baseline VMT calculation is almost as arbitrary as using the entire state.

In addition to providing justification for its project VMT calculation, the EIR must adjust its threshold calculation to a more reasonable and restricted geography.

Consistency with Transportation Plans and Policies

The DEIR notes that the California State University (CSU) system has adopted policies promoting low-carbon transportation modes such as walking, biking and public transit, and committing to transportation demand management (TDM) and VMT reductions (pp.3.6-6, 3.11-3). These are also identified in the DEIR as purposes of the student housing project (p.2-20). However, the DEIR provides

no analysis to justify how or whether the project will be consistent with several of the adopted policies, including:

- CSU TDM Manual Objective 1A (developing TDM policies)
- CSU TDM Manual Objective 1B (monitor to ensure TDM effectiveness)
- CSU TDM Manual Objective 3B (use financial incentives for non-single occupancy vehicle modes)
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.1 (establish a TDM plan)
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.2 (adjust parking policies, programs and infrastructure)*
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.4 (alternative transportation programs)*
- Cal Poly Humboldt Climate Action Plan TRA Strategy 1.5 (public transportation)*

The measures marked with an asterisk (*) are not even mentioned in the DEIR. The DEIR concludes correctly that without mitigation, the project would conflict with policies promoting active transportation due to potential safety conflicts in the surrounding area. However, the DEIR fails to address consistency with policies related to parking, financial incentives, improvement of public transportation, and implementation and monitoring of TDM plans. On its face, the project's abundant parking would seem to conflict with CSU TDM and Cal Poly Humboldt Climate Action Plan parking policies. Furthermore, the DEIR states at p.4-8 that the project is only "likely" to include TDM strategies. Without a firm commitment to TDM strategies as required by the above-referenced policies, the project would not pass the consistency step.

When considering the adopted Regional Transportation Plan (RTP), the DEIR also fails to assess the project's consistency with that plan's Safe and Sustainable Transportation Targets, despite those targets being central to the RTP and being specifically called out in HCAOG's scoping comment letter.

Transportation Safety

The "conceptual site plan" (DEIR Figure 2-9) presents an island of buildings and landscaping surrounded by streets and parking lots, and does not make clear how people walking, biking or rolling will have safe, comfortable and convenient access to and from the buildings through these vehicle-dominated spaces. The DEIR repeatedly describes "interconnected pedestrian and bicycle paths" on-site (e.g., pp.2-17, 3.11-10, 3.11-13), which we appreciate, but does not explain how these paths will connect to off-site facilities. The text also claims that there will be a "central concourse/promenade" that connects to off-site facilities (pp.2-13, 2-18, 3.11-13), and asserts that on-site paths will "direct student residents north to the L.K. Wood Boulevard-US 101 overcrossing or east to the future extension of the Annie & Mary Rail Trail project" (p.2-17), but the conceptual site plan does not show any such connections.

Additionally, the DEIR claims that the project will provide "signage" to prevent people walking and biking from using the planned southern emergency entrance to access Eye and Jay Streets (p.2-18). However, this will be one of the most direct paths of travel from the project to campus, downtown Arcata, and other major destinations, and signage will be unlikely to deter usage. As noted in the DEIR, Eye Street has no bicycle or pedestrian facilities (pp.3.11-7, 3.11-8).

We appreciate the DEIR's acknowledgement that there will be significant impacts to bicycle and pedestrian safety (Impacts 3.11-1 and 3.11-3). We also appreciate the proposed mitigation measures, including providing sidewalks along St. Louis Road and high visibility crosswalks and signage at other

locations. However, these measures are insufficient to fully mitigate the impact. First, St. Louis Road must also be provided with bicycle facilities between the project site and the Highway 101 overpass, as suggested by Caltrans in their scoping comments.

Second, despite the DEIR's claims, it is unlikely that most project residents will walk or bike north from the site. As noted above, the most important destinations, including campus, are south and east. Thus, the project should also anticipate pedestrian and bicycle use of Eye Street and provide bicycle and pedestrian facilities and traffic calming improvements there. The project must also include mitigation measures to address the intersections at Sunset Ave/G Street/H Street/Highway 101 ramps, and Sunset Ave/LK Wood Blvd/Highway 101 ramps, which are widely recognized as the most dangerous in the city for people walking, biking and rolling. Project residents using Eye Street or the future Annie & Mary trail to travel between the project site and campus—the most direct routes available—will be forced to navigate these intersections. We acknowledge that plans are under way at the City of Arcata to improve safety at the LK Wood intersection, but we are aware of no current plans for the G/H Streets intersection.

Alternatives Analysis

Although the DEIR analyzes a project alternative identified as “on-campus student housing,” the only on-campus location considered is a sports field. The DEIR should analyze the alternative of building student housing on an on-campus parking lot. These cover large areas of campus and would help achieve project objectives related to transportation, energy and greenhouse gases by managing vehicle parking.

The alternatives analysis concludes that the environmentally superior alternative is the no-project alternative, and excluding that, the lower density project alternative. Part of the basis for this conclusion, however, is flawed. The DEIR concludes that the no-project alternative would “result in reduced transportation and circulation impacts” (p.5-8), and that the lower-density alternative “may also reduce vehicle trips and VMT” (p.5-10). This is inconsistent with the rest of the DEIR and very likely incorrect. Even after correcting for the VMT analysis deficiencies identified above, it is likely that the project will still produce lower VMT per capita than the area average. Therefore, a no-project or lower-density project alternative would result in higher VMT per capita, and thus a greater transportation impact under CEQA Guidelines Section 15064.3(b).

Aesthetics

The majority of impacts identified in the DEIR as both significant and unavoidable fall under the category of aesthetics. Aesthetic impacts are highly subjective, and we object to the DEIR's characterization of the aesthetic impacts of the project.

The DEIR admits that Highway 101 is not a designated scenic highway in this location, yet still concludes that the project will “damage scenic resources within a state scenic highway” (p.3.1-14). Similarly, the DEIR concludes that the project will “substantially degrade the existing visual character or quality of public views of the site and its surroundings” (p.3.1-14).

The project will replace a dilapidated industrial structure, vastly improving views of the site. And from the highway, the project will not block or impede any natural vistas at all. It strains credulity to imagine these as significant aesthetic impacts. The conclusion of significant impacts seems to rely largely on the assumption that larger buildings and denser development are inherently less aesthetically appealing than low-density development. We object strongly to this subjective characterization.

Solar Photovoltaics and Electric Vehicle Charging

The DEIR describes the project as “PV-ready,” meaning it will not have solar panels installed, but theoretically could in the future. Solar panels are already required on most multifamily housing by state building codes, and CSU policies cited in the DEIR call for dramatically increasing both on-site renewable energy generation and renewable electricity procurement. Consistency with adopted renewable energy plans therefore requires the project to actually include photovoltaic panels when constructed.

Similarly, the DEIR states that 10% of project parking spaces will be “EV ready” (p.2-13). We strongly urge that the project actually construct the electric vehicle charging infrastructure, rather than waiting until some unidentified future date.

Conclusion

In sum, while we support this project in concept, the following changes to the project/DEIR are required:

1. Address deficiencies in the VMT analysis and adopt a more appropriate threshold of significance.
2. Reduce on-site parking and commit to TDM strategies to ensure compliance with adopted plans and policies.
3. Provide additional off-site safety improvements for bicyclists and pedestrians to mitigate for reasonably foreseeable impacts.
4. Address deficiencies in the alternatives analysis which bias the final conclusion.
5. Reconsider conclusions of significant aesthetic impacts.
6. Include PV panels and EV charging equipment in the project.

Thank you for your consideration.

Sincerely,

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