



September 8, 2025

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via email: deirdre.clem@humboldt.edu

RE: Cal Poly Humboldt Foster Campus Connectivity Project Draft Initial Study/Mitigated Negative Declaration

Dear Ms. Clem:

CRTP appreciates the opportunity to comment on the Cal Poly Humboldt Foster Campus Connectivity Project Draft Initial Study/Mitigated Negative Declaration (ISMND). We submit the following comments pertaining to the project's transportation impacts.

Vehicle Miles Traveled Impacts

Researchers have demonstrated conclusively that parking availability strongly influences driving behavior, and specifically that additional parking induces additional driving.¹ The ISMND admits that the new parking lot would result in a substantial increase in VMT per service population (see ISMND Table 3.17-1 and Appendix A). However, the ISMND seeks to avoid concluding that this is a significant impact by asserting that the project can “take credit for the VMT reduction associated with” the removal of other unrelated parking spaces, most of which are completely hypothetical (ISMND Appendix A p.6). This assertion is contrary to both law and reason.

The ISMND attempts to “take credit” for the removal of the unrelated parking in two ways. First, it asserts that the removal of a parking structure from the Campus Master Plan is part of the “project” for CEQA purposes. Second, it asserts that both the hypothetical future parking structure and the removal of existing parking spaces on campus as a result of other approved projects are part of the baseline condition for CEQA impact assessment. While we support the

¹ See for example: Millard-Ball and West. 2020. Residential parking supply has a stronger influence on household travel choices relative to a neighborhood's walkability and access to transit. UC Institute of Transportation Studies Policy Brief.

scrapping of parking structure plans, neither of these assertions is supportable, for the following reasons:

1. ISMND Appendix A admits that the parking structure in the Master Plan is “on land that is not currently controlled by Cal Poly Humboldt and, as such, is not considered reasonably foreseeable” (p.6). Furthermore, Cal Poly Humboldt publicly confirmed in 2023 that it would not be building previously proposed parking structures on campus, and given the university’s ongoing budget crisis, it is difficult to foresee such expensive structures being built in the future. The hypothetical parking structure is not, and perhaps never was, a realistic possibility.
2. CEQA Guidelines Section 15125 describes requirements for assessing baseline conditions. Section 15125(a)(1) states in part: “Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced.” Section 15125(a)(3) adds: “An existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline.” The inclusion of the hypothetical parking structure in the baseline conditions for VMT impact assessment clearly violates CEQA Guidelines.
3. Any impacts associated with the removal of campus parking spaces associated with other approved projects should already have been considered in the CEQA processes associated with those other projects. They cannot be considered to be part of the current, unrelated, project.

The unrelated parking spaces—both the hypothetical parking structure and the existing spaces whose removal has already been approved as part of other projects—must be removed from the baseline in the VMT impact analysis, and the project cannot “take credit” for their removal in the ISMND. After making these corrections, it will become clear that the project does have a significant impact on VMT pursuant to CEQA Guidelines Section 15064.3, and mitigation is required. We suggest looking to the “Strategies to Reduce Emissions from Commuter and Business Travel” contained in the university’s adopted Climate Action Plan 2.0 for feasible mitigation measures.

Bicyclist and Pedestrian Safety Impacts

The ISMND notes the lack of sidewalks on Foster Avenue and other bicycle and pedestrian infrastructure deficiencies in the area of the project and admits: “Because the project would be increasing vehicular trips along Foster Avenue, there could be a hazard for pedestrians along this portion of roadway due to the lack of a raised curb or other safety features” (p.3-78). However, the ISMND goes on to claim that the new shuttle between campus and the parking lot would be so attractive to both students parking in the lot and to nearby residents that “few (if any) pedestrian and bicycle trips would be generated by the proposed site” (Appendix p.7), and therefore the project does not “create hazardous conditions for these modes” (Appendix p.8).

This analysis is unsupportable for several reasons:

1. While many students who park in the lot on their way to the university's main campus likely will find the frequent shuttle to be the most convenient transportation option, as the ISMND asserts, the assumption that *none* will walk or bike is unreasonable. The ISMND estimates that the shuttle will take 5 minutes to get from the parking lot to the main campus (see p.3-78), which is a significant time savings over walking, but approximately the same amount of time it would take to bike that distance. Furthermore, walking and biking offer flexibility and other benefits that some students will undoubtedly prioritize.
2. The assertion that nearby residents will all take the shuttle rather than walking or biking to nearby destinations is absurd. Most residents do not primarily travel to the university's main campus, but do take other walkable and bikeable trips to destinations including downtown Arcata and the nearby church and school—destinations for which the shuttle will not be an option.
3. The ISMND does not include a commitment from the university to operate the shuttle for any particular length of time. While we do not doubt the university's good intentions, it is undeniable that maintaining ongoing operations like a shuttle over the long term is less certain than maintaining physical infrastructure like the parking lot. For example, the university at one time offered student shuttles to its marine laboratory in Trinidad, but no longer does so, despite continuing to actively use and maintain the Trinidad facilities.
4. Even if the project does not generate new bicycle and pedestrian trips, adjacent and nearby streets including Foster Avenue, Q Street, 17th Street, and Janes Road already carry significant volumes of bicyclists and pedestrians, including children going to school at Fuente Nueva Charter School. The additional car and bus traffic on these streets will create hazardous conditions for these bicyclists and pedestrians given the existing infrastructure deficiencies.

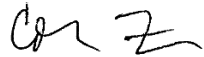
For all of these reasons, it is clear that the project will create significant hazards for pedestrians and bicyclists, and mitigation is required. The ISMND notes that existing plans call for many improvements in the area, including bike lanes and Class I trails. Constructing some of these planned improvements would be appropriate mitigation for the project's impacts.

It is also important to note that by failing to include bicycle and pedestrian improvements, the project violates the City of Arcata's adopted Complete Streets Policy, which states that "the city shall apply a Complete Streets framework in all applicable and feasible transportation projects to allow the safe, comfortable, convenient and accessible use of streets for all roadway users," and specifies that the definition of "transportation projects" includes "planning, prioritization, funding, design, approval, and implementation processes for any private development project, construction, reconstruction, retrofit, resurfacing, repaving, restriping, rehabilitation, or alteration of streets (including streets, roads, bridges, and other portions of the transportation system), including impacts to mobility due to construction or work zone efforts."

The Cal Poly Humboldt project will require encroachment permits from the City of Arcata and clearly qualifies as a “transportation project” under the Complete Streets Policy. It must therefore include accommodations for bicyclists and pedestrians in order to comply with the policy and avoid a significant impact under CEQA for “conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.”

Thank you for your consideration of our comments.

Sincerely,



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