



Humboldt's advocate for transportation choices

707.633.4488

www.green-wheels.org

c/o NEC

1465 G Street  
Arcata, CA 95521

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Kim Floyd  
Project Manager  
California Department of Transportation  
P. O. Box 3700  
Eureka, CA 95502 – 3700

Dear Ms. Floyd,

Thank you for the opportunity to comment on the new modified alternatives for the 101 Eureka Arcata Corridor Project. While the less expensive Alternative 1A provides an option that is somewhat more affordable, Caltrans has failed thus far to adequately justify the project or to address the impacts this project would have on non-motorized users of the corridor.

To assist the reviewer, in the first section of these comments we provide enumeration to indicate where we expect a response to comment or an answer to a question. Suggested mitigations are listed in the second section in outline format for clarity.

## **Issues:**

### ***Flawed Project:***

As we have written before, this project is deeply flawed because of a flawed project purpose. Caltrans states that the purpose for this project, other than addressing safety at intersections, is to address operational conflicts and travel delay at the at-grade intersections. Addressing operational conflicts should not have been part of the project purpose, but one possible alternative for improving safety. Addressing delay at intersections increases the capacity of feeder roads inducing sprawl.

(1) Caltrans has too narrowly defined the purpose by including the elimination of operational conflicts and delay instead of just improving safety, which was the primary impetus for this project when several fatal collisions occurred on the corridor before the speed limit was reduced. These additional purposes inhibited Caltrans from seeking the most cost-effective safety solution.

(2) Furthermore, defining safety as the number of collisions per vehicle miles traveled (VMT) rather than a reduction in the number of collisions over time, limits planners from looking at VMT reduction strategies to improve safety by reducing the number of collisions, not just the number of collisions per traffic volume.

### ***Flawed Process***

We are thankful for the opportunity to comment on the two modified alternatives and the summary of environmental consequences, but there is little to no detail available on how the analysis was conducted on the modified alternatives. For example, (3) what was the numerical result from the

quantitative analysis which placed Alternatives 1A and 3A in the “moderate” category for “Route 101 Corridor Business Access” in the “Draft Summary of Potential Environmental Consequences” (DSPEC),<sup>1</sup> and (4) why have these changed for Alternatives 2 and 3 between the DEIR and the DSPEC? Alternative 2 had “moderate” impacts on business access in the DEIR and “moderate to substantial” in the DSPEC. Alternative 3 changed from “minor to moderate” to “minor.” CEQA requires that the public be granted the opportunity to comment on the analysis. This analysis has changed, and must be reported in a new draft document if we are to have the opportunity to review it.

The DSPEC lists “pedestrian and bicycle circulation” consequences for each alternative, stating that those consequences are “minor” in Alternative 3, and “moderate” in Alternatives 2 and 3A. (5) There is no information in the DEIR, or in this later set of materials associated with the modified alternatives, that indicates how Caltrans reached this conclusion. These are unsupported claims. (6) We dispute that any of these build alternatives have impacts less than substantially adverse for pedestrians and bicyclists. In every build alternative, access to Bayside Cutoff, and to Bracut businesses—such as the KOA campground that many Pacific Coast Bike Route users rely on—is restricted depending on direction of travel. Forced out-of-direction travel in all of the build alternatives will certainly result in wrong-way travel behavior by many bicyclists on the corridor. Closure of the Bayside Cutoff and Bracut Median crossings will direct motorized out-of-direction travel through the 101/255 interchange in Arcata, impacting non-motorized travel between Sunny Brae and Downtown Arcata on the Samoa Boulevard bridge, which has no pedestrian facilities and roadway facilities that are poorly designed for bicyclists. (7) These impacts can and should be fully identified in the DEIR if they have not been, and mitigated.

Another example of inconsistency between impacts listed in the DEIR and those listed in the DPEC follows. On page 218, the DEIR lists different values for the difference in gallons of gas burned per day for each build alternative compared with the no-build alternative. These values differ in the DSPEC:

<b>Document:</b>	<b>DEIR</b>	<b>DSPEC</b>
Alternative 1	3305	3970
Alternative 2	1483	2150
Alternative 3	-605	60

There is no explanation why these numbers differ, and so it leads us to question the methodology for measuring this. (8) Caltrans must explain in the DEIR how this analysis was done, and what methodology was used, and why the results differ between the DEIR and DSPEC.

### ***Inviting Public Comment***

The public comment period on the modified alternatives was far too short to allow for substantive public input. The public comment period consisted of 17 days between the Dec 3 release of analysis results for the modified alternatives at the Open House at the Wharfinger and the Dec. 20 deadline for comments. Requests for extension by Humboldt County and by this organization have resulted in individual extensions, but no blanket extension for anyone in the public who may wish to comment. (9) Given the short timeline and multiple requests for extension why they didn’t Caltrans give a public extension?

The information on the modified alternatives was difficult to find on the website. The DEIR was removed from the page [www.dot.ca.gov/dist1/d1projects/envdocs.htm](http://www.dot.ca.gov/dist1/d1projects/envdocs.htm) where it had previously been linked, and moved to the page: [www.dot.ca.gov/dist1/d1projects/eureka\\_arcata/reports.htm](http://www.dot.ca.gov/dist1/d1projects/eureka_arcata/reports.htm) along with the relevant information about the modified alternatives. This page was not linked from anywhere we could find on the Caltrans website, not from: [www.dot.ca.gov/dist1/d1projects/eureka\\_arcata/](http://www.dot.ca.gov/dist1/d1projects/eureka_arcata/),

[www.dot.ca.gov/dist1/d1projects/](http://www.dot.ca.gov/dist1/d1projects/), or [www.dot.ca.gov/dist1/d1projects/envdocs.htm](http://www.dot.ca.gov/dist1/d1projects/envdocs.htm). We could only find the page by asking for the web address from the project manager. (10) This was a failure to live up to the intent of CEQA for analysis of all the alternatives to be available for public review.

### ***Greenhouse Gas Emissions***

Assembly Bill 32, the Global Climate Change Solutions Act of 2006, sets targets for the reduction of greenhouse gas emissions to 1990 levels by 2020, and 80% below 1990 levels by 2050. Transportation accounts for roughly 50% of emissions in California making this a critical sector to address in reducing emissions. While the DEIR and subsequent analysis compare the build alternatives to each other and to the no-build alternative with regard to emissions, all of these options represent a substantial increase in greenhouse gas emissions.

This failure to plan for the actual emissions targets, and instead merely attempt to minimize the increase in emissions presents two problems:

(11) First, spending more money on a transportation model built on the erroneous assumption of perpetual increase in VMT (see our previous comments) will leave us with less money for investing in the new type of infrastructure we need to reduce VMT. A new type of infrastructure which provides access while reducing VMT, would address safety concerns in a way that also addresses the AB32 challenge.

(12) Second, by comparing the alternatives under the assumption of similar travel demand for each alternative, the analysis of greenhouse gas emissions ignores the effects that different alternatives will have on land use development. Different patterns of land use development will certainly have different impacts on travel demand. Therefore the overall impact each alternative has on greenhouse gas emissions may be more related to induced development associated with each alternative than to out-of-direction travel associated with each alternative. For example, an interchange at Indianola Cutoff will likely facilitate automobile-dependent development in that area, which has no transit service, and non-walkable distances to services and jobs. This will result in emissions impacts that have not been measured in the DEIR or the DSPEC, but are emissions associated with this project.

### ***Sea-level rise***

On December 31, 2005, Humboldt Bay washed over 101. In other words, for a few hours this facility was already below sea-level. This should have been a clear signal to planners that sea-level rise needs to be addressed in this project. The roadway surface may be only a 20-year structure, but the proposed rebuilt bridges over Gannon Slough are 50-year structures to our understanding, and need to be designed to deal with sea-level rise. In addition, the investment in new structures, whether interchanges, realignment of the thru-lanes, extension of acceleration and deceleration lanes, or new u-turns, will last longer with maintenance than the 20-year lifespan of the pavement. (13) Caltrans must formulate a plan to protect these new structures from sea-level rise for 100 years.

### ***Non-motorized connectivity:***

Deputy Directive 64 which used to state that Caltrans “*fully considers* the needs of non-motorized travelers” in all planning, programming, design, construction, operations, and maintenance activities and products” was strengthened in Oct 2008 as part of complete streets legislation. The directive now reads “Caltrans *provides* for the needs for travelers of all ages and abilities...” This change from “fully considers” to “provides” represents a strengthening of the directive. No longer can planners and engineers consider and then neglect safety and access for non-motorized users. It must be provided as part of “all planning, programming, design, construction, operations and maintenance activities and products.”

Safety for motorists is measured as the number of collisions divided by the volume of traffic. This provides a measure of the level of risk the motorist faces at a given intersection, or, when divided by distance, a level of risk per mile driven on a given roadway. The level of risk a cyclist faces using this facility is unknown, because Caltrans has not measured the number of cyclists roadway users. The number of cyclists using the corridor has not been counted in 9 years. When it was counted, it was by a separate organization. Without a measure of the number of cyclist roadway users, there is no measure of collisions per bicyclist volume, which would help ascertain the risk a cyclist faces traveling the corridor. (14) The failure to even measure the most basic metric of non-motorized safety represents a failure to satisfy the old language for Deputy Directive 64, (“fully considers all users”) and the new language (“provides for.”)

(15) The modified alternatives further deteriorate connectivity for non-motorized users. The u-turns in Alternative 1A would be difficult for a bicyclist to use since motor traffic using the same facilities would be traveling at higher speeds in the same lane, and a bicyclist would be required to merge across 2 lanes of 55 mph traffic twice, rather than just once across 2 lanes of 50 mph traffic as bicyclists must do now to turn left. With several long out-of-direction travel distances required to reach places along the corridor, it is reasonable to expect that many bicyclists will travel the wrong way on the shoulder for long distances to get where they need to go more directly instead. For example, in Alternatives 1A and 3A where no left turns are allowed from Airport Road onto Southbound 101, many if not most cyclists will ride the wrong way on the Northbound shoulder in order to reach Eureka rather than ride an additional 2.3 miles (Alt. 1A) or 3.6 miles (Alt. 3A) to reach either the u-turn or the interchange where a turnaround is possible. This type of behavior will be common at Bayside Cutoff and Bracut in all build alternatives.

While Caltrans can choose to compare the impacts to non-motorized users in the DSPEC and has attempted to do so, to be clear, these impacts are consistent with Appendix G of the CEQA code. XV. d) “substantial increase in hazard due to a design feature” describes the following hazards:

- Increase in traffic volume on the Samoa Blvd. Bridge which has inadequate pedestrian and bicycle facilities and hazardous hook-ramps.
- Increased speed differential between motorists and non-motorized users due to the increase in speed limit.
- Frequency of wrong-way riding on the facility by non-motorized users due to loss of connectivity.

In addition, impacts to non-motorized users fit with Section XV. g) “Conflict with adopted policies” including Deputy Directive 64, discussed above, as well as language in local general plans cited in our previous comments and in the DEIR.

### ***Coastal Access***

Two critical aspects to coastal access are general connectivity to allow for coastal access from communities east of 101 discussed in the previous section and the California Coastal Trail.

In its funding of the Arcata Coastal Rail with Trail project which connects Arcata to Bracut, partway along the Eureka Arcata 101 Corridor, the State Coastal Conservancy recommended working with Caltrans to develop trail access. Meanwhile, the California Coastal Commission has formalized comments requiring complete trail planning as part of mitigation for this highway project. Caltrans shared in the visioning process for the Eureka Arcata Humboldt Bay Trail and has staked a position of being in support of it. (16) Therefore, Caltrans must ensure that this project does not render future trail development in this corridor infeasible. We outline below what mitigations would be required to ensure this Caltrans project does not negatively impact the trail project.

## **Our Take on the Alternatives**

All the build alternatives will require substantial mitigations or alterations to recreate the non-motorized connectivity that will be lost by closing the median crossings. Without these mitigations (outlined below) each build alternative will worsen conditions for non-motorized users. If the mitigations outlined below cannot be provided, we continue to recommend the no-build alternative.

While fundamental flaws in this project remain, amongst the build alternatives now on offer, Alternative 1A offers the greatest cost savings, and strikes a balance between disincentivizing development at Indianola Cutoff, while not generating inordinate amounts of out-of-direction travel for motorists nor inordinate traffic volume increases on Old Arcata Road and Myrtle Ave. The drawback of increased out-of-direction travel should be weighed against the potential for inducing more automobile-dependent development and resultant emissions which an interchange would precipitate at Indianola Cutoff.

### ***Mitigations required:***

#### **Non-motorized connectivity:**

1) Mitigate for impacts (described in issues section) caused by the closure of Bayside Cutoff and Bracut Median Crossings (All Build Alternatives):

- a) Class I multi-use trail from Bayside Cutoff to Bracut on east side of 101.
- b) Non-motorized undercrossing at Bracut

These measures will allow cyclists entering 101 at Bayside cutoff to proceed south, will allow access to both sides of Bracut for non-motorized users, and will make the proposed Arcata Coastal Rail-with-Trail facility accessible at Bracut for northbound cyclists. The slightly higher elevation at Bracut makes an undercrossing possible, and bicyclists need far less clearance than motor-vehicles. This makes it an opportunity to provide a non-motorized crossing at fairly low cost.

2) Mitigate for closure of median crossing at Indianola Cutoff (Alternatives 1 and 1A):

Non-motorized over-crossing at Indianola Cutoff.

If such a bridge would cost \$4 million as was estimated to us by Caltrans Staff, it is substantially cheaper than a full-blown interchange which would cost between \$11 million and \$25 million.

This median crossing is particularly important, since it provides access to the Humboldt Area Foundation, the only major foundation in our region. Many people who need to access the foundation have limited access to automobiles. There are no plans for transit service to Indianola Cutoff, so bicycle access is critical for those who do not own motor-vehicles.

3) Mitigate for Cole Avenue and Airport Road median crossing closures and restrictions (All alternatives):

Class 1 multi-use trail from the west end of Jacob's Avenue to 6<sup>th</sup> Street. Portion on 101 northbound bridge over Eureka Slough should be completed when bridge is replaced. For now it would connect with existing sidewalk on northbound bridge.

This mitigation is particularly important for low-income residents in the Jacobs Avenue neighborhood, many of whom do not own cars.

#### **Sea level rise / Coastal Access / California Coastal Trail**

The plan for dealing with sea level rise dictates the appropriate mitigation for the California Coastal Trail. There are two scenarios.

The first strategy is to protect the 101 by enhancing the North Coast Railroad Authority-owned levy between 101 and the bay. If this strategy is undertaken, Caltrans shall enhance the levy in a way that

accommodates a Class I multi-use trail. It is up to Caltrans to negotiate with NCRA as to how this will be accomplished.

The second strategy is to raise the level of 101, either gradually as it undergoes maintenance, or as part of this project. If this strategy is undertaken, Caltrans needs to ensure that it is not rendering future trail development infeasible. Therefore Caltrans shall establish that a Class I multi-use trail is fully feasible outside the Caltrans right-of-way in the face of wetland constraints and sea level rise challenges to the trail. This will require Caltrans to conduct all design, engineering and permitting for the trail to fully establish its feasibility. A recent feasibility study of the Eureka Arcata Humboldt Bay Trail<sup>2</sup> did not definitively establish the trail's feasibility. A setback between the railroad track centerline and the edge of the trail was assumed to be 8'6" in the completed study. This narrow setback is not permitted under current NCRA draft rail with trail guidelines ([www.northcoastrailroad.org/Acrobat/Web%20Trail%20Guidelines.pdf](http://www.northcoastrailroad.org/Acrobat/Web%20Trail%20Guidelines.pdf)), and is unlikely to be permitted under final guidelines. The preeminent document on rail-with-trail design, *Rail-with-Trail: Lessons Learned* recommends 10 feet as a typical minimum setback in constrained sections ([www.fhwa.dot.gov/environment/retrails/rwt/section5a.htm#s5d](http://www.fhwa.dot.gov/environment/retrails/rwt/section5a.htm#s5d)).

If Caltrans cannot establish full feasibility of a class I multi-use trail from Eureka to Arcata, this project must allow space for the trail within the Caltrans right-of-way in a location where it has demonstrated full feasibility of the trail.

Thank you for considering our comments.

Sincerely,



Chris Rall – Executive Director  
Green Wheels

CC:

Assemblyman Wes Chesbro  
State Senator Pat Wiggins  
Humboldt County Board of Supervisors  
Eureka City Council  
Arcata City Council  
Humboldt County Association of Governments  
Eureka City Operations  
Arcata Public Works

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<sup>1</sup> Draft Summary of Environmental Consequences, [www.dot.ca.gov/dist1/d1/projects/eureka\\_arcata/summary\\_env\\_impacts.pdf](http://www.dot.ca.gov/dist1/d1/projects/eureka_arcata/summary_env_impacts.pdf)

<sup>2</sup> Humboldt Bay Trails Feasibility Study, [www.nrsrcaa.org/baytrails/](http://www.nrsrcaa.org/baytrails/)