

Jun 30 2020

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**Subject:** Caltrans Comments for SCH# 2019049166, North McKay Ranch Subdivision DEIR  
**Date:** Monday, June 29, 2020 4:57:13 PM

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**STATE CLEARINGHOUSE**

Dear Trevor Estlow:

Thank you for giving Caltrans the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed North McKay Ranch Subdivision. The project proposes to subdivide and develop 81 acres straddling the border between the City of Eureka and the County of Humboldt approximately 2.5 miles east of US Route 101. The development proposal includes the construction of 320 residential units: 146 single-family residences and 174 multi-family residential units to be built in nine phases. Approximately 22,000 square feet of commercial development will be located on-site and 21.73 acres of open space would be dedicated to the County to remain in public use. We have the following comments:

The TIS dated May 9, 2018 estimated the project would generate 2,879 trips per day at full build out in 2040. The DEIR states that any change in land use that would result in more trips than those evaluated in this EIR would require a separate CEQA review. This includes the commercial development which uses a daily trip generation of 234 vehicles based on the on ITE land use 710 (general office building).

Table 3.16.1 and Table 3.16-4 of the DEIR identifies the intersection of Walnut and Fern Streets as an all-way stop controlled intersection (AWSC) under existing conditions. This intersection is signalized under existing conditions. Please revise.

Section 4.5.16 of the DEIR states: "All the new development projects would generate new vehicle trips that may trigger or contribute to unacceptable intersection operations, roadway operations, and freeway operations. All projects would be required to mitigate for their fair share of impacts." We note that the Traffic Study did not analyze impacts to freeway operations, despite a request from Caltrans to include the interchange at Herrick Avenue in the scope of the traffic analysis in our letter of response to the Notice of Preparation for the EIR. We suggest revising the above DEIR statements to be consistent with the contents of the traffic analysis and its recommendations.

Neither the traffic study nor the DEIR identify the cumulative impacts to traffic as a result of other approved projects in the area. The County previously circulated a mitigated negative declaration for the Mid-McKay Tract subdivision which included a potential to develop 852 new residences, with options for increasing that number to more than a thousand new residential units. Please address cumulative traffic impacts for other known developments in the unincorporated Cutten area. The one percent growth rate that was assumed will need to be justified for background growth to include a development as large as the mid-McKay Tract Subdivision.

The DEIR briefly discusses SB743 and VMT levels of significance but cites that the County of Humboldt has not adopted thresholds of significance related to VMT and the County General Plan Policy C-P5 requires that LOS be reviewed for projects.

In the Executive Summary discussion on significant unavoidable impacts, the DEIR makes a reference to the Sacramento Metropolitan Air Quality Management District thresholds of significance: “Because the proposed project would result in operational emissions that would exceed the Sacramento Metropolitan Air Quality Management District thresholds of significance, impacts related to GHG would remain significant and unavoidable.” We assume the use of SMAQMD thresholds of significance has been incorporated as a surrogate standard in the absence of any thresholds established by Humboldt County for Greenhouse Gas Emissions. Please confirm.

Section 4.5.8 of the DEIR (page 374 of 448) states that the on-going effects of the project will exceed the number of metric tons of carbon emitted from mobile sources (transportation) based on thresholds of significance established by other jurisdictions (SMAQMD) and result in significant and unavoidable impacts to Greenhouse Gas Emissions and Climate Change. The ongoing operation of the proposed project is stated to comply with CalGreen Building Codes, which includes requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that would reduce GHG emissions. We were unable to find any measures in either the project proposal or the proposed mitigation measures to increase bicycle use. We offer the following bicycle mitigation measures and strategies for the reduction of Greenhouse Gas Emissions:

- We request that all new road improvements constructed for the project include low-stress bicycle facilities that provide links to transit stops, schools, and other major neighborhood destinations, such as grocery stores.
- We recommend that the County require a bicycle parking analysis at nearby schools, grocery stores, restaurants, and other major destinations to ensure that there is adequate bicycle parking capacity to accommodate an increased number of cyclists generated by the project (using the future 2040 condition).
- We recommend that the proposed project incorporate bicycles by design with a goal of tripling the number of bicycle trips that residents choose to make.
- We suggest that the project contribute a fair share towards the development of a City of Eureka or greater Eureka area community-wide bicycle plan, which makes bicycle travel throughout the community safe and convenient for all bicycle riders of all ability levels.
- We suggest that the applicant contribute to a fair share towards a city- or community-wide bike-share program, including unincorporated neighborhoods beyond city limits.
- We suggest that the project pay a fair share fee to transit improvements or to assess the feasibility of establishing a transit assessment district or special assessment to pay for new transit services.

Mitigation Measure GHG-2 requires a network of on-site EV charging stations. Caltrans supports measures and incentives that promote a cleaner fleet mix. Caltrans offers to participate in community or region-wide planning efforts to plan for electric, fuel-cell, or other alternative fuel vehicles.

The DIR page 2-23 states “Electrical Vehicle charging will be required at the commercial and multi-family units.” Page 4-8 of the DEIR states “To reduce operational GHG emissions, the project would implement MM GHG-2, which will require a network of on-site EV charging stations. In addition, MM GHG-3 would be implemented, which requires catalytic converters on all wood burning stoves.” However, the list of GHG mitigation measures on pages ES-15 and 3.8-11 only includes a mitigation

measure for catalytic converters on wood burning stoves (called MM GHG-2). The network of EV charging stations referenced elsewhere is omitted from the list GHG mitigation measures. Caltrans requests that these omissions be corrected by adding the stated requirement for EV charging stations at the commercial and multi-family units to the official list of mitigation measures. Please also consider adding EV charging infrastructure for the single-family homes which are each being provided with two parking spaces.

Senate Bill 743, approved in 2013 and incorporated into the State's CEQA Guidelines in 2018, better aligned CEQA with the State's climate goals. CEQA now considers overall automobile use as the primary transportation impact. The change in how CEQA considers transportation impacts aims to reduce automobile use while increasing use of more sustainable modes that are essential to supporting our growing population and economy while meeting climate goals. Because criteria for determining the significance of transportation impacts must promote "the development of multimodal transportation networks" pursuant to Public Resources Code section 21099, subdivision (b)(1), project impacts to transit systems and bicycle and pedestrian networks must be considered. To align with the new SB 743 requirements, the Caltrans Local Development-Intergovernmental Review (LD-IGR) program now focuses on on-site and off-site improvements to reduce single occupancy vehicle trips; reduce per capita VMT; reduce GHG emissions; increase accessibility to destinations via cycling, walking, carpooling, and transit; and provide a safe transportation system, including safer connections between new development and the existing community and reduced impacts to multimodal access or conflicts between modes.

Due to the existing traffic congestion at intersections linking Cutten to destinations in the Eureka area and beyond, and the significant and unavoidable impacts to Greenhouse Gas Emissions, we request that the County work with the City of Eureka and the Humboldt Transit Authority (HTA) to improve transit service in the Cutten area. For expanded transit service to be effective, new development should consider adopting a transit-first approach for accommodating increased travel demand from new development.

We request that the County assess the feasibility of establishing a transit assessment district as a mitigation measure for cumulative traffic impacts to provide a consistent funding source for new transit service. A neighborhood shuttle route or demand-responsive service could be established to reduce short driving trips and serve the multi-family housing units. A transit assessment district could also support regional efforts to establish mobility-on-demand services that could include just the project area to locations in Eureka. This neighborhood shuttle could also be incorporated into evacuation planning to reduce the number of vehicles exiting the area and reduce risk from wildfires. Caltrans can assist with transit planning efforts for the community and region, in partnership with HTA and the Humboldt County Association of Governments.

We request that the project seek to further reduce Greenhouse Gas Emissions by assessing the accessibility of transit stops to and from the proposed project site. Deficiencies in bicycle and pedestrian facilities from the proposed project to existing transit service and other destinations may require additional mitigation to ensure safe and continuous travel. The nearest transit stop is on Walnut St approximately 0.2 mile to the west, the nearest elementary school is adjacent to the site, and more extensive employment, commercial, health and other services and opportunities are

approximately one mile to the north.

The TIS states: “Eureka has historically experienced a high rate of pedestrian accidents, rating the third most dangerous incorporated California city of its size for pedestrians.” The TIS notes “notable gaps in sidewalks on the side streets near the project.” DEIS page 2-22 describes “Off-site roadway improvements include proposed construction of infill sidewalks along the south side of Arbutus Street between Walnut Street and Cedar Street, and on the north side of Redwood Street between Walnut Street and the project site.” However, mitigation measure MM-TRANS-4 only requires sidewalks on newly constructed streets. Caltrans recommends off-site improvements to provide contiguous, ADA compliant, sidewalks and cross-walks connecting the project to nearby transit stops on Walnut St, grocery store, and the three schools in walking distance from the project. A Safe Routes to Schools analysis between the project and the three nearby local schools should also be conducted.

The Class III bicycle facilities on Harris Street are expected to be negatively impacted by additional traffic from the project. The grade on Harris Street creates a significant differential in speed between vehicles and bicycles creating a higher level of bicycling stress that could result in potentially significant impacts to multimodal travel with project-generated increases in traffic. Higher traffic volumes effectively reduce connectivity for most cyclists when continuous Class II or Class IV bicycle facilities are not provided. There may be other locations which warrant more detailed assessment of impacts to bicyclists. We request that the County work with the City of Eureka to develop an area bicycle plan with a continuous bicycle network.

We encourage the County to adopt thresholds of significance for both Vehicle Miles Traveled (VMT) and Greenhouse Gas Emissions. To avoid issues related to developing substantial evidence, the County may adopt the recommendations established by the Governor’s Office of Planning and Research (see the Technical Advisory) and the California Air Resources Board (Scoping Plan-Identified VMT Reductions).

Please contact me with questions or for further assistance regarding the above comments.

Sincerely,

Jesse Robertson  
Transportation Planning  
Caltrans District 1