

California Department of Transportation

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Cal Poly Humboldt Student Housing
SCH#2022030008

Ms. Dierdre Clem
Facilities Management
Cal Poly Humboldt
1 Harpst Street
Arcata, CA 95521

Governor's Office of Planning & Research

JUL 22 2022

STATE CLEARINGHOUSE

Dear Ms. Clem:

Thank you for giving Caltrans the opportunity to comment on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) to develop student housing for California State Polytechnic University, Humboldt (Cal Poly Humboldt). The project would include the development of 1050 student beds, increasing the number of student beds from the previous NOP EIR by 200 beds (850 beds previously). The project site is located near the intersection of the St. Louis Road and U.S. Highway 101 (US 101) overcrossing, approximately 0.5 mile north of Cal Poly Humboldt. We offer the following comments for your consideration:

The Caltrans Strategic Plan for 2020-2024 calls for the Department to enhance and connect the multimodal transportation network and to be a leader in Climate Action. Caltrans invites Cal Poly Humboldt to help meet the State's climate goals locally. Tail pipe emissions from the transportation sector make up the largest contribution of greenhouse gas (GHG) emissions in the State. One of the ways in which we can help California to reduce GHG emissions and achieve a carbon-neutral future by the year 2045 is through the reduction of Vehicle Miles Traveled (VMT) on California streets and highways. To meet the State's targets for reducing GHG emissions and energy consumption, we must work with our local partners to plan for a more sustainable transportation system.

Although the proposed project is located in an area suspected of having lower VMT rates when compared to the County or region as a whole, the design of the facility may have a positive impact on the existing VMT for the area. Examples to consider include:

- Increasing the connectivity of the site by connecting the public rights of way for local streets, such as St. Louis Road and Eye Street and/or Todd Street. A better-connected network of local streets, particularly in the north and south directions

may reduce the distance of existing trips by minimizing the amount of out-of-direction travel.

- Reducing the amount of parking provided on-site and/or requiring parking fees for residents would influence how residents choose to travel. Fewer vehicle trips would likely result from different trip purposes, beyond home-to-school trips.
- Incorporate shared mobility options and parking on-site. University bike share programs should include reciprocal parking on-site. Access to shared Zero-Emission Vehicles (ZEV), and charging points for privately-owned ZEVs, may help to support the adoption of alternative fuel vehicles.
- Secure bike parking should be conveniently located on-site.

As Cal Poly Humboldt is expected increase student enrollment and has plans to expand student housing, particularly to off-campus sites, the draft Environmental Impact Report (DEIR) will need to evaluate the potential for student housing to generate transportation impacts. To the extent known, trips generated from other off-site university-owned, or university-operated student housing facilities should be considered cumulatively for increases in VMT and potential impacts to transportation safety. Please consider coordinating with Caltrans and the Arcata City Engineering staff in the preparation of the scope of the transportation study.

We have previously reviewed a traffic study, which examined increases in multi-modal travel at the US-101/Sunset/LK Wood ramps, overpass and intersections and local road network from the student housing project site to the Cal Poly Humboldt Campus. Although some of the assumptions have changed for Arcata's 2017 study, increased travel demand at the 101/Sunset intersections and connecting streets have the potential to affect traffic safety and potentially require mitigation. Caltrans concurs with Cal Poly Humboldt's Revised NOP EIR that identifies transportation and land use impacts as potentially significant areas of review for the project/EIR.

The traffic impact study for the project should be consistent with State standards, established by the Governor's Office of Planning & Research and Caltrans, and include measures that support state multimodal, transit and climate goals. The TIS should use the most recent collision data, traffic, bike & pedestrian counts, etc., to identify existing conditions for the 101 corridor and ramps/Sunset Ave/LK Wood Blvd. intersections and connecting local roads near Campus. The study should include a robust discussion and multi-modal analysis of motor vehicles, non-motorized facilities, including trails, transit, first- and last-mile connectivity, and cumulative impacts of significant housing plans and proposals and Cal Poly Humboldt student housing sites.

The "Potential Permits and Approvals Required" section of the revised NOP states that Caltrans permits will be required for moving oversized or excessive loads. Please be advised that the Project may require encroachment permits for any work done within

Caltrans rights-of-way or other Caltrans permitting and cooperative agreements that may not be limited to the approvals and permitting listed in the NOP.

We recommend a coordinated approach to multimodal transportation planning for the Project in proximity to the affected 101-corridor near Campus. We suggest that Cal Poly Humboldt form a working group that meets regularly and includes Caltrans, local jurisdictions, Humboldt transit agencies, and other stakeholders to provide an opportunity to identify and discuss transportation, transit, land use and related issues and coordinate on planning issues and needs. This may include but is not limited to the development of a Cal Poly Humboldt Masterplan and housing sites.

We recognize and appreciate Cal Poly Humboldt's leadership in the community to promote transit service for the student population. We offer the following best practices to continue the tradition of transit service for students and to help manage travel demand to and from the university campus:

- Consult early and often with Arcata and Mad River Transit Service (A&MRTS) and Humboldt Transit Authority (HTA) by including both agencies in the planning process to ensure that Cal Poly Humboldt's student population is well served by transit.
- In addition to the Jack Pass program that allows students unlimited free rides on local buses, work with transit providers to establish a regional student transit pass that allows for unlimited rides on all regional transit service.
- Encourage residents to forgo cars by offering reduced rents or reimbursements.
- Consider a mixed-use project with retail establishments onsite so residents do not have to travel to meet all their shopping needs.
- Establish car (preferably zero emissions) and bike sharing locations onsite to offer an alternative to car ownership.
- Work with the City of Arcata in planning/constructing safe pedestrian and protected bicycle infrastructure to offer residents multimodal transportation choices. These pedestrian and bicycle infrastructure should offer origin-destination linkages and compliment transit especially the first-last mile connectivity.

We support campus incentives to reduce single-occupancy vehicle (SOV) trips, parking demand and space devoted to parking, both on- and off-campus. Some useful tools include user-pay campus parking, higher permit parking fees and limited eligibility, and multi-level, mixed-use parking garage structures.

As part of the project features or transportation improvements or mitigation measures that could benefit traffic safety/circulation and non-motorized connectivity from the project site to campus, we suggest the following:

- Annie and Mary Trail connections and improvements could be added as a feature of the project's site development.

- Bike/ped access and connectivity to the Westwood neighborhood, shopping center and transit, via the McDaniel Slough greenways, trails, or easements to other public rights of way.

Some residents of the project may choose to access LK Wood Blvd via St Louis Road. Depending on trip assignment and distribution for project residents, LK Wood Blvd. may need to be evaluated for safety conflicts between vehicle and non-motorized travelers. Potential strategies for providing safe and convenient multi-modal use of the corridor include:

- Developing a Class IV multimodal two-way (shared) bike and ped path along the west side of LK Wood and common US-101 corridor R/W with a crossing to the 101/Sunset/LK Wood intersection and campus.
- Consider improvements to the LK Wood intersection with Granite Ave, and/or a redesign of Cal Poly Humboldt's parking lot layout, ingress/egress and pedestrian routes to reduce potential safety conflicts.

We suggest that Cal Poly Humboldt consider working in partnership with local stakeholders to apply for annual Caltrans Sustainable Transportation Planning Grants for planning improvements to the larger transportation system beyond the scope of mitigation for the proposed project. A Sustainable Communities Formula grant can help to evaluate transportation needs for adjacent roads that might be impacted by growth, including Cal Poly Humboldt's Master Plan for Growth and the City of Arcata's General Plan Update. Strategic Partnership grants can help to coordinate regional, long-range transportation planning activities between Cal Poly Humboldt, the City of Arcata, the Humboldt County Association of Governments (HCAOG), Humboldt Transit Authority (HTA), and Caltrans. More information about Caltrans transportation grant programs can be found on our website: <<https://dot.ca.gov/programs/transportation-planning/regional-planning/sustainable-transportation-planning-grants>>.

We encourage Cal Poly Humboldt improving trail and pathway facilities within and adjacent to Campus, greater use of shuttles, and identifying high demand routes from Campus to destinations in the neighborhood and beyond. Encourage Cal Poly Humboldt's upgrade of adjacent Community Forest trails, trail heads, and other innovative measures to improve trail and neighborhood connectivity.

We encourage Cal Poly Humboldt to advance plans for infrastructure projects that are eligible and ready to submit for federal funding applications under the Infrastructure Investment Jobs Act/ Bipartisan Infrastructure Law (IIJA/BIL).

Among the more innovative trends in other parts of the State, local communities have begun planning and building structures that span State highways and freeways for other civic uses. In response to local interest and initiatives, we suggest that Cal Poly

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Humboldt consider participating in cooperative local efforts to “cap” a segment of US 101 through Arcata using a mix of grant funds and local matching funds.

We look forward to the potential partnering opportunities that expanded enrollment at the university may bring. Feel free to contact me with questions or for further assistance with the comments provided at (707) 684-6879 or by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,

Jesse G. Robertson

Jesse Robertson
Transportation Planning
Caltrans District 1

e-copy: State Clearinghouse
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