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13.0 Transportation

This section of the EIR addresses the four issues identified in CEQA as potential transportation impacts, with a focus on vehicle travel miles traveled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project, from car and truck trips to and from the site. Analysis is also provided to examine project consistency with policies and plans for providing bicycle, pedestrian, and transit facilities, and to evaluate transportation safety effects.

The key source of information used in this section is the *McKinleyville Town Center Q-Zone* (Humboldt County 2024) and analysis conducted by W-Trans, the project transportation consultant. W-Trans also prepared an operations analysis. That analysis is not utilized in this EIR. However, it is included in Appendix E for informational purposes, in part, to show how the County's planned road diets for Central Avenue and Hiller Road would affect traffic flow.

Responses to the Notice of Preparation

The Coalition for Responsible Transportation Priorities submitted comments regarding transportation topics that are CEQA-related (e.g., VMT, pedestrian/bicycle/transit planning, transportation safety) versus non-CEQA issues (e.g., traffic operations and traffic congestion), and commented on the geographic boundary to be used as the baseline for assessing VMT impacts.

Caltrans suggested changes/clarifications to the project description and NOP that do not address the scope of issues to be addressed in the EIR; suggested that the relationship between land use, transit and active transportation facilities be considered regarding state goals for reducing GHGs and VMT; and recommended review of Humboldt County regional transportation plans and bicycle, transit, and pedestrian plans.

13.1 Environmental Setting

McKinleyville Community Travel Characteristics

Residents of McKinleyville rely primarily on personal motor vehicles for commuting. As reported in the 2021 American Community Survey, 89.2 percent of working residents of McKinleyville, which includes the project site, commuted by car, truck, or van, with 78.6 percent driving alone and 10.6 percent carpooling. Public transportation was used as the

primary commute mode by 0.4 percent of workers living in McKinleyville, while 1.1 percent of workers reported walking or biking to work, and 7.7 percent worked from home.

McKinleyville is primarily a residential community. According to 2021 Census data, 5,411 of its residents commuted to jobs outside McKinleyville, while 1,491 people commuted to jobs in McKinleyville from outside the community, and 968 people both lived and worked in McKinleyville.

In terms of commute distance, 83.1 percent of employed residents travel less than 25 miles to work, with 55.9 percent having commutes of less than 10 miles. Among people working in McKinleyville, 82.0 percent travel less than 25 miles to work, with 62.2 percent having trips of less than 10 miles.

Existing Vehicle Miles Traveled

The VMT impacts of the proposed project are based on a comparison of project-generated VMT with countywide VMT as discussed in Section 13.3 below. The baseline (existing) VMT against which the change in VMT created by the project is compared is calculated as VMT per capita (per person) per day for proposed residential uses and VMT/employee for the proposed office uses. Baseline VMT for retail was not evaluated, as VMT impacts are based on the change in retail VMT rather than the change in the rate of VMT as is the case for residential and office uses. The Humboldt County Travel Demand Model was used to model existing VMT in the project area. Existing VMT was modeled at 8.4 per capita per day and 3.8 per employee per day. Existing countywide VMT was modeled at 16.7 per capita per day and 14.3 per employee per day. Existing VMT within the site is lower than the countywide rates, likely due to the ability of existing residents/employees within the site to access services and employment opportunities located much closer to their trip origin locations than is possible elsewhere in the county on average.

Existing and Planned Transportation Network

Roadway Network

The main roadways in the project area that were evaluated in transportation modeling for the project and their functions are summarized here to provide context for the circulation characteristics.

Central Avenue, also known as Business 101, is a north-south minor collector lined primarily with commercial land uses. It parallels U.S. Highway 101 within the project site and is the primary access route between the project site and communities to the south, via an interchange at U.S. Highway 101. There are two lanes in each direction with a two-way left turn lane and a speed limit of 35 mph.

Railroad Drive is a local road located along the northern boundary of the project site, connecting Central Avenue with McKinleyville Avenue. It includes one lane in each direction and has a speed limit of 25 mph. On-street parking is available along south side of the street and part of north side. Portions of the frontage along the south side are currently undeveloped.

McKinleyville Avenue is a minor collector running north-south and parallel to U.S. Highway 101 and Central Avenue along the western boundary of the project site; it provides access to U.S. Highway 101 via Murray Road to the north and Washington Avenue and School Road to the south. It is a two-lane roadway with a 25-mph speed limit with on-street parking available along the west side of the street.

Hiller Road is a local road running east-west connecting to Central Avenue and extending west across U.S. Highway 101, terminating near the Hammond Trail; while there is a grade-separated crossing over U.S. Highway 101, there is no direct connection between the two roadways. Hiller Road has one lane in each direction with a speed limit of 35 mph. Much of the frontage is currently undeveloped, with on-street parking available along the frontage of the developed sections.

Murray Road is classified as a minor collector that runs east-west, with an interchange at U.S. Highway 101, connecting to Central Avenue, and linking McKinleyville to communities to the east. Between U.S. Highway 101 and Central Avenue there are four travel lanes and a two-way left turn lane, and the speed limit is 35 mph. West of U.S. Highway 101 and east of Central Avenue, there is one lane in each direction.

Heartwood Drive is a minor collector, running east-west and connecting to McKinleyville Avenue and Central Avenue. There is one lane in each direction, with a speed limit of 25 mph, and the corridor is characterized by residential and commercial land uses.

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. In general, a network of sidewalks, crosswalks, pedestrian signals, and curb ramps provide access for pedestrians in the vicinity of the proposed project site; however, sidewalk gaps, obstacles, and barriers can be found along some or all of the existing roadways in the area. Such gaps and obstacles along the pedestrian network impact convenient and continuous access to destinations for pedestrians and may present safety concerns in some locations. The following section describes the pedestrian environment along the major streets bordering/near the project site.

- Central Avenue has largely complete sidewalks along both sides of the street, with numerous commercial driveways. Marked crosswalks and ramps are present at major intersections and overhead streetlights are present at some locations.
- Railroad Drive has continuous sidewalks along the north side of the street, but there are gaps along the south side. Overhead lighting is limited.
- McKinleyville Avenue has continuous sidewalks through the residential neighborhood along the west side of the street from Railroad Drive to Hiller Road; no sidewalks are present along the east side, which is fronted by wetlands and is undeveloped. There is limited street lighting along the corridor.
- Hiller Road features limited sidewalks along only developed parcels both sides of the street. West of the project site there is a sidewalk along the north side of the street along the overpass across U.S. Highway 101. Limited street lighting is available.
- Heartwood Drive includes sidewalks along both sides of the street. The recent extension of the street provides connectivity between the McKinleyville Avenue and Central Avenue corridors.

Bicycle Facilities

The *Highway Design Manual*, Caltrans, 2020, classifies bikeways into four categories:

- Class I Multi-Use Path – a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- Class II Bike Lane – a striped and signed lane for one-way bike travel on a street or highway.
- Class III Bike Route – signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- Class IV Bikeway – also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

At the project site, Class II bike lanes are present along Central Avenue from School Road to Railroad Drive, and the *Humboldt Regional Bicycle Plan* proposes the extension of bike lanes from Railroad Drive to Murray Road. Bike lanes also exist along McKinleyville Avenue and Murray Road. New separated bikeways are planned on Central Avenue and Hiller Road as described and illustrated in Figures 4.3 and 4.4, respectively, in Section 4.0, Project Description. Note that these bikeways are shown as Class I bikeways on the figures. Per the Caltrans bicycle facilities classifications listed above, these would be Class IV bikeways. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project site/area. [Table 13-1](#),

Existing and Proposed Bicycle Facilities, summarizes the existing and planned bicycle facilities in the project vicinity, per the regional bicycle plan.

Table 13-1 Existing and Proposed Bicycle Facilities

Facility	Class	Length (miles)	Beginning Point	Ending Point
Existing				
Central Ave.	II	0.85	School Rd.	Railroad Dr.
Murray Rd.	II	1.05	Sandpointe Dr.	Central Ave.
McKinleyville Ave.	II	1.00	Murray Rd.	Hiller Rd.
Planned New				
Central Ave.	IV	0.65	Railroad Dr.	Murray Rd.
Hiller Rd.	IV	1.35	Central Ave.	Ocean Dr.

SOURCE: W-Trans, 2024, *Humboldt Regional Bicycle Plan*, Humboldt County Association of Governments, 2018

Transit Service

The Humboldt Transit Authority (HTA) Redwood Transit System provides fixed route bus service in McKinleyville and other coastal communities in Humboldt County. Bus stops at the project site are located at the intersections of Railroad Drive/Central Avenue, McKinleyville Avenue/Railroad Drive, and Central Avenue/Gwin Road. Service is available Monday through Saturday, with hourly weekday service from 6:00 a.m. until 10:30 p.m. Saturday service is more limited, with buses operating from 9:00 a.m. until 9:30 p.m., with buses every two to three hours.

Bicycles can be used in conjunction with existing transit service. Two bicycles can be carried on most HTA buses, with bike rack space available on a first come, first served basis. Additional bicycles are allowed on HTA buses at the discretion of the driver.

Dial-a-ride, also known as paratransit, or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. Dial-a-Ride service in McKinleyville is provided by Humboldt Dial-A-Ride, with service available Monday through Friday from 7:00 a.m. until 6:00 p.m. and Saturday from 9:00 a.m. until 5:00 p.m.

Ride Humboldt Flex service offers a more flexible transit option, providing on-demand shared ride option for users of the service between bus stops and other approved locations. Currently Ride Humboldt Flex utilizes available seats in the Dial-A-Ride vehicles, and there are potential plans to expand the service based on demand and available funding for additional vehicles. The

service operates Monday through Friday from 7:00 a.m. until 6:00 p.m. and on Saturdays from 9:00 a.m. until 5:00 p.m.

13.2 Regulatory Setting

Federal, State, regional, and local policies regulate many aspects of the transportation system in the project site, including planning and programming, design, operations, and funding. While Humboldt County has primary responsibility for the maintenance and operation of local transportation facilities, there is ongoing coordination between County staff and regional, state, and federal agencies to plan, manage, and enhance the County's transportation assets; these entities include the Humboldt County Association of Governments, California Department of Transportation (Caltrans), and Humboldt Transit Authority.

State

California Department of Transportation (Caltrans)

Caltrans is the owner and operator of the state highway system, which includes U.S. Highway 101 in the vicinity of the project site. Caltrans' *Vehicle Miles Traveled-Focused Transportation Impact Study Guide*, 2020, includes its approach for evaluating the transportation impacts of land use projects and plans on state highway facilities; this document does not address the impacts of transportation projects. In accordance with current CEQA requirements, Caltrans does not consider vehicle delay in its evaluation of transportation impacts, instead focusing on project-related VMT. Caltrans provides guidance to lead agencies regarding when they should analyze potential impacts to the state highway system; to aid Caltrans staff in reviewing projects; and to ensure consistency in the assessment of impacts and identification of non-capacity increasing mitigation measures.

California Senate Bill 743 (SB 743)

Senate Bill (SB) 743 established the change in VMT resulting from a project as the primary basis for determining CEQA impacts with respect to transportation and traffic. This supported previous climate-focused and transportation legislation, including the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the California Global Warming Solutions Act of 2006 (AB 32), as well as the Complete Streets Act (AB 1358), which requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

In December 2018, the Governor's Office of Planning and Research (OPR) issued a final advisory to guide lead agencies in implementing SB 743, *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Key guidance includes the following.

- VMT is the most appropriate metric to evaluate a project's transportation impact under CEQA.

- VMT for residential and office projects should generally be assessed using efficiency metrics, i.e., on a “per rate” basis.
- The OPR-recommended threshold of significance for residential projects is VMT per capita of 15 percent below the city or regional average. Similarly, for office uses, the recommended threshold of significance is VMT per employee is 15 percent below the regional average. Applying these thresholds, residential and office projects expected to generate VMT that exceeds the relevant threshold could result in a significant impact. These thresholds were developed to support statewide GHG emission reduction targets.
- Where the VMT metric is efficiency based, as for residential and office uses, comparing existing regional average to the project VMT is analogous to cumulative VMT impact conditions.
- The recommended threshold for retail projects is an increase in total VMT, which indicates the amount of VMT added to the regional transportation network. Individual retail stores of less than 50,000 square feet in floor area are generally considered to be local-serving uses that would not typically result in an increase in VMT, and therefore, have a less than significant VMT impact. By introducing additional retail opportunities in proximity to residential areas, such retail projects typically result in a more efficient distribution of existing trips rather than generating new trips. Larger retail projects are generally considered to serve as regional destinations that could result in a significant VMT impact.
- Lead agencies have the discretion to set or apply their own significance thresholds in lieu of those recommended in the advisory, provided they are based on substantial evidence.
- Cities and counties retain the ability to use metrics such as level of service for other plans, studies, or network monitoring. However, level of service and similar metrics cannot constitute the basis for determining CEQA impacts.

Regional/County

Humboldt County Regional Transportation Plan

The Humboldt County Association of Governments is a joint powers authority governed by a Board of Directors made up of elected officials from the County of Humboldt and the county’s seven incorporated cities. As the designated Regional Transportation Planning Authority, The Humboldt County Association of Government’s responsibilities include the development of the Regional Transportation Plan, a long-range (20-year) transportation planning document for Humboldt County, which must be updated every five years. The most recent update of the Regional Transportation Plan is titled *Variety in Rural Options of Mobility (VROOM)*, which was adopted in 2022. VROOM includes numerous policies indicating that the Humboldt County Association of Governments would support local agencies regarding projects and programs to address climate change, emergency transportation, efficient land use, complete streets, trails,

and public transportation. VROOM includes the following projects that would impact transportation in the Town Center area:

- Central Avenue shoulder widening and signal synchronization;
- McKinleyville Avenue extension to School Road; and
- Transit hub for the McKinleyville Town Center, as well as increased service frequency between McKinleyville and Eureka, the provision of late-night service, and a pilot study of micro-transit service in the area.

Humboldt County General Plan – Circulation Element

The following transportation-related policies contained in the Circulation Element of the Humboldt County General Plan were used to inform the analysis in this section:

C-P1. Circulation System. Encourage development of a circulation system that supports:

- A. Access to higher density residential areas, local commercial facilities, neighborhood parks and schools, while maintaining maximum bicycle and pedestrian connectivity.
- B. Designing access to residential areas to minimize disruptions to the flow of traffic while providing for user safety and connectivity on arterial or collector roads.
- C. Improving connectivity between interrelated areas such as neighborhoods and common destinations.
- D. Planning retail, service and industrial facilities, community centers, major recreational facilities, employment centers, and other intensive land uses that consider the location of collectors or arterial roads consistent with the Land Use Element.

C-P2. Consideration of Land Uses in Transportation Decision Making. Transportation decisions shall be based on a comprehensive planning approach that considers existing land uses, principally permitted land uses and future land development as proposed in adopted County plans and plans of other governmental agencies.

C-P3. Consideration of Transportation Impacts in Land Use Decision Making. Decisions to change or expand the land use of a particular area shall include an analysis of the impacts to existing and proposed transportation facilities and services so as to minimize or avoid significant operational, environmental, economic, and health-related consequences.

C-P4. Mitigation Measures. Development with potentially significant circulation impacts as determined by CEQA review shall be conditioned to

proportionally mitigate such impacts through payment of impact fees, construction of on- and off-site improvements and dedication of rights-of-way or a combination of impact fees, improvements and dedications.

C-P5. Level of Service Criteria. The County shall strive to maintain Level of Service C operation on all roadway segments and intersections, except for U.S. Highway 101, where Level of Service D shall be acceptable. Level of Service improvements for automobiles should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible.

C-P9. Circulation Planning for Bicycles, Pedestrians and Transit. Circulation planning and project review shall include an assessment for bicycle, pedestrian and public transit access.

C-P11. Transportation Demand Management Programs. Require residential subdivisions and multifamily development that would result in fifteen or more dwelling units, and non-residential development that would employ greater than ten persons, and that require a discretionary permit, to comply with County transportation demand management programs.

C-P22. Public Transit. The County shall support the implementation of guiding goals, policies, and objectives of the Public Transit and Paratransit Service Element of the Regional Transportation Plan as amended, to the extent they are consistent with the General Plan.

C-P23. Public Transit Service. The County shall coordinate and integrate with transportation providers so that a full range of travel patterns and connectivity with other modes of transportation are provided.

- A. Existing and future public transit services should be coordinated so that service from rural areas is effectively integrated with urban service. Schedules should be designed for a smooth transfer between rural and urban buses. Convenient facilities should be made available so that transfer areas are attractive, well lit, protected from the weather and have bus information posted.
- B. Automobile and bicycle transport should be integrated with public transit by developing adequate parking facilities at major bus stops and, where feasible, by transporting bicycles on intercity and regional buses.
- C. Public transportation should support access to social services and mitigate the impacts of service changes to social service clients.

C-P28. Bicycles and Pedestrian Facilities in New Subdivisions. Bicycle and pedestrian facilities should be encouraged to connect neighborhoods. Standards for urban, suburban, rural and remote contexts shall be developed.

C-P30. Landscape Buffer Strips. The County Wide Transportation Plan shall provide landscape buffer strip standards as part of the road cross-section standards and according to the urban, suburban, rural and remote context. Landscape buffer strips should be used, where feasible, to segregate pedestrian walkways from arterial and collector roadways.

C-P31. Removal of Obstacles in Pathways. Where feasible and consistent with the County-Wide Transportation Plan, new pathways and sidewalks shall be free of obstacles such as utility poles and mailboxes. Where obstacles are unavoidable on existing sidewalks or pathways, pedestrian facilities shall be widened or otherwise designed to provide the least amount of obstruction to users.

C-P32. On-Street Parking. Design on-street parking to minimize conflicts with all users consistent with the County-Wide Transportation Plan. Where appropriate, creative on-street parking arrangements such as parking pockets or bays shall be considered to improve design flexibility.

C-P33. Design Standards for All Pathways. Design standards appropriate to urban, suburban, rural and remote character shall be used by the County Public Works Department for the design and construction of pedestrian and bicycle facilities.

C-P34. Traffic Calming. Use traffic calming measures, where feasible and appropriate, as a means of improving safety for all users. Traffic calming measures may include, but are not limited to, roundabouts, chicanes, curb extensions, and traffic circles.

C-P35. Protection of Designated Pedestrian and Bicycle Routes. New development along and adjacent to planned and designated pedestrian and bicycle routes shall consider and incorporate those routes.

McKinleyville Community Plan

Section 2350 of the Community Plan focuses on the Town Center area with the intention of incorporating a mix of land uses including multifamily housing, employment sites, parks, offices, retail, and other uses, and providing for non-motorized mobility facilities. More information about the Community Plan and its reference to the Town Center can be found in Section 3.0, Environmental Setting.

Humboldt Regional Bicycle Plan

The Humboldt Regional Bicycle Plan was developed by Humboldt County Association of Governments in 2018 to serve as a 20-year planning document for the region. The primary goal stated in the plan is to “[c]reate the safest conditions for bicyclists by providing bikeways and improving roadways to eliminate barriers to bicycle travel.” Plan priorities include conducting a feasibility analysis of bike lanes along Central Avenue from U.S. Highway 101 to Railroad Drive.

Humboldt Regional Pedestrian Plan

The 2008 Regional Pedestrian Plan is a 20-year planning document that guides future development of pedestrian infrastructure within the County. The primary goal stated in the plan is to make walking an integral transportation mode in the County (Humboldt County Association of Governments 2008). The Pedestrian Plan was developed to assist in the planning and designing of facilities, and to secure funding for the construction of pedestrian improvements and pedestrian programs in Humboldt County. Projects in the project area include sidewalks along Hiller Road to provide east-west access and facilitate pedestrian access to commercial sites along Central Avenue.

McKinleyville Multimodal Connections Project

The County and the Redwood Community Action Agency were awarded a Caltrans Sustainable Transportation Planning Grant in 2020-2021. The application was submitted in cooperation with the McKinleyville Municipal Advisory Committee. The grant program encourages local and regional planning that furthers state goals, including, but not limited to, the goals and best practices cited in the Regional Transportation Plan Guidelines adopted by the California Transportation Commission.

The County, Redwood Community Action Agency, and other stakeholders collaborated with community members, schools, social service organizations, and project partners to create the McKinleyville Multimodal Connections Project. Multimodal improvement concepts were developed to promote connectivity between the unincorporated McKinleyville area, the fastest growing community in Humboldt County, and employment, schools, and community destinations around Humboldt Bay.

The project team identified locations for enhancements to multimodal user facilities to improve travel by walking, bicycling, or using other wheeled devices with the aim to foster transportation equity for disadvantaged community members, encourage active commuting, and support greenhouse gas reduction goals.

Multimodal improvement projects were recommended for the segment of Central Avenue from School Road to Railroad Drive and for the segment of Hiller Road between McKinleyville Road and Central Avenue within the project site. For both segments, the project document notes that multimodal improvements are anticipated as part of the improvements associated with the Town Center Development. The County included multi-modal improvements as part of the Town Center project description as described in Section 4.0, Project Description.

McKinleyville Town Center Q-Zone Regulations

As described in Chapter 4.0, Project Description, the proposed project includes a mix of land uses and alternative transportation facilities (bicycle, pedestrian and transit facilities) intended in significant part to reduce reliance on vehicle travel. In addition to improving connectivity and

facilitating use of non-vehicle mobility options, the proposed project includes a “road diet” design for Central Avenue that would eliminate one travel lane in each direction, provide additional space to enhance existing bicycle facilities, and shorten crossing distances for pedestrians at intersections along the Central Avenue corridor to reduce potential vehicle-pedestrian conflicts.

Transportation related planning components in the Q-Zone regulations include the following.

- A project vision that includes developing a mix of land uses that are served by robust pedestrian, bicycle, transit facilities and provides “complete street” improvements that support both vehicular and non-vehicular modes of movement.
- Section 4 addresses connectivity requirements within and adjacent to the site. It specifies street classifications and their functions, cross-sections for improvements to Central Avenue and Hiller Road (that constitute “road diets” for these facilities and which show bicycle and pedestrian facilities as illustrated in Figures 4-3 and 4-4 of this EIR), bicycle and pedestrian facilities locations and connections (as partially illustrated in Figure 4-5 of this EIR), and transit facilities.
- Section 4.1.4 specifies that an enhanced transit facility must be constructed within the site that provides convenient access to Central Avenue. The transit center is to include loading space for multiple buses, bike lockers, and if grant or other funding is available, space for park and ride facilities. The facility must be constructed and operational before 50 percent of the development assumed for the Town Center site is constructed. Section 5.3.3 requires that walkways shall be constructed within the site to connect pedestrians to the transit facility.
- No additional drive-thru restaurants, and no large “big-box” department stores are permitted.
- There is no minimum off-street parking requirement for non-residential development within the Town Center. Where parking is desired, parking shall be in a common parking lot established and maintained through the formation of a parking district or private parking lot.

13.3 Thresholds of Significance

Significance Criteria

CEQA Guidelines Appendix G is a sample initial study checklist that includes a number of factual inquiries related to the subject of transportation, as it does on a whole series of additional environmental topics. Lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of transportation impacts, or indeed on any subject addressed in the checklist. Rather, with few exceptions, CEQA grants agencies discretion to

develop their own thresholds of significance. Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The County has done so here. Therefore, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

VMT Analysis Approach and Thresholds of Significance

Regarding assessing VMT impacts as directed in CEQA Guidelines section 15064.3, subdivision (b), Humboldt County does not currently have an adopted VMT policy that would establish VMT thresholds of significance, although a policy is currently under development. Based on consultation with County staff, the OPR Technical Advisory was used as the basis for identifying appropriate VMT thresholds of significance and using them to assess the significance of project-generated VMT. The Technical Advisory indicates that for mixed-use projects, the VMT effects of each use can be evaluated independently or only the dominant use may be evaluated. Since the proposed project would include a sizable residential, office, and commercial use development capacity, it was determined that evaluating the VMT impacts of each use would be appropriate. The analysis approach used for each use was as follows.

- Residential: Potential impacts of residential development were analyzed by measuring home-based VMT per capita, which represents the VMT associated with all home-based vehicular travel, measured in miles, divided by the population of the residential units that are generating the travel. In other words, this accounts for all trips for which one end is at a place of residence.
- Office: Employment-based uses were evaluated based on the VMT per employee for commute trips, for which one trip end is the place of employment.
- Commercial/Retail: The commercial/retail component of the project was assumed to be retail-only, as this is the use that has the highest trip generation rate and therefore results in a more conservative approach. The Technical Advisory recommends that retail projects be evaluated based on whether they result in a net increase in total VMT. Per OPR guidance, individual retail stores exceeding 50,000 square feet are considered regional-serving and may result in significant VMT impacts, whereas individual retail projects under 50,000 square feet are considered local-serving and may be presumed to have a less-than-significant VMT impact.

Per the Technical Advisory, for both residential and employment VMT, the project site values were compared with the regional average; for this analysis the countywide average was determined to be the appropriate standard, given the size, character, and location of the project site within Humboldt County and the minimal number of trips to and from the project site that would cross county lines. The use of such “efficiency metrics” for the impact assessment focuses on the miles traveled per resident or employee, not the total amount of VMT generated by the proposed residential or employment uses. The VMT impact of the project would be considered significant if the VMT per capita or VMT per employee is within 15 percent below the countywide average.

13.4 Analysis, Impacts, and Mitigation Measures

Conflicts with Bicycle, Pedestrian and Transit Programs, Plans, Ordinances, or Policies that Lead to Physical Impacts

The proposed project could result in environmental impacts if it were deemed to conflict with a plan, ordinance or policy related to circulation, and the mitigation to rectify the conflict would result in physical environmental changes with potential to create adverse impacts. The potential for the proposed project to create conflicts with plans and policies is summarized below.

Bicycle, Pedestrian and Transit Facility Planning

The proposed project would be substantially consistent with Humboldt County General Plan and McKinleyville Community Plan transportation policies. The General Plan Circulation Element includes several policies that support coordinated development of multimodal infrastructure and land use to facilitate access for all modes of transportation. Policy C-P1 focuses on developing the circulation system and considering vehicle circulation when identifying the location of land development projects. Policy C-P11 requires the inclusion of transportation demand management programs for residential and nonresidential projects to help reduce the demand for vehicle travel and, therefore, more efficiently make use of the circulation system. Policy 6 from the Community Plan references the development of alternatives to improve a pedestrian crossing across Central Avenue; while the Town Center includes pedestrian enhancements throughout the project area, the specific project land uses and sites have generally not been identified, so the location and design of pedestrian crossings have not been addressed. Generally, these policies would help the County manage the transportation demand generated by development within the Town Center, and the project therefore does not conflict with existing County policy.

With the exception of the Life Plan Humboldt project as described in Section 4.0, Project Description, the specific locations of various planned land use types within the is not known at this time. Several General Plan policies are related to project-level reviews that would occur as part of the entitlement process for future individual project proposed within the site. This includes evaluation of the connectivity of local streets (Policy C-S2), assessment of access for pedestrians, bicyclists, and transit users (Policy C-P9), provision of bicycle and pedestrian facilities in new subdivisions (Policy C-P28), removal of obstacles in pathways (Policy C-P31), and protection of planned and designated pedestrian and bicycle routes (Policy C-P35). The Q-Zone regulations require bicycle, pedestrian and transit improvements needed to reduce vehicle use. Future individual projects would be required to incorporate associated facilities.

The bicycle, pedestrian and transit improvements required within the project site would also assure project consistency with the McKinleyville Community Plan, Humboldt Regional Bicycle Plan, Humboldt Regional Pedestrian Plan, and the McKinleyville Multimodal Connections Project, and in general, would be consistent with studies and analyses intended to identify multimodal transportation needs and projects to reduce VMT, criteria air emissions, and GHGs, and to promote equitable access to multimodal forms of movement.

Give the discussion above, the project would not conflict with adopted policies, plans, or programs regarding transit, bicycle, or pedestrian facilities. Consequently, no physical impacts would occur, as no associated facilities would need to be constructed to avoid such conflicts other than those already identified as part of the project description. Impacts of constructing the planned facilities would be similar to those resulting from constructing new development projects throughout the site. Construction impacts and mitigation measures for potentially significant construction impacts are identified in the individual topic sections of this EIR.

Vehicle Miles Traveled

Future development within the project site will generate new vehicle trips. These trips will have local and regional destinations that in aggregate constitute the daily VMT for the proposed project. VMT impacts were analyzed for each of the major proposed land uses as previously described. Large projects such as the proposed project, can potentially shift travel patterns. For these types of projects, a travel demand forecasting model can be used to estimate VMT for purposes of determining the potential impacts. The Humboldt County Travel Demand Model (HCTDM) was used for this purpose. The model has a baseline year of 2015, the most current year available in the model for calculating base year regional VMT. This is the baseline against which VMT generated by the project at a 2045 buildout horizon year is to be compared to assess impact significance. The horizon year is analogous to a cumulative scenario.

The horizon or cumulative condition analysis is provided only for information. For VMT impact analyses where the threshold of significance is based on an efficiency metric (e.g., VMT/capita or VMT/employee), the California Office of Planning and Research identifies that that existing and cumulative conditions are essentially the same:

When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance (California Office of Planning and Research 2018).

The purpose of the cumulative year analysis was to illustrate that as the McKinleyville area builds out over time, with more diverse destinations available to residents, potentially in closer proximity to vehicle trip origins, that VMT could decline relative to existing conditions. However, the VMT impact significance determination in this EIR is based on the base year condition rather than the cumulative year consistent with the above-noted OPR guidance. This approach is conservative and avoids speculating on the type, timing, and location of future development that might contribute to a reduction in cumulative project VMT.

While the precise location of the transit center has not been fixed it is anticipated to either be in the existing McKinleyville Shopping Center Development or immediately behind it along the extension of Nursery Road. This location will allow it to connect to the east/west pedestrian/bicycle path that will be a component of the Town Center and will place it close to Pierson Park which will have enhanced pedestrian access across Central Avenue. The Transit Center will also be close to the Midtown Trail connection through the middle of the site in a North/South orientation.

VMT Assessment Methodology

The VMT analysis was undertaken at the buildout level for the Town Center. Future development for uses consistent with the Town Center will not require additional transportation analysis.

The HCTDM is maintained by Caltrans and is used to support regional transportation planning analysis and to evaluate the effects of roadway infrastructure and land development projects in the County. Its use to evaluate VMT impacts is consistent with the OPR Technical Advisory given that VMT effects are to be compared to existing countywide VMT (for planned residential and office uses). The model is not inherently designed to evaluate VMT impacts on a sub-county level.

The units of analysis in the model are geographic areas called transportation analysis zones (TAZs); the Town Center area is located within TAZs 191, 194, 182, and 198. Based on the intent of the project, the location of currently undeveloped land within the project site, and consultation with County staff, 90 percent of the proposed project development capacity was assigned to TAZ 191 in the center of the project area west of Central Avenue, with the remaining 10 percent assigned to TAZ 182 to the east of Central Avenue. This was based on the availability of undeveloped land, as the project would not increase the intensity of development on already developed sites. The specific locations of future individual development projects within the site would not impact trip generation, and given the scale of the project, would not have a substantial effect on trip lengths.

VMT Impact – Residential and Office Uses

IMPACT 13-1	Conflict with CEQA Guidelines Section 15064.3 by Exceeding the Applicable Threshold for Residential and Office Use VMT	Less than Significant
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The baseline VMT for the project site, shown in [Table 13-2, Demographics and Baseline VMT Conditions 2015](#), was evaluated for all project area TAZs. Existing VMT per capita and VMT per employee are substantially below the countywide averages for those metrics. Given the largely rural character of Humboldt County, this result would be expected, since the project location and overall density is higher than more rural locations, and the proximity of the project site to major population centers would allow for shorter trip lengths.

Table 13-2 Demographics and Baseline VMT Conditions 2015

	Population	Jobs	Home-Based VMT	Work-Based VMT	VMT per Capita (Residential Use)	VMT per Employee (Office Use)
Project TAZs	1,070	465	8,979	1,756	8.4	3.8
Humboldt County	131,283	49,825	2,193,552	714,193	16.7	14.3

SOURCE: Humboldt County Travel Demand Model - Elite Transportation Group, 2024

Applying the guidance from the OPR Technical Advisory to determine VMT thresholds of significance, with a baseline countywide VMT of 16.7 per capita, the threshold of significance for residential uses was determined to be 15 percent below this level or 14.2 per capita. Analysis using the HCTDM determined that the VMT per capita for the project site residential uses would be 3.3, which is 77 percent below the countywide average.

The countywide VMT per employee was determined to be 14.3, resulting in a significance threshold for office development of 12.2 VMT per employee, also 15 percent below the existing VMT. Based on the model run, the VMT per employee for the project would be 2.2, or 82 percent lower than the countywide average.

These results are summarized in [Table 13-3, Residential and Office VMT Metrics of Project Compared to Baseline](#).

Table 13-3 Residential and Office VMT Metrics of Project Compared to Baseline

	Population	Jobs	Home-Based VMT	Work-Based VMT	VMT per Capita (Residential Use)	VMT per Employee (Office Use)
Project VMT	6,122	3,435	20,006	7,434	3.3	2.2
Humboldt County (2015)	131,283	49,825	2,193,552	714,193	16.7	14.3
Threshold of Significance					14.2	12.2

SOURCE: Humboldt County Travel Demand Model, W-Trans, Elite Transportation Group, 2024

VMT Impact – Retail/Commercial Uses

IMPACT 13-2	Conflict with CEQA Guidelines Section 15064.3 by Exceeding the Applicable Threshold for Retail Use VMT	Less than Significant
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The project also includes 632,800 square feet of retail/commercial. To provide a more conservative VMT analysis, this development was assumed to be retail, since retail uses generate more trips than comparably sized other types of commercial uses, as it includes employee trips, customer trips, and deliveries.

The OPR Technical Advisory indicates that individual retail developments exceeding 50,000 square feet of floor area may be considered regional retail projects that are likely to attract trips from the broader region, potentially resulting in significant VMT impacts. Individual retail stores/establishments of 50,000 square feet or less are generally assumed to be local-serving and can be presumed to cause less-than-significant VMT impacts, since by providing more retail options they tend to more efficiently redistribute existing trips rather than generate new ones.

Policy 4 from the McKinleyville Community Plan is relevant to this analysis:

4. The Town Center Area shall have no additional drive-thru restaurants, and no large “big-box” department stores, as defined. Rather, the department stores should be divided into several separate rooms or buildings to avoid the look of the giant retail, department store.

The definition of “big-box” stores in the Community Plan reads as follows:

"big-box" Department Store

A large - usually in excess of one acre floor area - commercial structure where, under one proprietor or a set of discrete franchises, retail sales and services are offered in a centralized, warehouse-like setting intended to serve a regional area. Due to their large area requirements compared to the more traditional pattern of decentralized specialty shops, this class of development can have adverse effects (i.e., traffic, lighting, and stormwater runoff from expansive parking areas; visual resource impacts from structural bulk) if not appropriately sited and mitigated.

Big box stores commonly exceed 50,000 square feet and typically are intended to serve a regional market. However, in the project context, the County clearly intends that retail uses designed to serve a regional area not be permitted within the project site, in large part due to their adverse environment effects, including traffic (and by extension, VMT). Consequently, it is unlikely that individual future retail uses with a regional market would be permitted within the site, regardless of whether or not they exceed 50,000 square feet. As a result, the retail VMT impact of the project would be less than significant, as all future uses would be considered local-serving. Should a future project applicant propose a retail use with an intended regional market, the County would likely find it to be inconsistent with the Community Plan and associated Town Center policies. A General Plan amendment would likely be required to consider such a project. The amendment would be a discretionary action that triggers additional CEQA review, wherein the impacts of the specific project, including its VMT impacts, would be evaluated.

Life Plan Humboldt

The Life Plan Humboldt project is considered to be a commercial use. The planned building square footage and associated potential employment generation for the project were included as inputs to the VMT modeling analysis conducted for the project as a whole. Consequently, its VMT effects are addressed as part of the retail/commercial VMT analysis presented above.

Unmodeled VMT Benefits of Proposed Multimodal Facilities

As previously discussed, the project includes several elements that would promote reduced VMT. The proposed separated bike lanes along Central Avenue and Hiller Road and the connection of the north/south Midtown trail through the center of the site and the east/west

pedestrian/bicycle trail with proximity to the proposed transit center will provide viable alternative modes of transportation to normal vehicle trips. The incentive for alternative forms of transportation is enhanced considering that there is no minimum parking requirement. The Town Center is designed to be a location convenient to pedestrian and bicycle trips. This would include convenient access to the transit center which will provide bus access to other locations within the community and county. The Central Avenue road diet would add a buffer and a protective barrier to the existing bike lanes, establishing separated bikeways through the project site. The road diet would also reduce the number of vehicle lanes pedestrians would need to cross, promoting a more pedestrian-oriented environment. The pedestrian environment would be further bolstered by eliminating sidewalk gaps along Hiller Road and Railroad Drive. As stated previously, the HCTDM is not sensitive to development design features that would reduce VMT. Consequently, the VMT reduction benefits of the project design features are not captured in the quantified VMT results presented above; the results are considered to be conservative.

Refer to Section 5.0, Air Quality, for a quantification of VMT reductions accruing to project design features and to mitigation measures that would reduce VMT for the purpose of reducing criteria air emissions from the project.

Design Features/Circulation Safety Impacts

IMPACT 13-3	Create Circulation Hazards or Insufficient Emergency Access that Triggers the Need for Physical Improvements	Less than Significant
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Creation of Circulation Hazards

While the designs of future individual development projects within the project site are generally not known at this time, vehicular access is anticipated to occur along existing streets. New roads are not envisioned within the Town Center as the focus is on enhanced pedestrian and bicycle circulation. The one exception is that Nursery Way will be extended through the Life Plan Humboldt Development to Hiller Road. The design of this road and future driveways and access points, will undergo review for compliance with safety and design standards by the County of Humboldt prior to issuance of any permits. During such reviews, routine assessments include potential need for traffic control or turn lane improvements to maintain safety, potential for vehicle queueing conditions that could lead to safety concerns, and safety issues related to site accessibility for pedestrians, bicyclists, and transit users. Any new transportation facilities would need to be designed and constructed to uniformly applied local, regional, and federal standards, and as such, the proposed project would not be expected to include hazardous circulation design features.

Future individual development projects within the site would be subject to review under the County's standard building permit review process. Plans for internal circulation, connection to the public road network, and improvements needed on the public road network would be evaluated at that time. Through this process, the County would ensure that individual projects would not substantially increase transportation hazards. Potential impacts associated with circulation hazards would be less than significant.

Emergency Access

Emergency access is a standard component of the building permit process. When individual projects are submitted for permit issuance, each project would be required to meet uniformly applied County standards and requirements. Conformance with Safety, Fire, and Building Codes would be required. Proposed development projects that do not meet required standards and codes would not be permitted.

Traffic generated by the project could affect emergency response vehicle functions during peak commute hours. However, responders are trained to manage congested conditions by employing tactics such as using sirens, making use of turn lanes and shoulders to bypass stopped traffic, and utilizing alternate routes to bypass congestion and minimize response times. California law also requires drivers to yield the right-of-way to emergency vehicles and remain stopped until emergency vehicles pass. Concern has been expressed with modifications to Central Avenue relative to emergency access and for flexibility when work is being done within the street. To accommodate this the street is being designed to have two through lanes and a center turn lane. This design will provide flexibility for emergency access along Central Avenue and provide sufficient flexibility for work on underground utility infrastructure.

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