

3.11 TRANSPORTATION

This section identifies applicable regulatory requirements related to transportation and describes the existing transportation system within and in the vicinity of the project site. The transportation impact analysis presented in this chapter, identifies the environmental effects resulting from implementation of the project and, if necessary, mitigation measures are set forth to reduce significant transportation impacts. Consistent with CEQA Guidelines, impacts associated with bicycle, pedestrian, and transit facilities; the generation of vehicle miles traveled (VMT); transportation hazards; and emergency access are evaluated as part of this analysis.

The analysis within this section is based on the analysis and findings of the *Cal Poly Humboldt Craftsman Mall Student Housing Project CEQA Transportation Analysis Memorandum* (Transportation Analysis Memo) prepared by Fehr & Peers in September 2022, which evaluates the environmental effects of the proposed project based on the applicable CEQA significance thresholds. The Transportation Analysis Memo is included as Appendix E and provides additional detailed data, modeling, and information related to the transportation analysis.

Comments received regarding transportation in response to the NOP included concerns related to VMT impacts, bicycle parking, circulation, increased pedestrian travel, increased traffic and parking demand, and pedestrian and bicycle safety. Because a project's effects on automobile delay no longer constitutes a significant impact under CEQA, comments related to automobile delay (e.g., level of service [LOS], congestion) are not addressed herein.

3.11.1 Regulatory Setting

FEDERAL

There are no federal laws or regulations addressing transportation and circulation that are relevant to the project.

STATE

California Department of Transportation

The California Department of Transportation (Caltrans) is the state agency responsible for the design, construction, maintenance, and operation of the California State Highway System, as well as the segments of the Interstate Highway System that lie within California. Caltrans District 1 is responsible for the operation and maintenance of US Highway (US) 101 in the vicinity of the project site. Caltrans requires a transportation permit for any transport of heavy construction equipment or materials that necessitates the use of oversized vehicles on state highways.

The Caltrans Transportation Impact Study Guide (TISG) was prepared to provide guidance to Caltrans Districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans review of a land use project or plan's transportation analysis using a VMT metric. This guidance is not binding on public agencies, and it is intended to be a reference and informational document. The TISG replaces the Guide for the Preparation of Traffic Impact Studies and is for use with local land use projects, not for transportation projects on the State Highway System (Caltrans 2020).

California Fire Code

The 2019 California Fire Code, which is codified at Part 9 of Title 24 of the CCR, incorporates by adoption the 2018 International Fire Code and contains regulations related to construction, maintenance, access, and use of buildings. Topics addressed in the California Fire Code include fire department access (especially circulation and width of on-site roadways), fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety. The

California Building Standards Code, including the California Fire Code, is revised and published every 3 years by the California Building Standards Commission.

California Manual on Uniform Traffic Control Devices, Part 6: Temporary Traffic Control

The California Manual on Uniform Traffic Control Devices, Part 6: Temporary Traffic Control provides principles and guidance for the implementation of temporary traffic control (TTC) to ensure the provision of reasonably safe and effective movement of all roadway users (e.g., motorists, bicyclists, pedestrians) through or around TTC zones while reasonably protecting road users, workers, responders to traffic incidents, and equipment. Additionally, this document notes TTC plans and devices shall be the responsibility of the authority of a public body or official having jurisdiction for guiding road users.

Senate Bill 743

Senate Bill (SB) 743, passed in 2013, required the California Governor's Office of Planning and Research (OPR) to develop a new guideline addressing transportation metrics under CEQA. Enacted as part of SB 743 (2013), Public Resources Code (PRC) section 21099, subdivision (b)(1), directed the OPR to prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed CEQA Guidelines addressing "criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, [OPR] shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

Subdivision (b)(2) of PRC section 21099 further provides that "[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion *shall not be considered a significant impact on the environment* pursuant to [CEQA], except in locations specifically identified in the guidelines, if any." (*emphasis added*)

OPR published its proposal for the comprehensive updates to the CEQA Guidelines in November 2017 which included proposed updates related to analyzing transportation impacts pursuant to SB 743. The updated CEQA Guidelines were adopted on December 28, 2018; and according to the new CEQA Guidelines Section 15064.3, VMT replaced congestion as the metric for determining transportation impacts. The guidelines state that "lead agencies may elect to be governed by these provisions of this section immediately. Beginning July 1, 2020, the provisions of this section shall apply statewide."

To provide guidance to agencies implementing the new CEQA requirements, OPR published the Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR Technical Advisory) in December 2018. The OPR Technical Advisory describes considerations agencies may use in selecting VMT metrics, calculation methodologies, and significance thresholds. The OPR Technical Advisory does not mandate the use of specific metrics, methodologies or significance thresholds, because agencies have discretion to select those that are appropriate for the local land use and transportation context (OPR 2018).

The OPR Technical Advisory also provides guidance on impacts to transit. Specifically, the OPR Technical Advisory suggests that lead agencies generally should not treat the addition of new transit users as an adverse impact. As an example, the OPR Technical Advisory suggests the following:

[An] infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network.

CALIFORNIA STATE UNIVERSITY

California State University Transportation Impact Study Manual

The California State University (CSU) Transportation Impact Study Manual (TISM) (CSU 2019) provides guidance for addressing transportation-related impacts for projects on CSU campuses, including all lands owned by CSU,

consistent with the SB 743 and the CEQA Guidelines update. The TISM includes guidance for analyzing transportation impacts (including VMT), applicable significance thresholds, and recommended mitigation measures. The TISM recommends the following thresholds of significance:

- ▶ **Plan Conflict:** The project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.
- ▶ **VMT Impacts**
 - **Project Level:** For projects that do not meet any of the VMT screening criteria described within the CSU TISM, which includes projects that generate no or few trips and are not anticipated to increase VMT per capita, analysis is required to determine whether the project would result in VMT per resident in excess of 15 percent below the existing regional, sub-regional, or citywide VMT per resident. VMT trip purposes for student, faculty, and staff housing are defined as Home-Based Work (Production & Attraction) + Home-Based Other (Production & Attraction).
 - **Cumulative:** The CSU TISM also requires evaluation of whether the project would result in an increase or decrease in the regional, sub-regional, or citywide VMT per capita, to determine whether the project would result significant cumulative impacts. Accordingly, the CSU TISM recommends the evaluation of the VMT per resident under the “with project” condition to determine whether VMT would be in excess of the Citywide, regional, or sub-regional VMT/Service Population identified under the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) condition.
- ▶ **Hazard Impact:** The project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- ▶ **Emergency Access Impact:** The project would result in inadequate emergency access.

California State University Sustainability Policy

The CSU Sustainability Policy (CSU 2014) aims to reduce the CSU’s impact on the environment; educate students, faculty, and staff on sustainable practices; and incorporate sustainability principles and climate science in the CSU’s educational offerings. The policy contains the following statement related to transportation and the associated reduction of greenhouse gas (GHG) emissions:

- ▶ The CSU will encourage and promote the use of alternative transportation and/or alternative fuels to reduce GHG emissions related to university associated transportation, including commuter and business travel.

California State University Transportation Demand Management Manual

The CSU Transportation Demand Management (TDM) Manual (Nelson Nygaard 2012) addresses the unique transportation needs of different campuses and provide a system-wide framework for implementing sustainable transportation programs. The manual contains a set of goals, criteria, and best practices that encourage students, faculty, and staff to commute to and from campus via bus/rail transit, carpools, vanpools, bicycling, and walking to lessen reliance upon single-occupant vehicle (SOV) travel and reduce vehicle trips to campuses.

The manual establishes the following goals and objectives:

GOAL 1: Encourage the Use of Non-Auto Modes

- ▶ **Objective 1A:** Develop TDM programs that are effective, scalable, and sustainable over time.
- ▶ **Objective 1B:** Monitor key criteria to ensure the effectiveness of TDM programs.
- ▶ **Objective 1C:** Enhance the pedestrian, cyclist, and transit user experience.
- ▶ **Objective 1D:** Enhance safety for pedestrians and cyclists.
- ▶ **Objective 1E:** Increase dialogue and communication among campus departments and establish a forum for ongoing coordination and policy development to strengthen a campus’s capacity to design and deliver effective TDM strategies in a coordinated manner.

- ▶ **Objective 1F:** Provide effective transportation alternatives to driving alone.
- ▶ **Objective 1G:** Provide sufficient on-campus or nearby housing and basic commercial needs to encourage walking and biking.
- ▶ **Objective 1H:** Effectively market all TDM programs.

GOAL 2: Maintain Financially Sustainability

- ▶ **Objective 2A:** Develop TDM programs that are financially sustainable over time.
- ▶ **Objective 2B:** Implement the most cost-effective blend of parking & TDM investments to accommodate affiliate needs.

GOAL 3: Ensure Equitable Access

- ▶ **Objective 3A:** Provide transportation opportunities for all students.
- ▶ **Objective 3B:** Encourage the use of non-SOV modes through financial incentives.

GOAL 4: Preserve Valuable Campus Lane

- ▶ **Objective 4A:** Ensure that campus land is treated as a commodity to help meet future needs.
- ▶ **Objective 4B:** Reduce off-site infrastructure needs.

GOAL 5: Promote Environmental Sustainability

- ▶ **Objective 5A:** Support system-wide sustainability goals set forth in California State University Executive Order 987, adopted in August 2006.
- ▶ **Objective 5B:** Encourage the use of non-SOV modes for both internal and external trips to and from campus.
- ▶ **Objective 5C:** Measure the environmental impacts of transportation investments.

GOAL 6: Build Partnerships with the Local Community and Private and Institutional Actors

- ▶ **Objective 6A:** Increase the level of engagement and partnership with regional agencies and regional transit providers.
- ▶ **Objective 6B:** Enhance collaboration between the university and public and private sectors.
- ▶ **Objective 6C:** Develop and test new ways of engaging and partnering with public and private institutional actors.
- ▶ **Objective 6D:** Ensure quality multi-modal campus connections between on-campus and off-campus pedestrian, bicycle, and transit routes.

Cal Poly Humboldt Climate Action Plan 2.0

The Cal Poly Humboldt Climate Action Plan (CAP 2.0) was developed to reduce GHG emissions from Cal Poly Humboldt's operations and to further integrate sustainability into academics, research, and campus culture (Cal Poly Humboldt 2021). The CAP 2.0 provides a roadmap to meet Cal Poly Humboldt's goal of achieving carbon neutrality no later than 2045, in alignment with the SU Sustainability Policy and the California Governor's Executive Order B-55-18. It combines reduction strategies with efforts to sequester carbon and offset GHG emissions, including actions to foster the integration of sustainability and climate action into all facets of Cal Poly Humboldt, including Transportation (TRA) goals and strategies. The following strategies and policies are relevant to the project:

TRA GOAL 1: Reduce commute emissions 50% below 2015 levels by 2030, and to zero by 2045

- ▶ Strategy 1.1: Develop and implement a Transportation Demand Management (TDM) Plan
- ▶ Strategy 1.3: Improve walkability and bikeability of campus and area surrounding campus

LOCAL

Cal Poly Humboldt is part of the CSU, which is a statutorily and legislatively created, constitutionally authorized State entity. As explained in the “California State University Autonomy” section in Chapter 3 of this EIR, the CSU is not subject to local government planning and land use plans, policies, or regulations. Nevertheless, in the exercise of its discretion, Cal Poly Humboldt does reference, describe, and address local plans, policies, and regulations where appropriate and for informational purposes. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project’s consistency with local plans, policies, and regulations.

Humboldt County Association of Governments Regional Transportation Plan

Humboldt County Association of Governments (HCAOG) adopted the 2022-2042 RTP, also known as Variety in Rural Options of Mobility (VROOM), in January 2022 (HCACOG 2022). The policies in the RTP VROOM serve to guide the development of a sustainable transportation landscape in the Humboldt region. The following policies are relevant to the project:

- ▶ **Policy Land-1: Reduce driving.** HCAOG encourages and supports land use planning and projects that accommodate reducing driving, such as through infill development, pedestrian friendly streets, bicycle infrastructure, and transit-oriented development. HCAOG staff will provide information on transit-oriented development, as requested. HCAOG encourages member and committee agencies to engage transit operators when planning or reviewing new developments.
- ▶ **Policy Land-8: Integrated long-range planning.** Support local communities in developing integrated transportation and land use strategies for responding resiliently to climate change, and codifying such strategies in General Plans, Regional Transportation Plans, Local Coastal Programs, and Climate Action Plans. HCAOG will review proposed development projects in member jurisdictions and provide feedback on the projects’ impacts on regional efforts to meet adopted targets for greenhouse gas emission reductions, VMT, mode shift, traffic safety, and zero emission vehicles.
- ▶ **Policy Streets-1: Multi-modal safety & functionality.** HCAOG shall encourage and facilitate local jurisdictions, local Native American Tribes, Caltrans, and non-profits to individually and collaboratively plan, design, install, and maintain roads in Humboldt County to build a transportation system that emphasizes safety over speed, and emphasizes multi modal functionality over convenience for single-occupancy automobiles.
- ▶ **Policy Streets-11: Vision Zero.** HCAOG adopts the Vision Zero commitment to support policy, strategies, and roadway design standards that have been shown to be most effective in improving safety, with the goal of eliminating all traffic fatalities and severe injuries in Humboldt, while increasing safe, healthy, equitable mobility for all users.

City of Arcata General Plan

The Transportation Element of the *Arcata General Plan* (City of Arcata 2008) includes goals and policies that address the transportation and circulation system and serves as a blueprint for growth and development in the City of Arcata. The following policies from the Transportation Element are relevant to analysis of the project.

- ▶ **Policy T-2a: Land use development patterns.** The City encourages and supports travel demand management efforts. The City shall promote land use and development patterns that encourage walking, bicycling and transit use. In recognition of the link between land use and transportation, the land use plan shall discourage low density, homogenous land-use patterns that foster automobile travel and are impractical to serve with transit. Land use planning shall emphasize high density and mixed land use patterns which translate into higher transit and pedestrian travel in the downtown and neighborhood commercial areas. Infill, redevelopment, and reuse of underutilized property at higher densities shall be encouraged prior to outward expansion of City boundaries. The following land use measures are emphasized:
 1. Mixed-use neighborhood centers within transit corridors which include housing and commercial services near employment.

2. Land use patterns which maximize linking trip opportunities by assembling uses, thus allowing people to take care of a variety of daily needs with a single trip.
 3. Clustering of higher density housing and incorporation of residential apartments on upper floors of buildings in the downtown area.
 4. Integration of new housing into neighborhood shopping centers, including Sunny Brae, Westwood, and Valley West.
 5. Pedestrian-oriented land use and urban design, including the following elements:
 - a. Pedestrian-scale block patterns.
 - b. Incorporate pedestrian and bicycle amenities into public and private projects.
 - c. Design streets for multi-modal use.
 - d. Integrate transit stop facilities into public and private projects.
 - e. Orient buildings and houses to street.
 - f. Provide attractively landscaped streets and buffers.
 - g. Preserve existing and historic urban fabric.
 - h. Eliminate blank wall facades.
 - i. Incorporate bicycle routes and enhancements in public and private projects.
 6. A fixed urban services boundary to reduce sprawl and infrastructure costs.
 7. Focused growth along existing or planned transit corridors rather than extension of transit to serve new isolated development.
 8. Prevention of large areas of single uses. Isolated single-use developments at the edge of the City could encourage automobile travel for commuting and errands.
 9. Provision of convenience retail and services in ground floor space in the downtown to accommodate the needs of employees and reduce the need for mid-day automobile trips.
- **Policy T-5: Bicycle and Pedestrian Facilities.** Create a complete, interconnected bicycle and pedestrian circulation system. Increase the percentages of person trips via walking and bicycling. Provide a pedestrian and bicycle system which serves commuter as well as recreational travel.
- **Policy T-8a: Developer responsibilities and exactions.** Developers shall be required to construct transportation improvements along their property frontages. Where appropriate, a traffic impact study shall be required which identifies on-site and off-site impacts and mitigation measures.

The developer shall be required to provide all necessary access and circulation facilities within the property and such facilities shall be designed to meet City standards. The following improvements may be required:

- If development is located on an existing street:
- dedication of right of way;
- widening of street along property frontage to provide for a travel lane;
- bicycle lane and parking lane;
- reconstruction of curb, gutter and sidewalk;
- transit facilities and landscaping within the right of way.

- If development is located in a new growth area not served by streets: a. dedication of right of way to construct a street to connect the project site to a public street; b. construction of the street and connecting intersection(s) to City standards; c. after the dedication is accepted, the City will maintain the street.
- In all instances, the developer shall be responsible for mitigating any off-site traffic impacts of the proposed development in a manner consistent with the policies of this plan. Measures may include a reduction in the size or density of the development; installation of pedestrian, bicycle and transit amenities to encourage alternative travel modes; or implementation of Transportation Demand Management measures.

City of Arcata Pedestrian and Bicycle Master Plan

The City of Arcata adopted the Pedestrian and Bicycle Master Plan in 2010. The Pedestrian and Bicycle Master Plan is a tool for helping the City achieve its vision of making Arcata “a place where walking and bicycling are the preferred modes of travel, where half the trips within the city are by walking or bicycling” (City of Arcata 2010). The Master Plan evaluates existing conditions and the needs of pedestrians and bicyclists in Arcata, and identifies a citywide system of improvements and implementation strategies for improving walking and bicycling facilities.

3.11.2 Environmental Setting

ROADWAY SYSTEM

Roadways classifications within the city include freeways and highways, arterials, minor arterials, collectors, local, and rural streets. The following roadways provide access to project site:

- ▶ **US 101**, also known as Redwood Highway in the vicinity of the project site, runs through the states of California, Oregon, and Washington connecting the City of Los Angeles in the south to the City of Tumwater in the north. In the vicinity of the project site, US 101 is a bidirectional north/south freeway with two lanes provided for each direction of travel. The posted speed limit is 65 miles per hour (mph).
- ▶ **L.K. Wood Boulevard** is a north/south bidirectional two-lane roadway located east of the project site and US 101. L.K. Wood Boulevard provides access to St. Louis Road via the US 101 overcrossing. Class II bicycle lanes exist on L.K. Wood Boulevard. Sidewalks are present on the east side of the roadway.
- ▶ **St. Louis Road** is a north-south local street with one travel lane in each direction, traveling from Spear Avenue/West End Road in the north to a cul-de-sac at the project site. St. Louis Road also provides access to the US 101 overcrossing to L.K. Wood Boulevard. The posted speed limit along St. Louis Road is 25 mph. Sidewalks are present on the at least one side of the roadway north of the US 101 overcrossing. Class II bike lanes are provided on both sides of the roadway from the US 101 overcrossing to Spear Avenue/West End Road.
- ▶ **Eye Street** is primarily a north-south residential roadway with one travel lane in each direction ranging from Jay Street in the south and terminating at the project site in the north. The speed limit along Eye Street is, *prima facie*, 25 mph. Sidewalks are present on a 350-foot segment starting at Jay Street. No other sidewalks are present. There are no designated bicycle facilities along Eye Street.

TRANSIT SYSTEM

The Arcata & Mad River Transit System (A&MRTS) provides fixed-route transit service within the City of Arcata. The nearest public transit stop is located approximately 0.25 mile away from the project site on L.K. Wood Boulevard, which is served by the A&MRTS Gold Route and Red Route. The Gold Route serves Downtown Arcata, Cal Poly Humboldt, Valley West Shopping Center, and Alliance Road. The Red Route serves Downtown Arcata, Greenview Market, Arcata Community Center, Sunny Brae, Cal Poly Humboldt, and L.K. Wood Blvd. The Gold and Red Routes operate Monday through Friday from 7:00 a.m. to 5:00 p.m. with 1-hour headways.

Additionally, Humboldt Dial-a-Ride paratransit service, origin-to-destination shared-ride transportation, is available for those who are unable to independently use the transit system. Humboldt Dial-a-Ride services are available on a prearranged basis for any trip purpose within the designated service areas.

BICYCLE AND PEDESTRIAN NETWORK

The bicycle and pedestrian transportation system in the City of Arcata is composed of bikeways and trails. The Pedestrian and Bicycle Master Plan classifies bicycle facilities into the following three categories:

- ▶ **Class I:** Class I bikeways are typically called “bike paths” or “shared-use paths.” They provide a paved right-of-way completely separated from nearby streets or highways, designated for the exclusive use of bicycles and pedestrians. Minimum recommended widths range from 8’ to 12’, depending on anticipated usage. A minimum 2’-wide graded area is required adjacent to the path, clear of trees, poles, guardrails, etc.
- ▶ **Class II:** Often referred to as a “bike lane,” a Class II bikeway is a restricted right-of-way on a street or highway that is designated for the exclusive or semi-exclusive use of bicycles. Bike lanes have pavement striping and stencils, and signage. Bike lane widths are based on parking and street conditions.
- ▶ **Class III:** Usually referred to as “bike routes,” Class III bikeways are facilities shared with motorists or pedestrians but which provide—through signage, pavement markings, design, and/or connection to other facilities—advantages to bicyclists not available on other roadways. Bicycle boulevards are a type of Class III facility that have design features that give preference to bicyclists. There are no recommended minimum widths for Class III facilities.

As of 2010, the City of Arcata had 12 miles of designated bike lanes (Class II) along 22 percent of the City’s 62 miles of roadways (City of Arcata 2010: 5-7). The following bicycle facilities are present in the vicinity of the project site:

- ▶ **US 101:** No bicycle or pedestrian facilities are present on US 101; however, unique to Humboldt County is bicycle access on all State Routes, including the eight-foot-wide shoulders of US 101, which is part of the Pacific Coast Bike Route (City of Arcata 2010: 5-9).
- ▶ **L.K. Wood Boulevard:** Class II bicycle lanes exist on both sides of L.K. Wood Boulevard. Sidewalks are present on the east side of the roadway.
- ▶ **St. Louis Road:** Sidewalks are present on the at least one side of the roadway north of the US 101 overcrossing. Class II bike lanes are provided on both sides of the roadway from the US 101 overcrossing to Spear Avenue/West End Road.
- ▶ **Eye Street:** Sidewalks are present on a 350-foot segment starting at Jay Street. No other sidewalks are present. There are no designated bicycle facilities along Eye Street.

3.11.3 Environmental Impacts and Mitigation Measures

This section describes the analysis techniques, assumptions, thresholds, and results used to identify potential significant impacts of the project on the transportation system. Transportation impacts are described and assessed, and mitigation measures are recommended for impacts identified as significant or potentially significant.

VMT METHODOLOGY

State CEQA Guidelines Section 15064.3 was added December 28, 2018, to address the determination of significance for transportation impacts. The new guideline requires that the analysis is based on VMT instead of congestion (such as LOS). The change in the focus of transportation analysis is the result of legislation (SB 743) and is intended to shift the emphasis from congestion to, among other things, reducing GHG emissions, promoting a diversity of land uses, and developing multimodal transportation networks. Pursuant to CEQA Guidelines Section

15064.3(c), this change in analysis was mandated for use beginning July 1, 2020. Therefore, VMT is the analytical methodology employed to evaluate the impacts of vehicular trip generation in this Draft EIR.

CSU has developed and adopted VMT guidelines and thresholds (i.e., CSU TISM) to meet the State requirements set by SB 743 and to address CEQA Guidelines Section 15064.3. Therefore, the VMT analysis here-in primarily relies on the guidance provided in the CSU TISM and CEQA Guidelines Section 15064.3.

As previously described, Fehr & Peers prepared the project Transportation Analysis Memo analyzing potential impacts to the transportation system. See Appendix E for a detailed description of the methodology used in the Transportation Analysis Memo. The methodology for VMT analysis uses the following thresholds to determine significance of the project's VMT per capita for residential projects:

- ▶ Project-level impacts: The project would result in a significant impact related to VMT if the project VMT per resident exceeds a threshold of 15 percent below existing regional, sub-regional, or citywide VMT per resident.
- ▶ Cumulative impacts: VMT per resident under the "with project" condition exceeds the regional, sub-regional, or citywide VMT per resident identified under the RTP/SCS condition.

The recommended VMT significance criteria included in the OPR Technical Advisory are based on statewide GHG reduction targets, which are defined at the Metropolitan Planning Organization (MPO) level. Although the Humboldt County Association of Governments is a Regional Transportation Planning Agency, and not an MPO, the entirety of Humboldt County represents a logical boundary for the evaluation of VMT impacts based on the methodology used by OPR to develop the thresholds identified in the OPR Technical Advisory. The OPR Technical Advisory also notes that the VMT calculation itself should not be arbitrarily truncated at political boundaries (i.e., an arbitrarily defined sub-area boundary), and thus using a Humboldt County-wide geography represents a good faith effort at the full accounting of the VMT effects of the project. This County-wide analysis also represents the extents of the Humboldt County travel demand model.

In addition to the methodological reasoning for the selection of a Humboldt County-wide benchmark for VMT, student housing location data from Cal Poly Humboldt, location-based services "Big Data" regarding Cal Poly Humboldt-related trips, and data from the Humboldt County Association of Governments Travel Model (HCAOG Travel Model) indicate that there is a substantial regional student housing component consisting of students living off-campus and outside of the City of Arcata. Because the project does not propose to increase student enrollment, it is reasonable to assume that the net effect of the project would be that students who would otherwise be living outside of the City of Arcata would move closer to campus. Therefore, a regional basis (i.e., a Humboldt County-wide basis) is the most reasonable for evaluating the effect of the project. Therefore, the Humboldt County-wide average was used as the basis for the assessment of project-generated VMT impacts.

THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are based on Appendix G of the State CEQA Guidelines, the CSU TISM, and the OPR Technical Advisory. A transportation-related impact would be significant if implementation of the project would:

- ▶ conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, or 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.

A VMT impact would be significant if implementation of the project would:

- ▶ result in project-generated VMT per resident that exceeds 16.4 (i.e., 15 percent below countywide VMT per resident [19.3]) under existing plus project conditions.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.11-1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle and Pedestrian Facilities

The project would not interfere with the implementation of a planned facility, including transit, roadway, bicycle, and pedestrian facilities. However, due to the current lack of pedestrian facilities along the portion of St. Louis Road, the project could increase the potential for bicycle- and pedestrian-vehicle conflicts. As such, the project would conflict with CSU policies that promote the use of bicycling and walking travel to and from campus. Therefore, this impact would be **significant**.

Bicycle and Pedestrian Facilities

As detailed in Chapter 2, "Project Description," the project would include the construction of interconnected pedestrian and bicycle paths throughout the development to direct student residents to the US 101 overcrossing or the City's planned Annie & Mary Rail Trail project east of the project site. Additionally, the project would provide covered bicycle parking near building entrances. The project, as proposed, would not modify existing off-site bicycle or pedestrian facilities; and thus, would not conflict with existing bicycle or pedestrian facilities nor interfere with the implementation of any of the planned bicycle or pedestrian facilities in the vicinity of the project site.

The project may increase bicycle and pedestrian travel activity within the project site, between the project site and nearby destinations including the Cal Poly Humboldt campus. Internal bicycle and pedestrian facilities proposed by the project would accommodate increases in bicycle and pedestrian travel within the project site. However, the project would also increase vehicle travel activity on the roadway network in the vicinity of the project site, particularly on St. Louis Road, the US 101 overpass, and L.K. Wood Boulevard. Currently, the project does not include any planned pedestrian connections to the L.K. Wood Boulevard/US 101 overcrossing to the north of the project site via St. Louis Road, and thus, would not provide pedestrian facilities connecting to the area's existing circulation system. The project would connect directly to the planned Annie & Mary Rail Trail, which will be located along the project site's eastern boundary and is anticipated to be completed in 2024.

In locations with bicycle and or pedestrian network gaps, project-generated bicyclists and pedestrians would physically mix with higher speeds and volumes of vehicle traffic, including additional vehicle traffic that would be generated by the project. In such instances, the project would increase the potential for bicycle- and pedestrian-vehicle conflicts, which would conflict with CSU policies that promote the use of alternative modes of transportation for travel to and from campus, including those identified in the CSU Sustainability Policy, the CSU TDM Manual, and Cal Poly Humboldt CAP 2.0. As a result, this impact would be considered significant.

Transit Services

As discussed above in the Environmental Setting section, A&MRTS provides fixed route bus service in the project area, served by the Gold and Red Route which both have stops on L.K. Wood Boulevard and Ridge Road. Local and regional plans do not identify any future planned or programmed transit improvements in the vicinity of the project site. Although the project would be expected to generate an increase in demand for transit ridership in the area, it is anticipated that the existing transit services would adequately accommodate any increase in demand. Additionally, as detailed in the Regulatory Setting section, above, the OPR Technical Advisory suggests that lead agencies generally should not treat the addition of new transit users as an adverse impact because infill development improves proximity and accessibility as well as improves regional vehicle flow by adding less vehicle travel onto the regional network.

Cal Poly Humboldt would continue to work with the Humboldt Transit Authority to address its transit needs (Fehr & Peers 2022: 8). Furthermore, the project would not conflict with existing transit stops east of the project.

Local and regional plans do not include transit improvements in the project area, and the project is not expected to generate a substantial increase in transit ridership. Additionally, the project would not alter any existing transit stops in the vicinity of the project site. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing transit services. Thus, the impact on transit services would be less than significant.

Summary

The project would not physically disrupt an existing facility or interfere with the implementation of a planned facility, including transit, roadway, bicycle, and pedestrian facilities. However, the project would conflict with CSU and Cal Poly Humboldt policies that promote the use of bicycling and walking for travel to and from campus, including those identified in the CSU Sustainability Policy, the CSU TDM Manual, and Cal Poly Humboldt CAP 2.0. Additionally, the project does not provide pedestrian facilities connecting the project site to the area circulation system. For these reasons, this impact would be **significant**.

Mitigation Measures

Mitigation Measure 3.11-1: Provide Pedestrian Facilities along St. Louis Road

Cal Poly Humboldt, in cooperation with the City of Arcata, shall provide a sidewalk that connects the northern access road for the project to the US 101 overcrossing and the rest of the pedestrian circulation system. The sidewalk connection shall be built on the east side of St. Louis Road with appropriate pedestrian crossing provided along St. Louis Road. There is adequate right-of-way available to complete the sidewalk gaps along the roadway. The design of the off-site pedestrian improvements shall be consistent with City design standards. The sidewalk shall be completed prior to occupancy of the project.

Significance after Mitigation

Implementation of Mitigation Measure 3.11-1 would reduce impacts by reducing the potential for conflicts involving pedestrians in a manner consistent with CSU and Cal Poly Humboldt policies that promote the use of walking, bicycling, and transit to and from campus. Additionally, the Mitigation Measure 3.11-1 would provide pedestrian facilities connecting the project site to the area circulation system. Consistent with the 2017 application for development of the project site, as considered by the City, the provision of additional pedestrian facilities along St. Louis Road is considered feasible and acceptable. Therefore, implementation of this mitigation measure would reduce the significant impact to **less than significant**.

Impact 3.11-2: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Regarding Vehicle Miles Traveled

Construction activities would be short-term and temporary and construction worker trips are redistributed throughout the transportation network. Additionally, the average number of daily trips made by construction workers would not exceed the small project screening threshold of 110 daily trips. Based on the modeling of operational VMT the project would not exceed the CSU TISM VMT threshold of significance for residential projects. Therefore, the project's impact to VMT would be **less than significant**.

Construction

Construction of the project would begin as early as Spring 2023 and is anticipated to be completed by Fall 2024. The number of construction workers would fluctuate based on the phase and intensity of construction.

Construction activities would be temporary and intermittent in nature; and thus, would not result in long-term increases in vehicular trips. Additionally, the VMT of construction workers is not newly generated; instead, it is redistributed throughout the regional roadway network based on the different work sites in which workers travel to each day. Therefore, construction workers would not generate new trips each day, they would only redistribute them. Further, even if the trips generated during construction were considered to be new trips, the average number of construction workers trips is estimated to be no more than 50 per day during the 18-24 months of construction. Therefore, the number of daily construction trips generated would be fewer than 110 trips per day; thus, satisfying the screening threshold established in the CSU TSIM which is consistent with OPR's screening criteria for small projects. Therefore, construction activities are not expected to result in a significant increase to VMT.

Operations

As detailed in Chapter 2, "Project Description," the project would involve the development of new student housing including an exercise gym, common lounge spaces, study spaces, computer rooms, television rooms, a café/market, conference rooms, and bicycle parking. The Transportation Analysis Memo used the HCAOG Travel Model to calculate the VMT per resident anticipated to be generated by the project. The trip patterns in the HCAOG Travel Model were checked against location-based services "Big Data" to confirm that the model is reasonably replicating existing travel patterns related to Cal Poly Humboldt. For detailed information regarding trip generation, trip length, and VMT methodology and analysis see Appendix E. Table 3.11-1 presents the project-generated VMT per resident in relation to the CSU TISM threshold of significance of 15 percent below existing regional VMT per resident.

Table 3.11-1 Cal Poly Humboldt Student Housing Project Vehicle Miles Traveled Analysis

Year	Countywide Residential VMT per Resident	Project-Generated VMT per Resident	Threshold Value	CEQA Impact?
Baseline Year 2022	18.1	14.1	16.4 (equal to 15% below VMT per Resident)	No

Source: Fehr & Peers 2022: 7-8.

As identified in Table 3.11-1, above, the project would not exceed the VMT threshold established by the CSU TISM under the existing plus project scenario. Therefore, the project would not substantially increase VMT and the impact would be less than significant.

Summary

Construction worker VMT is redistributed throughout the transportation network depending on worksite; thus, it is not newly generated. Additionally, the average number of daily construction worker trips does not exceed the threshold for small projects as established by the CSU TISM and OPR Technical Advisory. Furthermore, project-generated VMT falls below the 15 percent regional VMT per resident threshold established by the CSU TISM. Therefore, the project would result in a less than significant VMT impact and would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b). Thus, the impact would be **less than significant**.

Mitigation Measures

No mitigation measures are required.

Impact 3.11-3: Substantially Increase Hazards Due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment)

The construction contractor would prepare a construction traffic control plan (TCP) to minimize potential hazards related to transportation and circulation during construction activities as well as obtain necessary encroachment permits from the City of Arcata. Additionally, project access at St. Louis Road would be designed in accordance with applicable site distance standards. Based on the conceptual nature of the site plan, it is not possible to conclude that pedestrian and bicycle safety in the vicinity of the project site would be sufficient. As a result, impacts would be **potentially significant**.

Construction

Project construction is expected to begin in 2023 and would be completed within approximately 18-24 months. Construction transportation impacts would be localized and temporary; however, during construction of the project, traffic operations could be degraded. As detailed in Chapter 2, "Project Description," Cal Poly Humboldt would prepare a construction TCP which would demonstrate appropriate traffic handling during construction activities for all work that will or may impact the traveling public. The TCP would include the following elements:

- ▶ identify the location of the proposed construction area;
- ▶ illustrate the location of areas where the public right-of-way would be closed or obstructed;
- ▶ identify the placement of traffic control devices necessary to perform the work;

- ▶ present proposed phases of traffic control;
- ▶ establish time periods when the traffic control would be in effect and, although not anticipated, identify the time periods when work may prohibit access to private property from a public right-of-way; and
- ▶ provide information on access for emergency vehicles to prevent interference with emergency response.

Additionally, the construction contractor would obtain an encroachment permit from the City of Arcata for any off-site improvements. The encroachment permit application would include the submittal of a site plan, a proposed plan for pedestrian and traffic control, the TCP, and insurance certificates and endorsements (City of Arcata 2022). Thus, any off-site improvements would be subject to review by the City's Public Works Department ensuring local standards are met. Therefore, any increased hazards related to transportation during construction would be minimized. For this reason, the impact related to transportation hazards during construction would be less than significant.

Operations

As detailed in Chapter 2, "Project Description," the project would involve the development of new student housing including an exercise gym, common lounge spaces, study spaces, computer rooms, television rooms, a café/market, conference rooms, and bicycle parking. Additionally, a concourse/promenade would be constructed within the central portion of the proposed student housing development, extending in a north-south direction connecting to bicycle and pedestrian facilities that provide access to the Cal Poly Humboldt campus. On-site circulation would provide interconnected pedestrian and bicycle paths throughout the development to promote multimodal transportation choices, all of which are intended to direct student residents to the US 101 overcrossing or the City's Annie & Mary Rail Trail project which would be located along the eastern project site boundary.

The project would be consistent with City development standards. Additionally, off-site improvements associated with the project are subject to City review processes which would ensure that these off-site improvements would comply with all applicable City and industry roadway/driveway design standards.

Vehicular site access would be provided on St. Louis Road on the north side of the project site. St. Louis Road is a local road with a posted speed limit of 25 mph. Eye Street would provide an additional emergency vehicle access and has a speed limit of 25 mph. According to Table 201.1 of the Caltrans Highway Design Manual, the stopping sight distance at 25 mph is 150 feet. The sight distance entering the project site at both entrances appears to be more than 150 feet, indicating that the sight distance would be adequate (Fehr & Peers 2022: 9).

Although the project would be consistent with local design regulations, based on the conceptual nature of the site plan it cannot be ensured that hazards related to pedestrian and bicycle travel in and around the project site would be minimized. The project would increase vehicular, bicycle, and pedestrian travel in the surrounding area which could potentially increase the risk of pedestrian- and bicycle-vehicle conflicts. For this reason, the project's impact related to transportation hazards during operations would be potentially significant.

Summary

The construction contractor would prepare a TCP and obtain encroachment permits as necessary for off-site improvements. Additionally, the project's site design would meet Caltrans standards related to site distance and would be consistent with City design standards. However, the project would increase travel in the vicinity of the project site and with limited detail regarding site design and off-site improvements, it cannot be ensured that pedestrian and bicycle conflicts would not occur. For this reason, the impact related to transportation hazards would be **potentially significant**.

Mitigation Measures

Mitigation Measure 3.11-3: Provide Pedestrian and Bicycle Safety Improvements

The contractor shall implement pedestrian and bicycle safety improvements to enhance visibility and connectivity between pedestrian and bicycle networks in the vicinity of the project site. All improvements shall be consistent with City design standards. The following facilities, as identified in the Transportation Analysis Memo, shall be incorporated into the final design of the project:

- ▶ Provide high-visibility crossings by using patterns or raised crossings at the proposed northern access road and eastern driveway (at the points of connection with the Annie & Mary Rail Trail.)
- ▶ Add pedestrian crossing signage along the eastern driveway of the project

Significance after Mitigation

Implementation of Mitigation Measure 3.11-3 would reduce impacts to a less-than-significant level by reducing the potential for safety conflicts involving bicyclists or pedestrians. However, the City of Arcata holds jurisdictional control of the public roadway right-of-way surrounding the project site, including the roadway segments/right-of-way identified for improvement in Mitigation Measure 3.11-3 related to the implementation of high-visibility crossings at the project's access. Therefore, implementation of this mitigation measure would reduce the significant impact to **less than significant**.

Impact 3.11-4: Result in Inadequate Emergency Access

Emergency access would be provided via two roadways on the northern and southern ends of the project site (i.e., St. Louis Road and Eye Street). Additionally, the internal circulation would be designed to accommodate emergency vehicles, and the project would be consistent with the 2019 California Fire Code which establishes standards regarding emergency access. Furthermore, the project would develop a TCP to ensure sufficient emergency access is maintained during construction activities. Thus, the project would provide adequate emergency access during construction and operations. This impact would be **less than significant**.

As detailed in Impact 3.11-3, above, St. Louis Road would provide vehicular access to the project site. Additionally, the north end of Eye Street would serve as a secondary emergency access point. This access point would be controlled using removable bollards or gate, and signage would be provided to prevent pedestrian/bicyclist access from the project site to Eye Street. The internal roadway design would provide adequate emergency vehicle circulation and sufficient clearance to accommodate likely emergency vehicle movements (Fehr & Peers 2022: 10).

The project would be constructed consistent with the 2019 California Fire Code which establishes minimum width dimensions to maintain adequate access for fire apparatus roads at no less than 24 feet. Additionally, Section 3310.1 of the 2019 California Fire Code identifies minimum requirements to provide required emergency access during construction activities. As detailed in Impact 3.11-3, above, the construction contractor would prepare a TCP prior to construction which would minimize safety impacts during construction including ensuring that emergency access is maintained at all times.

Furthermore, the project applicant would collaborate with the City to integrate the design of the development into the City's emergency response and evacuation plans for wildfires, floods, and other potential emergency situations (Fehr & Peers 2022: 10). Therefore, the project would not result in inadequate emergency access; thus, the impact would be **less than significant**.

Mitigation Measures

No mitigation measures are required.