

Mads Odom

From: Oona Smith [REDACTED]
Sent: Thursday, March 14, 2024 11:44 AM
To: David Loya
Cc: Beth Burks
Subject: comments on GP Update and DEIR
Attachments: 2024.0314 HCAOG staff comments_Arc GPU DEIR.pdf

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Hello David,

My comment letter is attached. HCAOG continues to appreciate the good work for "smart growth" and climate change solutions that you, other staff, and commissioners are devoting to this update.

As the letter notes, don't hesitate to contact me or Beth if you have any questions (concerns) or want to discuss.

Thanks.

Have a great week's end and weekend,

Oona

Oona Smith, Senior Regional Planner (she/her pronouns)

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I acknowledge my presence in [Jaroujiji](#) (meaning "where you sit and rest" (Eureka)), part of the ancestral territory of the Wiyot peoples. I offer gratitude and reconciliation to their elders past and present.



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March 14, 2024

David Loya, Director of Community Development
City of Arcata
736 F Street
Arcata, CA 95521

Submitted via e-mail: dloya-at-cityofacata.org

**RE: General Plan and Gateway Code Draft Environmental Impact
Report Public Comment, and General Plan final draft (Dec.
2023)**

Dear Director Loya,

The Humboldt County Association of Governments continues to support the Commission's, and City staff's, deliberative work in crafting the General Plan Update and Arcata Gateway Code. HCAOG values that the Commission has directed and recommended policies that have been proven to increase multimodal access and active transportation mode shift, improve safety, and enhance neighborhoods' walkable and welcoming sense of place. Such outcomes provide climate crisis solutions, among other benefits, and support the Regional Transportation Plan (*VROOM 2022-2042*) goals and Safe and Sustainable Transportation Targets.

Re General Plan and Gateway Code DEIR

(Comment 1) Impact TR-c: Substantially increase hazards due to a geometric design feature or incompatible uses (e.g. farm equipment)

The impact analysis notes that design for future projects will comply with appropriate design standards, such as "City or Caltrans engineering and safety standards" and "street design standards, Manual of Uniform Traffic Control Devices requirements, fire code requirements and zoning regulations,.." (page 4.2-24). Historically, the MUTCD and other government guides have not necessarily championed design standards for the most vulnerable road users, and are known to take considerable time to adopt safety innovations.

With that in mind, HCAOG recommends that the Commission consider adding policy to further lessen potential adverse impacts regarding Impact TR-c. HCAOG recommends that the General Plan include a policy consistent with the following policy in the Humboldt Regional Bike Plan (HCAOG, 2018):

Policy 1.2: HCAOG encourages local jurisdictions to adopt the National Association of City Transportation Officials (NACTO) design guides, including the *Urban Bikeway Design Guide* and the *Urban Bikeway Design Guide*, and/or the FHWA's *Small Town and Rural Multimodal Networks* as their primary guides for designing innovative bicycle facilities.

We encourage policy to also include NACTO's latest publications, as appropriate. For additional design resources to consider,

(t)he Bike Plan provides recommended design standards and guidelines for developing a uniform and consistent regional bikeway system. The recommendations include standards set forth by the Federal Highway Administration and Caltrans, and, by reference, the NACTO and AASHTO¹ design guides."

(Comment 2) For potential transportation hazards due to incompatible uses (Impact TR-c), HCAOG would like the Commission to consider the increasing prevalence of larger and "oversized" sports utility vehicles, pickup trucks, and especially oversized lifted pickup trucks, and how they are prone to lessen vulnerable road users' comfort, convenience, and safety. Two comments to this effect are: "The increased likelihood of large and lifted trucks to cause a fatality² in the event of a crash is well documented." [<https://www.strongtowns.org/journal/2023/5/23/lifted-pickup-trucks-an-invitation-to-rethink-normal>]; and

Larger vehicles that share streets with pedestrians and cyclists are more deadly than compact or mid-sized cars, both because their greater weight conveys more force upon impact and because their taller height makes it likelier they will crash into a person's head or torso rather than their legs. Worse, because SUV drivers sit so much higher than similarly sized minivans, blind spots can prevent them from seeing people standing in front, especially children... Safety-conscious city leaders have a vested interest in what vehicles their residents and visitors choose to drive. That's especially true in cities that have adopted Vision Zero, a pledge to eliminate all traffic deaths..." [David Zipper, 9/17/20, <https://www.bloomberg.com/news/articles/2020-09-17/how-cities-could-push-back-on-pickups-and-suvs>].

HCAOG staff suggest that now is an opportunity for the Commission to consider the idea of incorporating policy to allow the City to designate streets (or define parameters/criteria) that should have standard-size or compact-car parking only, or where oversized cars cannot park. The priority streets, presumably, would be those with the highest active mobility activity and high-density mix of uses, i.e., the most lively, crowded streets with on-street parking.³

The draft General Plan goals and new policy recognize that parking pricing can support multimodal mode shift. As a VMT reduction strategy, market-price on-street public parking has been estimated to potentially effect 30% change (Fehr & Peers, 3/13/24 presentation). The City should consider that higher parking rates for oversized vehicles, in certain areas, can potentially mitigate the safety hazard.

¹ American Association of State Highway and Transportation Officials

² <https://www.consumerreports.org/cars/car-safety/the-hidden-danger-of-big-pickup-trucks-a9662450602/>

³ E.g., "in Massachusetts, the town of Marlborough permits up to a third of parking spaces to be reserved for small cars, while Needham allows up to half" [Metropolitan Area Planning Council, Massachusetts, posted 2/8/2010. <https://www.mapc.org/resource-library/local-examples-compact-car-spaces/>]

Another potential safety policy to consider is requiring or incentivizing large-sized fleet trucks to install side guards. The Vision Zero Network reports,

One of the most simple and effective technology improvements to mitigate crash severity are side guards; panels installed between the wheels that help prevent people from being pulled under the large vehicle during a side-impact collision. Side guards have demonstrated success in averting underride incidences and greatly decreasing fatalities... So far, policy advancement on this proven life-saving device has been locally led. [Boston](#), New York City, Portland, OR, Washington D.C. and Cambridge, MA are some of the cities to create policies (all quite recently) requiring side guards on trucks in certain circumstances.⁴

Re Final Draft General Plan (December 2023)

(Comment 3) If not considered before, HCAOG encourages the Commission to consider if the Valley West area should also be identified as warranting the same or similar type of study as identified in (page 2-55) “CM-1f **Parking and public transit service study**. The City shall undertake a comprehensive study of parking and public transit service options for the downtown/uptown area and Cal Poly Humboldt, with cost/revenue implications presented for each option. This study shall be undertaken jointly with Cal Poly Humboldt.”

(Comment 4) For accuracy, I suggest revising language: (page 2-58)

CM-3f **Transit subsidies for Cal Poly Humboldt**. The City supports continued A&MRTS contract services with Cal Poly Humboldt to provide subsidized fares to its students and employees. This revenue source, which allows these users to ride without cost ~~to the individual~~ for individual trips, is the single most important Transportation Demand Management strategy for Arcata.

(Comment 5) (page 2-60) Policy CM-4c (1) Delete “should” where it says “shall/should.” (Also fix the typo: “that are intended to.”)

(Comment 6) (page 2-62) To keep policy relevant if future plans are required for new grant programs or legislation, revise CM-5a as underlined: “1. Regularly (at least every five years) update the City of Arcata Pedestrian & Bicycle Master Plan or equivalent active mobility plan.”

(Comment 7) (page 2-63) Consider applying CM-5b for right-of-way opportunities for Class IV bike lanes (protected) as well:

CM-5b Bikeway system and pedestrian network standards.

1. Right of way opportunities. As opportunities arise, the City shall utilize existing or acquire new easements or right of way for Class I bikeways. Such opportunities may include connecting dead-end streets in new developments with existing neighborhoods, along streets with excess width and unpaved right of way, along drainage channels or creeks, or along abandoned railroad rights of way.

(Comment 8) The following policies should say “will” or “shall.”

- (page 2-66) CM-6a **Downtown parking** 3. On-site parking standards. The City should reduce or eliminate the parking standards applicable within the downtown area.

⁴ <https://visionzeronetwork.org/resource/how-can-cities-increase-the-safety-of-large-vehicles-in-urban-areas/>

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- (page 2-66) CM-6c **Parking standards for new development.** The City's should continue to specify maximum parking requirements for new development and eliminate minimum parking requirements.
- (page 2-68) CM-8d **Transit finance.** A&MRTS should continue to fund capital and operating expenses through fare box revenue, Cal Poly Humboldt, and state and federal subsidies

Thank you for considering HCAOG staff comments. Please don't hesitate to contact me, or Beth Burks, to address any questions or discuss these comments.

Sincerely,

Oona Smith

Oona Smith
Senior Regional Planner