



Humboldt's advocate for transportation choices

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c/o NEC

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Humboldt County Planning Department  
Community Development Services  
Attn: Martha Spencer  
3015 H Street  
Eureka, CA 95501

Re: Comments on the Circulation Element, Chapter 7 of the County General Plan Update & Recommendations on Alternatives Voting Chart

Dear Planning Commissioners,

Thank you for the opportunity to comment on the Circulation Element Chapter of the County's General Plan Update. Green Wheels is a community organization dedicated to serving as Humboldt County's advocate for a balanced, sustainable transportation system that provides convenient and active transportation choices. We support policies that ensure choices among modes of travel and accommodate each mode when and where it is most appropriate.

We are providing comments on the Circulation Element to help the Planning Commission update the General Plan in a way that guides the County in the direction of a safe and balanced circulation system. The single-occupant automobile produces more air pollution and uses land and natural resources more inefficiently than any other of Humboldt's transportation modes. As the population climbs, the potential increase in traffic levels will need to be addressed at a time when state and federal laws are pressuring communities to reduce the environmental impact generated by air pollution. Bicycling and walking, the quietest, cleanest and most energy efficient and health promoting forms of transportation, should be promoted whenever possible. A well-designed multimodal circulation system has "complete streets" that increase the quality and functionality of our roads and provide affordable transportation options during a time of high unemployment and economic instability. The task of updating the General Plan to account for the many ways we use our roads, will require adopting several policies, standards, and implementations that work in concert. Our specific recommended language for the policies mentioned below can be reviewed in the Voting Charts attached. Thank you again for the opportunity to comment on the Circulation Element.

**Update Level of Service/Quality of Service (LOS/QOS), Design Standards and Road Classifications**

People of all ages and abilities use the roadways on bike, on foot, and as

transit riders, but within the current General Plan our roadways do not consider these uses. In fact, their safety and convenience is often compromised for a high LOS for vehicles. Limiting the definition of LOS to vehicles causes problems because for example, pedestrians crossing a street are considered a delay because they interrupt traffic flow; this translates into a lower rating in terms of vehicle LOS. A low LOS for vehicles can mean a vibrant community with high level of active transportation, including students, shoppers and professionals commuting by walking or biking, which is desirable. The County can and should balance LOS and QOS for all modes when assessing roadways by establishing and utilizing a Complete Streets LOS or QOS that counts all modes or developing LOS/QOS for walking, biking and transit individually. LOS standards can be prioritized for each mode by context: for example, pedestrian and bicycle considerations should have greater importance on local streets serving schools, daily retail needs, and community amenities than on highways serving freight transfer facilities. Planners, engineers, and developers need the County's General Plan to include specifications for the bicyclists and pedestrians so they can provide safe roadways for people using non-motorized transportation.

- Green Wheels recommends combining elements of **C-P5 Level of Service Criteria** (Mod. A, B) and **C-P25 Multimodal LOS** (Mod. A, B) as described in the attached charts to provide flexibility and context-sensitive guidance for balancing LOS/QOS and operation for all modes on roadways.
- To further clarify how to balance the needs of automobiles, bicycles, transit and pedestrians, implementation measures like, **C-IM1. Circulation Standards** (Mod. A, B) **C-IMX. Safe and Convenient Pedestrian and Bicycle Access** and **C-IM2 (Mod. A) Tracking Road Improvement Requirements** should be adopted. C-IMX would allow the County to evaluate and improve, where appropriate, the LOS and QOS for bicycles, pedestrians, and transit riders.
- Roadway Classification Standards and Design Standards for bicyclists and pedestrians can be updated along with LOS and QOS standards. We recommend **C-P6. Jurisdictional Coordination and Integration** (Mod. A, B), **C-P11. Roadway Functional Classifications** (Mod. A, B, C), **C-P12. Level of Service Criteria** (Mod. A), **C-P27 Right-of-Way Design Standards** (Mod. A), **C-P31. Design Standards for All Pathways** (Mod. A, B) and **C-S1. Functional Classification** (Mod. A, B, C).

### **Identify and Fund Infrastructure Priorities**

Updating the General Plan to equally consider the many ways people get around will require integrating these modes in the process of evaluating, prioritizing, and funding, projects and maintenance along with automobiles. Incorporating active transportation and, to the maximum extent possible, public transit will ensure an increase in the circulation systems performance and safety oppose to simply addressing traffic congestion. Relevant standards and implementations will need to be commensurately updated.

- Incorporating active transportation can be achieved with policies (Mod. A), **C-P13. Prioritization of Investments.** (Mod. A, B, C), **C-P14. Efficiency and Capacity** (Mod. A, B), **C-P16. Public Input** (Mod. A, B) and **C-P24. Investment in Improvements** (A, B).
- Standards and Implementations: **C-S5. Prioritizing Roadway Capital Expenditures** (Mod. B, C), **C-S8. Pedestrian and Bicycle System** (A, B), **C-S9 Prioritization Pedestrian and Bicycle Facilities and Routes** Mod. A, B, C), **C-IM5. Roadway System Construction** (Mod. A, B, C), **C-IM12. Pedestrian and Bicycle System Plan** (Mod. A, B) and **IMXXX. Flexible Funding** (Proposed).

### **Include Transit and Trails**

A well-designed Circulation System is more than roads; it incorporates transit and trails for increased mobility for people. Distances between rural communities certainly make walking and bicycling more challenging. A good trail system that links neighborhoods with rural routes and downtown destinations in nearby communities can serve as a recreational or tourism resource as well as a commuter route that is protected from higher-speed roads.

- Effective trails policies include **C-P35. Development of Railroad Right-of-Ways for Bicycles and Pedestrians.** (Mod. A) **C-P36. Develop a Regional Trails System** (Mod. A, B), **C-S8. Pedestrian and Bicycle System** (A, B) and **C-IM4. Regional Coordination.**

Humboldt is a diverse rural county that also includes suburban and micro-urban communities especially along Highway 101. Improving transit Quality of Service as well as Level of Service through places where transit has shown itself to be effective such as through Fortuna to McKinleyville provides greater mobility for our County. Increasing transit use also reduces traffic congestion during peak hours in Eureka, Cutten, and Central Avenue in McKinleyville. The City of Eureka has 38.87% of the County's employment opportunity, but only 19.69% of the housing. Conversely, the unincorporated area of the county has 30.94% of the employment opportunity and 53.86% of the housing. The jobs-housing imbalance creates traffic into and out of Eureka each day, especially during peak travel times associated with resident's work, and school commute. Commuters bike and walk (although, technically walking is prohibited) on the shoulder of the 101 Safety Corridor and many more would if they had a safe, direct path on which to do so. Any investment in redesigning the 101 Safety Corridor should prioritize the safety and convenience of non-motorized users and increase the QOS and LOS for mass transit users before increasing the LOS for more vehicles.

- Green Wheels supports the multimodal strategy **C-P17. U.S. Highway 101 Safety Corridor Improvements** (Mod. A) with **C-IM10. U.S. Highway 101 Safety Corridor Improvements** (Mod. A).
- Transit policies that will improve roadway traffic by reducing single occupancy vehicle trips include **C-P23. Public Transit Service** (Mod.

A, B), **C-Pxx. Long Term Transit Plan** (Mod. A), **C-Pxxx. Development of Transit Hubs.** (Mod. A), **C-PXXXX. Investment in Public Transportation** (Proposed), **C-IM7. Transit Infrastructure** (Mod. A, B), **C-IM8. Park and Ride Facilities** and **C- IM11. Transit Service to East, South and North County** (A, B) are targeted solutions for our County.

### **Consider New Roads and New Development Carefully**

Of the existing 1,200 miles of road system in the County there is a \$150 million dollar backlog in road maintenance, according to County Public Works Director Tom Matson in his, April, 2010 report to the Board of Supervisors. This is a \$50 million increase from 2003, when Director Allen Campbell estimated \$100 million. The County has an opportunity to adopt solution-based policies that hold new development to a standard that is linked more closely to economic sustainability, both in terms of the costs associated with the personal transportation expenses of residents (tax payers) and the County's ability to maintain the road system. This backlog underscores the need to increase the capacity of existing roads by defining where bikes and pedestrians belong (i.e. Complete Streets), which provide people safe transportation options other than driving.

- Policies that reinforce the County's ability to foster a better performing circulation system for people instead of just a bigger circulation system for cars include: **C-P1. Orderly Development** (Mod. A, B, C), **C-P2** (Mod. A, B, C) and **C-P3. Consideration of Transportation Impacts in Land Use Decision Making** (Mod. A), **C-P4. Mitigation Measures** (Mod. A), **C-P26. Bicycles and Pedestrian Facilities in New Subdivisions** (Mod. A, B), **C-S2. Neighborhood Connectivity**, **C-IM5. Roadway System Construction** (Mod. A, B, C), and **C-IM6. Coordination with Public Health** (A, B).

We appreciate the dedication of the Planning Commission and Community Development Services staff to creating an effective and equitable Humboldt County General Plan.

Respectfully submitted,

Ashley Hanson - Staff  
Green Wheels