



Date: April 9, 2023
To: Arcata Planning Commission
CC: David Loya, Community Development Director
From: Oona Smith, Senior Regional Planner
Re: **April 11, 2023, meeting (III.C) General Plan Update, Circulation Element**

Thank you to the City of Arcata Planning Commission and staff for your diligent work towards long-range planning and community visioning. Please accept these comments related to updating the General Plan Circulation Element. I offer these comments in consideration of the adopted objectives and policies of HCAOG's Regional Transportation Plan, *Variety in Rural Options of Mobility (VROOM) 2022-2024*.

HCAOG staff appreciate and support the draft/suggested changes that serve to most effectively increase safety, most broadly increase accessibility for users—especially the most vulnerable users, increase equity in transportation investments and resources, decrease transportation-related greenhouse gas emissions, and improve health outcomes. As more and more research supports, transportation policies that engender these benefits simultaneously augment the social, economic, and recreational qualities of neighborhoods.

I find that Planning Commissioners have suggested changes to the December 2022 Draft that will bring the Circulation Element more up-to-date, i.e., more consistent with current concepts/strategies of what works to create walkable, healthy neighborhoods and fiscally-sound cities. In particular, I appreciate that Planning Commissioners are recommending or considering:

- adding a Vision Zero safety policy in the General Plan: 2045;
- emphasizing equity, mobility, and accessibility, including by adding language explicitly supporting accessibility for users with disabilities;
- relegating the use of level of service (LOS);
- considering streetscape safety and quality over the capacity for drivers to enter/exit intersections and roadways; and
- reassessing the provision of parking as a valuable and/or scarce resource more than an obligatory subsidy for private car storage.

Such planning approaches are consistent with HCAOG's *VROOM 2022-2042* goals and objectives.

Below are HCAOG staff comments on specific draft language, followed by "Errata" that simply calls attention to typos, syntax errors, redundancies, and minor edits to improve clarity. (Note: Text identified as "PC's comment" refers to language from this source: "General Plan Update Commissioner Comments Compilation And Bike Rack (current through 03/27/2023).")

PC's comment: "5) I propose we stop using Level of Service as a management consideration for city streets. And prioritize traffic calming and safety on all city streets regardless of classification."

HCAOG staff appreciates that Planning Commissioners are discussing changing the Circulation Element's policy direction away from applying either the operational analysis and intersection level of service (LOS) or the federal functional classifications of streets as long-range planning tools or planning rationale. While they may be useful to apply for evaluating traffic patterns, numerous planning professionals, academics, institutions and advocates agree that they are not good tools for creating multi-modal systems or walkable

neighborhoods. It would be more consistent with the Circulation Element's Principles and Goals to omit or amend corresponding language, for example:

- Page 2-50: **Table T-5 Proposed Vehicular Circulation Improvements** – Notes for three projects highlight “LOS Deficiency.” (Correlated PC’s comment: “Table T-5 and Figure T-k should be modified accordingly to remove projects motivated solely by congestion concerns.”)
- Page 2-56: Guiding Principles and Goals: D. Manage the street and highway system to promote more efficient use of existing capacities rather than increase the number of travel lanes.”

Page 2-57 **Policy T-1 Balanced Transportation System with Choice of Modes, Objective.**

Instead of focusing the Objective on “a balanced transportation system” and “reducing automobile trips,” Policy T-1’s Objective could better reflect the Guiding Principles and Goals which say to provide for a “connected multimodal transportation system...” and “increased use of active and shared transportation modes...” Secondly, saying “transit” (instead of bus transit) would not preclude how public transit is becoming more dynamic with microtransit and on-demand trips that do not necessarily use buses.

PC’s comment:

“6) How is this negative? Consider removing the word negative.

a) **Balanced Transportation System.** Create and maintain a balanced transportation system with choice of bus transit, bicycle, and pedestrian as well as private automobile modes. Reduce the percentage of trips that are made by automobile and provide the opportunity, incentives, and facilities to divert trips from automobiles to other modes. Provide negative incentives, such as parking meters, permit parking, time-limited parking, carpool incentives, and other targeted parking measures that encourage alternative modes utilizing “induced demand” strategies.

Page 2-57, T-1a “**Investment in alternative modes.** In order to provide a **realistic** and cost-effective balance between travel modes...”

Consider updating the term “alternative modes” to “active modes.” Clarify what “a realistic balance” means.

Page 2-57, T-1c **Intercity travel.**

“The City shall **coordinate with Humboldt County and Caltrans** to provide adequate facilities for vehicles, buses, and bicycles to serve intercity demand. Coordinate with long-distance bus operators to improve services to Arcata. Joint efforts may include transportation improvements outside of Arcata which serve intercity travel, such as bicycle links connectivity, timed-transfer bus stops, park-and-ride lots, and regional transit service and development of park-and-ride lots in Arcata to reduce intercity vehicular travel.”

It is also beneficial to coordinate with regional agencies (e.g., HCAOG, RCEA), neighboring jurisdictions, and Cal Poly Humboldt.

Page 2-58, T-1e **Parking and public transit service study.**

Integrate this policy with T-6a Downtown Parking.

Page 2-59, **POLICY T-3 BUS TRANSIT POLICY**

“Objective. Maintain a bus transit system which connects to other active-travel modes, and serves major commercial and employment areas within Arcata, Cal Poly Humboldt, public schools, and higher density residential areas. Increase average citywide transit mode share of daily person trips to ___% from the 2020 level of 3%.”

T-3a **5-year transit plans.** The City **shall maintain the existing (1)** A&MRTS routes (as shown in Figure T-e), frequency, and level of service **until increased demand, additional development, and**

transit planning studies identify the need (2) for either route modification, an expanded route system, or increased service on existing routes. The transit planning studies should evaluate the cost-effectiveness and feasibility of increased routes and service based on projected capital and operating costs, fare box recovery, and state and federal subsidies (see Policy T-3c for planning criteria).”

- (1) This does not allow the City to decrease service due to decreased demand (COVID-19?).
- (2) Neither could the City modify service unless all three come about. Increased demand, regardless of additional development, should allow the City to modify service.

“T-3b **Regional transit service.** Short- and long-range transit plans shall be coordinated with the regional transit service provided by the Redwood Transit System. The City supports regional transit ~~plans which~~ plans’ recommendations or implementation measures to improve service and timed transfers, and reduce headways for intercity travel.”

HCAOG updates the Transit Development Plan every five years, which evaluates all transit systems based in Humboldt County. The City’s policy may want to incorporate relying on that resource. For regional service, the City may want to coordinate only with the RTS line, but with Humboldt Transit Authority, Greyhound, Amtrak, and Redwood Coast Transit Authority (Del Norte).

{Re edit: Technically speaking, plans—in and of themselves—do not improve service.}

Page 2-66, **POLICY T-6 PARKING SUPPLY AND PARKING MANAGEMENT**

“**Objective.** Provide an adequate supply of parking. Minimize the impacts of Cal Poly Humboldt parking into adjacent neighborhoods. Ensure that new development provides an adequate but not excessive supply of parking.”

HCAOG would support a broader objective that recognizes the pros/cons of the City’s role or assumed responsibility for parking supply and parking management. There are conditions under which on-street car parking can aid pedestrian and bicyclist safety, have a net positive financial impact on city and/or business revenues, and/or contribute to recreational access and environmental (e.g., a parking benefits district).

Public discourse (and agreement) on parking is hard, so I will end with a light-hearted analogy by Donald Shoup, from “The High Cost of Free Parking.”

Minimum dessert requirements

If cities required restaurants to offer a free dessert with each dinner, the price of every dinner would soon increase to include the cost of a dessert.

To ensure that restaurants didn’t skimp on the size of the required desserts, cities would have to set precise “minimum calorie requirements.” Some diners would pay for deserts they didn’t eat, and others would eat sugary desserts they wouldn’t have ordered had they paid for them separately. The consequences would undoubtedly include an epidemic of obesity, diabetes and heart disease. A few food-conscious cities like New York and San Francisco might prohibit free desserts, but most cities would continue to require them.

Many people would get angry at even the thought of paying for desserts they had eaten free for so long.

(Shoup sources: <https://parkade.com/post/donald-shoup-the-high-cost-of-free-parking-summarized>, <http://shoup.bol.ucla.edu/PayAsYouPark.htm>, Donald Shoup “Parking and the City” (2018).)

ERRATA (Typos & Syntax)

(1) Page 2-45: the Regional Transportation Plan (~~RPT~~RTP).

(2) Page 2-49: **Existing Modes of Travel.** Based on 2020 census data, the majority of Arcata residents drive alone to work (57%) as shown in the accompanying figure.

The 57% reported is of total city population ("residents"), not 57% of employed people?

(3) Page 2-56, Guiding Principles and Goals:

"B. Create a transportation system that ~~incentivizes~~ offers a choice of travel modes and is safe, accessible, comfortable, accommodating, and welcoming to all users."

"Incentivizing a choice" is not clear.

"E. Create a multimodal transportation system that will improve the livability of residential neighborhoods, ~~including use of methods to calm or slow traffic and reduce~~ such as by calming streets, slowing traffic, and minimizing through-traffic on local ~~neighborhood~~ streets."

Awkward syntax.

(4) Page 2-57: T-1 **Complete Streets.**

The City shall direct the design, construction, reconstruction, repair and maintenance efforts on the City's streets, bridges, pathways, and sidewalks, creating a comprehensive, integrated transportation network that is safe, accessible, comfortable, accommodating, and welcoming to users of all ages, physical abilities, incomes, races, and ethnicities, ~~incomes, and physical abilities,~~ and all modes of transportation and mobility, particularly those walking, rolling, biking, and using transit. In doing so the City shall apply a Complete Streets framework in all applicable and feasible transportation projects to allow all street users the safe, comfortable, convenient and accessible use of streets ~~for all street users.~~

This long, complicated first sentence is hard to comprehend. The reference of "those" is convoluted.

(5) Page 2-57, Policy T-1b **Interconnections and transfers between travel modes.**

"The City shall provide and maintain a Transit Center to facilitate interconnection and transfers between bus routes and systems. As funding permits, Transit Center facilities shall be improved to encourage its use as a multi-modal transfer point. In addition to facilities at the Transit Center, ~~p~~ Pedestrian and bicycle amenities shall be provided at other locations which serve as modal transfer points such as bus stops and park-and-ride lots."

This policy covers transit connections, so I suggest integrating it with Policy T-3d Transfers between routes and systems.

(6) Page 2-58, **POLICY T-2 TRAVEL DEMAND MANAGEMENT**

Rename Policy T-2; as is, it does not cover common TDM; it covers linking land use and transportation.

"Objective. Reduce the percentage of ~~automobiles~~ automobile trips and reduce the annual vehicle-miles of travel."

"T-2a Land use development patterns. ~~The City encourages and supports travel demand management efforts.~~ ... Land use planning shall emphasize high-density and mixed land-use patterns in the downtown and neighborhood commercial areas 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~~ expanding City boundaries."

"8. Prevention of large areas of single uses. Avoid Isolated single-use developments at the edge of the City ~~that could~~ encourage and/or force automobile travel for commuting and errands."

(7) Page 2-59

T-3c **Bus route system.** Public transportation is an enterprise activity and its services must be designed to be as efficient and productive as possible. As a transit operator, the City must balance demand with resources for a sustainable system. ~~The City shall consider adding transit routes or modifying existing transit routes and level of service based on the transit planning efforts described in Policy T-3a.~~ Criteria to evaluate and identify thresholds for changes to the A&MRTS system shall be developed.

Redundant.

(8) Page 2-61, T-3f **Transit subsidies.**

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,~~ program (the JackPass) provides Cal Poly Humboldt students and employees unlimited fare-free rides on A&MRTS. ~~is the single most important Transportation Demand Management strategy for Arcata.~~

Students and employees do have a cost, albeit indirect.

(9) Page 2-66 T-5i **Retention of railroad right of way.**

The Great Redwood Trail Authority, as the holder of the former North Coast Railroad ~~Authority~~ Agency right of way, is encouraged to maintain railroad rights-of-way through railbanking for interim use as a multi-purpose trail. The City may consider purchase of right of way should the ~~Authority~~ Agency decide to sell.