

CALIFORNIA COASTAL COMMISSION

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W12b

MEMORANDUM

Date: December 12, 2023

To: Commissioners and Interested Persons

From: Shana Gray, Deputy Director
Melissa Kraemer, District Manager
Abbie Strickland, Transportation Program Analyst

Subject: Addendum to Commission Meeting for Wednesday, December 13, 2023
Item W12b, CDP Application No. 1-23-0773
(Caltrans South Broadway Complete Streets)

The purpose of this addendum is to modify the recommended findings of the November 21, 2023, staff report to respond to comments received since the publication of the staff report. After publication of the staff report, the Commission received several public comment letters. The correspondence is included in a correspondence packet posted to the Commission's website. The Commission's responses below will be added as a Response to Comments section to the staff report as Finding IV-L (page 25). This addendum also modifies the recommended findings to correct a minor error. Staff continues to recommend that the Commission, upon completion of the public hearing, approve the coastal development permit with the special conditions and findings included in the staff recommendation of November 21, 2023, as modified by the changes recommended herein.

I. Changes to the Findings

- Page 25: Add a new Finding IV-L – Response to Comments – as follows:

L. Response to Comments

The Commission received public comments after publication of the original staff report (November 21, 2023) and before the Commission hearing (December 13, 2023) that touch on several issues. The below responses are incorporated into the Adopted Findings for this application. Page numbers referenced below refer to the staff report published on November 21, 2023.

1) Bike Lane Separation Barriers

Comment Summary: In a letter dated November 29, 2023 (“CTRP/EPIC Letter”), a number of North Coast environmental and transportation policy groups state they strongly support this project overall and express support for the collaboration with Caltrans they have had through this project’s development. However, the groups raise concerns about the proposed use of plastic bollards for a separation barrier. The groups request that Caltrans replace the flexible bollards in the proposed project with a hard barrier such as solid bollards, which can provide physical protection for bicyclists.

Response: This issue is already discussed on pages 17-18 of the November 21, 2023, staff report. As stated there, the project proposes new bike lanes with a 3-foot-wide striped separation barrier with plastic bollards. An example view of the proposal is shown on page 12 of the Staff Report.

As stated in the staff report, the project is a significant improvement to the expansion of safe multi-modal, non-vehicular transportation in the corridor and region. The project has significant benefits for public access in consistency with the public access policies of the Coastal Act, and brings the potential for anticipated reductions in VMTs, GHGs, and energy consumption consistent with Section 30253(d) of the Coastal Act. A 3-foot separation barrier with extensive plastic bollards is a better complete streets feature employed by many progressive transportation agencies at this time with substantial improvement for cycling use. The 3-foot-wide separated barriers with extensive use of the plastic bollards (as opposed to the less physical plastic delineators often seen) do provide a strong sense of a separated bike lane and discourage automobiles from crossing into the lanes, or double parking in the bike lanes. Even in plastic form, separated barriers with plastic bollards have proven to reduce bicycle related crashes. We note that while some comments refer to the flexible plastic delineators used in Broadway [Pop-up Complete Street Demonstration](#), this project would use the more substantial plastic bollards depicted on page 12 of the staff report. Additionally, the 3-foot-wide separated barriers with extensive plastic bollards are accompanied by a number of measures aimed at traffic calming, which will help slow traffic speeds in the corridor and reduce risks overall.

Hard barriers and hard bollards do provide superior protection for cyclists. Caltrans offers a number of design reasons why hard bollards are not feasible at this time, including Highway Design Manual requirements and the need to have flexibility to employ detours to address utility work. Caltrans also states that the project as funded cannot support a hard separated barrier at this time, in part because of additional right-of-way acquisition costs that would be needed. Funding for such additional improvements would require Caltrans to obtain funding from the CTC, which would likely cancel or significantly delay the project at this time. Caltrans also states that these new separated bike lanes are a substantial change to the existing conditions, and that time should be given to the community to evaluate the transportation changes before the new system is hardened in place.

While hard bollards would increase safety, jeopardizing or delaying this project with the substantial improvements it makes to public multimodal access would be a great loss for public access and VMT/GHG reduction. As noted in the staff report, Caltrans and Commission staff are currently engaged in a joint effort to increase multimodal transportation in the North Coast region and several other upcoming Caltrans projects would improve bicycle access in Eureka. Current draft proposals of the other Eureka Highway 101/Broadway complete street projects use a separation barrier of a narrow-landscaped median with tree planting, which is more preferred for bicyclist safety, bicyclist user comfort, and visual improvements than even hard bollards. Caltrans and Commission staff intend to work together to see if that separation barrier is feasible, and if so, expand those improvements to this corridor section. **Special Condition 1** requires Caltrans to submit monitoring reports on these multimodal improvements, including reports on traffic incidents, a survey on user satisfaction, and any updated recommendations the Caltrans complete streets, traffic safety, or other programs recommend. Commission staff and Caltrans staff will use this information to engage in ongoing dialogue with local environmental/transportation advocacy groups (such as EPIC/CTRP/Humboldt Waterkeeper/North Coast Environmental Center) on ongoing improvements that can be made to this corridor. Special Condition 1 provides enough of a feedback loop for the Commission, Caltrans, and other local entities to collaborate together on further improving cycling safety in this corridor, while allowing these significant improvements to move forward at this time.

Therefore, the proposal as conditioned is consistent with the Coastal Act's provisions to maximize public access and other relevant provisions of the Coastal Act.

2) Bus Stop Modifications

Comment Summary: In the same CTRP/EPIC letter, the groups raise concerns about the design of the improved bus stops. The project would create new northbound and southbound bus stops at one location and reconfigure and redesign another bus stop at another location. Essentially the proposed design will create a designated bus stopping area in the highway shoulder, shifting the bike lane away from the highway (see e.g. Exhibit 5, p. 10, p. 14.) This would allow buses to stop outside of the moving traffic lane and not block one of the two lanes of Highway 101 (Broadway Street). The project would also shift the sidewalk farther away from the highway or create a new pedestrian waiting area set back from the highway. In either case, the proposed bike lane would be between the pedestrian area and the bus stopping area. The CTRP/EPIC letter expresses concern that this could lead to significant conflicts between bicyclists and transit riders, "particularly transit riders using wheelchairs and those with hearing and/or vision impairments who may have trouble assessing approaching bike traffic." The groups request that Caltrans redesign transit stops to separate bus loading/unloading zones from bicycle lanes and provide safe conditions for all street users at and near bus stops.

Response: Having improved bus stops in the corridor will be a significant improvement for public transit in the corridor, and the separated bike lanes will be a significant

improvement for multimodal access. Some possible conflicts between the two user groups are unavoidable, and complete street projects in general commonly are designed with scenarios that involve pedestrians needing to cross bike lanes to reach public transit buses or bus stops. Raised bus waiting areas are a preferred option for separating bus loading zones and bike lanes, but even in those cases, pedestrians must cross bike paths to reach the waiting areas. The proposed design is consistent with the FHWA Separated Bike Lane Planning and Design Guide. Caltrans states that its design also is based on a similar design implemented in Portland, Oregon, in which Portland TriMet installed over 30 similar designs with more extensive bus use, and the design in that region has proven successful. Caltrans states that the proposed design was shared with and informed by feedback from various groups, including Tri-County Independent Living, a disability non-profit organization. Caltrans also states that the expectation of conflicts is low, and a proposed alternative to realign the bikeway behind the pedestrian loading area does not seem preferable because it would require bicyclists to cross the pedestrian path two times.

Special Condition 1 requires Caltrans to submit monitoring reports on these multimodal improvements. Those reports and the ongoing dialogue on the improvements therein will allow for the potential to address conflicts between pedestrians and cyclists at the bus stops. Therefore, the proposal as conditioned is consistent with the Coastal Act's provisions to maximize public access and other relevant provisions of the Coastal Act.

3) Driveway at Pierson's Building Center

Comment Summary: In a letter dated December 8, 2023, an attorney for the Pierson's Building Center raises concerns about the project proposal to eliminate acceleration/deceleration lanes that provide specific turn lane entry points from the highway into the building center (a retail commercial establishment) and from the building center back onto the highway. The proposed project would eliminate the separate turning lanes for the building center to accommodate the construction of the separated bike lanes, new sidewalk, and added landscaping (see Exhibit 5, p. 10.). The Pierson Building Center comments state that the closure of these dedicated turn lanes will cause traffic problems entering the center and contribute to traffic delays on the highway as traffic backs up trying to enter the center. The Pierson Building Center comments also state that the addition of a new bus stop just south of the Pierson Building Center entry will cause further traffic delays. The letter requests a delay in hearing and states that Caltrans should be required to conduct further traffic studies analyzing the potential for delays and likelihood of increased bike use. The letter also asserts that the proposed tree planting would block views of their advertising sign from the highway.

Response: For the most part, these comments relate to private concerns between the commentator and Caltrans. The concern that the new design could cause traffic back-ups on Highway 101/Broadway Corridor could be considered a Coastal Act public access issue, given that the Highway 101/Broadway Corridor here provides north and

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south access to various public coastal access and recreation opportunities in the vicinity. However, as discussed below, Caltrans and staff do not expect any significant adverse public access impacts from the removal of the acceleration/deceleration lanes fronting the building center on Broadway Street.

Currently, traffic flows into a deceleration lane and turn into the Pierson's Building Center, and cars exiting the center turn into a small acceleration lane to rejoin the highway. In the new design, the separate turning lanes will be removed; however, traffic would still be able to turn into the building center. The merging lanes themselves are quite short and do not significantly contribute to coastal public access in the corridor. Additionally, the removal of the deceleration lane is not expected to adversely affect public access along Highway 101/Broadway Corridor, because the project will not reduce the number of existing travel lanes along this stretch of Broadway Street. The project overall was informed by traffic studies within the Eureka Broadway Multimodal Corridor Plan and Caltrans states that it does not do traffic studies for the removal of such small segments of merging lanes when the intersection remains open. Caltrans states that they do not anticipate a significant increase in traffic back-ups on Broadway Street from the removal of the lanes because of their shortness. Rather the main traffic concerns relate to the building center's parking area, which mixes loading and unloading zones with parking and other vehicular uses and causes traffic to back up from the center to the highway. In particular, Caltrans states that the acceleration lane turning south is very short and provides almost no merging support.

The project would not close access to the building center and there is ample time for patrons to visit the building center throughout the day, with hours between 7:30 am and 6 pm during the work week when visitation is highest from trades people, which allows for a manageable amount of traffic flowing into the building center from Broadway Street. Caltrans and the building center representatives have not identified any particular time of day or day of the week with supporting evidence where visitors would have to queue on Broadway Street to turn into the building center if Caltrans removes the deceleration lane as part of this project.

Most importantly, the removal of the lanes is a necessary component of adding protected bike lanes, new sidewalk, and crosswalks. The project improves safety for multimodal users, expanding the number and type of users for the corridor. Some trade-offs are inevitable. The new bus stop and bike lanes will help shift users from cars and potentially reduce traffic, thus reducing congestion. The merging lanes themselves allow for cars to enter the turn into the center at higher speeds, which increases the risk to cyclists and pedestrians using the same area. The new design will require cars to slow down and come to a stop before turning into the center, improving safety.

In regard to the concerns over the tree plantings, those concerns are mostly a private, not a coastal act concern. The Commission notes that the vegetation and screening an important part of improving protection and comfort for multimodal access and for visual improvement of the corridor. Caltrans states that they may be able to carefully site the trees and select certain tree species to reduce or avoid the obstruction of the sign. If so,

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CT can submit revised final construction plans pursuant to **Special Condition 2**, which the Commission can process either as a de minimis change or through a CDP amendment.

The proposal is consistent with the Coastal Act's provisions to maximize public access and other relevant provisions of the Coastal Act.

II. Minor Error Correction

- Page 25: Modify text as follows (deleted text shown in strikethrough format; added text shown in underlined format):

Caltrans served as the lead agency for California Environmental Quality Act (CEQA) ~~review for the bridge replacement project. Caltrans prepared an Initial Study and adopted a Mitigated Negative Declaration for the project on December 22, 2021~~ and has determined that the project is covered by Categorical Exemption [14 CCR 15300, Class 4].