green wheels
Humboldt's advocate for transportation choices

City of Eureka
Community Development Department
Sidnie L. Olson, AICP
Principal Planner
531 K Street
Eureka, CA 95501-1165

January 30, 2009

Ms. Olson,

Thank you for the opportunity to comment on the DEIR for the proposed Marina Center. Green Wheels is a community organization which works for a healthier community, economy and environment, advocating for balanced and sustainable transportation on the North Coast.

The Marina Center Project, should it be built as proposed, is an unfortunate lost opportunity for Eureka's traffic safety, public health and economic vitality.

Eureka's Problems

Eureka is the second most dangerous amongst 96 comparable California cities when it comes to motor-vehicle-related injuries and deaths.[1] For such a small town, it has heavy traffic. There are substantial economic woes as well.

Some of these problems stem in part from transportation and land use policy that treat Eureka like a patch of asphalt for non-Eureka residents to drive over on their way to work or shopping. Due to land use decisions that limit housing development while emphasizing automobile-accessed retail development, Eureka has 30% of the jobs in Humboldt County and a large share of the retail space, but only 20% of the population. Thus large traffic volumes are generated as non-Eureka residents commute to work or drive to shopping destinations, and fierce competition between retailers to attract a limited customer base.

Eureka's streets are designed with an emphasis on traffic throughput over safety and livability. High-speed one-way couplets have been installed on H and I Streets, Harris and Henderson Streets, and 6th and 7th Streets to maximize the speed and volume of traffic through Eureka neighborhoods.

The glut of retail in Eureka, without a large local population to support it, results in substantial blight. When the Bayshore Mall was built, many Old Town businesses failed. Now the Bayshore Mall, with recent tenant bankruptcy filings is threatened with blight.

The proposed Marina Center threatens to exacerbate all these problems by introducing parking-intensive, large retail spaces with little housing or other uses to balance it. The results will be

increased traffic with associated emissions, noise, traffic injuries and deaths, and increased competition amongst retail establishments for a limited customer base.

Lost Opportunity

Ironically, using a different strategy, the developer could generate much more value from the property while at the same time addressing many of these issues. The site is within walking distance of two major grocery stores. It is close to recreational opportunities on the bay, at the Eureka Marsh, and on the boardwalk in Old Town. The commercial center of Humboldt County is a ten minute walk away. There is great potential for housing and offices with phenomenal bay views. Yet the project proposes not much more than one housing unit per acre.

We are not suggesting that this site should be developed only with residential units. The Coastal Commission has staked a position disallowing housing on the ground floor. The key is to implement a classic mixed-use strategy that maximizes the use of the site for housing and businesses, rather than wasting land on parking, which generates no revenue for the developer or the city.

Mixed-use developments enable a developer to do more with less land and less parking. Housing can be placed above retail and offices. Parking demand is substantially reduced since residents park at different times of day than employees and customers.[2] Coupling high density mixed-use development with strategies to facilitate pedestrian, bicycle and transit access can further reduce parking needs, increasing the amount of profitable development and boosting tax revenue by supplying retail and businesses with employees and customers.[3]

A large scale example of this approach is the Pearl District in Portland, Oregon. A blighted collection of industrial properties in close proximity to the downtown was developed into a high density mixed-use neighborhood with excellent pedestrian, bicycle and transit facilities. The developer made substantial profits, and the citizens of Portland view the project as a jewel in the crown of their downtown.

While providing bicycle and pedestrian facilities is an easy and obvious strategy to reduce parking demand, thus freeing up more land to facilitate more substantial development of the site, there are major failures in addressing non-motorized access to the site. Furthermore, the scale of the site makes this a lost opportunity to anchor and reorganize the transit systems around a transit-oriented development. In fact, in Green Wheels' April, 2008 call for feasibility study of Bus Rapid Transit for the Humboldt Bay Region,[4] one alternative alignment runs through the Balloon Tract property to create such a transit-oriented development opportunity.

A mixed-use approach that takes advantage of multimodal access to the site would not only facilitate a higher value project for the developer, and more reliable tax revenues for the City. Such an approach could act to facilitate reduction in Eureka traffic by giving more people the opportunity to access all the amenities of downtown Eureka without relying on their cars. That means more business activity with fewer parking problems for the whole downtown.

Failure to Plan for All Modes

Inconsistency of this project with Eureka's 2004 Strategic Visioning is worth taking note of. First, the Strategic Visioning calls for a mixture of uses on the waterfront, including housing, which is not included in this project in a substantive way. Second, it calls for promotion of bicycle and pedestrian use of city streets.[5] The proposed project is particularly deficient in this regard.

Some of the failures in the Transportation Section of the DEIR stem from a failure view the project from the perspective of users of the site other than motorists. For example, bicycle access exiting from the site to the 7th Street bike route requires the bicyclist to proceed straight across Broadway on 6th Street from the right turn lane (there is no through lane or crosswalk on the eastbound side of 6th street), mount the curb and walk or ride her bicycle south on the sidewalk on Broadway, against traffic, cross Commercial Street, and cross 7th Street to reach the 7th Street Bike Lane. The crossings of Commercial Street and 7th Street against traffic on the sidewalk will put bicyclists in a location where motorists exiting Broadway will not expect them. Therefore this bike route design is inappropriate without radical changes the access design.

When outlining transit access to the site, the authors neglected to properly research the Redwood Transit System schedule, citing inaccurate schedule information (which is easily available at *www.redwoodtransit.org*). The document also fails to clarify the location of transit stops. Because of high traffic speeds, high traffic volumes and lack of space for buses to pull over, there are few transit stops close to the site even though transit routes pass close to it. In the EIR, transit stops need to be indicated on the maps showing where transit service exists so the public has an opportunity to understand how this project is served by that transportation mode.

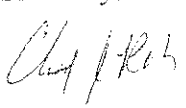
The only traffic impact metric used was Level of Service (LOS) for motor vehicles. There are measures of the quality of service for other modes, such as the Bicycle Compatibility Index to measure changes in bicycle quality of service,[6] and a measure of transit quality of service as well.[7] Given the Eureka Visioning's stated goal of promoting bicycle and pedestrian use of city streets, the EIR needs to measure traffic impacts for bicyclists and transit users, and compare it with a mixed-use transit-oriented development alternative.

Back to the Drawing Board

The Balloon Tract represents such a great opportunity for renewal in Eureka that the degree to which this project fails to seize that opportunity is staggering. While I have laid out some options for developing the site to its full potential, there are certainly others. However, the current design is so removed from what would provide optimal value to either the developer or the City of Eureka that we recommend the developer start over.

There are approaches to urban design which accommodate public input in a way that brings a large proportion of the public on board, neutralizing the NIMBYism associated with infill projects. One approach is a design charrette in which the developer involves stakeholders from a broad array of interests in an intensive initial design process. While such a process has greater upfront costs, the resulting project can move forward more easily afterward with broad support from the community. We suggest starting over and doing this to get a project developed that the developer and the people of Eureka can all enjoy and be proud of.

Sincerely,



Chris Rall – Executive Director
Green Wheels

CC:
Eureka City Council

[1] Office of Traffic Safety. 2007. Available at: *www.ots.ca.gov/Media_and_Research/Rankings/default.asp.*
[2] Shoup, Donald. 2005. The High Cost of Free Parking. Chicago: Planners Press. First chapter available at: *http://shoup.bol.ucla.edu/Chapter1.pdf*
[3] Strategic Economics, Hamilton, Rabinovitz & Alschuler, Inc., Urban Explorer. 2004. *Towards the Future: Jobs, Land Use and Fiscal Issues in San Jose's Key Employment Areas 2000-2020.* Whitney & Whitney, Inc.
[4] Green Wheels. 2008. Bus Rapid Transit for the Humboldt Bay Region: A Call For Feasibility. Available at: *www.green-wheels.org/brt/feasibilitycall*
[5] Eureka City Council. 2004. Strategic Visioning. Available at: *www.ci.eureka.ca.gov/civica/filebank/blobdload.asp?BlobID=2184*
[6] Federal Highways Administration. 1998. Available at: *www.ntl.bts.gov/DOCS/98095/index.html.*
[7] Nelson Nygaard. 2006. *Downtown Glendale Mobility Plan: Transportation Performance Measures and Street Typology.* Available at: *www.ci.glendale.ca.us/planning/pdf_files%5CMobilityPlan/GLENDALE_PerfMeasures_StreetsRPT.pdf.*