April 24, 2025

Mr. Kash Boodjeh, AIA
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P.O. Box 398
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Additional Transportation Analysis for the We Are Up Project

Dear Mr. Boodjeh;

W-Trans has prepared additional material to supplement the transportation analysis previously prepared for the We Are Up project, proposed to be located on four adjacent parcels (1515, 1529, and 1551 Central Avenue and 144-146 Weirup Lane) in the community of McKinleyville in the County of Humboldt. This report updates a previous trip generation estimate in response to the revised Project Description, which now includes new parcels and resulting project footprint adjustments. The current analysis also considers subsequent modifications to the project description, an assessment of consistency with the Humboldt County General Plan transportation policies, the project's potential vehicle miles traveled (VMT) impacts, and adequacy of the proposed parking supply.

Project Description

The project as proposed includes up to 70 residential units that would accommodate an estimated 100 to 120 residents. The Weirup Lane parcel would include 13 cottages and 17 townhomes, while up to 41 apartments would be included in a three- to four-story community center building on the Central Avenue parcel. The community center building would include seven studios, 17 one-bedroom units, 11 two-bedroom units, and six three-bedroom units, as well as meeting space, an arts and crafts room, support office, and a 200 square foot retail space. Uses for the community center include hosting events, classes, and meetings for residents and the broader community as well as shared meals for residents and guests. In addition, the project would include a greenhouse, garden, barn, orchard, and open space.

Trip Generation

The current project description represents an expansion of the proposed uses analyzed in the previous Initial Study and Mitigated Negative Declaration (IS/MND). The IS/MND contained a use-specific trip generation to estimate daily trips for residents, guests, employees, and deliveries, based on the number of residents and characteristics of the project. Based on this analysis it was estimated that the project would generate 99 trips per day. It is noted that the IS/MND trip generation estimate was project-specific and did not rely on Institute for Transportation Engineers (ITE) standard rates. The assumptions from the IS/MND were used in this analysis for the elements of the project that remain as previously proposed with the exception of the retail space. Because the retail space was not previously analyzed, the standard ITE rate for Land Use 822 (Strip Retail Plaza) was applied. Based on these assumptions, the residential and retail components of the project are estimated to generate approximately 165 trips per day. These estimates are summarized in Table 1.

Table 1 – Estimated Daily Trip Generation

Source of Trips	Number	Assumptions	Estimated Trips
Residential Occupant Drivers (35% of total residents)	42	2 trips/day*	84**
Visitors and Deliveries	17	2 trips/day*	34**
Weekly Dinner Guests	150	Divided by 7 for daily trips, vehicle occupancy of 2.2 assumed*	20**
Live-in Full-Time and Part-Time Employees	2	2 trips per day*	4**
Off-Site Full-Time and Part-Time Employees	8	2 trips per workday, multiplied by 5/7 for daily one-way trips*	12**
Retail	200 square feet	54.45 trips per 1,000 square feet (ITE rate)	11
Total trips			**165**

* Assumptions based on ISMND; ** Each trip represents a trip to or from the site, so a round trip is counted as two trips.

The trip generation associated with events to be hosted at the community center was also estimated. The ISMND trip generation discussion focused on trips associated with the residential use and did not address trips generated by large events. Event-related trips were discussed in the assessment of the adequacy of the proposed parking supply as the availability of on-site parking was a key constraint on event size.

Per the Notice of Preparation (NOP) project description, a variety of events would be hosted at the site. The events would range in size. "Primary events" such as community dinners, conferences, or meetings, could accommodate up to 150 people. Such events were addressed in the previous trip generation estimate as provided in Table 1. No limitations are proposed on the number of these events. The project also includes hosting "Indoor and Outdoor Weddings/Special Events" at the community center or elsewhere on the grounds. These events could involve up to 400 persons, including all guests, employees, and volunteer staff. These larger events would be limited to 35 per year and no more than three events per month.

While it is expected that the actual usage of the community center would be substantially less than these maximum limits, especially in the near term, the proposed size and number of these events were selected to provide a conservative estimate and to allow for greater flexibility for future uses of the site. For the 35 special events, it was assumed that the community center would host two weddings per month as well as one other event per week, with the maximum number of potential attendees at all events. Based on the vehicle occupancy rate assumed in a 2019 approval of a special event permit by Humboldt County for a music festival at the County Line Ranch, it was assumed that there would be 3.0 persons per vehicle; for 400 attendees, this translates to 133 vehicles per event. Assuming two trips per vehicle per event (entering and exiting the site) and the maximum of 35 events per year, this totals 9,310 event-related trips per year or an average of 26 trips per day.

Combining the trips for the residential component of the project with the event-related trips, the project would generate an estimated average of 191 trips per day, as summarized in Table 2.

Table 2 – Average Daily Trip Generation – Total	
Land Use	**Daily Trips**
Multifamily housing	154*
Retail	11
Events	26
Total	**191**

* Includes total trip generation, excluding the retail use

Vehicle Miles Traveled (VMT)

Under the California Environmental Quality Act (CEQA), transportation impacts are evaluated based on the vehicle miles traveled (VMT) generated by the project; VMT represents the number of trips multiplied by the average trip length. While the County of Humboldt has not adopted thresholds of significance, County staff provided direction to use the recommended approach and significance thresholds from Humboldt County's *VMT Study* (2024) to evaluate the project.

The conclusion relative to VMT in the IS/MND was that the project would screen out from VMT analysis since it was estimated to generate fewer than 110 trips per day. The Governor's Office of Planning and Research (OPR) published its *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2018), which provided guidance indicating that projects below this threshold can be presumed to have a less-than-significant VMT impact and can therefore be screened out from VMT analysis. The County VMT Study was completed after the IS/MND and its guidance applies a similar small project screening criterion, although it is expressed in project-generated VMT. The study's recommended screening criteria of 725 VMT was determined by multiplying 110 trips per day by 6.58 miles, which is the average trip length in Humboldt County according to the 2012 *California Household Travel Survey*. With the revised project description and increased number of residential units, the project no longer falls within the small project threshold and therefore requires a VMT analysis.

The Humboldt County VMT Study is based on analysis of "big data" secured by the firm Streetlight Data. As a result, the data reflect real-world trips rather than estimates derived from travel demand computer models. The study recommended significance thresholds based on the VMT at the Census block group level, and an online VMT tool was developed to facilitate the calculation of VMT for residential and office/ employment-based uses.

The project includes both the residential facility and community center and is therefore considered to be a mixed-use project. Since the VMT Study does not specifically identify an analysis approach for mixed-use projects, the approach recommended by the OPR Technical Advisory was used, with each proposed use analyzed independently. It is noted that the residential facility includes not only dwelling units but staffing, so the residential and employment VMT were analyzed separately. Events were also treated as a separate use for the VMT analysis.

Residential VMT

For residential uses, the VMT Study recommends the use of screening criteria that presumes a less-than-significant impact if the VMT per capita is at least 15 percent below the subregional average. The project is located in Census Block Group 060230105022, which has a VMT per capita of 20.47. The VMT per capita for unincorporated Humboldt County is 22.1, so the significance threshold is 18.79. Applying this threshold, the project would need to reduce its residential VMT by 15.0 percent to have a less-than- significant impact.

Based solely on the VMT per capita, the project would result in a potentially significant VMT impact. However, VMT per capita is derived from existing residential development in the area and given the anticipated characteristics of residents of the proposed project, many of whom would be non-drivers, trip patterns are expected to be

substantially different from typical residential projects. Based on the trip generation estimate in Table 1, the residential component of the project is estimated to generate 154 trips per day, including trips by residents, visitors, and employees of the residential facility, as well as deliveries. This estimate of the trips generated by the residential use was based on the total daily trip generation and excluded the off-site employee trips, event and retail trips, all of which were analyzed separately.

To estimate the VMT per capita for the residential component of the project, the estimated trip generation was compared to ITE trip generation rates of more typical residential uses in the project area, which are single-family homes and multifamily housing. A 70-unit project consisting only of single-family homes would be expected to generate 660 trips per day, while a multifamily residential project would generate an estimated 472 trips per day. In comparison, the residential component of the project would be expected to generate 77 percent fewer trips than a project consisting of single-family detached homes and 67 percent fewer trips than a typical multifamily project. This comparison is shown in Table 3.

Table 3 – Residential Trip Generation Comparison

User Groups	Trips Per Day (70-unit project)
Single family detached*	660
Multifamily*	472
We Are Up	154

* Based on standard ITE trip generation rates, *Trip Generation,* 11th edition.

Based on this difference in trip generation rates, the VMT per capita was estimated for the We Are Up project. While the project's Census Block Group includes a mix of single family and multifamily development, to provide a conservative analysis it was assumed that the VMT per capita for the Census Block Group (20.47 miles) represents only multifamily development, since the latter use generates fewer trips than single family development. It was also assumed that the average trip lengths for each type of residential development would be similar, so the reduced number of trips would translate to a comparable reduction in VMT.

Based on the estimated trip generation in Table 3, We Are Up is estimated to generate 67 percent fewer trips than a comparably sized multifamily project. With a VMT per capita of 20.47 miles for the Census Block Group, the project-level VMT per capita would be 6.68 miles, or 67 percent lower. Since this rate is 64 percent below the threshold of 18.79, the residential VMT associated with the project meets the screening criterion for residential projects and the VMT impact is considered less than significant.

Supporting this finding is the presence of pedestrian and bicycle infrastructure in the area surrounding the project site as well as numerous retail opportunities within walking distance of the site that could be accessed without a vehicle, including Grocery Outlet adjacent to the site, Rite Aid across the street from the project site, and a variety of nearby restaurants. As indicated in an interoffice memorandum issued by the County of Humboldt Public Works Department on February 21, 2025, the project would enhance the existing pedestrian crosswalks across Central Avenue, improving access between the project site and these destinations. The adjacent streets providing access to these sites include sidewalks and there are bike lanes along Central Avenue and Sutter Road, which support the use of non-vehicle transportation modes. The project would be adding a bus stop on Central Avenue adjacent to the project site and additional bus stops are located on Central Avenue less than 700 feet from the project site, offering an additional non-vehicle transportation option.

Employee VMT

For office uses, the Humboldt County VMT Study recommends applying a screening criterion of at least 15 percent less than the subregional average. For Census Block Group 060230105022, the VMT per employee is 7.95. The countywide average VMT per employee is 14.70, so the significance threshold is 12.50. Since the VMT per

employee for project TAZ is well below this level, employment VMT is considered less than significant and screens from VMT analysis.

Retail VMT

The Humboldt County VMT Study recommends that local-serving retail projects be screened out for VMT analysis, as they help create more efficient trip patterns, resulting in short trips and a net reduction in VMT. Projects under 50,000 square feet are considered local-serving; since the project's proposed retail use is only 200 square feet, it is well below the screening criterion. Therefore, the VMT impact for the project's retail component is considered less than significant and can be screened from more detailed analysis.

Event-Related VMT

Neither the Humboldt County VMT Study nor the OPR Technical Advisory provide specific guidance for analyzing community centers or other uses that serve recreational users or visitors, such as hotels. However, a common approach to analyzing VMT for such uses is to perform a qualitative assessment based on the larger context of the project and anticipated users, so consideration was given to the type of events likely to be hosted at the project site.

The community center event space would not be an attraction that would draw new visitors to the region; rather, it would likely be used for events that serve the local population. As a result, this use is similar to retail development in that it would largely redistribute existing event-related trips from other locations rather than generate new trips. The Humboldt County Visitors Bureau includes a list of existing event spaces on its web site, www.visitredwoods.com. Of the 21 venues listed, only one is located north of Arcata that has similar capacity to the proposed project and that venue is located approximately six miles east of McKinleyville in Fieldbrook. There are also event venues located in Blue Lake, approximately seven miles east of McKinleyville. The project would provide an event space that, compared with existing venues, would require less travel for attendees originating in McKinleyville or communities to the north. Compared with other nearby event sites, it is a shorter distance from the US 101 corridor, resulting in reduced trip lengths to and from the site, and the community center would be expected to host a broader variety of events than the other sites. Without the availability of the proposed event space, events attended by residents of McKinleyville or communities to the north would generally need to be held at facilities in Arcata, Eureka, or other communities farther south, requiring longer travel distances. Therefore, the anticipated events hosted at the project site would not be expected to result in an increase in regional VMT, and the impact is considered less than significant. To the extent that the community center would be used as an alternative to more remote locations, it would reduce VMT below existing levels.

Significance finding – The VMT associated with the project's residents, employees, retail use, and events would be less than significant.

General Plan Consistency

The project was evaluated for consistency with transportation policies from the Humboldt County General Plan. Policy C-P.5 establishes a standard of Level of Service (LOS) C for intersection operations, measured in terms of vehicle delay. It is noted that vehicle delay is not considered a transportation impact under CEQA.

The primary project access point is located on Central Avenue, which is designated as Business 101 and is the major north-south surface street through McKinleyville. The Central Avenue/School Road intersection was identified as the location where adverse effects would most likely be observed, as both streets provide access to and from US 101, the major regional highway through the McKinleyville area. Per the previously cited interoffice memorandum, due to concerns about the potential for increased delay at the Central Avenue/Anna Sparks Way intersection, the project would provide improvements to complete the existing traffic signal system. In addition, the project includes constructing the east leg of the intersection, which would serve as the primary project access

point; this would include pavement markings to maintain clear access to the parking lot and prevent queueing that could otherwise extend into the intersection and onto Central Avenue.

While intersection LOS was not directly evaluated as part of this analysis, recent analyses of existing and future traffic in the vicinity of the project site were reviewed to assess the potential of project-generated traffic to result in adverse effects on delay. The Humboldt County Travel Demand Model was recently deployed to analyze effects of the proposed McKinleyville Town Center project on several intersections along the Central Avenue corridor (it is noted that the report for this prior work is not yet available publicly though it has been provided to County staff). The Town Center traffic operations study included LOS analysis of the intersections of Central Avenue/ Heartwood Drive and Central Avenue/Hiller Avenue under both existing conditions (2015 base year) and future conditions (2045 horizon year). Under existing conditions, both intersections were determined to operate at LOS A during the a.m. and p.m. peak hours. In the future scenario, which includes 30 years of anticipated regional growth, the Central Avenue/Heartwood Drive intersection would continue to operate at LOS A during both peak periods. The Central Avenue/Hiller Avenue intersection would also continue to operate acceptably at LOS A during the a.m. peak and LOS B during the p.m. peak. Therefore, even with the addition of anticipated future regional growth, both intersections would continue to meet County standards. Since the trips generated by the project would be substantially less than what was assumed for future growth in the area, LOS at nearby intersections would continue to remain at acceptable levels as defined by the County's General Plan policies.

Aside from the total number of trips generated by the project, its unique characteristics suggest that its potential effect on peak hour traffic operations would be nominal. The project's total daily trip generation is an average of 191 trips per day. Excluding events, which would not generally occur during peak periods, the total would be 156 trips per day. Typically, about 10 percent of daily trips occur during the p.m. peak hour, which would translate to 16 project-generated trips during the p.m. peak hour. However, since project residents would be primarily individuals with disabilities and seniors, the project's trip patterns are not typical of most development projects. There would be eight full-time employees at the site, including two that would live on site and would therefore not commute. Based on these considerations, the project is expected to have fewer trips during peak commute times than the overall population.

Finding – The project would not result in nearby intersections operating unacceptably.

Parking Supply

The adequacy of the proposed parking supply was assessed in accordance with Humboldt County Code Section 109.1.2.6. Since the project would require parking for residents, employees, and visitors, the demand associated with each use was determined separately and totaled to provide the total parking demand for the project. As noted in the trip generation analysis, standard ITE land use categories do not precisely match the proposed uses, so a custom trip generation estimate was prepared. To provide consistency, the same assumptions were applied regarding resident vehicle use and ownership, as well as the number and size of anticipated events.

The project as proposed would provide a total of 178 parking spaces. This includes 142 paved parking spaces, eight garage spaces, and 28 lawn spaces to be used for overflow parking during events. Of the 150 paved and garage spaces, 45 would be reserved, with 35 designated for residents and 10 for employees. The 133 undesignated spaces (105 paved spaces plus 28 lawn spaces) would primarily be used to accommodate guests. As previously noted, it is estimated that there would be up to 42 resident vehicles; if there are more than 35 resident vehicles stored on site, the additional vehicles would need to be parked in the unreserved spaces.

Given the number of residents, anticipated levels of vehicle ownership, and the number of employees, the available parking supply would far exceed usage, with the exception of during special events. The number of visitor spaces was used to determine the maximum special event size that could be accommodated while accommodating all vehicle parking on-site. Assuming 3.0 persons per vehicle for special event attendees, and that 42 spaces would be needed to accommodate residents' vehicles, a maximum of 378 attendees (including staffing)

could be accommodated, assuming all attendees would be using vehicle transportation to access the site. If there are no more than 35 resident vehicles stored on site, there would be 133 spaces available for special event attendee use, which would allow for events of 400 attendees. This is summarized in Table 4.

Table 4 – Adequacy of Parking Supply

User Groups	Proposed Designated Spaces	Anticipated Maximum Demand
Residents	35	42
Employees	10	10
Visitors/Events*	133	126
Total Parking Spaces	**178**	**178**

* 35 large events would be held each year

Finding – Assuming that attendees would be accessing the project site by vehicle, the proposed on-site parking supply could accommodate events with up to 400 attendees, including staffing, assuming no more than 35 resident vehicles are simultaneously on-site, or 378 attendees if there are 42 resident vehicles as projected. Events with more than 400 attendees would require additional analysis.

Conclusions and Recommendations

- The project would generate an average of 191 trips per day, including all proposed uses.
- The potential VMT impact was evaluated separately for the proposed residential, employee, and retail uses, as well as planned events. The VMT impact for all uses was determined to be less than significant.
- Based on intersection improvements to be provided by the project at the Central Avenue/Anna Sparks Way intersection, analysis of existing and future intersection operations along the Central Avenue corridor, and the nominal number of peak hour trips that would be generated by the project, the project is not expected to result in unacceptable operations at nearby intersections.
- The proposed on-site parking supply was determined to be adequate for events with up to 400 attendees, assuming no more than 35 resident vehicles are stored on site. If there are 42 resident vehicles on site, the maximum event size would be reduced to 378 attendees.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,

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