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From: Elaine Astrue <eastrue@protonmail.com>
Sent: Friday, February 18, 2022 12:28 PM
To: CEQAResponses
Subject: Public Comment on Nordic Aquafarms DEIR, 3.12 Transportation

The DEIR states (3.12.6) that the project impact TR-a is Less than Significant. However, the proposed project conflicts in multiple areas with the Humboldt Regional Bicycle Plan (Bike Plan) (1). Specifically, the project as defined conflicts with the Bike Plan's vision, primary goal, and near-term plans to provide a connected, safe transportation network for non-motorized road users.

While the primary goal stated in the Bike Plan is to create the safest conditions for bicyclists by providing bikeways and improving roadways to bicycle travel, the project's estimated increases in heavy truck and car traffic would significantly degrade safety for non-motorized road users in the Project vicinity. (2,3,4,5)

The referenced research finds that higher volumes of car and truck traffic increase the risk of injury collisions for cyclists. The lack of a formal cycle track (separated pathway) or formal bike lane also increases risk. For example (2):

...busy streets are associated with higher risks than quiet streets; and [...] bicycle-specific facilities are associated with lower risks.

This section and section 3.12.2 also omit the planned Class III bicycle route for SR 255 e/o New Navy Base Road, described in the Bike Plan (1: Figure 18, page 6-18). As SR 255 is the only ingress/egress route, no alternate exists for bicycles and pedestrians in the project vicinity. Further, this regional plan for a Class III bike route itself appears to be inadequate and outdated vs. current roadway standards. The latest NACTO design guidelines (6) indicate that a Class I protected bicycle lane is recommended for a high-speed limited access roadway such as SR 255.

Regarding existing conditions and roadway safety, the DEIR includes a brief mention of collision data along the New Navy Base Road on page 3.12-14. However, there is no corresponding analysis for SR 255. Since Highway 255 is contiguous with New Navy Base Road and required for nearly all travel to/from the project site, the DEIR must address collision data along SR 255 both n/o and e/o New Navy Base Road.

The DEIR states (3.12.6, page 3.12-14) "...Project access formerly served 500+ wood chip trucks per day" and because of this historical use, the project impact TR-c is Less than Significant. However until ~10 years ago SR 255 e/o New Navy Base Road (i.e. the Samoa Bridge) was defined as a freeway and Caltrans prohibited bicycle and pedestrian traffic on the bridge. Given the introduction of non-motorized access to SR 255 e/o New Navy Base Road, this historical use case is not relevant to the proposed project and its impacts.

The DEIR states (3.12.7) that the project impact TR-e is Less than Significant. However, the project vicinity is subject to extremely strong winds, which is why a significant offshore wind farm project is being proposed for the same location. In certain conditions, the vital connector SR 255 e/o New Navy Base Road (i.e. "the Samoa Bridge") is already marginal for bicycle and pedestrian use due to the combination of strong winds and substandard roadway design. The Samoa Bridge travel lanes are 11 feet wide, barely wide enough for heavy trucks under ideal driving conditions. It is currently routine for trucks to be blown out of their travel lane, either into the narrow shoulder or the oncoming traffic lane. Given these existing conditions, any increase in heavy truck traffic would represent a substantial increase in hazards to cyclists on this segment on SR 255. Thus the project would have a significant cumulative impact on non-motorized safety.

Regards,
Elaine Astrue

References

1. https://hcaog.net/sites/default/files/final_bike_plan_update_2018_incl_maps.pdf
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3. <https://injuryprevention.bmj.com/content/19/5/303>
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5. <https://ehjournal.biomedcentral.com/articles/10.1186/1476-069X-8-47>
6. <https://nacto.org/publication/urban-bikeway-design-guide/designing-ages-abilities-new/choosing-ages-abilities-bicycle-facility/>