

## California Department of Transportation

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May 27, 2021

Ms. Heidi Kunstal  
Planning Department  
County of Del Norte  
3015 H Street  
Crescent City, CA 95531

Governor's Office of Planning & Research

**May 27 2021**

Dear Ms. Kunstal:

### STATE CLEARINGHOUSE

This letter is regarding the proposed Hambro Family Entertainment Center located south of Crescent City, adjacent to HWY 101 and across from South Beach. The project proposes to develop a portion of a 14.3-acre property (APN 115-020-042-000) in two phases, an 18-hole miniature golf course, axe throwing, batting cages, parking area, picnic area and restrooms etc. in phase 1. Phase 2 would consist of a go-kart track and parking improvements. The center at build-out would provide food, water, restrooms, and off-street parking for 36 vehicles.

On February 5, 2021, Caltrans District 1 submitted a comment letter where we highly recommended the construction of a left-turn lane prior to opening day of phase 1 rather than in phase 2 (as recommended in the project's Traffic Impact Study). We also recommended installing a 6-foot wide Americans With Disabilities (ADA) compliant sidewalk with curb and gutter across the entire parcel frontage with HWY 101, as well as other advisory comments. The Del Norte County Planning Commission approved the Coastal Development Permit (CDP) for this project on March 3, 2021. Conditions of approval included constructing the left-turn lane in phase 2 rather than in phase 1 as requested, and did not require the ADA compliant sidewalk, curb, and gutter along the project frontage with HWY 101.

This letter seeks to clarify our position, including a clear and unambiguous description of the project's potentially significant transportation and safety impacts, our concerns regarding these impacts, and a detailed explanation of requested mitigation.

### Traffic Impact Study-

The Traffic Impact Study (TIS) dated July 9<sup>th</sup>, 2020 studied a different phased approach than was put forward to the Planning Commission on March 3, 2021. The TIS studied a project consisting of 3 phases:

Phase 1: 18-hole miniature golf course with 12 stalls in parking lot

Phase 2: Go-kart track with up to 32 karts and parking lot expanded to 32 stalls

Phase 3: 7,000 sq. foot arcade (indoor video games) and parking lot expanded to 44 stalls.

The development approved by the Planning Commission was a 2-phase plan:

Phase 1: 18-hole miniature golf course, batting cages, axe-throwing, picnic area etc. and at least 19 parking stalls.

Phase 2: Go-Kart track and at least 36 parking stalls

It is apparent that Phase 3 (as described in the TIS) was modified and incorporated into Phase 1 as presented to the Planning Commission. It is reasonable to expect that axe throwing, batting cages and a picnic area would generate more trips than an arcade alone. Also, there was no mention of on-site food and beverage sales typically offered in conjunction with family fun centers. The lack of food establishments in the vicinity would likely generate even more trips to this development. Considering the expanded scope of Phase 1, it is reasonable to conclude that the mitigations recommended for Phase 2 (TIS) are needed for Phase 1 (current proposal).

### Sidewalk and curb improvements—

We disagree with the conclusion in the Traffic Impact Study that existing facilities for pedestrians, bicyclists and transit users are adequate given the semi-rural location of the project. To be consistent with State and Caltrans' goals to encourage bicycling and walking, a 6-foot-wide sidewalk with a curb and gutter should be included across the entire project parcel frontage. The sidewalk must be built to current standards for ADA and Accessibility and coincide with the Caltrans right of way line while the paved shoulder width must be 8 feet minimum (10 feet preferred). As mentioned in the Traffic Impact Study, sidewalks are proposed along US 101 between Sunset Circle and Anchor Way in Crescent City which would end less than 900 feet from the project site (TIS, p4). As this distance is very walkable in an area of expanding urbanization, constructing the sidewalk at the project location allows connectivity to the existing pedestrian network in Crescent City. The County of Del Norte also agrees with this

recommendation, considering sidewalk creation a public safety infrastructure improvement (DNCPC minutes, p15). Requiring incremental frontage improvements such as sidewalks, curb, and gutter where none already exist follows standard practices, allows for safe pedestrian access and improves the storm drain system. These features are necessary to protect the public health, safety and welfare, in addition to improving the multi-modal network as well as the equity of the transportation system.

The California Highway Patrol (CHP) has identified a need for a widened right shoulder northbound to accommodate road users (motorists, bicyclists, pedestrians) and for the ability for right-turning traffic to decelerate outside the through traffic lane. This, in conjunction with the sidewalk and delineated driveways, would also provide motorists with cues that they are entering a developed area, causing them to slow down. This could lead to a reduced speed limit or shift the existing 50 mph speed zone further south, with lower prevailing vehicle speeds. Also, constructing the sidewalk would clearly delineate private property from the State right of way, create additional shoulder width for bicyclists and deceleration of vehicles, and possibly even on-street overflow parking, if needed. The sidewalk and curb improvements are similar to improvements at the Anchor Beach Inn (US-101 at Anchor Way) which is also a sidewalk island from Crescent City's sidewalk network.

#### Left Turn Channelization-

The Traffic Impact Study recommended the construction of the left turn lane as a requirement for Phase 2; however, we have determined that it is necessary for it to be included as part of Phase 1. Since the scope of Phase 1 was expanded from the scope of Phase 1 in the TIS, it is reasonable to conclude that the mitigations that were deferred to Phase 2 are now needed for opening day in Phase 1. Due to the project location south of Crescent City where drivers are increasing their speed to 50 mph (and higher), and likely distracted by the ocean views and activity along the west side of the highway, southbound drivers may not anticipate a vehicle stopped in their lane waiting to turn left. It is therefore reasonable to conclude that permitting the project without requiring the left turn channelization will result in a marked increase in rear-end collisions involving southbound drivers.

We disagree with the Traffic Impact Study conclusion that the left turn lane is only needed in phase 2 of this project based on reported collisions in the project area.

Casual observation in the area reveals a significant amount of activity associated with the proximity to the ocean, especially South Beach. Located directly across from the project site, the wide sandy South Beach is known as a popular surfing location and attracts surfers, beachcombers, dog walkers, families and passing motorists. This location is used to conduct surfing events and competitions where competitors and spectators park along the dirt shoulder off the southbound lane of US 101. Also, the proposed Hambro Family fun Center being directly across from South Beach would attract beachgoers to cross the highway to use the restrooms, eat, drink and to avail themselves of the attractions.

Per Caltrans Traffic Accident Surveillance and Analysis System (TASAS) data, many of the multi-vehicle collisions along this stretch involved drivers entering or exiting the highway for beach access. In one collision report, a southbound driver who collided with a vehicle parked on the shoulder admitted to being distracted by the view of the ocean. Prohibiting parking along the west side of the highway would not be enforceable, nor likely allowed by the Coastal Commission.

#### Roadway Characteristics-

Motorists heading south from downtown Crescent City are increasing their vehicle speeds from a posted 30 mph to 50 mph or more at the project location. According to the Highway Design Manual, a vehicle travelling at 50 mph needs a stopping distance of 430 feet, increasing to 580 feet at 60 mph (2020 HDM, page 200-2). The single lane US 101 curves north of the project location reducing sight distance. Motorists who are accustomed to travelling at a relatively high speed may not be aware of, or have enough time to react to a vehicle stopped in the southbound travel lane waiting to turn left. The problem is further compounded by having the ocean to the right which offers a visual distraction to drivers.

#### Conclusion-

It is unfortunate that our recommendations for a left turn lane and a sidewalk with curb and gutter in Phase 1 were not required as conditions of approval for the project's permits and entitlements, granted to date. We hope that this letter helps to clearly explain our serious concerns regarding the project's potential impacts, including concerns regarding the safety of the traveling public, as well as the measures that we have determined should be required in order to reduce and mitigate those potential



impacts. These safety concerns have been seconded by the California Highway Patrol in Crescent City.

The project will require an encroachment permit from Caltrans. We will require that the measures, identified and justified in this letter, be included with the project's access to US 101. Design details for these features will be finalized and approved as part of the encroachment permit.

Other features recommended in our previous letter, such as electric vehicle charging, etc. continue to be recommended, but may be constructed at the discretion of the project's developer.

We look forward to continuing to work closely with the County and the developer, as this project moves forward. If you have any questions or would like to discuss this letter, feel free to call me at (707) 834-2413, or email me at [rex.jackman@dot.ca.gov](mailto:rex.jackman@dot.ca.gov). Thank you.

Sincerely,



Rex A. Jackman  
Branch Chief, Transportation Planning  
Caltrans District 1

c. Larry Depee, CHP Area Commander

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May 27, 2021  
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bc:

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