

APPENDIX A

Airport Ground Access Improvement Plan for California Redwood Coast–Humboldt County Airport (ACV)

Airport Ground Access Improvement Program for California Redwood Coast–Humboldt County Airport (ACV)

PROGRAM PURPOSE

CALIFORNIA MANDATE

HCAOG, in its duties as the Regional Transportation Planning Agency (RTPA), must adopt a long-term regional transportation plan, and update it every four years. The RTPA must include in the plan an airport ground access improvement program (AGAIP) for each “primary air carrier airport” within its planning area (per California Government Code §65081.1(a)). Primary air carrier airports are those that have over 10,000 annual enplanements. The single such airport in Humboldt County is the California Redwood Coast–Humboldt County Airport (formerly the Arcata-Eureka Airport), which had 56,682 enplanements in 2013; 51,668 in 2014; and 55,168 in 2015. This AGAIP was prepared during the 2014 update of the regional transportation plan (RTP), the first of HCAOG’s RTPs to include an AGAIP; HCAOG has updated the AGAIP in conjunction with updating the RTP in 2017.

For preparing an AGAIP, California law (§65081.1) stipulates that:

- (b) The program shall address the development and extension of mass transit systems, including passenger rail service, major arterial and highway widening and extension projects, and any other ground access improvement projects the planning agency deems appropriate.
- (c) Highest consideration shall be given to mass transit for airport access improvement projects in the program.
- (d) If federal funds are not available to a transportation planning agency for the costs of preparing or updating an airport ground access improvement program, the agency may charge the operators of primary air carrier airports within its planning area for the direct costs of preparing and updating the program. An airport operator against whom charges are imposed pursuant to this subdivision shall pay the amount of those charges to the transportation planning agency.

FHWA & FAA GUIDANCE

HCAOG follows the “Airport Ground Access Planning Guide,” (Guide) to prepare the AGAIP. The Guide was prepared jointly by the FHWA and FAA in 1996. Although the guide is old, its basic information still applies to current circumstances. This is the only guidance—federal, state or local—that HCAOG staff was able to find for this mandated program. Most of the information in this AGAIP comes straight from the Guide.

OVERVIEW OF THE PLANNING PROCESS

The FHWA and FAA deem the full planning process for an airport ground access improvement program to be long term, at twenty years or longer. “This time frame allows the thoughtful analysis of such issues as land use change and land use policy,” the Guide states, “that require the longer time orientation.”

The seven steps of the AGAIP planning process, summarized by FHWA-FAA, are:

1. Define the problem: What is the policy issue being addressed?
2. Given the understanding of the policy issue, establish performance measures to monitor and evaluate the program.
3. Collect data needed to apply performance measures.
4. Understand the system’s patterns, demand, and performance, and estimate future demands.
5. Develop candidate strategies and actions.
6. Assess effectiveness of alternative strategies and actions; select cost-effective actions.
7. Implement selected policy interventions/strategies; monitor established performance measures; adapt management based on feedback.

Table 1 (next page) shows the purpose and examples of carrying out the seven steps. The AGAIP for ACV will follow the seven steps, revising, expanding, or combining steps as warranted. The defined problem (step one) and the improvements identified for solving the problem (step five), are described below under “ACV’s Dominant Policy Issues.” Stakeholders will continue with the next steps to further develop and implement the AGAIP. Stakeholders include, but are not limited to, County staff from the Aviation Division/ACV and Fly Humboldt!, the Humboldt County Aviation Advisory Committee, and HCAOG committees, as well as interested members of the general public.

AIRPORT GROUND ACCESS POLICY ISSUES

COMMON AIRPORT GROUND ACCESS ISSUES

Airports, in general, develop their airport ground access improvement programs to address one or more of the following issues or needs:

- ◆ **Localized air quality problems**, such that a jurisdiction is not meeting an air quality standard for a criteria pollutant or greenhouse gas emissions. Solutions could be to reduce motorized vehicle trips and to upgrade vehicles and machinery to more efficient and/or cleaner-fuel engines (e.g., replace all diesel equipment on the airside with electric or compressed natural gas).
- ◆ **Quality of multi-modal access & service for passengers**, where the airport managers are motivated to improve ground transportation choices for airport users, and reduce the number of motorized vehicle trips or single-occupancy vehicle (SOV) trips that the airport generates.

Table 1. FHWA’s Seven-Step Airport Planning Process

Step	Purpose	Examples in Airport Access
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One: Define Problem and Policy Context	Determine central policy issues faced by the airport. Its characteristic and setting defines what kind of performance is important to monitor.	The need to: expand airport capacity; provide accessibility and support economic development in key areas; lower airport-related total VMT (vehicle miles travelled); minimize environmental damage to neighboring communities.
Two: Define Performance Measures	Measures are selected only after agreement on the nature (and priority) of challenges faced in and around the subject airport. Establish the measures to be used to determine success or failure of the system performance.	Examples: traffic flow on the access roads; amount of choice offered to arriving passenger; percentage of region served by shared-ride services; percentage of passengers who arrive by other than private vehicle; cost and volumes for moving cargo and passengers.
Three: Collect Data Needed to Apply Performance Measures	Document both asset condition and level of performance, with a base-year inventory of intermodal systems' physical and operational characteristics.	Data sources to examine airport access patterns include: periodic ground access surveys, ridership and revenue data, and regional trip tables based on a simulated process. Operational characteristics may include time, cost capacity and usage.
Four: Understand Patterns and Demands	Utilizing performance measures data, understand existing and projected conditions and patterns in ground access.	Is demand skewed toward the central business district? Is congestion better or worse than it was five years ago? At times of greatest congestion, is the airport serving primarily resident non-business travelers or nonresident business travelers? What will conditions be like 5, 10 or 20 years from now?
Five: Develop Alternative Strategies and Actions	Determine what project or combination of projects would most effectively address the identified policy issue/need.	Policies range from curb striping that encourages non-SOV airport access, to creating exclusive right-of-way service
Six: Evaluate Alternative Strategies and Actions	Use established performance measures to analyze and evaluate alternatives; choose actions and policies to implement.	Evaluating alternative strategies can go beyond analyzing vehicle flows, and include concepts such as the mobility of people and goods, and accessibility to various destinations.
Seven: Implement and Monitor Selected Policy Interventions	Solve identified problem(s); understand effectiveness of implemented strategies. Revise strategies to increase or expand effectiveness.	A series of comprehensive ground access surveys are taken every five years, to track changes in different users'/market segments' travel behaviors.

- ◆ **Airport-related congestion in ground transportation** that negatively impacts roads on and near the airport. The traffic congestion may be contributing negatively to air quality, noise quality, mobility (e.g. travel times to/from airport for airport users and ground transportation services), fuel consumption, and may create localized impacts to nearby neighborhoods, as well as local to global environmental impacts.
- ◆ **Poor ground access for freight businesses** that use the airport. Bad circulation design, congestion, and lack of space are examples of factors that may be hindering goods movement and economic opportunities.
- ◆ **Poor ground access/circulation for emergency response**, which diminishes the effectiveness of emergency response and evacuations.
- ◆ **Airport expansion plans**, which opens opportunities for (and may require) redesigning ground transportation circulation, access, parking facilities, public transit services, etc.

- ◆ **A need to increase airport revenues/reduce costs**, which motivates airport managers to reconsider, for example, parking fees, shuttle services, or switching airport transport services to private or in-house operations.

ACV'S POLICY CONTEXT

The AGAIP shall be guided by and consistent with adopted plans, as well as updates, of the *Arcata-Eureka Airport Master Plan Report*, the *County of Humboldt Airport Land Use Compatibility Plan—Humboldt County Airports* (amended 1998), and the *Humboldt County Regional Transportation Plan*.

Arcata-Eureka Airport Master Plan Report (September 2005)

“Arcata-Eureka Airport’s principal role,” says the Master Plan Report, “is to serve as a base of operations for scheduled airline services.” The airport’s role is also to serve as:

- A source of scheduled passenger and cargo service
- A point of air access to the community
- A site for emergency access to the community
- A place to conduct business
- A base for Humboldt County region pilots

“For the foreseeable future,” the report states,

it is anticipated that the operational role of Arcata-Eureka Airport as a commercial airport will remain essentially the same as at present. ... It is anticipated that with future development of the airport facilities that the airport will experience moderate growth over the long run.

Regional Transportation Plan (RTP) Update

HCAOG’s regional transportation plan, “VROOM,” (2017) states the goal and objectives for the region’s transportation system, which are:

Overall Goal: HCAOG’s goal is for Humboldt County to have a comprehensive, coordinated, sustainable, and balanced multi-modal transportation system, so that people in the region can travel and move goods safely and efficiently by the modes that best suit the individual or business/industry, and society at large.

Overall Objective: Program all transportation funds based on multi-modal transportation goals and objectives, and needs and priorities as established in the Regional Transportation Plan.

To achieve the overall goal and objective, HCAOG will pursue six main objectives/planning priorities for planning projects and programs. The objectives support one another and will apply to each transportation mode, framing each mode’s policies. In alphabetical order, the objectives are:

- ❖ Balanced Mode Share/Complete Streets
- ❖ Economic Vitality
- ❖ Efficient & Viable Transportation System
- ❖ Environmental Stewardship
- ❖ Equitable & Sustainable Use of Resources
- ❖ Safety

Below are policies that set a national context for developing AGAIPs (Title 49-Transportation, Subtitle VII-Aviation Programs, (USC §47101; laws in effect on March 10, 2014).

(a) General. It is the policy of the United States

- (5) to encourage the development of intermodal connections on airport property between aeronautical and other transportation modes and systems to serve air transportation passengers and cargo efficiently and effectively and promote economic development;
- (6) that airport development projects under this subchapter provide for the protection and enhancement of natural resources and the quality of the environment of the United States;
- (7) that airport construction and improvement projects that increase the capacity of facilities to accommodate passenger and cargo traffic be undertaken to the maximum feasible extent so that safety and efficiency increase and delays decrease;

(b) National Transportation Policy.

- (1) It is a goal of the United States to develop a national intermodal transportation system that transports passengers and property in an efficient manner...
- (3) A national intermodal transportation system is a coordinated, flexible network of diverse but complementary forms of transportation that transports passengers and property in the most efficient manner. By reducing transportation costs, these intermodal systems will enhance the ability of the industry of the United States to compete in the global marketplace.
- (4) All forms of transportation, including aviation and other transportation systems of the future, will be full partners in the effort to reduce energy consumption and air pollution while promoting economic development.
- (5) An intermodal transportation system consists of transportation hubs that connect different forms of appropriate transportation and provides users with the most efficient means of transportation and with access to commercial centers, business locations, population centers, and the vast rural areas of the United States, as well as providing links to other forms of transportation and to intercity connections.
- (6) Intermodality and flexibility are paramount issues in the process of developing an integrated system that will obtain the optimum yield of United States resources.

General Conformity Rule for Air Quality

The State of California, federal government, and regional and local agencies set air quality standards, which may be different for some pollutants. A jurisdiction that meets an air quality standard is “in attainment” for that pollutant; otherwise it is “in non-attainment.” Air quality in Humboldt, Del Norte, and Trinity County is regulated by the North Coast Unified Air Quality Management District. The air in the district “is considered to be ‘in attainment’ of state and federal ambient air quality standards except for the State’s 24-hour PM₁₀ standard. The two pollutants of greatest concern are ozone and particulate matter” (<http://ncuaqmd.org>, April 3, 2014).

The FHWA-FAA Guide gives direction regarding the federal General Conformity Rule:

It is important to understand the type of air quality impacts that an airport must examine. The U.S. Environmental Protection Agency (EPA) has made it clear that the general conformity rule will cover new emissions, both direct and indirect, which the airport agency can practicably control, and which it will maintain control over due to a continuing operational responsibility.

Therefore, airports should check with the appropriate FAA Airports District Office to determine the need for determining air quality impacts under the general conformity rule.

The regulation establishes that when an airport operator intends to spend federal funds on a project within the boundaries of the airport, the air pollution emissions impacts experienced off the facility must be documented to the standards required by the State Implementation Plan (SIP). In short, this means that airport operators must become involved in developing mitigation measures that minimize the growth of SOV (single-occupancy vehicle) travel.

Relatively more recently, the FAA and US EPA directed a “Proactive Role for Airports,” including the following:

First, general conformity evaluations are generally based upon emissions estimates. Therefore, EPA and FAA encourage airport operators to develop comprehensive emissions inventories for their facilities as well as estimates of future activity levels and emissions. This should include information on all sources of emissions, including passenger and employee commuting, aircraft, ground support equipment (GSE), stationary sources, and construction activities. Next, operators should work closely with local and State air quality agencies to ensure that the SIP accurately reflects all emissions at the airport and growth rates for operations at the airport. Airport operators should also evaluate the sources of pollutant within their control to determine how the pollution can be reduced or eliminated. This information can be very useful in designing a project to keep the emissions below the de minimis levels or to mitigate the increase in emissions from the project. (FAA & EPA, 2002)

ACV’S DOMINANT POLICY ISSUES

HCAOG staff consults with the Humboldt County Aviation Advisory Committee (HCAAC) and County Aviation Division staff to identify and confirm ACV’s ground access problems, potential solutions, and dominant policy issue(s).¹ They have confirmed that this comment in the FHWA-FAA Guide applies to ACV: “For the airport manager in a region that has attained the national air quality standards, and that does not suffer from significant levels of congestion, the ground access issue turns to the standards of accessibility experienced by the user.” The dominant ground transportation issue is the lack of pedestrian and bicycle connectivity to access the airport terminal from adjacent properties.

Access and circulation infrastructure to and at the airport consists of the following:

- Airport Road provides direct access to and from the airport and connects to the nearby U.S. 101 Interchange and Central Avenue (a major arterial road). Anecdotal testimony reports that most drivers drive faster than 35 mph, the posted speed limit. A portion of Airport Road on the southwest side (across from the airport) has a curb and a tread-worn pedestrian trail, but it is not continuous. The northeast side of Airport Road, which accesses the airport, has no crosswalk, sidewalk/trail or curb. Airport Road has striped shoulders, but no designated bikeway.
- Within the airport grounds, Airport Loop Road provides direct access to the terminal. There is no sidewalk at the intersection of and Airport Loop Road and Airport Road. Airport Loop Road does not have sidewalk or bikeway access to the terminal.

¹ Discussions during Humboldt County Aviation Advisory Committee’s regular monthly meeting, October 2017.



The ACV airport currently has modest multi-modal amenities, as follows. It is served by two public transit lines: Redwood Transit System (local) and Amtrak (regional). Three car rental companies have staffed kiosks at the airport. Private (commercial) shuttle and taxicab companies and local hotels also provide ground transport. At the airport Business Park, a quarter-mile from the airport, bike rentals (including a helmet) are available for guests of the Holiday Inn Express & Suites.

The HCAAC has identified infrastructure projects that would serve to improve pedestrian and bicycle access to and from the airport. The improvements are conceptual and need further study to determine scope, feasibility, design, and costs. The HCAAC has prioritized the proposed projects as follows:

- 1) Install a pedestrian crosswalk at Airport Road and Airport Loop Road.
- 2) Improve walkways from Airport Road to the terminal.
- 3) Install sidewalk on Airport Road.
- 4) Improve the walkway from the Airport Business Park (Concorde Drive and Boeing Avenue) to the airport (Airport Road).
- 5) Provide an overhang to cover passenger loading/unloading zone.
- 6) Provide covered walkways to terminal (within airport grounds).
- 7) Install bicycle storage.

The projects could potentially be combined with larger construction projects and, as such, may be implemented in different order than listed. The proposed project to install sidewalk on Airport Road was added to HCAOG's Regional Transportation Plan (RTP), *VROOM*, in the 2017 update. The project is included in the project list (Table *Streets-4*) in the Complete Streets Element of *VROOM*.

PERFORMANCE MEASURES

After the airport manager and the advisory committee define the dominant policy issue(s) for the AGAIP and the corresponding intervention strategies, they will choose the parameters that will best measure and evaluate how well the strategy is doing. These parameters, or performance measures, evaluate the strategies and the system changes that the strategies are meant to induce.

The FHWA-FAA Guide presents an example of Logan International Airport, in Boston, where the policy issue was the environmental damage to communities located adjacent to the airport. The Boston planners wanted a policy and an intervention strategy to minimize the number of people who were driving through the neighborhoods to get to the airport. They focused on measuring the relationship between the primary mode choices and the actual number of vehicle trips using the

roadways near the airport (i.e., average number of vehicle trips per passenger, VTTP).² The higher the VTTP is for a mode, the higher is airport-related congestion and air pollution. (For regions that do not have to examine a wide variety of policies to deal with congestion and air quality issues, the VTTP performance measure may require a more detailed level of analysis than is warranted.)

Table 2. Ground Access Vehicle Trips per Air Passenger Trip

MODE	VTTP*
Pick-Up/Drop-Off	1.29
Taxi	1.09
Parking	0.74
Rental Car	0.69
Door-to-Door Shuttle	0.33
Scheduled Bus	0.10
Rapid Transit	0.0

* Vehicle trips per air passenger

Source: FHWA-FAA 1996

The FHWA-FAA Guide summarizes Boston’s program thusly:

Table 2 shows that in the common pick up/drop off mode, 1.29 vehicle trips are generated for each one-way air passenger trip. For the drive/park mode, only 0.74 vehicle trips are generated per air passenger trip. Therefore, one intervention policy might be to encourage the pick-up/drop-off trip to become a drive alone/park trip. A vehicle with two persons—one of whom will then return home after dropping off the air passenger—is not considered to be more efficient than a vehicle with one passenger going directly to the parking garage. Table 2 shows that moving 100 passengers from drop-off mode to park-alone mode would decrease vehicle trips by 55. (Similarly, moving 100 passengers from taxi to door-to-door shuttle would decrease vehicle trips by 41.)

In this innovative evaluative method, any policy action that has the effect of moving the passenger to a lower ranking on the levels shown in Table 2 is considered to be positive, and vice-versa. For planning multimodal ground access, this method is exemplary in that it is modally blind and can be applied to a wide variety of possible policy interventions.

The policy implications of the data on Table 2 are extremely important; for the data shows that influencing modal choices within the auto mode must be part of comprehensive access strategy, in addition to the traditional study of shifting passengers from automobiles to transit.

Other performance measures, of course, can be used to evaluate the AGAIP’s policies and strategies. Parameters might include total travel time, cost and volumes for moving cargo and passengers, capacity versus demand, accidents, perceived quality and the average time to transfer people or freight from one mode to another. Table 3 shows examples from the FHWA-FAA Guide.

² Developed by Boston Central Transportation Planning staff based on information from a 1987 Air Passenger Survey. (FHWA-FAA 1996)

Table 3. Examples of Performance Evaluation Measures

Goals	Objectives	Performance Measures	Data Needed	Source of Data
Mode Split to Non-SOV* Modes	Increase balance of use across ground modes.	Percent of total airport users to shared ride services.		User surveys, as updated with mode-specific reports.
Existence of Choices for Ground Access	Have non-motorized and HOV* motorized options to airport.	Number and availability of ground access options, including pedestrian and bicycle facilities that connect to airport.	Inventory of existing facilities and services.	Site inventories, schedules, operating agreements, permits etc.
Accessibility	Minimize travel time.	Travel time to major destinations {This measure requires a method of calculating change in door-to-door times.}	Airport and state transportation facility information, population and employment data, regional transportation simulations.	State, regional, and local agencies.
	Optimize ADA access for ground transportation	Extent of ADA compliance	Airport compliance schedules	On-site inventory of compliance
Quality of ground service to airport.	Provide high quality ground access.	Headways, layover times, HOV vehicle cleanliness. Speeds and volume-to-capacity ratio (V/C) on transit, access roads, bikeways, walkways, parking lots. Structural condition, design standards.	Condition of access facility, perceptions and ratings from ridership/users.	Field examinations/inspections, performance audits, maintenance logs, user surveys. Traffic and ridership counts, capacity data.
Affordability/ Cost Minimization	Minimize social costs.	Subsidies and environmental costs.	Revenue recovery, quantified pollution costs.	FAA summaries including subsidies, environmental models.
	Minimize capital costs.	Meet short-term budgets. Meet long-term budgets (assumes long-range capital improvements, minimal/no backlog maintenance).	Cost/revenue balances (budgets), cost models, condition ratings.	Master plans, construction cost data; inventory.
Connectivity Between Modes	Promote easy transfer between modes.	Service availability between modes; time and distance of transfer between modes less than N minutes and N feet.	Layover times travel times	Schedules/timetables, facility and service specifications, plans, surveys.
Convenience	Make transit as convenient as possible.	Availability of remote intermodal ticketing and luggage support.	Existing ticketing choices.	Inventory of services.
Mobility	Make bus/airport shuttles competitive with autos.	Ratio of travel times.	Travel times and speeds, average time to transfer people or freight from one mode to another.	Travel time studies, schedules, surveys.
	Provide capacity for peak hour loads	Extent of vehicle queuing, and overall delay	Quantification of observed delay/back-up.	Carriers' logs of on-time performance
Reliability	Improve on-time performance at terminals	Percent of ground transport on-time departures.	On-time performance.	Carriers' internal logs.
Safety	Improve safety in motion connecting modes.	Accidents per passenger mile, community concerns.	Accident frequency and severity data, community perceptions/experiences.	Sheriff's/Police Depts. and FAA records, surveys, interviews.

*SOV=single occupancy vehicle; HOV=high occupancy vehicle.

Source: FHWA-FAA 1996.

ALTERNATIVES FOR IMPROVING AIRPORT GROUND ACCESS

AIRPORT CIRCULATION

The different transportation modes that serve multi-modal ground access are:

- Private automobile, motorcycle (drop-off/pick-up (kiss-n-ride), park-n-ride, short/long-term/employee parking, package drop-off, rental car)
- Pedestrian (abled and disabled)
- Public transit buses (local, express, intercity, tour, paratransit)
- Private shuttles, limousines, taxis
- Bicycles
- Delivery vehicles (packages, mail, freight, baggage)

When planning, designing, and managing a multi-modal ground access system, airport planners and managers consider the balance and circulation of modes to and around the airport. The components of airport land-side circulation include the following:

- Airport Roads
 - Primary airport access roads
 - Terminal area access roads
 - Recirculation roads
 - Terminal frontage roads
 - Service roads: General-use and restricted-use
- Terminal curb areas
 - Curb frontage
 - Sidewalk platforms
 - Terminal entranceways
 - Pedestrian crossings and walkways
- Public Transportation Areas
 - Bus stops
 - Bus Pullouts
 - Bus staging and parking areas
- Public Parking Facilities
 - Short-term and long-term parking areas and/or structure
 - Parking lot entrances and exits
- Rental Car Areas
 - Parking area entrances and exits
 - Access road
- Taxicab, Shuttle, and other commercial vehicles
 - Terminal curbside for pick-up and drop-off
 - Staging and parking areas
 - Storage (staging) and dispatching of taxi cabs,

MARKET SEGMENTATION

Air travelers can be segmented by purpose of their trip (e.g., business or non-business) and residency (e.g., resident of airport service area or visitor). The trip purpose will determine the importance of different ground access modes at a given airport. For example, airports that primarily serve tourists often have higher taxicab and rental car use than other airports. Residents are more likely to use a private automobile to get to and from the airport. Airport employees are an important market segment that accesses the airport by transit.

The FHWA-FAA Guide reports on five large airports in areas with mature transit systems:

Between 10 and 21 percent of employee trips to these airports use transit, and less than 10 percent arrive as auto passengers. Even though these airports are in metropolitan areas with the best transit systems in the country, over 70 percent of the airport employees drive to work. ... (T)hese data illustrate the importance of different modes

for providing service to different market segments and the importance of market segmentation for airport access planning.

Below are excerpts of what the FHWA-FAA Guide suggests for improving airport ground transportation for:

- Access roads (off-airport, near-airport, and on-airport)
- Pedestrian and bicycle
- Public transit
- Automobile parking
- High occupancy vehicles (HOVs)
- Travel demand management (TDM)

ACCESS ROADS

When designing for multi-modal access, airport circulation designs should:

- Separate pedestrians and vehicular traffic.
- Establish pedestrian/bicycle networks.
- Establish bicycle travel ways, separated from auto and bus lanes whenever possible.
- Design pedestrian crossings with adequate sight distance, signing, and pavement markings to maximize safety.
- Minimize the number of at-grade crossing points. Especially where the number of conflicts between pedestrians and vehicles are expected to be high, consider grade-separated pedestrian walkways.

“Not to be overlooked when examining the regional context of airports are needs related to emergency vehicle access to and from airports. To ensure adequate emergency medical service response times, the highway segments that constitute the shortest routes between hospitals/major medical centers and the airport, as well as redundant routes, should be identified and considered for improvements. In addition, the shortest routes from existing and planned local fire and rescue stations that support the airport should be identified and reviewed. Potential highway capacity bottlenecks for these vehicles should be identified and mitigated through geometric or operational changes” (FHWA-FAA 1996).

PEDESTRIAN & BICYCLE

Virtually all trips include walking, so almost all airport users will be pedestrians for at least a leg of their journey. Bicycle travel will be used by airport passengers, employees, and visitors, too, although employees are presumably the most likely. Bicycle trips will also be combined with transit trips (e.g., a transit rider will bring his/her bicycle on the bus to the airport).

For airports, typical ground access enhancements include the following:

- Provide covered walkways from public parking lots to entrances of terminal buildings.
- Improve markings and lighting of pedestrian routes.
- Improve ADA access from parking to curbside to terminals.
- Install secured bicycle parking (short-term, long-term, covered, lockers).
- Improve pedestrian and bicycle trails and walkways, especially those that connect intermodal terminals.

PUBLIC TRANSIT

Multiple-stop routes serving the airport, because of frequency of stops and associated travel times, are usually less attractive to airport passengers and visitors than to airport employees. Public transit's "marketability," generally, is considered high for employees, medium for resident passengers, and low for non-resident passengers.

The FHWA-FAA Guide offers these ingredients for success:

- Express or semi-express service to major activity areas (e.g., central commercial area/business district, tourist centers, residential areas with high density of airport employees).
- Convenient schedule aligned with airport peak times (for air passengers and airport employees).
- Competitive fare (transit fares cost less than parking).
- Sheltered waiting areas for shuttle/bus stops.
- Good visibility of signs and markers denoting shuttle/bus stops.
- Passive and active security features (e.g., video or audio monitoring of platforms and station areas, well-lit corridors, visible elevators, roving security personnel).

HIGH OCCUPANCY VEHICLES (HOVs)

High occupancy vehicle services at airports are usually managed by the private sector. The most common HOV services are door-to-door shuttles (i.e. shared ride vans), courtesy vehicles, and charter buses. Large (international) airports will often manage HOV inter-terminal and parking shuttles.

The service and operational issues that should be considered when designing HOV services include:

- Maximize passenger comfort and convenience on vehicles (e.g., seating configuration and capacity, baggage storage space, the width and height of vehicle doors and steps, passenger shelter amenities, speed and reliability of service).
- Minimize the frequency of stops, necessary transfers, and dwell times.
- Reserve curb space for boarding/de-boarding at convenient, visible locations.
- Develop desired performance measures (e.g., passengers per hour, vehicles per hour, minimum headway).
- Establish operating procedures, including information regarding passenger pickup and drop-off, driver and vehicle requirements, and staging areas.
- Consider the needs of disabled passengers in the provision of services (e.g., lift-equipped vehicles, audio information systems or driver announcements of stops, color and size of passenger wayfinding signs and symbols).
- Identify fare collection methods and procedures that minimize passenger delay.

Good wayfinding systems include:

- Clear signage and graphics, posted in highly visible locations at frequent intervals throughout the terminal to facilitate passenger wayfinding.
- Information describing fares, schedules, and best routes to popular destinations.
- Pathways that allow passengers to identify their destination and minimize their reliance on signs.
- Staffed information booths to supplement available signs and computerized terminals.

AUTOMOBILE PARKING

Generally speaking, options for improving airport parking conditions include the following:

- Reallocate space to match parking demand (air passenger, visitor, employee, rental car company).
- Modify parking operations or rates.
- Increase parking capacity by redesigning and/or constructing facilities.

Airport parking can be allocated for different users (e.g., employees, air passengers, rental cars), different parking durations (e.g. long term, short term), or different levels of service (e.g., self-park, valet). Sometimes an airport will have enough total spaces, but too much is allocated to one user group and not enough to the other. For example, if the airport needs more long-term public parking, more spaces could be created by moving employee lots or converting them to long-term/remote parking lots.

TRANSPORTATION DEMAND MANAGEMENT (TDM)

Transportation demand management measures are designed to reduce the number of vehicle trips made, by shifting trips to higher-occupancy modes. Employees and travelers are the two major travel markets that access an airport, and each group demands different travel times and peak volume capacities. “A study of California airports estimated that 40 percent of all vehicle trips to the airport and 20 percent of all airport-related vehicle miles traveled (VMT) are by employees,” says the FHWA-FAA Guide. “These estimates are probably transferrable to airports nationwide...” Most TDM measures are designed to encourage employees to use HOVs.

The FHWA-FAA Guide also remarks that,

Having a TDM program successfully reduce air passenger ground access trips is considerably more difficult than for employee trips. Air passengers are concerned about getting to and from the airport as quickly, conveniently and reliably as possible. Air passenger traveling on business, in particular, are often less price-sensitive to the cost of the access trip, including parking charges, and are willing to pay for the convenience of taking a taxi or parking at an airport. However, experience with work travelers has shown that if the cost of driving alone is increased and quality alternatives are provided, passengers making business and pleasure trips will be more likely to shift to higher occupancy modes.

Some typical TDM strategies, described more below and in Table 4, include:

- Managing High Occupancy Vehicles (HOV)
- Financial incentives
- Information and marketing
- Parking management
- Airport access fees and circulation control

Managing HOVs

Employers can support vanpooling by:

- Providing ride-matching assistance
- Buying or leasing vans for employees use

- Subsidizing employee ownership or lease
- Subsidizing vanpools or riders by paying operational expenses and parking costs
- Insuring vans
- Maintaining and/or fueling vehicles

Financial Incentives

Employers can offer positive economic incentives to shift SOV drivers to ridesharing. Employees who use car/vanpools, transit, bicycles, or other alternatives to driving alone, can be enticed and rewarded with direct and indirect financial incentives. Rideshare subsidies, for example, pay employees either a pre-set amount, a reimbursement for actual travel costs, or pre-paid transit passes or coupons. Indirect financial incentives are measurable benefits with monetary, but non-cash, value. Examples of indirect financial incentives are: use of fleet vehicles for ridesharing; subsidized fuel or maintenance (provided on-site or with vouchers accepted at local gas stations); extra vacation time accumulated; “catalog points” awarded for ridesharing and redeemable for merchandise; free or discounted equipment (e.g., walking shoes, bicycles, etc.).

Parking Management Program

Perhaps the most effective TDM measure for airports is managing parking. Higher charges for airport parking will encourage employees and some passengers to look for alternatives to driving their automobile to the airport. However, there is a risk that higher parking prices will increase the drop-off of passengers, increasing airport-related congestion and air pollution.

Table 4. TDM Strategies for Airport Ground Access

TDM Strategies	Characteristics	Market Segment				
		Employee	Visitors/ Tourists	Local Residents	Airport Visitors	Meeter/ Greeter
Parking Prices/ Fees	Parking rates can change based on modes or time of day.	X	X	X	X	X
Reduce Parking Supply	Limit amount of parking available.	X	X	X	X	X
Employer-Sponsored Ride-Matching Program	Program matches employees who want to use commute alternatives.	X				
Preferential Parking for Ride Sharing	Reserved parking spaces near entrance to building/work site for employees who rideshare.	X				
Guaranteed Ride Home	Commuters using a high-occupancy mode get free or subsidized emergency transportation, generally by taxi or rental car, for the trip home.	X	X	X		X
Information, Marketing, and Promotions	Post information via kiosks, bulletin boards, posters, flyers, website. Contests, prize drawings, rideshare fairs, commuter and bike clubs.	X	X	X	X	X
Transportation Coordinator	Offers individual trip planning assistance, and actively encourages HOV modes through marketing and information.	X	X	X	X	

Source: FHWA-FAA 1996.

SOURCE MATERIAL

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APPENDIX B

Addendum to the Final Environmental Impact Report

Prepared for the Humboldt Regional Transportation Plan 2013-14 Update

VROOM...Regional Transportation Plan 2017 Update

Humboldt County Association of Governments

ADDENDUM

to the Final Environmental Impact Report

prepared for the Humboldt Regional Transportation Plan 2013-14 Update

SCH# 2013102063

INTRODUCTION

All counties in California have a transportation planning agency, officially designated as either a metropolitan planning organization (MPO) or a Regional Transportation Planning Agency (RTPA), based on the county's population. HCAOG is Humboldt County's designated RTPA; it is governed, per a joint powers agreement of 1968, by the seven incorporated cities and the County of Humboldt.

The RTPAs core functions are to “maintain a setting for regional decision-making” and “involve the public in this decision-making” (CTC 2017). In tandem with that function, RTPAs must prepare three documents:

- an annual Overall Work Program;
- a Regional Transportation Improvement Program (RTIP), a five-year program proposal of projects that regions prepare, in coordination with Caltrans, for inclusion in the State Transportation Improvement Program; and
- a long-range plan, the Regional Transportation Plan (RTP), which HCAOG must update every four years.

HCAOG's RTP, *Variety in Rural Options of Mobility* (“VROOM...”), covers a 20-year planning horizon. *VROOM...2017* updates the version that HCAOG updated in 2013-2014 (and adopted in August 2014). In conjunction with the 2014 update, HCAOG certified the Final Environmental Impact Report (EIR) in July 2014 (State Clearinghouse #2013102063). HCAOG has assessed the potential environmental impacts of the 2017 update of the RTP *VROOM...*, and has documented the assessment and findings in an addendum to the Final EIR. An EIR addendum, as a specific document defined by CEQA statute, is discussed below.

PURPOSE OF AN ADDENDUM TO A CERTIFIED EIR

WHEN EIR ADDENDA APPLY

HCAOG is the Lead Agency for adopting the Humboldt County RTP. When a Lead Agency has certified an EIR for a project (or plan) and subsequently the circumstances of the proposed project change, CEQA Guidelines specify when the Lead Agency shall prepare a “subsequent” EIR or an “addendum” to the EIR. Briefly stated, an addendum is appropriate where the changes to the project or plan do not pose a substantial change to the environmental impacts as analyzed in the

Section 15162: When a Subsequent EIR is Required

The CEQA Guidelines Section 15162 states that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

previously certified EIR. (Or, more technically, an addendum “can be used where there is no substantial evidence that the modification would result in a new or substantially more severe impact” (AEP 2017).)

A subsequent EIR is required, per Section 15162, if changes to the proposed project or project setting would potentially cause “significant environmental effects or a substantial increase in the severity of previously identified significant effects” that were not addressed in the EIR that the Lead Agency certified. (See sidebar for full text of Section 15162.)

If project (or plan) changes are minor with no change in scope and they will not result in any new or substantially more severe significant effects than were identified in the certified EIR, then, per CEQA Guidelines Section 15164, the Lead Agency or responsible agency shall prepare an addendum to a previously certified EIR. Section 15164 also allows that: “(c) An addendum need not be circulated for public review but can be included in or attached to the Final EIR,” and “(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project” (or plan).

PURPOSE OF THE RTP EIR ADDENDUM

The purpose of this Addendum is to update the *Humboldt Regional Transportation Plan Update 2013/14 Update–Final Environmental Impact Report* (FEIR; State Clearinghouse #2013102063) based on changes proposed to the RTP “VROOM...” as part of the 2017 update. This Addendum to the FEIR evaluates the environmental impacts that could result from minor changes in the RTP update’s proposed policies and action plans (or project lists). The FEIR’s sections were reviewed and updated as appropriate to confirm that no new impacts would occur as a result of implementation of the Regional Transportation Plan, as described in this Addendum. Conditions of the regional transportation system have not changed substantially since the FEIR was adopted; likewise,

the RTP 2017 update proposes policies and actions essentially identical in scope and intent as that envisioned in the FEIR. The proposed RTP update will not result in more significant impacts; no changes to and no new mitigation measures are required.

The proposed plan, as updated, (1) is not anticipated to result in new significant impacts; and (2) would not require major revisions to the previously certified FEIR; therefore, impacts are deemed consistent with those in the FEIR. None of the conditions of Section 15162 have occurred (see sidebar), which would have compelled preparing a subsequent EIR; therefore, this Addendum to the certified FEIR is consistent with CEQA Guidelines Sections 15162 and 15164.

FINAL EIR & RTP BACKGROUND

PROGRAM FEIR BACKGROUND

HCAOG is updating the 20-year Regional Transportation Plan, VROOM..., to comply with its four-year update cycle. HCAOG's last RTP update was prepared during 2013-2014. Before adopting VROOM in August 2014, the HCAOG Board certified the Final Program EIR in July 2014 (State Clearinghouse #2013102063).

For the environmental review in 2013-14, HCAOG staff prepared an Initial Study to determine which environmental factors required further analysis in an EIR. The Initial Study (Appendix A of the FEIR), determined that the RTP 2014 would have a less-than-significant adverse impact (or less-than-significant when the identified mitigation measures were incorporated with implementation) on these environmental topics, which therefore did not warrant further analysis in an EIR:

- Aesthetics
- Agricultural Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

After conducting the Initial Study, HCAOG analyzed these environmental topics in an EIR:

- Air Quality
- Biological Resources
- Environmental Justice
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Transportation/Circulation

as well as Growth-Inducing Impacts and Irreversible Effects.

Program EIR: Tiered Environmental Assessments

Program EIRs serve as part of the “tiering” approach for CEQA analysis. Program EIRs readily apply to RTPs because RTPs are largely policy documents and their proposed project are mostly conceptual and will almost always go through additional project-level environmental review. The 2014 FEIR explains its function and potential use as a Program EIR; we reproduce part of that explanation below, revised for the proposed RTP update:

Analysis of site-specific impacts of individual projects is not the intended use of a program EIR. Many specific projects in the RTP 2017 update are not currently defined to the level that would allow for such an analysis. Individual, specific environmental analysis of each project will be undertaken as necessary by the appropriate implementing agency prior to each project being considered for approval at the local level. This program EIR serves as a first-tier environmental document under CEQA supporting second-tier environmental documents for:

- Transportation projects developed during the engineering design process.

Project sponsors implementing transportation projects would undertake future environmental review for projects in the proposed RTP 2017 update. These sponsor (or implementing) agencies would include the cities within Humboldt County as well as Humboldt County, Caltrans, and public transit agencies. In sponsoring individual projects, local agencies may choose to take advantage of the streamlining benefits of the Program EIR, or to engage in their own environmental review without use or reference to the Program EIR. If they so choose, these agencies would be able to prepare subsequent environmental documents that incorporate by reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives, and other relevant factors. If the lead agency finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review. Where subsequent environmental review is required, such review would focus on project-specific significant effects (and if necessary project-specific mitigation measures) specific to the project, or its site, that have not been considered in this program EIR (FEIR page 1-7).

The FEIR and the Addendum include a programmatic review of the Action Plans of each RTP Element, assessing—at the programmatic level—the environmental impacts of projects listed in the RTP (the Addendum reviews only those projects that are newly proposed in the 2017 update; it does not duplicate the FEIR’s review). As discussed earlier, the Program FEIR’s and Addendum’s level of analysis is consistent with the conceptual level of the projects in the RTP.

The FEIR programmatically reviewed all projects, some of which could have significant impacts, and identified relevant mitigation measures that could be used by local agencies to mitigate impacts to a less-than-significant level. When the respective implementing agencies move forward on their individual projects (e.g., through actual project design), they will undertake analyzing the potential environmental impacts of each project individually and specifically, as applicable, in order for their own agency’s decision-making body to consider approving the project.

Further, as noted in the 2014 FEIR (Section 2.0), the Program EIR analysis does not apply to projects for which funding is not programmed through HCAOG, including any Caltrans or Harbor District related projects.

PROJECT DESCRIPTION: REGIONAL TRANSPORTATION PLAN 2017 UPDATE

The proposed project is the update of the Regional Transportation Plan (RTP) for Humboldt County, uniquely referred to as “VROOM...” (for *Variety in Rural Options of Mobility*). The RTP 2017 update serves the same purpose as the previous RTPs for Humboldt County¹ in that (1) it is a long-range planning and programming document aimed at achieving a coordinated and balanced regional transportation system, and (2) HCAOG developed the RTP 2017 consistent with current RTP guidelines (CTC 2017) and pursuant to applicable State and federal laws (Government Code §65080 et seq. of Chapter 2.5, federal legislation; U.S. Code, Title 23, §134 and §135 et seq.). HCAOG adopted the last RTP in August 2014 (also called VROOM...).

The Humboldt regional transportation system includes, but is not be limited to, transportation network components of the highways, streets, and roadways; public transportation; active transportation including bicycle and pedestrian modes; commuter trails (i.e. as used for transportation); goods movement (rail, truck, and marine); aviation facilities, and tribal transportation facilities. “VROOM...” covers these modes in distinct elements (chapters) that identify goals, objectives, and policies; assesses needs, and proposes an action plan (short-term and long-term projects). As well, “VROOM...” covers provisions for land use and transportation connections, emergency transportation coordination, air quality, greenhouse gas emissions and related climate-change and sea-level rise impacts, and includes a Tribal Transportation Element, which was prepared in collaboration with the Tribal members of the Technical Advisory Committee (TAC). “VROOM...” includes the required Financial Element, which identifies revenue sources (local, state, and federal funding), and projected costs and revenues, noting any projected funding deficits under both constrained and unconstrained project scenarios.

As described in the 2014 FEIR:

The plan’s overall goal is for Humboldt County to have a comprehensive, coordinated and balanced multi-modal transportation system, so that people in the region can travel and move goods safely and efficiently by the modes that best suit the individual and society at large. HCAOG’s overall objective is to program all funds based on multi-modal transportation goals and objectives, and needs and priorities as established in the Regional Transportation Plan. HCAOG decides how to program transportation funds based on multi-modal goals and objectives, and needs and priorities as established in the RTP. The RTP’s policies and proposed projects pursue six main objectives/planning priorities (in alphabetical order), which the RTP applies to each mode:

- Balanced Mode Share/Complete Streets
- Economic Vitality
- Efficient & Viable Transportation System
- Environmental Stewardship
- Equitable & Sustainable Use of Resources
- Safety (FEIR pages ES-1, ES-2.)

¹ 1998-00, 2000-02, 2002-04 and 2004-06, 2008, and 2014.

New policies that the 2017 update proposes to add to the RTP are:

2. Complete Streets Element

Policy CS-8 HCAOG will accelerate programming for regional projects that retrofit existing roads to provide safe and convenient travel by all users.

Policy CS-9 HCAOG supports a “fix it first” priority of protecting and preserving what we have first when allocating resources to roadways and other transportation assets.

Policy CS-13 HCAOG shall pursue efforts to increase shared mobility options in the region such as car share and bike share programs. HCAOG shall work to make shared mobility programs equitably available to people with low-incomes and other transportation disadvantages.

Policy CS-15 HCAOG supports roadway design standards that increase bicyclist and pedestrian safety and will work with local jurisdictions to help implement innovative designs and engineering projects that have been shown to improve bicyclist and pedestrian safety.

3. Commuter Trails Element

Policy Trails-3 HCAOG shall pursue and support using existing public right-of-way for trails to the maximum extent feasible in order to preserve land, assets, and financial resources.

Policy Trails-7 The regional trails network shall provide travel options for residents and visitors, with equitable access for transportation-disadvantaged populations.

4. Tribal Transportation Element

No new policies proposed.

5. Public Transportation Element

Policy PT-6 HCAOG encourages transit providers to promote and accommodate bicycles on transit vehicles, and to provide secure bicycle parking facilities at transit stops and transportation centers. {formerly Policy 1.4 in the adopted *Regional Bike Plan 2012*}

6. Aviation Element

Policy AS-6 HCAOG supports improving ground access to airports in order to enhance passenger, air cargo, and general aviation airport opportunities. (Consistent with California State Aviation Plan–Policy MB-3.)

7. Goods Movement

Policy GM-11 (Goods Movement) HCAOG shall support projects that improve intermodal freight access and reduce congestion, especially along freight corridors. {*California Transportation Plan 2040*}

8. Emergency Transportation

No new policies proposed.

9. Financial Element

Not applicable.

10. Global Climate Crisis Element *(New element)*

Policy C-1: Put forth strategies that shift travel to be more transit-focused and rideshare-oriented, to achieve more road safety benefits. *(CTP 2040 recommended policy)*

Policy C-2 Promote active transportation, ridesharing, rail, and public/mass transit promoting policies for the co-benefit of reducing air pollution when they replace motor vehicle trips. *(CTP 2040 recommended policy)*

Policy C-3 Support local communities in developing integrated transportation and land use strategies for responding resiliently to climate change, and codifying such strategies in General Plans, Regional Transportation Plans, and Local Coastal Programs. *(CTP 2040 recommended policy)*

Policy C-4 HCAOG will support and plan transportation and projects that provide safe and convenient travel modes for people who cannot or choose not to drive.

Policy C-5 HCAOG will promote and support land use policies that accommodate or reinforce planning, designing, and building a truly multimodal transportation network.

Policy C-6 HCAOG shall encourage partnerships to develop adaptation strategies that address sea-level rise in Humboldt County.

The RTP 2017 update’s proposed regional projects that are new from the RTP 2013/14 Update are listed in the following:

Table *Projects-1* lists new regional projects for highways, streets, and roads (for driving, bicycling, and walking modes) that are proposed in the Complete Streets Element.

Table *Projects-2* lists new regional trails projects proposed in the Commuter Trails Element update (serving transportation needs not just recreational).

Table *Projects-3* lists new proposed regional public transportation projects proposed in the Public Transportation Element.

Table *Projects-4* lists new regional aviation projects proposed in the Aviation Element.

There are no new projects proposed for the Action Plans of the Emergency Transportation Element, Tribal Transportation Element, or Goods Movement Element.

Table *Projects-1* **New Complete Streets Projects Proposed in the HCAOG RTP 2017 Update**

Jurisdiction	Location	Project Description
Blue Lake	Railroad Ave from Greenwood Ave to Hatchery Road	Overlay and pedestrian improvements, rehab and reconstruction

Jurisdiction	Location	Project Description
Blue Lake	First Ave from Greenwood Ave to I Street	Rehabilitation and reconstruction with pedestrian improvements
Eureka	Henderson St from I St to Fairfield St	Road rehabilitation, ADA, bike lanes, bus pullouts, storm drains
Eureka	Fairway Dr from City limits to Ridgecrest Drive; Campton Road from City limits to Oak St	Road rehabilitation, ADA, bicycle facility
Eureka	H & I Street Corridors	Road rehab, ADA, bicycle facility and bus pullouts
Fortuna	U.S. 101/12th Street Northern Interchange Improvements, Onramps, Dinsmore Drive	Reconfigure interchange to include roundabout and bike/pedestrian facilities
Fortuna	U.S. 101/Riverwalk Drive Southern Interchange Improvements	Reconfigure interchange to include roundabout and bike/pedestrian facilities mand.
Fortuna	U.S. 101/Kenmar Road Interchange Improvements	Reconfigure interchange to add two roundabouts and bike/pedestrian facilities
Fortuna	South Fortuna Boulevard/Ross Hill Road/Kenmar Road	Pedestrian improvements including adding sidewalk, bike lane and retaining wall
Fortuna	Thelma and Ross Hill Road	Install roundabout
Fortuna	Newburg Road, Lawndale Drive, Summer Street, 2 nd Ave, Orchard Lane	New sidewalk, bike lanes and school entry improvements
Fortuna	Various Locations – Riverwalk Drive, Fortuna Boulevard, Rohnerville Road	Strongs Creek Trail Phase 1 – Class I bike lane through Fortuna and Class II bike lanes on City streets
Caltrans	101 – In Eureka from Elk River Bridge to Pierson/Tetrault signal	Eureka South Entry Gateway Project

Table *Projects-2* **New Regional Commuter Trail Projects Proposed in the HCAOG RTP 2017 Update**

Jurisdiction	Trail Project	Project Description
Eureka	Eureka Loop Trail	Multipurpose trail connecting the north and south ends of the Eureka Waterfront Trail to key destinations in Greater Eureka Area.

Table *Projects-3* **New Regional Projects for Public Transportation Proposed in the HCAOG RTP 2017 Update**

Operator/Agency	Location	Project Description
HTA	HTA Maintenance Yard, Eureka	Bus parking restructuring
HTA	HTA Maintenance Yard, Eureka	Additional maintenance bays
HTA	HTA Maintenance Yard, Eureka	Solar photovoltaic system
K-T Net	Increased frequency	

Table *Projects-4* **New Regional Aviation Projects Proposed in the HCAOG RTP 2017 Update**

Lead Agency	Airport	Project Description
County of Humboldt	Redwood Coast Airport	Air Freight Needs Assessment (to study Redwood Coast, Murray Field, and Rohnerville Airports)
County of Humboldt	Redwood Coast Airport	Obstruction Mitigation Plan
County of Humboldt	Redwood Coast Airport	Obstruction Removal
County of Humboldt	Redwood Coast Airport	Pavement Maintenance Management Plan
County of Humboldt	Redwood Coast Airport	Phase 4 ARFF – Construct ARFF Building

Lead Agency	Airport	Project Description
County of Humboldt	Redwood Coast Airport	Taxiways B&G Drainage Improvements
Hoopla Valley Tribe	Hoopla Airport	Taxiway extension to runway
County of Humboldt	Murray Field Airport	Air Freight Needs Assessment— <i>see under Redwood Coast Airport</i>
County of Humboldt	Rohnerville Airport	Air Freight Needs Assessment— <i>see under Redwood Coast Airport</i>
SCRID No. 1	Shelter Cove Airport	Airport Land Use Plan Update
SCRID No. 1	Shelter Cove Airport	Improve drainage – southeast tiedown area
SCRID No. 1	Shelter Cove Airport	Pilots’ lounge
SCRID No. 1	Shelter Cove Airport	Slurry seal taxiway/miscellaneous pavement
SCRID No. 1	Shelter Cove Airport	Taxiway realignment
SCRID No. 1	Shelter Cove Airport	Taxiway realignment planning
SCRID No. 1	Shelter Cove Airport	Tiedown area paving, southeast and northwest tiedown
City of Eureka	Samoa Field (formerly Eureka Municipal)	Remove/prune willow stand
City of Eureka	Samoa Field (formerly Eureka Municipal)	Construct security fencing

IMPACTS ASSESSMENT

As summarized above, the update to the RTP consists of some new policies, updated Action Plans, and a new Global Climate Crisis element. The Action Plans consist of project lists provided by each HCAOG member entity and Technical Advisory Committee members. The project lists are similar to those in the 2014 RTP and, in fact, project lists for some jurisdictions did not change at all. The proposed projects and funding cover the same transportation modes as in the previous RTP. No new major projects are proposed in the revised Action Plans in the RTP 2017 update.

The Addendum to the FEIR assesses potential impacts based on the incremental change due to the new policies and projects proposed in the 2017 update compared to the policies and projects proposed in the 2014 RTP that were already analyzed in the FEIR.

For the proposed project, the RTP 2017 update, the existing analysis contained in the environmental checklist of the Initial Study (Appendix A of the FEIR) continues to adequately address the environmental factors for these ten environmental factors: **aesthetics, agricultural resources, cultural resources, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems.** As discussed in the Initial Study, the HCAOG Board determined that the RTP posed either no adverse impact, a less-than-significant adverse environmental impact, or a potentially significant environmental impact that was reduced to less-than-significant when the identified mitigation measures were incorporated with implementation.

Because the minor changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR,

no additional analysis or discussion of these topics is required. The determinations for these environmental factors is the same as concluded in the Initial Study Checklist: With the FEIR mitigation and monitoring program incorporated, the proposed RTP 2017 update will have a less-than-significant adverse environmental impact in these ten environmental factors.

The Program EIR analyzes the environmental factors for air quality, biological resources, environmental justice, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, and transportation/circulation, plus growth-inducing impacts and irreversible effects.

Since the FEIR was certified in 2014, and the RTP subsequently adopted, there has been no substantial evidence that substantial changes have occurred to these baseline environmental conditions either on or near the proposed project sites. Some changes, of course, have occurred; for example, the State legislature has passed new related laws, and HCAOG members have adopted new plans. However, because these changes do not directly affect either the program-level environmental analysis and/or do not apply to the local or regional level, the changes are deemed “minor” as they relate to comparing conditions now to conditions discussed in the 2014 FEIR.

Because the nature and scope of the projects proposed in the RTP 2017 update has not changed from the 2014 Update, and because the conditions discussed in the 2014 FEIR have not substantially changed for **environmental justice, geology and soils, hydrology and water quality, noise, or irreversible effects**, no further environmental assessment is required.

Likewise, there is no substantial evidence of substantial changes to **air quality, biological resources, greenhouse gas emission and climate change, or transportation/circulation**, but below we summarize pertinent updates that have occurred in the past four years in order to reflect current developments including changes to local, state, and federal regulations, and changes to environmental data.

AIR QUALITY

Humboldt County is within the North Coast Air Basin and falls under the management of the North Coast Unified Air Quality Management District (NCUAQMD). As stated in the 2014 FEIR, as well as currently on the NCUAQMD website, “NCUAQMD is listed as ‘attainment’ or ‘unclassified’ for all the federal and State ambient air quality standards except for the State 24-hour standard for PM10” in Humboldt County only, and “(t)he District has not exceeded (i.e., violated) the federal annual standard for particulate matter during the last five year period” (NCUAQMD 2017) (PM10 is particulate matter with a diameter of 10 micrometers or less.)

Below are current revisions and corrections to the FEIR table.

Table *Air-1* **Current Federal and State Ambient Air Quality Standards***

Pollutant	Federal Standard*	California Standard*
Ozone	0.075 0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.10 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)

	0.14 ppm (24-hr avg)	
Lead	4.5 µg/m³ (calendar quarter)	0.15 µg/m³ (3-month avg)
	<u>0.15 µg/m³ (rolling 3-month avg)</u>	<u>1.5 µg/m³ (30-day avg)</u>
Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hr avg)	50 µg/m ³ (24-hr avg)
		20 µg/m ³ (annual avg)
Particulate Matter (PM _{2.5})	35 µg/m ³ (24-hr avg)	
	12 µg/m ³ (annual avg)	12 µg/m ³ (annual avg)

*Strike-outs and underlined text show updates to the original table (2014 FEIR).

ppm= parts per million, µg/ m³ = micrograms per cubic meter

Source: California Air Resources Board (5/4/16), www.arb.ca.gov/research/aaqs/aaqs2.pdf, Sept. 12, 2017.

The minor changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for air quality environmental factors are the same as stated in the FEIR.**

BIOLOGICAL RESOURCES

The FEIR includes lists of federal- and State-listed special status animal and plant species known to occur, or with potential to occur, within Humboldt County (FEIR Table 4.2-2 and 4.2-3). The lists are based on the California Department of Fish and Wildlife’s (then Fish and Game) 2003 California Natural Diversity Database (CNDDB) and the U.S. Fish and Wildlife Service’s Information Planning and Conservation System (IPaC) in 2014 (from the Environmental Conservation Online System). Below we summarize updates to listed special status species since 2014, and discuss how new species that were not listed in the FEIR might be impacted, if at all, by the implementation of the proposed RT 2017 update. We have also noted revisions to information in the FEIR tables, which are minor yet pertinent.

□ Birds

- White-tailed kites (*Elanus leucurus*) are fully protected under California Fish and Game Code. They are a nesting raptor species, known to nest within Humboldt County, including recent records of nests near Eureka (CDFW 2017a). Suitable habitat is: Cismontane woodland, marsh and swamp, riparian woodland, valley and foothill grassland, and wetlands. Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching (County of Humboldt 2017).

Most (recorded) observations in Humboldt County have been near the coast, concentrated near Humboldt Bay and the Eel and Mad Rivers (ibid).

The new proposed projects in the RTP 2017 update are not located in riparian woodlands, river bottomlands, wetlands, marshes or other areas of suitable habitat, nor areas where the white-tailed kites’ nest have been observed in Humboldt County. Therefore, impacts would be less than significant and no new mitigation is required.

□ **Reptiles & Amphibians**

- The western pond turtle was listed as the scientific name *Emys marmorata*, whereas the CNDDDB 2017 lists it under the scientific name *Actinemys marmorata* (CDFW 2017a).
- The Del Norte salamander (*Plethodon elongatus*) was listed as a CDFW Species of Special Concern (no formal protection other than CEQA consideration) and is not currently listed (State or federal) (ibid).

□ **Mammals**

- The fisher–West Coast DPS was listed as the scientific name *Martes pennant*, whereas the CNDDDB 2017 lists *Pekania pennant*.
- Although not a special-status species, Roosevelt elk (*Cervus canadensis roosevelti*) are identified as a sensitive resource in the Humboldt County General Plan and under County Code (Section 313-20.1). Suitable habitat for Roosevelt elk includes deciduous and conifer forests, riparian areas, and meadows; within Humboldt County they primarily limit their habitat and range to within Redwood National and State Park (from Freshwater Lagoon to the Klamath River) (County of Humboldt, 2017). Because most of the Roosevelt elk’s range is outside of project areas proposed in the RTP 2017 update, impacts would be less than significant and mitigation is not required.

□ **Plants**

- Two plant species that the FEIR did not list but the *Humboldt County General Plan Update’s Revised Draft EIR* identified as likely to occur in Humboldt County are: the McDonald’s rockcress (*Arabis mcdonaldiana*) which has federal and state protection as an endangered species; and water howellia (*Howellia aquatilis*), which has federal protected status as a threatened species (CDFW 2017b).
- Table *Bio-1* shows plant species of special concern. They are not formally listed at the State or federal level (i.e. not legally protected under the national Endangered Species Act (ESA) or California ESA), but are legally protected to be considered under CEQA.

Table *Bio-1*. **California Rare Plant Species Known or with Potential to Occur in Humboldt County**

Scientific Name	Common Name	Rare Plant Rank ¹
<i>Anisocarpus scabridus</i>	scabrid alpine tarplant	3
<i>Arctostaphylos manzanita</i> ssp. <i>elegans</i>	Konocti manzanita	3
<i>Buxbaumia viridis</i>	buxbaumia moss	2
<i>Calycadenia micrantha</i>	small-flowered calycadenia	2
<i>Castilleja ambigua</i> var. <i>humboldtiensis</i>	Humboldt Bay owl’s-clover (Note: in the FEIR listed as johnny-nip)	2
<i>Lasthenia californica</i> ssp. <i>macrantha</i>	perennial goldfields	2
<i>Ramalina thrausta</i>	angel’s hair lichen	1
<i>Sidalcea oregana</i> spp. <i>eximia</i>	coast checkerbloom	1b
<i>Vaccinium scoparium</i>	little-leaved huckleberry	2

¹0.1–Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2–Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

0.3–Not very threatened in California (less than 20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

Sources: County of Humboldt, 2017 (citing CNDDB 2017, CNPS 2017, Calflora 2017).

The FEIR identified the coast sidalcea (*sidalcea oregana* spp. *eximia*) as a Special Status Plant (1b.2 plant). Its common name is coast checkerbloom and it is rare, threatened, or endangered in California and elsewhere. It is worth noting here that it grows at the Redwood Coast Airport (Arcata-Eureka Airport), being relatively common in the airport’s grassy areas that are regularly mowed. Survey maps, from 2009 and 2010 surveys at the airport, are provided from the California Department of Fish and Wildlife (Eureka office) (see Figures *Bio-1* and *Bio-2* below). The RTP 2017 update proposes projects that could potentially affect this habitat area, such as constructing runway lighting improvements. The County’s Public Works Department, which includes the Aviation Division, is aware of the plant’s status and presence, and has in the past coordinated with CDFW and USFWS. The biological resources mitigation measures outlined in the FEIR shall serve to further reduce potential environmental impacts to less than significant.



Photo credits: CDFW-Eureka Office

Coast Checkerbloom (*sidalcea oregana* spp. *eximia*) at the Arcata-Eureka Airport

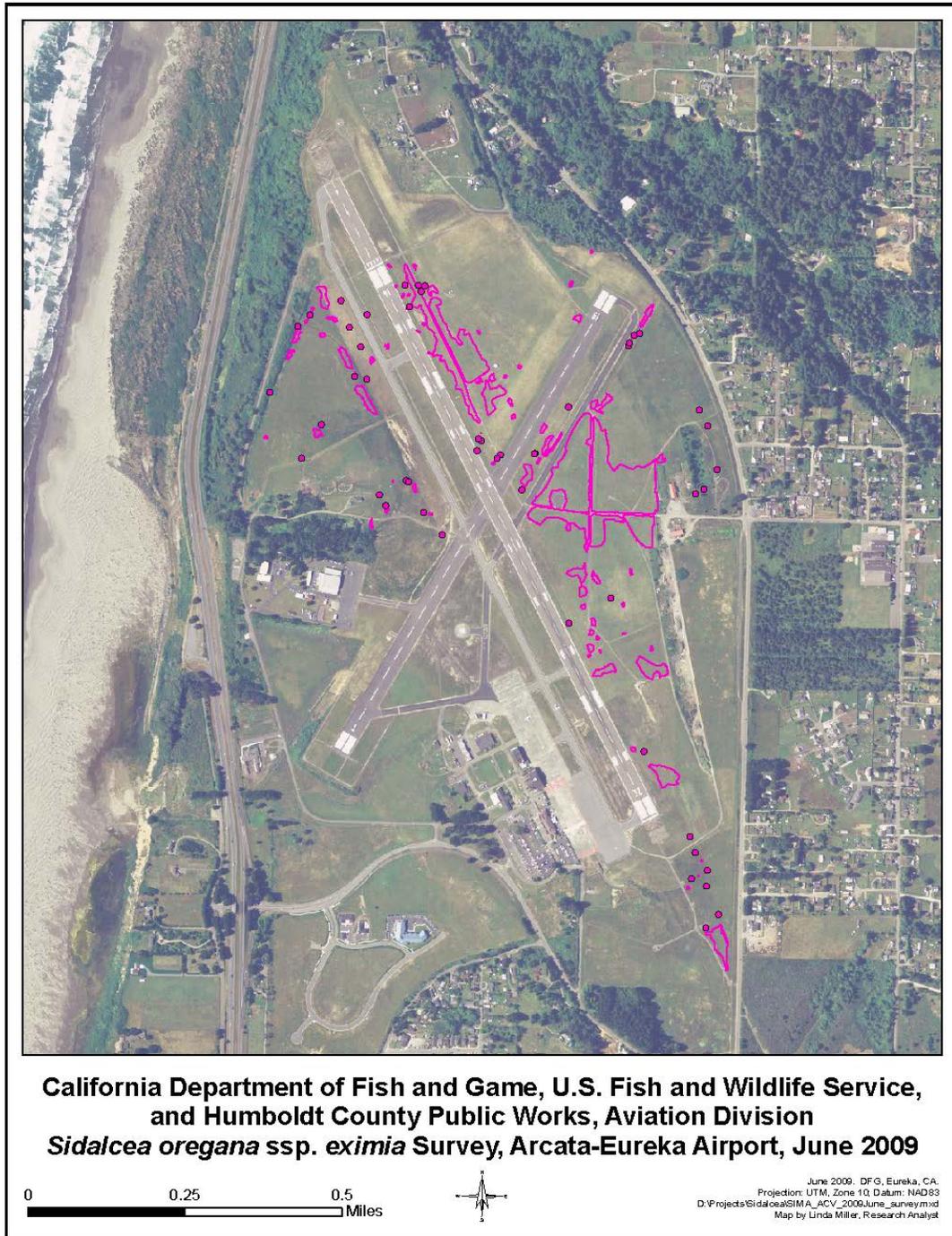


Figure Bio-1. Survey of Coast Checkerbloom (*sidalcea oregana spp. eximia*) at the Arcata-Eureka Airport, 2009



Figure Bio-2. Survey of Coast Checkerbloom (*Sidalcea oregana* spp. *eximia*) at the Arcata-Eureka Airport, 2010

The minor changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for environmental factors for biological resources are the same as stated in the FEIR.**

GREENHOUSE GAS EMISSIONS/CLIMATE CHANGE

Governor Jerry Brown, in 2015, established a California target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 (Executive Order B-30-15, April 29, 2015). Then, in September 2016, Governor Brown signed Senate Bill 32 (Pavley) and Assembly Bill 197 (Garcia), which codified the 2030 target. The target is a mid-target for the State reaching the ultimate goal of the California Global Warming Solutions Act of 2006 (AB 32), which is to reduce emissions to 80 percent below 1990 levels by 2050.

To comply with California's climate bills, State agencies must take climate change into account for planning and investment decisions. Foremost among State agencies, the Air Resources Board (CARB) must develop strategies to reduce GHG emissions, which they did most recently in the draft *2017 Climate Change Scoping Plan Update—The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (CARB January 20, 2017; not yet finalized/adopted). As reiterated in the *2017 RTP Guidelines for RTPAs*, State agencies should use the following principals as guidance:

- Give priority to actions that both build climate preparedness and reduce GHG emissions;
- Where possible, take flexible and adaptive approaches to prepare for uncertain climate impacts;
- Actions should protect the state's most vulnerable populations; and,
- Prioritize natural infrastructure solutions (e.g., flood plain and wetlands restoration or preservation, combining levees with restored natural systems to reduce flood risk, and urban tree planning to reduce high heat days) (as defined in Public resources code 71154(c)(3)).

State agencies must also employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives.

The "California Greenhouse Gas Inventory 2000-2015," 2017 edition, offers updated data from what was available in 2014. In it, the California Air Resources Board (CARB) reports:

- In 2015, statewide emissions of CO₂ from routine emitting activities declined 1.5 million metric tons of CO₂ equivalent (MMTCO₂e) from 2014 levels; statewide emissions have decreased overall by 10% since peak levels in 2004.
- The transportation sector remains the largest source of GHG emissions in the state, accounting for 37% of the inventory, and had an increase in emissions in 2015.
- Emissions from transportation sources were relatively constant through 2007, declined through 2013, then increased by 4.6 MMTCO₂e (or 3%) from 2014 to 2015.
- Emissions from the electric power sector comprise 19% of 2015 statewide GHG emissions (5.2% decline in 2015 compared to 2014). Emissions from the electricity sector continue to decline due to growing zero-GHG energy generation sources.
- Emissions from the remaining sectors have remained relatively constant. (CARB 2017)

The Intergovernmental Panel on Climate Change's (IPCC's) *Fifth Assessment Report* includes projected changes in the global climate system according to different levels of future GHG emissions. Although the range of temperature changes have not substantially changed from what is reported in the 2014 FEIR (based on a 2007 IPCC report), the minimum increases under most scenarios appears to have increased:

The increase of global mean surface temperature by the end of the 21st century (2081–2100) relative to 1986–2005 is likely to be 0.3°C to 1.7°C under a stringent mitigation scenario; 1.1°C to 2.6°C or 1.4°C to 3.1°C under two respective intermediate scenarios; and 2.6°C to 4.8°C under very high GHG emissions. The Arctic region will continue to warm more rapidly than the global mean (“Climate Change 2014 Synthesis Report Summary for Policymakers,” IPCC 2014).

Other summary points from the *IPCC Fifth Assessment Report* are:

- The evidence for human influence on the climate system has grown since the IPCC Fourth Assessment Report.
- Over the period 1901 to 2010, global mean sea level rose by 0.19 [0.17 to 0.21] m. The rate of sea level rise since the mid-19th century has been larger than the mean rate during the previous two millennia (high confidence).
- Total anthropogenic GHG emissions have continued to increase over 1970 to 2010 with larger absolute increases between 2000 and 2010, despite a growing number of climate change mitigation policies.
- Emissions of CO₂ from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010 (high confidence) (ibid).

As noted in the 2014 FEIR, the City of Arcata has an adopted “Community Greenhouse Gas Reduction Plan” (August 2006), and the County of Humboldt has a “Climate Action Plan,” (January 2012). Other recent local planning includes:

- The Blue Lake Rancheria has set the goal to reach full energy self-sufficiency and reduce greenhouse gas emissions to zero. Since 2002, the Tribe has cut energy consumption by 35 percent, with associated drops in emissions. The Tribe has set a target to reduce GHG emissions by another 40 percent by 2018.
- The City of Blue Lake adopted a “Climate Action Plan” in August, 2014.
- The City of Eureka has developed a “Sea Level Rise Adaptation Planning Report” (December 2016)
- The City of Trinidad, in addition to its Climate Action Plan (2010), developed the “2016 Climate Change Vulnerability Report and Adaptation Response” (April 2016) as part of its Local Coastal Program Update Project (in process).
- Humboldt State University (Office of Sustainability) developed a *Climate Action Plan*, issued on December 12, 2016.

And in HCAOG’s RTP, the 2017 update included a new “Global Climate Crisis Element,” which adds new focused policies to promote and support strategies to reduce transportation-related GHG emissions. The policies are:

Policy C-1. Put forth strategies that shift travel to be more transit-focused and rideshare-oriented, to achieve more road safety benefits. (*CTP 2040 recommended policy*)

Policy C-2. Promote active transportation, ridesharing, rail, and public/mass transit promoting policies for the co-benefit of reducing air pollution when they replace motor vehicle trips. *(CTP 2040 recommended policy)*

Policy C-3. Support local communities in developing integrated transportation and land use strategies for responding resiliently to climate change, and codifying such strategies in General Plans, Regional Transportation Plans, and Local Coastal Programs. *(CTP 2040 recommended policy)*

Policy C-4. HCAOG will support and plan transportation and projects that provide safe and convenient travel modes for people who cannot or choose not to drive.

Policy C-5. HCAOG will promote and support land use policies that accommodate or reinforce planning, designing, and building a truly multimodal transportation network.

Policy C-6. HCAOG shall encourage partnerships to develop adaptation strategies that address sea-level rise in Humboldt County.

The FEIR discusses that the 2014 RTP would reduce per capita GHG emissions from 2013 by 14 percent, and that the full set of projects and policies are designed to align transportation planning to reduce VMT and transportation-related GHG emissions.

The changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for GHG emissions/climate change environmental factors are the same as stated in the FEIR.**

TRANSPORTATION & CIRCULATION

The criteria for analyzing transportation impacts, as it relates to complying with CEQA, is going through major shifts on account of the passage, in September 2013, of Senate Bill 743 (Steinberg). Senate Bill 743 mandates that a proposed project's impact on auto delay, level of service (LOS), or similar measures of vehicular capacity or traffic congestion, cannot be a basis for determining a significant adverse impact (nor can parking capacity be a basis for adverse impacts within infill areas where frequent transit service is provided nearby). In 2016, the Governor's Office of Planning and Research released a proposal of revised CEQA Guidelines, in which they state,

Legislative findings in that bill plainly state that California's foundational environmental law can no longer treat vibrant communities, transit and active transportation options as adverse environmental outcomes. On the contrary, aspects of project location and design that influence travel choices, and thereby improve or degrade our air quality, safety, and health, must be considered (OPR 2016).

OPR recommends that vehicle miles traveled (VMT) per capita and VMT per employee be used as the new metrics for analyzing transportation impacts under CEQA. OPR also acknowledges that:

- some variation in *thresholds* may be appropriate in different parts of regions and the state; for example, (i) outside of central urban locations it may be appropriate to refer to a city's

average, or (ii) within unincorporated county areas it may be appropriate to reference the average of the cities in the county. (CEQA Guidelines § 15064(b))

- VMT data is not available at the same level in all areas of the State, but that statewide data on VMT are available statewide. “For example, the California Statewide Travel Demand Model provides data on vehicle miles traveled throughout the state which can be used both for setting thresholds and for estimating VMT resulting from a proposed project” (ibid). The adequacy of any analysis “is to be reviewed in the light of what is reasonably feasible” (CEQA Guidelines § 15151).

The proposed changes must be finalized by the Natural Resources Agency, through the “rulemaking” process, before they go into effect—which is generally expected to occur in 2018. OPR has recommended that the new procedures remain optional for two years after formal rulemaking, to give agencies who want it “more time to become acquainted with the new procedures” (ibid).

Because the proscribed CEQA criteria per SB 743 is not yet in effect, for the time being agencies can use LOS as a threshold to determine transportation impacts and still be in compliance with CEQA. Nonetheless, in the 2014 FEIR, HCAOG veered away from LOS and used VMT, per capita VMT, and vehicle hours travelled (VHT) as the performance indicators to determine potential impacts to the overall regional transportation system. This was consistent with the performance indicators established by the RTP 2013/14 Update, which have remained the same in the proposed RTP 2017 update.

Additionally, the FEIR used the criteria for determining transportation and circulation impacts based in part on the CEQA Guidelines environmental checklist. It also used performance measures established by HCAOG, which added the following thresholds for significant impacts:

- A change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

The RTP 2017 update includes new proposed projects, as well as deletes some projects because they have been accomplished (mostly in the Complete Streets Element). The new proposed projects do not change the overall scope or nature of projects as adopted in the 2013/14 RTP (See Tables *Projects-1* through 4 for all new proposed projects). None conflict with applicable adopted transportation plans; none are related to air traffic patterns; projects listed in the Complete Streets Element aim to design and deliver projects that will decrease hazards; none propose design concepts that would hinder existing emergency access; and transit projects consist of capital projects (e.g. purchasing new fleet inventory) and new transit service.

The changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for environmental factors for transportation and circulation are the same as stated in the FEIR.**

LONG-TERM EFFECTS

An EIR must address a proposed project/plan's potential irreversible effects and growth-inducing impacts. Irreversible effects (*CEQA Guidelines* Section 15126(e)) mean irreversible environmental changes such as consuming or demolishing significant resources, particularly nonrenewable natural resources and irreplaceable cultural or historical resources. Significantly altering a natural resource through development, urbanization, and the like is also considered an irreversible impact under CEQA. Growth-inducing impacts (*CEQA Guidelines* Section 15126(g)) mean a proposed project's potential to foster economic or population growth, including by removing an existing obstacle(s) to growth.

The RTP 2017 Update proposes the same type of transportation projects that were proposed previously. To implement projects, jurisdictions/agencies would draw upon the same type of environmental and economic resources for construction, operations, and transportation services. The projects would be implemented within the same geographic areas, and in the same and similar settings within the built environment (e.g., developed areas, existing transportation corridors, and existing service areas). No new projects are proposed that would expand transportation access into undeveloped areas. The RTP 2017 Update would not result in new significant environmental impacts not previously evaluated in the FEIR.

The changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for potential irreversible effects and growth-inducing impacts are the same as stated in the FEIR.**

CONCLUSION

Based on the above, no new significant adverse environmental impact nor a substantial increase in previously identified significant impacts would occur as a result of the proposed RTP Update. Therefore, the impacts introduced as a result of the RTP do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

The significance determinations reported in the CEQA Checklist section of the Initial Study have not changed for the applicable topics. Likewise, the significance determinations and the Mitigation and Monitoring Program identified in the Final EIR have not changed.

REFERENCES

CITATIONS

AEP 2017 (Association of Environmental Professionals) “AEP 2017 Advanced CEQA Workshop” booklet.

CARB 2017 (California Air Resources Board) “California Greenhouse Gas Inventory 2000-2015,” 2017 edition. (Version June 6, 2017). (www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf, accessed September 12, 2017).

CDFW 2017a (California Department of Fish and Wildlife) California Natural Diversity Database (CNDDDB), “Special Animals List” (July 2017).

CDFW 2017b California Natural Diversity Database (CNDDDB) “State and Federally Listed Endangered, Threatened, and Rare Plants of California—Last updated July 2017.”

CTC 2017 (California Transportation Commission) *Regional Transportation Plan Guidelines for Regional Transportation Planning Agencies*. (Adopted January 18, 2017)

County of Humboldt 2017 *Amendments to Humboldt County Code Regulating Commercial Cannabis Activities Project Draft EIR* (State Clearinghouse Number 2017042022). Prepared for the County of Humboldt by Ascent Environmental (September 2017).

NCUAQMD 2017 “Air Quality Planning & CEQA” webpage. www.ncuaqmd.org/index.php?page=aqplanning.ceqa#T1, accessed September 12, 2017.

OPR 2016 (Governor’s Office of Planning and Research) *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA: Implementing Senate Bill 743* (Steinberg, 2013). (January 20, 2016)

U.S. FWS 2017 (Fish and Wildlife Service) ECOS Environmental Conservation Online System, Listed Animals. <https://ecos.fws.gov/ecp/>, accessed September 15, 2017.

RESOURCES

Coyote Campus Project Addendum to FEIR: Gavilan Joint Community College District 1. January 2015

APPENDIX C

Public & Agency Comment Letters

From: **Emily Sinkhorn, Redwood Community Action Agency**

Date: May 17, 2017

Public Transit section of the RTP

- I thought perhaps it could be mentioned that the Unmet Transit Needs process two years ago determined that service along Old Arcata Road as a reasonable to meet need. I did not see this discussion in this section. Could there also be a discussion of what ADA and other improvements would need to happen to make new transit stops along this proposed route feasible?

From: **Sungnome Madrone, Mattole Salmon Group**

Date: Sat, Aug 5, 2017 at 9:42 PM

Subject: Input on the Complete Streets, Commuter Trails...Plan

Here is my written input on the plan.

- On page 3 of **the Staff Report** at the bottom it should say...[the Grand Vision is to have a multi use trail for non-motorized travel from Trinidad and Blue lake to...](#) As one of the originators of that vision it has always included all the way to Trinidad.
- Also at the bottom of [page 6 Trinidad should once again be listed](#) as part of the connected vision.
- [On page 8 under Little River Trail all of the Little River Trails studies should listed here.](#) I realize this is just a staff report but it would be nice if any future reports and communications would have these more **accurate changes made.**

On Page 14 of Section 2. Complete Streets Element it says the "TAC prioritized all projects based on the RTP's main objectives". Yet of the over 200 projects listed only 4 do not have any prioritization's cores. I was told at the public meeting that it was because no entity was taking responsibility for the project so no scoring was done, yet the statement above says all projects were scored. **Scoring this project** would make it a short term priority I would guess. Please prioritize it according to its attributes and then the issue of who is responsible is another matter. Fair is fair.

In fact an argument can be made for this project being a higher priority than the Bay trail for many reasons.

#1 the public owns all of the right of way for construction

#2 there is no Railroad to deal with

#3 this is the biggest bottle neck of transportation on the coast with HWY 101 as the only option and pedestrians are completely stopped.

With the county's bay trail project making contract amendment requests for more time to spend the money they have been allocated this point becomes clear. as the bay trail is dealing with #1 and #2 above as well as severe bay (rail and trail berm areas) erosion from rising seal level and subsidence.

Please do not mis-understand me. I support all of these trail and want to see the bay train completed as much as any one. In fact I was one of the original visionaries of this effort in the 1980's and beyond.

The only thing holding up the Little River Trail is Cal Trans illegal refusal to take on the responsibility for mitigating for the loss of non-motorized transportation over Little River when they built the bridges. That does not change its priority according to the RTP Main Objectives.

Sungnome Madrone

Executive Director, Mattole Salmon Group

www.mattolesalmon.org



October 6, 2017

Marcella Clem, Executive Director
Supervisor Ryan Sundberg, Chair of the Board of Directors
Humboldt County Association of Governments
611 I Street, Suite B
Eureka, CA 95501
via email: marcella.clem@hcaog.net; rsundberg@co.humboldt.ca.us

RE: Draft 2017 Regional Transportation Plan Update

Ms. Clem and Chair Sundberg:

Thank you for the opportunity to provide input on the proposed 2017 Regional Transportation Plan (RTP) Update for Humboldt County. Our comments are as follows.

Climate Change & Greenhouse Gasses

The increased emphasis on the global climate crisis in the RTP Update is necessary and appropriate. However, there are some areas of the document where treatment of climate issues should be strengthened. For example, performance measures for aviation and goods movement both establish standards based on greenhouse gas (GHG) emissions per capita. However, recognition of the seriousness of the climate crisis calls for standards based on overall GHG emissions, so that emissions do not increase even if and when population grows. As the RTP's own summary of the CARB Scoping Plan notes, while per capita targets may be used, "the 'correct overall objective' is no-net increase or net zero emissions threshold" (p.10-179).

Additionally, policies and objectives such as PT-11 and GM-9 which establish goals of increased use of "alternative fuels" must define this term by specifying either specific fuels or GHG emissions standards in order to ensure that the policy does not encourage use of new or established fuels with significant GHG footprints. Finally, Policy CS-11 must be updated to include reference not only to AB 32, but also to SB 32 and other legislation described in the RTP's new Global Climate Crisis chapter.

Below, in addition to other topics, we address some other portions of the draft RTP Update which must be modified in order to avoid inconsistency with the RTP's own climate-related goals, objectives and policies. We note that RTP internal consistency is required by the 2017 Regional Transportation Plan Guidelines for Regional Transportation Planning Agencies.

Mode Share & VMT

The bulk of specific projects and actions identified in the RTP Update are contained in the "Complete Streets Element." We have serious concerns about the ability of the "complete streets"

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concept to adequately address the health, safety and environmental challenges we face today, as we noted in our recent comments on HCAOG's draft 2017 Regional Bike Plan:

Accommodating all road users equally sounds good in theory, and the idea is very popular and indeed ingrained in many current state and federal policies. However, the fact is that vehicles are the main safety threat to bicyclists (and pedestrians), and reducing vehicular travel is the only way to ensure true safety for everyone else. Reducing vehicular travel is also key to meeting many other environmental and societal goals, a fact implicitly recognized by the inclusion of mode shift (increasing the proportion of trips by bicycle, and thus decreasing the vehicular proportion) as an objective of the plan *per se*. Reducing vehicular travel, however, will likely require making it more inconvenient—by making it slower, providing less parking, etc. In this context, “Complete Streets” policies often function more as a way to justify the continued dominance of automobiles by providing minimum accommodation for other travel modes, rather than progress toward true mode shift.

We encourage HCAOG to prioritize the development of Class I bikeways and other infrastructure which is actually designed for bicyclists and pedestrians, rather than making them an afterthought on roads designed for vehicles. We also encourage HCAOG to consider innovative new solutions to incentivize more convenient and safe active transportation and disincentivize vehicle use. For example, banning vehicles entirely from some roads (which, it must be admitted, our local jurisdictions struggle to maintain in adequate driving shape anyway) and dedicating them to bicycles and pedestrians instead should be considered.

Mode shift and reduced VMT are explicit priorities of the RTP Update as well, appearing in Policies such as CS-11, C-1, and C-2. Yet these policies conflict with other goals, objectives and policies which call for equal accommodation of all modes of travel, a situation which would surely result in continued dominance of the single-user automobile. Furthermore, some policies and performance measures in the RTP Update (particularly in the Goods Movement Element) call for reducing road congestion. However, reduced congestion and increased travel speed is the cause of induced travel demand,¹ so fulfilling these goals would result in increase vehicular mode share and VMT, in conflict with climate-related goals and policies.

It also must be noted that the RTP Update's introduction contains the problematic assertion that no significant mode shift will occur, claiming that “the private automobile will remain the primary mode of transportation” (p.1-8). This fatalistic assumption is at odds with many of the goals, policies and objectives of the RTP itself, including those related to the climate crisis.

We strongly urge HCAOG to re-interpret and re-state its “complete streets” and related assumptions, goals, objectives, and policies in such a way as to clarify that increasing mode share for modes such as walking, bicycling, and mass transit is a top priority, while increasing convenience and speed of travel for vehicles are *not* goals of HCAOG or the RTP.

We also note that many of the “top priority” complete streets projects listed in Table *Streets-4* appear to have nothing to do with the “complete streets” concept, let alone with encouraging mode shift. Rather, many of them involve simply building new roadways or improving roadways for vehicular use. We were particularly disturbed to see the Richardson Grove Operational

¹ Cervero, Robert. 2003. Road Expansion, Urban Growth, and Induced Travel: A Path Analysis. *Journal of the American Planning Association* 69(2): 145-163.

Improvement Project in this Table, as this project is explicitly designed only to allow the largest trucks to use the roadway and includes no improvements for pedestrians, bicyclists or other users. By inducing additional truck traffic,² the Richardson Grove project runs counter to goals, objectives and policies of the RTP pertaining to climate, environment, mode share, and infrastructure maintenance, and should not be included in the RTP at all. Certainly HCAOG must not “greenwash” the RTP by identifying all road projects as “complete streets” projects.

Finally, the RTP is overly focused on the roadway system at the expense of other types of transportation infrastructure. The clearest illustration of this problem comes from a comparison of Tables *Streets-4* and *Trails-1*. Not only is the list of trail projects much shorter than the list of road projects, but *Trails-1* lacks any of the information about funding sources or years of construction contained in *Streets-4*. Funding and timeline information must be included to demonstrate HCAOG’s commitment to the regional trail system.

Goods Movement & Economic Analysis

The Goods Movement Element recognizes “Humboldt’s small population and economic base” as well as its “rugged terrain and remoteness...[which] make it more expensive to transport goods in and out” (p.7-125). However, the document also makes “maximiz[ing] use of transportation corridors” a specific objective (p.7-122) and includes increased port areas, greater numbers of airplane trips, and greater numbers of highway miles as performance measures (p.7-137).

The small population, rugged terrain and remoteness identified by the RTP itself make the idea of maximizing freight traffic both economically unsound and environmentally infeasible in a carbon-constrained world. It is also inconsistent with climate-related goals, objectives and policies of the RTP. Instead, objectives, policies and performance measures should be focused on actually achieving the RTP’s well-stated goal of moving goods “efficiently and cost-effectively” in and out of the County “in a manner that is economically sustainable and environmentally compatible” (p.7-121). In other words, the RTP should be focused on meeting local needs for goods movement in a responsible manner, not maximizing goods movement for its own sake.

The RTP Update also requires some corrections regarding truck routes. First, inclusion of “STAA compliance” in a list of economic attractors under the RTP’s “economic vitality” objective is misleading at best. The county’s roadways are fully compliant with the STAA already. STAA trucks are required to be allowed on the “National Network,” which is the name generally applied to a designated set of large interstate highways (49 CFR §3111(b), California Vehicle Code Section 34501.5(a)). STAA trucks must also be allowed “reasonable access” to facilities and services via roads within 1 mile of the National Network, and on designated Terminal Access routes between the National Network and freight terminals or facilities (23 CFR §658.19, California Vehicle Code Section 34501.5(c)-(d)). The denial of a request for a TA designation may legally be made “only on the basis of safety and an engineering analysis of the access route” (23 CFR §658.19(i), California Vehicle Code Section 34501.5(d)). “Safety and an engineering analysis” are exactly the reasons that

² Coalition for Responsible Transportation Priorities. July 2017. Truck Traffic Impacts: “Richardson Grove Operational Improvement Project” and “197/199 Safe STAA Access Project”. Available at <http://transportationpriorities.org/wp-content/uploads/2017/07/Traffic-Study-2017-Final.pdf>.

certain stretches of the regional highway network lack TA designation. Thus, STAA compliance is not an issue.

Additionally, the description of “major truck routes” on pages 7-114 and 7-115 contains outdated information about STAA Terminal Access routes generally and about the Richardson Grove Operational Improvement Project specifically. This description should be updated with information about the impending STAA access on SR 299 (mentioned elsewhere on p.7-126) and with current information about the Richardson Grove project’s status.

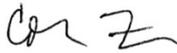
Finally, we encourage HCAOG to include consideration of short sea shipping in the Goods Movement Element. While there are certainly challenges to adoption of regional freight movement via this mode, we note that there are significant challenges to all modes of regional freight movement due to our “rugged terrain and remoteness.” Short sea shipping holds promise as a cost-effective, low-emissions mode of freight transportation, and the RTP should consider it.

Public Process

The numerous omissions of figures and notations of text “to be updated” throughout the document are troubling, in that they deny the public the ability to review the RTP Update in its entirety. In the interest of transparency, CEQA documentation should also be made available with the RTP Update for public review—even if it consists solely of an Environmental Impact Report Addendum or other documentation which does not legally require public circulation.

Thank you for your careful consideration of our comments.

Sincerely,



Colin Fiske
Campaign Coordinator
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org
P.O. Box 2495
McKinleyville, CA 95519



November 1, 2017

Oona Smith, Senior Planner
Humboldt County Association of Governments
611 I Street, Suite B
Eureka, CA 95501

via email: oona.smith@hcaog.net
cc: marcella.clem@hcaog.net; rsundberg@co.humboldt.ca.us

RE: Semi-Final Draft 2017 Regional Transportation Plan Update

Ms. Smith:

Thank you for your review of our October 6, 2017 comments on the proposed 2017 Regional Transportation Plan (RTP) Update for Humboldt County. Thank you also for inviting us to submit additional comments on topics we would like you to “reconsider or consider anew.” This invitation reflects an admirable commitment to public and stakeholder engagement.

The proposed changes reflected in the Semi-Final Draft RTP Update address a number of our previous concerns. However, we do wish to encourage you to reconsider some of those concerns which remain unaddressed, namely:

- For reasons described more fully in our previous comments, we again ask you to address the internal inconsistency between the admirable goal of a “system [that] moves passengers and goods in a manner that is economically sustainable and environmentally compatible” (p.7-9) and the problematic objective to “maximize use of transportation corridors,” (p.7-10). Moving more goods simply because our corridors have the theoretical capacity to do so, regardless of local needs and environmental impacts, is neither economically sustainable nor environmentally compatible in our remote region. The established goal is also incompatible with proposed performance measures which go one step further by measuring capacity *expansion* rather than only “maximum use.” Such performance measures include increased port areas, greater numbers of airplane trips, and greater numbers of highway miles (p.7-23). We ask that you remove these performance measures from the RTP and modify the proposed goods movement objective as follows:
 - *“Improve goods mobility, reliability, and system efficiency in and out of Humboldt County as necessary to meet local needs. Connect road, sea, air, and rail transport modes to maximize the utility of each mode ~~and maximize use of transportation corridors within the region.~~”*
- As we detailed in our previous comments, there is no problem of “STAA compliance” on highways in our region. There is no legal mandate to redesign roads to allow larger trucks, and whether or not to do so is purely a policy question. Therefore, we ask again that you remove the phrase “STAA compliance” from the RTP (specifically at p.1-8).

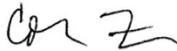
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- We appreciate the fact that the Richardson Grove Operational Improvement Project no longer appears in the “Complete Streets” element. However, we again ask that the project be removed from the RTP entirely. If you have not done so already, we urge you to review our July 2017 report entitled “Truck Traffic Impacts: ‘Richardson Grove Operational Improvement Project’ and ‘197/199 Safe STAA Access Project’”, which is available on our website. This report shows that the project—which would redesign a section of highway for larger trucks while providing no accommodation for pedestrians, cyclists or other users—is highly likely to induce additional truck traffic. Therefore, as we noted previously, the project “runs counter to goals, objectives and policies of the RTP pertaining to climate, environment, mode share, and infrastructure maintenance.”

We also note one minor erratum: Our name appears as “Coalition for Sustainable Transportation Priorities” on p.1-15 of the document, rather than “Coalition for Responsible Transportation Priorities.”

Thank you again for your careful consideration of our comments.

Sincerely,



Colin Fiske
Campaign Coordinator
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org
P.O. Box 2495
McKinleyville, CA 95519

DEPARTMENT OF TRANSPORTATION

DISTRICT 1, P. O. BOX 3700
EUREKA, CA 95502-3700
PHONE (707) 441-4693
FAX (707) 445-6314
TTY 711



*Making Conservation
a California Way of Life.*

November 27, 2017

Oona Smith, Senior Planner
Humboldt County Association of Governments
611 I Street
Eureka, CA 95501

Dear Ms. Oona Smith,

Thank you for giving Caltrans the opportunity to review and comment on the Humboldt County Association of Governments' (HCAOG's) 2017 Update of the Humboldt Regional Transportation Plan: "Variety in Rural Options Of Mobility" (VROOM).

We would like to recognize HCAOG's effort in developing a 2017 Regional Transportation Plan that is easily understandable by the general public. The Draft RTP purpose, goal, and objectives are well-aligned with the California Transportation Plan (CTP 2040) policy framework and other statewide plans. There are also frequent references to the CTP 2040 throughout the document. The plan appeals to the county's strengths and sets ambitious goals. We also appreciate the detail provided relating to the different transit services operating in the county, which is very helpful information.

We also recognize the cooperative relationship with the region's Tribal Governments and evidence of this collaboration is present throughout the entire plan.

General

1. From a perspective of consistency with the Active Transportation Program, we suggest re-organizing information contained in the Humboldt Regional Bike Plan, the Humboldt Regional Trails Plan, and the Humboldt Pedestrian Master Plan into a single Active Transportation Plan, which can become either an integral element of the RTP or an independent plan that is incorporated by reference.
2. The maps provided in the Maps Tab are helpful and informative. While Humboldt County houses less than one-half of one percent of the state's total population, the region offers an expansive service area for public transportation. Public transportation combined with active travel modes provide service throughout the greater parts of Eureka, Arcata, and Fortuna as well as to the more remote portions of the county.
3. Page correction: The Plan purpose begins on 1-6 rather than 1-5.

Consultation/Cooperation

1. The plan states that nearly a quarter of Humboldt County's population will consist of senior citizens by the year 2030. The plan does an excellent job providing a strategy for how to

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to enhance California's economy and livability"*

Ms. Oona Smith
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prepare for changing demographics as well as with the identification of methods for engaging senior citizens. The Public Participation element lists many groups and committees that advocate for the elderly. However, another group that stands to benefit from the transportation plan is the low-income population who may not be able to maintain a private car. It was unclear from the list provided if the low-income population had been involved in the consultation process. Outreach methods that are less time-intensive than participation in an advocacy group may better suit the needs of the low-income population.

2. While the resources inventoried on page 12 of section 1 are practical tools for planning a transportation system, they are not necessarily natural or historic. There is a brief mention of California State Wildlife Action Plan, but no specific species or natural sites are identified.
3. Page correction: The RTP best represents its coordination with the Public Transit-Human Services Transportation plan on page 5-10.

Introduction

1. Page 1-1: Second sentence reads, "A complete transportation network involves operating and maintaining a comprehensive transportation system that upholds safety, activity, equity, sustainability, and resiliency." It is not clear what is meant by the word "activity". Consider replacing with "mobility".
2. Page 1-4 and 1-5: We recommend adding a row for California statewide metrics to each table to provide additional context. Also, we suggest adding text to describe the transportation implications of the demographic tables, especially Table 4.
3. Page 1-8: We recommend adding a sentence that includes a mention of climate change adaptation/resiliency to the "Efficient & Viable Transportation System" objective.

Complete Streets

1. We recommend weaving in photos of complete streets infrastructure in Humboldt County, if possible, to better illustrate concepts.
2. Page 2-4: The description of SR 36 in Humboldt County should be revised to 46 miles in length, rather than the 32 miles as is currently stated.
3. Page 2-4: The description of SR 169 in Humboldt County includes the segment from Klamath to Klamath Glen. This segment is neither 20 miles long, nor is it in Humboldt County. The 20-mile portion of SR 169 within Humboldt County extends from Waitec to Weitchpec, at the junction of SR 96. The segment from Klamath to Klamath Glen is 3.5 miles and entirely within Del Norte County. Between the two segments is an 18.2-mile section where the alignment remains unconstructed.
4. Page 2-6, Table 1: This table should include the new Waterfront Trail from Truesdale Avenue to C St.
5. Page 2-8: Bike and pedestrian connectivity from Broadway (US 101) to the Class I Hikshari Trail could be improved if bike lanes/connections were made at the following locations:
 - Vigo St., from Broadway Ave. to the Waterfront Trail
 - Del Norte St., from Broadway Ave. to the Waterfront Trail
6. While Senate Bill 1 is discussed in detail in Chapter 9, I think that given the magnitude of this legislation it would be appropriate to reference the bill in the introduction. We think that it would also be appropriate to discuss SB 1 on page 2-11 in reference to the roadway maintenance backlog.

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7. Additional information, including the number of bridges in Humboldt County, would be helpful to provide, if available.

Modal Discussion

The plan does a good job of explaining how HCAOG intends to create a cohesive multimodal system. Element 7, in particular, had a very articulate plan for goods movement. The discussion in the Aviation Systems element related to the number of Air Taxi services provided is not common practice but has the potential to be a more utilized mode of transport.

Programming/Operations

Page 9-18: “Office of Regional and Interagency Planning (ORIP)” should be “Office of Regional Planning (ORP).”

Financial

The Financial element is well done: consistency statements are included, the funding sources are clear, and federal requirements have been met. The list of fiscally constrained project is simple and complete.

Global Climate Crisis

1. Ridesharing is referenced in Policy C-2 (page 10-4) but not mentioned elsewhere in the draft RTP. Notwithstanding the current absence of transportation network companies (TNCs) or mobility service providers (MSPs) like Uber and Lyft in Humboldt County, we encourage HCAOG to address this increasingly popular mode of transportation. The discussion of rail throughout the document could serve as a model.
2. Page 10-3: Pie charts displaying national GHG breakdowns are low resolution and could be clearer. The reference data is from 2012. We recommend updating this information with higher resolution graphics.
3. Page 10-4, 10-5: “CTP 2040 recommended policy” should be “CTP 2040 recommendation” (five instances).
4. Page 10-8: “CTP 2014” should be “CTP 2040” (two instances).

Please contact me with questions or for further assistance at the number above regarding the above comments.

Sincerely,



Jesse Robertson
Transportation Planning
Caltrans District 1

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to enhance California’s economy and livability.”*