

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
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October 6, 2017

Marcella Clem, Executive Director
Supervisor Ryan Sundberg, Chair of the Board of Directors
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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.

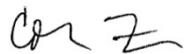
Finally, we encourage HCAOG to include consideration of short sea shipping in the Goods Movement Element. While there are certainly challenges to adoption of regional freight movement via this mode, we note that there are significant challenges to all modes of regional freight movement due to our “rugged 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
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November 1, 2017

Oona Smith, Senior Planner
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via email: oona.smith@hcaog.net
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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).

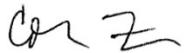
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- We appreciate the fact that the Richardson Grove Operational Improvement Project no longer appears in the “Complete Streets” element. However, we again ask that the project be removed from the RTP entirely. If you have not done so already, we urge 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,



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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

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*Making Conservation
a California Way of Life.*

November 27, 2017

Oona Smith, Senior Planner
Humboldt County Association of Governments
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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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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 Wautec 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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