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**RE: Draft 2016 Regional Transportation Plan & PEIR Addendum**

Commissioners, Ms. Leighton & Mr. Schwein:

Thank you for the opportunity to comment on the proposed 2016 Regional Transportation Plan (RTP) for Del Norte County. We have serious concerns about the process of developing the draft RTP and about its content, particularly with regard to safety, road maintenance and capacity increases, public involvement, climate and environment, social equity and environmental justice, internal and external consistency, and certain methodological considerations.

We also have serious concerns about the application of the California Environmental Quality Act (CEQA). The 2016 RTP is clearly an entirely new document and an entirely new project, yet it has been treated instead as merely a minor change to the previous RTP. The Environmental Impact Report (EIR) Addendum which has been prepared would be appropriate for a minor change. However, as a new project, the 2016 RTP must meet required standards for independent environmental review and circulation for public comment. The Addendum is inadequate in any event, for numerous reasons elaborated herein.

The draft RTP acknowledges the need to “maintain internal consistency” of the document (pp.1-2, 3-1), but there are numerous lapses of internal consistency apparent. Many of the Goals, Policies and Objectives contained in the Policy Element—particularly those related to safety, road maintenance, and climate and environment—are not adequately supported by the Action Element, nor even by the analysis of Existing and Future Conditions. Furthermore, many of the Objectives listed in the Policy Element do not actually implement the Goals, and many of the Policies do not implement the Objectives. We provide numerous examples of such inconsistencies in these comments.

Other issues—such as social equity and environmental justice—which the RTP is required to consider by the 2010 California Regional Transportation Plan Guidelines (RTP Guidelines), by other statutes, or simply by good planning practices do not receive adequate attention or are not incorporated into the document in such a way as to meet required standards. Other problems with the draft document pertain to its inconsistency with other relevant adopted plans. Still others pertain to the process of developing and reviewing the document, including insufficient and sub-standard public participation and environmental review under CEQA. We examine all of these issues at length herein.

Two specific projects loom large over regional transportation planning in Del Norte County: the needed realignment or bypass around Last Chance Grade on US 101, and the unneeded STAA access project on US 199/SR 197. In fact, we would argue that the Last Chance Grade project is by far the most necessary and consequential project in the region, and the 2016 RTP should focus on it. Conversely, the STAA access project is an outdated project bogged down by challenges to its inadequate environmental documents, and the 2016 RTP update is a critical time to reconsider the project and indeed to cancel it.

In these comments, we often examine the draft RTP through the lens of these two projects. We show particularly that the STAA access project appears to be only partially included in the document but never identified or addressed, conflicts with a number of the draft RTP's Goals, Objectives and Policies, and it will have a negative impact on the proposed programmatic performance measures. We also show that the Last Chance Grade project is required for successful implementation of many of the RTP's Goals, Policies and Objectives, yet has been insufficiently prioritized in the draft RTP and its predecessor documents.

### **The STAA Access Project, Last Chance Grade & the RTP**

The 2011 RTP (attached) explicitly identified the "197/199 Safe STAA Access Project" as a top priority. The Del Norte Local Transportation Commission (DNLTC) has "overprogrammed" this project in the Regional Transportation Improvement Program (RTIP), so that all local RTIP allocations over the course of numerous cycles are dedicated to this one project. The RTIP has historically been one of the most important source of local transportation improvement funds, and committing all available local RTIP funds to this project means that many other deserving projects cannot be funded.

Some local officials have suggested that the STAA access project is irrelevant to the 2016 RTP update because it is already approved and programmed. In fact, this project is not under construction but rather is currently undergoing additional court-ordered environmental review. The environmental review process is intended to inform project decision-making, not to be an after-the-fact addendum to a decision already made. Indeed, in spite of past approvals, the future of the project is uncertain. Deadlines associated with STIP funds allocated to the project mean that funding will likely be rescinded if the project is not completed within the next 2-3 years. The DNLTC's 2016 Regional Transportation Improvement Program (RTIP, attached) asserts that the agency is "concerned about Caltrans' ability to deliver...[B]oth our shares and the project are at risk."

In contrast, the Last Chance Grade project as it is currently conceived (i.e., a bypass or realignment around the geologically unstable hillside) is missing from the 2011 RTP. The only mention of Last Chance Grade in that document refers to pavement repair and maintenance on the existing route (p.95). However, the bypass project is not a new idea. The Final Environmental Impact Report (FEIR) for the 1990 RTP (attached) describes a project for the "acquisition of right-of-way for the Wilson

Creek bypass to bypass a bluff area” (p.2-3). Wilson Creek is one of the boundaries of the stretch of US 101 today known as Last Chance Grade. The 1990 RTP’s reference to this project shows just how long the DNLTC has recognized the importance of a bypass around Last Chance Grade. Yet the 2011 RTP’s failure to even mention a Last Chance Grade bypass shows that the project has not been sufficiently prioritized in recent years. Indeed, although the draft 2016 RTP lists “the permanent solution project for Last Chance Grade” as its top priority (p.6-1), the project is still listed as “unconstrained,” a category the document describes as “unlikely to receive funding over the next 20 years” (p.4-4). Thus, while the draft 2016 RTP pays lip service to the Last Chance Grade project as a top priority, the Action Element reveals that the DNLTC continues to kick the can down the road.

### **Project Identification & Emphasis**

Over the years since the STAA access project was initially proposed, various documents have split it into seven, five or four “sites” or sub-projects for reasons that are often unclear. This piecemeal approach to project identification in key lists and tables of projects prevents adequate public knowledge and consideration of the project in its entirety.

In the draft 2016 RTP, the STAA project is never clearly and plainly identified or described. Instead, it appears only obliquely and generically referenced, twice, as “operational improvements” (pp.2-28, 2-31). Nevertheless, the majority of the sub-projects which make up the project (specifically, those funded by the State Highway Operation and Protection Program or SHOPP) appear to be included in the Action Element in Table 4.1 (p.4-5). However, they are not identified as components of the project (STAA access is nowhere mentioned in their descriptions), and only a reader with detailed knowledge of the project would be able to identify them as such. Furthermore, and most importantly, other components of the STAA project are not listed or described anywhere at all in the draft RTP.

After careful re-assessment of its impacts, some of which we relate in these comments, the DNLTC must conclude that the STAA access project should be canceled and therefore not included in the 2016 RTP update. However, should the DNLTC continue to include it, it must be clearly and unambiguously identified as the single complete project that it is, rather than continuing to be split into different projects listed by site and/or funding source.

In contrast, the Last Chance Grade project is described at several locations in the text, and is identified as a top priority project. However, its location is improperly identified in Table 4.2 (p.4-6) as “9 miles west of Crescent City” (which if accurate would put it offshore in the Pacific Ocean). Additionally, the only place it is mentioned in the Policy Element is under the heading of “Recreational Travel,” which—given the importance for movement of people, goods and emergency services of maintaining connectivity on US 101 south of Crescent City—is an odd and seemingly unjustifiable choice.

In the context of recreation, however, it is important to note that the draft RTP completely omits mention of US 199 as a route important to tourism. The identification and importance of US 199 as a recreational gateway for tourism from I-5 communities, especially during the inland hot weather months, cannot be overstated. The US 199 corridor is the gateway to important recreation areas including: the Smith River National Recreation Area; the most sought-after camping facility in Redwood National/State Parks, Jedediah Smith Campground; and the most famous tourist location in Del Norte County, Stout Grove, showcasing our largest redwood trees and hosting guided tours that are attended by international visitors. In omitting identification of US 199 as an important tourist route, the draft

RTP also fails to assess the conflict that the STAA access project presents with the goal of enhancement of recreational travel.

### **Justification, Need, and Assessment of the STAA Access Project**

While the STAA access project is never explicitly mentioned or described in the draft 2016 RTP, there are nevertheless a number of misleading and incorrect statements in the text which serve to buttress support for the project. For example, the document claims that “US 199 is the only eastbound route connecting US 101 to Interstate 5” (p.2-10). This is untrue. While US 199 is the only major road connecting US 101 and I-5 *which lies partly in Del Norte County*, it is not the only such connection available to County residents, visitors or shippers, and identifying it as such overstates its regional significance. A Federal Highway Administration (FHWA) map of the National Network and National Highway System (attached) shows the major connections between US 101 and I-5. In addition to US 199, other major connections between the two corridors include State Route 299 about 75 miles south of Crescent City and Oregon Route 42 about 130 miles north.

The draft RTP also includes a statement which implies that all commercial trucks are referred to as “STAA trucks” (p.2-31), and another claim that US 101 and US 199 are part of the National Network, both of which are false. There are, of course, a wide variety of commercial trucks, and STAA trucks are only one specialized type. STAA trucks are generally only utilized by carriers transporting large quantities of non-liquid, lightweight freight (larger trucks often maximize allowable weights before they can fill their trailers with heavy freight) over long distances. STAA trucks are only allowed on the National Network of interstate highways and on “Terminal Access” routes. Terminal Access routes are intended under both federal and California law as a way to ensure access for STAA trucks between the National Network and freight “terminals” (23 CFR §658.19, California Vehicle Code Section 34501.5(c)-(d)). As the official Caltrans District 1 truck route map (attached) shows, US 101 in Del Norte County is a designated Terminal Access route; US 199 is not. The National Network route nearest to Del Norte County is I-5.

The goal of the STAA access project is designation of the US 199/SR 197 corridor as a Terminal Access route. Such a designation would not provide new access to a terminal from I-5, but rather would serve as an additional linkage in a web of STAA routes outside the National Network, completing circuits to the north via US 101 and Oregon Route 42 in and to the south via US 101 and SR 299, which will open to STAA travel by 2017 (Caltrans District 2, personal communication, 3 September 2015). These existing (Oregon Route 42) and soon-to-exist (SR 299) STAA routes provide sufficient “terminal access” for STAA trucks between I-5 and Del Norte County. Indeed, as the Traffic Analysis Report for the STAA project prepared by consultant Fehr & Peers (attached) summarized, “the majority of the (truck traffic generating) respondents surveyed indicated that the STAA improvements would not affect their shipping patterns” (p.ES-2). Importantly, these surveys were completed before impending STAA access on SR 299 was anticipated. With the completion of that STAA route, US-199 will become even less important as a potential STAA route. The current draft RTP seems to ignore the impending STAA route via SR 299, stating that “restrictions for STAA vehicles along US 101...remain in neighboring Humboldt County to the south” (p.2-14). This statement, while technically true, misleadingly implies that there is no way for STAA vehicles to leave the area heading south on US 101, which will not be true once SR 299 is designated for Terminal Access.

The draft RTP proposes several performance measures by which to judge the effectiveness of the transportation program (p.4-12 et seq.). The STAA project is likely to have a negative impact on all the relevant metrics:

- **Transportation System Investment & Preservation/Service Fuel Use/Travel Distance/Time/Cost:** By increasing the number of large trucks on the road in Del Norte County, the project will make it harder to preserve the local road system. Doubling the weight borne by a vehicle axle is estimated to increase some pavement damage by a factor of 15 to 20, and a heavy truck axle may bear 20 times more weight than the average passenger vehicle (FHWA 2014, attached). Thus, trucks contribute disproportionately to damage done to roads and bridges.
- **Safety:** Project proponents have long claimed that the project will increase safety for road users. While it is possible that some of the components of the proposed project would improve safety for current road users in the absence of STAA trucks, reclassifying the route and adding these additional oversized STAA vehicles instead increases safety hazards for other users. The Smith Engineering & Management report on the STAA access project (attached) fully elaborates these safety risks. To summarize, the STAA project incorporates significant exceptions to the state's mandatory design standards for measurements such as curve radius, shoulder width, and sight distance. Thus, while the STAA project would create roadway geometries sufficient to *theoretically* allow STAA trucks to make the curves, it would not create alignment sufficient for them to *safely* make those curves. This would make the roadway particularly dangerous for other users, as large trucks account for a disproportionate number of fatalities in vehicle collisions (Insurance Institute for Highway Safety 2016, attached).
- **Congestion/Delay/VMT:** The STAA project's Traffic Analysis Report predicts that 92 additional trucks per day will travel the corridor as a result of the project. Clearly the project would increase large truck vehicle miles traveled (VMT). Furthermore, it would doubtless contribute to the increased proportion of truck traffic in relation to other vehicles projected in the draft RTP (p.4-1). Increasing numbers of oversize trucks on Del Norte's rural roads only increase congestion and delay.
- **Land Use Efficiency:** It is likely that "Terminal Access" designation for US 199 and SR 197 will induce growth in trucking-dependent land uses in the region, which would work counter to the goal of compact development around the County's few population centers. The Final Environmental Impact Report/Finding of No Significant Impact for the STAA project (excerpt attached) predicts that the project would "foster a small amount of economic and population growth" (p.2.1-47), but relies inappropriately on County and Crescent City General Plans to claim that this growth would have "no substantially adverse growth-related indirect effects." Comments from planning consultant Mara Feeney (attached) on the STAA project's environmental impact analysis pointed out weaknesses in the traffic assessment and questioned the conclusions about induced growth. However, whether judged "substantially adverse" or not, induced growth of trucking-dependent land uses is likely to reduce land use efficiency and thus impair this performance measure.

It is also important to note that investing in the STAA access project prevents the County from investing in other important projects which would further the goals of the RTP. For example, Policies 3.2.2.4.1 and 3.7.2.1.1 call for prioritization of traffic calming and bicycle and pedestrian safety improvements, and the "Crescent City Gateway and Traffic Calming Project" to forward those purposes is one of the top priority projects in the draft RTP (p.6-1). Notably, a very similar project was suggested

by Caltrans in a letter included with the County's 2016 RTIP (attached), but the suggestion had to be ignored because the County has used up more than its entire RTIP allotment for numerous funding cycles on the STAA access project.

Finally, the goods movement strategy of the DNLTC in recent years has focused almost exclusively on STAA access, and the draft RTP continues the focus on trucks. However, the failure to examine other goods movement alternatives is unjustifiable. The document correctly states that "the movement of goods [in Del Norte County] is primarily trucks" (p.2-28), but fails in its promise to "examine the potential for new travel options within the region" (p.1-1) in this regard.

For example, it is not true, as the draft RTP claims, that the lack of container ship access completely "prohibit[s] the Harbor from becoming a major source of goods movement" (p.2-28). In fact, there is nothing to stop the County from partnering with other regional ports to develop an important short sea shipping network for freight. A 2008 report on freight mode shift prepared for the Maritime Administration of the US Department of Transportation (attached) noted that "while the West Coast has only a very limited number of deep-draft international ports, there are numerous smaller ports potentially available for port development for RORO [short sea 'roll-on, roll-off'] ships" (p.40). Further, the potential "operational issues" discussed by a Government Accountability Office report (attached) which identified obstacles to adoption of short sea shipping (pp.13-14) do not apply to the Crescent City Harbor, because it is not already developed and heavily utilized to handle other kinds of cargo. That report succinctly summarized the potential benefits of short sea shipping as "improved freight mobility, improved air quality, and reduced infrastructure spending" (p.11). The possibility for freight mode shift to short sea shipping deserves serious consideration in the RTP.

### **Justification, Need, and Assessment of the Last Chance Grade Project**

Identification and justification of the need for the Last Chance Grade project are underdeveloped in the draft 2016 RTP. As noted above, the project is identified in only one location in the Policy Element, under "Recreational Travel," where the goal of improvements at Last Chance Grade is identified only as "address stability problems" (p.3-6). In the Action Element, Last Chance Grade is noted for its "vulnerability" as a "landslide prone area" which is "being evaluated for a permanent solution" (p.4-2), but no details of the environmental, social or economic risks of such vulnerability are identified, nor are any potential "permanent solutions" identified. In Table 4.2, the phrase "permanent solution" is again employed, but cost and year of construction are listed simply as "TBD" (p.4-6).

Only in the draft RTP's brief chapter on Priority Projects does the document begin to identify the stakes for the Last Chance Grade project, noting that the "corridor is at risk for complete failure, which would cut off the County's connection to Humboldt County and the rest of California" (p.6-1). Here the draft also asserts that "the Last Chance Grade Feasibility Study 2015 has identified the community's preferred alternatives for this route." This is incorrect. The Last Chance Grade Engineered Feasibility Study (attached) identified a wide range of potential project alternatives, and while some public comment was accepted, it cannot be said to represent "the community's preferred alternatives." A document more closely approaching the community consensus on the project is the consensus white paper released by the Last Chance Grade Stakeholder Group in December 2015 (attached), which agreed that "the 'no-build' alternative is not an option" (p.2), ruled out some other alternatives as well, and agreed on a list of "values and benefits" by which remaining alternatives should be judged.

This document forms a solid basis for including and describing Last Chance Grade project alternatives in the draft RTP and should be utilized for that purpose.

Table 4.2 of the draft RTP identifies the Last Chance Grade project as supporting Goals 1, 2 and 5 of the Policy Element. In fact, it supports many more of the proposed Goals than that.

- Goals 1 & 2: A failure of US 101 at Last Chance Grade would prevent “safe, efficient, and convenient” travel on much of the County’s road system and would represent a major lapse in the goal to “preserve the existing County roadway system.” Thus, preventing such a failure with the Last Chance Grade project strongly supports Goals 1 & 2.
- Goal 3: A failure of US 101 at Last Chance Grade would cut off many “county resident, visitors and employees” from access to local and interregional transit services. Preventing that failure strongly supports Goal 3.
- Goal 5: A failure of US 101 and Last Chance Grade would cut off one of the most significant current freight movement routes for Del Norte County. Preventing such a failure strongly supports Goal 5.
- Goals 6 & 7: The draft RTP notes that Last Chance Grade has been identified by bicyclists as a “problem area” on the Pacific Coast Bicycle Route (p.2-29). A new route with better bicycle facilities and less debris would improve the non-motorized transportation system and encourage active transportation and thus support Goals 6 & 7.
- Goal 8: A failure of US 101 at Last Chance Grade would cut off one of the primary tourist routes into and out of the County. Preventing such a failure with the Last Chance Grade project would certainly support Goal 8.
- Goal 9: A properly sited and constructed alternative route could help reduce existing fragmentation of the old-growth coast redwood forest bisected by the current route. Incorporating such “sensitivity to the environment” into Last Chance Grade project development would help to support Goal 9.

Finally, unlike the STAA access project, the Last Chance Grade Project is sure to have a positive impact on all of the relevant performance measures proposed in the draft RTP (p.4-12 et seq). (Table 4.2 identifies certain relevant performance measures, although we believe the list found there is incomplete.)

- Transportation System Investment & Preservation/Service Fuel Use/Travel Distance/Time/Cost: By any measure, the current lane miles of Last Chance Grade must qualify as “distressed” and generally in poor condition. Due to ongoing earth movement and geological instability, recurring efforts at maintenance and repair of the existing route cannot address these problems for the long term. A bypass of Last Chance Grade will reduce distressed lane miles with poor pavement condition and improve these metrics substantially.
- Safety: The constant danger posed to road users by earth movement at Last Chance Grade is a serious safety threat. While the Engineered Feasibility Study identifies steps Caltrans is taking to keep the public safe (Appendix B, p.4), no agency can provide complete safety from the consequences of sudden and significant earth movement. A bypass of the geologically unstable area would increase the safety of all road users.
- Transit: The draft RTP identifies at least two major transit routes which currently utilize Last Chance Grade. A failure at Last Chance Grade would prevent these routes from providing

service and cut off many transit-dependent people from their destinations. The Last Chance Grade project would ensure continued transit access.

- Congestion/Delay/VMT: A bypass of Last Chance Grade would ameliorate the persistent recurring delays due to occasional partial failures and near-constant construction work on the current route. Furthermore, a total failure of US 101 at Last Chance Grade would require residents to drive many more miles (the economic impact study found at Appendix G of the Engineered Feasibility Study estimates “an additional distance of 320 mile” between Del Norte and Humboldt Counties). Avoiding the likely dramatic increase in VMT which would result from a total failure at Last Chance Grade would prevent a significant deterioration in this performance measure.

## **Safety**

Safety is identified as one of the transportation issues “of central importance” in Del Norte County, and features prominently in Goal 1 of the draft RTP: “Provide and maintain a safe, efficient, and convenient countywide road system” (p.3-1). Policy 3.2.2.2.1 calls for the county to “identify and eliminate unsafe conditions” on the local road system (p.3-2).

Unfortunately, the draft RTP provides insufficient analysis and consideration of this critical issue. The collision summary provided in Section 2.5.7 is of extremely limited usefulness, as it lists collisions by road or street but fails to break those roads or streets down into smaller segments which might help identify collision hot spots. An analysis of state highways in Caltrans District 1 by the Coalition for Responsible Transportation Priorities (CRTP) (attached) found two segments in the County with particularly high fatal collision rates, one on US 101 near Last Chance Grade and the other on US 199. Although the segment on US 199 included a portion of the STAA access project, none of the recorded fatal accidents were within the STAA project’s boundaries.

A collision analysis of all the STAA project’s locations performed by Caltrans (attached) shows that while some of the locations had higher than average collisions rates, some were lower than average. This shows that even if it increased safety, the STAA project would not be the most effective intervention for that purpose. However, as described above and detailed in the comments from Smith Engineering & Management, exemptions from mandatory safety design standards mean that the STAA project would actually decrease safety. Thus, the STAA project would undermine much of the draft RTP’s Policy Element:

- Contrary to Objective 3.2.2.2 & Policy 3.2.2.2.1 (p.3-2), the STAA project will contribute to unsafe conditions on a state highway.
- Contrary to Policy 3.6.2.1.2 (p.3-5), the STAA project will decrease, not increase, safety for other road users.
- Contrary to Goal 8 (3.8.1), Objective 3.8.1.1 & Policy 3.8.1.1.2 (p.3-6), the STAA project will decrease safety on US 199 and make recreational travel harder and more daunting for tourists.

Also important to highlight is the fact that Objective 3.6.2.1 (“Minimize conditions that restrict the movement of goods in and out of the County”) does not adequately implement the goods movement Goal (“Provide for the safe and efficient movement of regional and interregional goods”) (p.3-5). As illustrated above, projects such as the STAA access project which remove freight restrictions cannot be



claimed to be “safe.” (In contrast, there is broad consensus that the Last Chance Grade project would increase road user safety on US 101.)

Furthermore, the actions identified in the draft Action Element related to safety rely almost entirely on the state’s Strategic Highway Safety Plan (SHSP) (attached), with very little elaboration or explanation of how to apply the SHSP’s framework to the local road system (pp.4-2/4-3). One of the weaknesses of relying on a statewide plan for prioritizing local infrastructure spending is revealed by the “one primary safety goal” of the SHSP, identified in the draft RTP as: “reduce roadway fatalities to less than one fatality per one hundred million vehicle miles traveled (VMT)” (p.4-2). Arguably, a safety goal weighted by VMT makes sense for a comprehensive statewide plan such as the SHSP, which examines everything from distracted driving to driver training and licensing. However, for the DNLTC and other local agencies deciding which projects to prioritize for safety purposes within our region, the rate relative to traffic volume (or relative to any other metric) should matter much less than the raw number of serious accidents.

Indeed, the description in the draft RTP of the proposed performance measure related to safety appears to essentially agree with this assessment. The description claims that safety is monitored by “the total accident count” (not a relative rate), and that the available data “can be used to monitor the number of fatal and injury collisions by location to see if added improvements are needed” (p.4-13). However, the description then goes on to a vague and apparently contradictory discussion of weighting the collision rate by VMT and/or by annual average daily traffic (AADT), and the summary table of performance measures (Table 4.6) indicates that collisions will be weighted both by VMT and per capita. The description also implies that it is desirable to use region-wide or statewide average collision rates on “similar facilities” as benchmarks for safety. However, statewide averages are less relevant than within-county averages for prioritizing local funds.

The RTP should clarify that it is indeed the number of serious collisions, not the relative rate, which will be monitored and used to prioritize safety projects. The DNLTC must also face the fact that the STAA access project is more likely to decrease safety than to increase it (see above), and should abandon the project and remove those portions of it currently included in the draft RTP. Finally, the Last Chance Grade project should be more seriously pursued in the near-term as a safety improving project.

### **Road Maintenance & Capacity Increases**

“Maintenance of the existing system to ensure connectivity” is another issue “of central importance” identified in the draft RTP (p.3-1). Section 4.3 (p.4-2) of the draft RTP identifies the top regional priorities as “maintaining existing facilities” and maintaining interregional connectivity, and Chapter 6 lists specific top priority projects. Section 4.3 states that “should a capacity increasing project become a regional priority, it shall be initiated only when fully or largely funded by revenue sources that otherwise could not be used for maintenance activities.”

A significant portion of the STAA access project—including all of the portions listed in the current draft Action Element—are funded through the SHOPP, which is a primary funding source for maintenance activities. Thus, even if the STAA project is considered a regional priority, it would conflict with the policy articulated in Section 4.3. Furthermore, additional heavy truck use will make it more difficult to maintain existing roadways (see discussion of impact of heavy truck on pavement above) and has no bearing on basic interregional connectivity.

In contrast, the Last Chance Grade project furthers the goal of maintaining essential connectivity and does not increase capacity. Additionally, maintenance and repairs at Last Chance Grade have cost tens of millions of dollars over the last few decades, and nearly \$8 million more is included in the draft RTP for this purpose (p.6-1). By reducing the need for future maintenance of the current route, the Last Chance Grade project would allow more funds to be spent on other critical maintenance needs and support the goal of “maintaining existing facilities.”

Capacity increases and maintenance of roadways generally work at cross purposes, at least from a fiscal perspective. The draft RTP generally deals with both inconsistently. The Policy Element asserts reasonably that “expanding the traffic capacity of roadways is not a priority” (p.3-1). Yet the Action Element admits that “capacity enhancement” is one of the main categories of projects included in the document (p.4-2). Furthermore, while the STAA project does not “increase capacity” in the sense of adding lane-miles, it increases the capacity of the roadway in a very real way by allowing an entirely new class of vehicle.

Since the STAA access project is not listed in Chapter 6, conflicts with the regional transportation priorities, and is inconsistent with a large number of Goals, Objectives and Policies, the case for it to be canceled is strong. On the other hand, the Last Chance Grade project is listed in Chapter 6 and does support many of the Goals, Policies, and Objectives, yet is relegated to “unconstrained” (“wish list”) status.

## **Greenhouse Gasses & Climate**

Long-range transportation planning must include reduction in greenhouse gas (GHG) emissions as a top priority, and it is appropriate that the draft RTP addresses this issue. However, the manner in which it is addressed is insufficient.

The claim that its small population makes Del Norte County’s GHG contribution negligible or not “noticeable” (p.3-6) is unsupported. The fact that the county accounts for a very small fraction of global GHG emissions does not mean that its emissions are not meaningful, measurable, or noticeable. And although GHG inventories specific to the county do not yet exist, rural areas such as Del Norte generally have higher GHG emissions per capita than urban areas (Dodman 2009, attached). This fact makes a strong case that the RTP should take the mandate to reduce GHG emissions at least as seriously as large metropolitan areas.

The draft RTP contains some strong goals, objectives, and policies pertaining to GHG emissions, such as Objective 3.9.3.2: “Ensure that transportation projects do not contribute to increased vehicle emissions” (p.3-7). However, Objective 3.9.3.3 seems to scale back the RTP’s ambition: “Reduce *or maintain* GHG emissions from transportation related sources in Del Norte County” (emphasis added) (p.3-7). While current statutes and regulations may not require rural counties like Del Norte to inventory their GHG emissions and establish firm reduction targets, it is hard to believe that such requirements will not become law in the future. More importantly, “maintaining” GHG emissions means they will continue to contribute to the overall exceedances of GHG emissions which are causing climate change and its impacts. This is not considered or evaluated. It is simply wrong to assume that maintaining GHG emissions has no impact. Thus, from both an environmental and a legal perspective, it would be highly prudent for the DNLTC to establish an ambitious GHG reduction target for the local transportation sector and a plan to meet such target. A policy of maintaining current emissions levels is certainly unacceptable.

The Action Element does not live up even to the low ambition of the Policy Element. It begins with an assumption that “the proportion of truck traffic on State highways will increase” (a trend which the document inexplicably attributes to population growth, despite the fact that population growth should be expected to increase truck traffic and non-truck traffic roughly in the same proportion) (p.4-1). According to the federally approved model used by the California Air Resources Board (CARB) to estimate emissions for regulatory purposes (technical documentation attached), heavy duty diesel trucks such as tractor trailers emit roughly 2,000-2,300 grams/mile of carbon dioxide (p.54), while gasoline-fueled passenger cars emit roughly 160-300 grams/mile (p.45). Since heavy trucks emit far more GHG per trip than passenger vehicles, an increase in the proportion of trucks would mean an increase in GHG emissions.

The STAA access project will surely increase truck traffic significantly and, although unmentioned, may be part of the reason for the projection of a disproportionate increase in truck traffic. Even the STAA project’s own Traffic Analysis Report predicts that truck traffic will increase by nearly 100 trucks per day by 2030—a roughly 15% increase in truck traffic on US 199 from background projections found in the same report. This increase was labeled “not significant” by the Traffic Analysis Report purely on the basis of a level of service analysis, with no consideration of GHG or other emissions. However, based on the projections in that report and carbon dioxide emissions estimates cited above, one can calculate that this single project may increase GHG emissions in the US 199 corridor more than all the added passenger vehicles projected from all sources over the next 15 years. This conclusion that increased truck traffic is not significant must be revisited in light of Objective 3.9.3.2 and other new policies and standards.

Furthermore, no discussion of GHG emissions in regional transportation planning can be considered sufficient if it considers fossil-fueled vehicular emissions alone. The discussion must also consider fossil-fueled vehicles in relation to other low-emission or zero-emission modes of transportation (mode share), as well as land uses and land use patterns tied closely to regional transportation systems.

The question of mode share is treated inconsistently in the draft RTP, and the nexus with GHG emissions is not clearly identified. In its description of existing conditions, the document recognizes that “short commute times indicate that an improved bicycle network may encourage a mode shift from automobile to bicycle” (p.2-29). But the Action Element assumes that no significant mode shift will occur, claiming that “the private automobile will remain the primary mode of transportation” and that bicycle travel will increase only “modestly” (p.4-1).

These kinds of fatalistic, unproductive, and unsupportable assumptions are found throughout the draft RTP. The very first page of the document asserts that the Plan will “identify projected growth areas” rather than attempting to guide growth through the planning process (p.1-1), and the Action Element is partly based on an assumption that truck traffic per capita will increase as well (p.4-1). This common but backwards approach to planning is evident in the discussion of VMT projections, which assumes (based on the output of a Caltrans model) that VMT will grow more than twice as fast as population growth in the county (p.2-13). The draft RTP’s goals include an “efficient” road system (Goal 1), an “efficient” goods movement system (Goal 5), the promotion of alternative transportation (Goal 7), and minimizing increased vehicular emissions (Goals 9 & 10), and proposed performance measures include land use efficiency and reduction in VMT per capita. An *increase* in VMT and truck traffic per capita would be contrary to all of these goals and have a negative effect on performance measures, and would thus represent a major failure of the regional transportation planning process. Assuming such

increases at the outset calls into question the purpose of planning at all. Similarly, the Action Element assumption that “any expansion [in transit service] will not significantly impact overall traffic levels” (p.4-1) is self-defeating from a planning perspective. After all, if basically unchanging mode shares are assumed, how can changes in mode share be proposed as a performance measure for program success (p.4-14)?

These mode share assumptions may be one of the reasons for the lack of ambition and preparedness reflected by the treatment of bicycle and pedestrian infrastructure and transit in the Action Element and the Financial Element. These two modes are the only ones in the plan without “wish lists” prepared beyond projected revenues. Indeed, projected transit revenues actually outpace identified transit projects by nearly 6:1 in the short term and 3:1 in the long term (p.5-3).

GHG reduction goals in the Policy Element must be strengthened, and planning assumptions in the Action and Financial Elements must be modified to allow for more ambitious goals. Moreover, achievable mode shifts to zero-emission and low-emission modes must be given a higher priority, and the connections between transportation mode, land use, and GHG emissions must be made explicit.

Nor does the draft RTP give adequate consideration to planning for the *effects* of climate change, notably sea level rise (SLR) and increased severity of wildfires. RTP Guidelines Section 6.30 strongly recommends giving these effects proper consideration in RTP development. The Sea Level Rise Guidance document for planning projects in California (attached) estimates that the coast north of Cape Mendocino will experience SLR of up to 23 cm by 2030 and up to 142 cm by the end of the century. However, while the draft RTP mentions the importance of considering sea level in planning in such a coastal community (pp.4-1, 4-3) and describes a separate assessment of local vulnerability to SLR and adaptation options (p.4-3), it is not clear that any of those options have actually been considered and incorporated into the projects, goals, objectives, or funding strategies in the RTP. The effects of SLR on tsunami risk certainly do not seem to be considered (p.4-3 et seq.).

Most models also predict a significant increase in wildfire frequency in Northwestern California (see California Energy Commission’s white paper on fire and climate change, attached). However, while wildfires are mentioned in the RTP mostly in the context of emergency preparedness (p.4-3 et seq.), consideration of increased severity or frequency does not seem to have been incorporated into any actual transportation planning.

### **Measuring Transportation Impacts: Environmental Implications**

The draft RTP notes that VMT is a “robust measure of vehicle activity” which “is now the basis for transportation impact identification and mitigation under the California Environmental Quality Act (CEQA)” (p.2-12). The RTP qualifies its support for VMT by asserting that it is “not a good indicator of congestion” (p.2-12), but does not note that one of the reasons VMT has become the standard for impact assessment is because of the failure of congestion-based metrics to adequately fill that role. Therefore, it is perhaps unsurprising, but nevertheless unacceptable, that the draft RTP goes on to identify level of service (LOS) as the metric for “determining when roadway capacity needs to be improved” (p.2-17).

Level of service (LOS) is an outdated metric which is increasingly recognized as leading to unintended consequences when used to measure the impacts of development and to determine appropriate mitigation. One researcher succinctly summarizes: “The use of LOS is often criticized for its bias

towards automobiles at the expense of bicycling, transit, and walking, and it complicates smart growth or compact development” (see attached article by Henderson). We agree with this criticism.

Furthermore, the use of LOS and other measures of automobile congestion to assess transportation impacts has led to mitigation measures which add automobile capacity to the road system. However, there is a growing consensus in transportation planning that adding capacity induces new travel and does not reduce congestion. We highly recommend that the DNLTC review the literature on induced travel. A recent policy brief for the National Center for Sustainable Transportation, appropriately titled “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion” (attached) contains a concise summary.

The increased vehicular traffic and neglect of alternate transportation options which result from use of LOS as a transportation impact metric make it ill-suited for two of the most urgent tasks in transportation planning today: reducing greenhouse gas emissions and designing livable communities. In recognition of these facts, SB 743 directed the Governor’s Office of Planning and Research (OPR) to replace LOS standards in the CEQA Guidelines with a new measure which reflects the need to “promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.” In response, OPR is currently in the process of finalizing CEQA Guidelines revisions which direct the use of vehicle miles traveled (VMT) as the new metric for measuring transportation impacts. As OPR notes in its latest proposal (attached), “vehicle miles traveled directly relates to emissions of air pollutants, including greenhouse gases, energy usage, and demand on infrastructure, as well as indirectly to many other impacts including public health, water usage, water quality and land consumption.”

Thus, the draft RTP’s continued reliance on LOS is clearly inappropriate, conflicting even with its own use of VMT in many other areas and with portions of the Policy Element, such as Goals 9 and 10 pertaining to reduction of GHG emissions and environmental impacts. Proposed Performance Measure 6 (“Congestion/Delay/Vehicle Miles Traveled”) is also called into question, as congestion and delay are no longer appropriate metrics for impact analysis or determination of the need for new capacity.

### **Other Environmental Considerations**

The draft RTP contains a vaguely worded goal to “ensure sensitivity to the environment in all transportation decisions” (p.3-6). However, no implementing objectives or policies are provided, ensuring that the goal is all but meaningless.

The RTP Guidelines note federal requirements that an RTP must contain “a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities” (p.11). However, no such discussion is included in the draft RTP. The draft RTP lists 7 projects on US 199 in the Smith River Canyon, a re-paving project directly beside much of the length of the South Fork of the Smith River, and dozens of other projects in the Smith River watershed, along with about twenty projects clustered around the mouth of the Klamath River. The STAA access project will increase truck traffic substantially (see above), increasing not only the risk of serious collisions (see above) but also polluted runoff. Recent National Marine Fisheries Service comments (attached) on Caltrans’ ongoing

environmental analysis for the STAA access project noted that Caltrans should “describe the changes in the number of heavy truck [*sic*] as well as the total number of vehicles per day and any changes in concentration of pollutants of vehicle origin in stormwater runoff” (p.2).

A comprehensive discussion of mitigation should include, at a minimum, a consideration of cumulative impacts of these projects on the hydrology and biological resources of the Smith River and Klamath River watersheds. The RTP is the most appropriate venue for consideration of the cumulative impacts of all these projects work on these important watersheds, as well as potential mitigation.

Additionally, the draft RTP incorporates a list of “species of greatest conservation need” and “recommended conservation strategies” in Appendix C. However, there is no indication that the needs of these species or the recommended conservation strategies were incorporated into transportation planning in the RTP in any way. It is worth noting that failure to properly consider the impacts of the STAA project on protected species has already led to successful legal action against Caltrans and the National Marine Fisheries Service.

### **Social Equity & Environmental Justice**

The RTP Guidelines require the consideration of social equity and environmental justice (p.62 et seq.). In fact, there is no discussion of environmental justice. Discussion of social equity in the draft RTP is extremely limited, confined largely to a brief acknowledgement that large portions of the local population are elderly, live in poverty, and/or have a disability, and that these groups “rely on transit at higher rates than the general public” (p.3-3). A recent analysis of Census data supports this conclusion, finding that users of public transportation are disproportionately low-income and minority commuters (see Maciag, attached).

The draft RTP further acknowledges that severe budget cuts at the Redwood Coast Transit Authority have led to decreased services, increased difficulty in accessing remaining services, and decreased ridership in recent years (pp.2-24, 2-30, 3-3). The draft further acknowledges some serious route scheduling problems, such as the current inability to connect between the Redwood Coast Transit Authority route from Crescent City and the nearest Greyhound route out of Arcata without spending the night in Arcata (p.2-30). However, there is no discussion of strategies for addressing budget cuts and restoring services or even adjusting schedules. In fact, as noted above, transit is the only mode discussed in the draft RTP for which the projects proposed are only a small fraction of the projected revenues.

This lack of ambition is also reflected in the Policy Element, where the transit-related Goal is the only one to be qualified by a caveat limiting it to “within the financial constraints” of non-local funding. Furthermore, even the basic objective to “provide life-line transportation for transit-dependent people” (p.3-3) is not supported by policies sufficient to implement it. Holding one annual public hearing and complying with the Americans with Disabilities Act does not add up to ensuring life-line transportation for people with no other options (p.3-4).

Finally, the only proposed performance measure to be applied to transit is cost effectiveness “per revenue mile” (pp.4-12, 4-14). Cost effectiveness should not be the only metric for judging the success of transit service, or even the most important metric. From a social equity perspective, a better metric would be proportion of need or demand met; from an environmental standpoint, increased mode share would be preferred.

The draft RTP does not acknowledge that along with transit, bicycle and pedestrian modes are more likely to be utilized by disadvantaged populations, particularly lower income residents without regular access to a vehicle. As discussed above, these “active transportation” modes also get short shrift in the document. Furthermore, the Action Element includes projects such as the STAA access project which will have a negative impact on social equity. As noted above, big trucks are dangerous in accidents. The risk is particularly high for pedestrians and bicyclists (including transit users trying to reach bus stops) who may be involved in such collisions. In contrast, the benefits of using these large trucks will largely accrue to a few relatively wealthy business owners. The fact that local RTIP funds are tied up in the STAA project for many years, when they could otherwise be used to improve safety for non-vehicular road users in Crescent City and other areas, only serves to highlight the social inequity of the project.

### **Consistency with Other Planning Documents**

RTP Guidelines Section 2.5 emphasize that “it is very important that the RTP be consistent with other plans prepared by local, state, federal agencies and Native American Tribal Governments.” The draft RTP acknowledges the need to “promote consistency” with other plans on its first page (p.1-1), lists a number of such plans which were “reviewed” during RTP development (p.1-3), and claims that the Policy Element is “consistent with the policy direction of the DNLTC, the Del Norte County General Plan Circulation Element (2003), the California Strategic Highway Safety Plan, and the California Transportation Plan (CTP 2040)” (p.3-1). The latter list is surprisingly short, and it is not clear why the RTP should not be compared to other plans—including those listed on p.1-3—for consistency as well.

Despite the claim of consistency, there are numerous apparent inconsistencies between the draft RTP and the Del Norte County General Plan Circulation Element. The General Plan’s Policy 8.C.1 calls for transit services that are “timely, cost-effective, and responsive to growth patterns and ridership demand.” As described above, the draft RTP’s only performance measure for transit is cost effectiveness, and it contains no plans to respond to ridership demand by restoring the service and ridership lost to recent budget cuts. Additionally, the RTP apparently only considered one potential funding source for transit, the Transportation Development Act (p.5-3), while General Plan Policy 8.C.2 calls for the County to “pursue all available sources of transit funding.”

General Plan Policy 8.C.3 calls for the County and DNLTC to “consider the transportation needs of senior, disabled, minority, low-income and transit-dependent persons in making decisions regarding public transportation services.” As we have seen above, there is no evidence of such consideration in the draft RTP. General Plan Policies 8.D.1 and 8.D.2 require the development of programs to encourage mode shift to “transit, walking, bicycling and ride sharing” and to “develop other measures to reduce vehicular travel demand,” respectively. As discussed above, the draft RTP assumes no significant mode shift and increased VMT per capita, in conflict with these goals. Finally, General Plan Policy 8.D.4 calls for the County to “encourage major traffic generators to develop and implement trip reduction measures.” The STAA access project represents the exact opposite approach, instead tailoring infrastructure modifications for the benefit of a few major truck traffic generators who may want to increase their truck trips.

Moving beyond the General Plan, one of the plans which the draft RTP preparers claim to have reviewed but for which no claim of consistency is made is the 2009 Wild Rivers Regional Blueprint Plan (attached). The STAA access plan (and perhaps other projects listed in the draft RTP) appears contrary

to several of the goals expressed in the Wild Rivers Regional Blueprint Plan. Notably, the increased large truck traffic which will result from the project will make it much harder to “create safe and walkable communities” and “promote safe and vibrant neighborhoods,” and will likely undercut the travel and tourism industry by making travel on our winding rural roads even more frightening for urban visitors.

Even more importantly, a number of applicable state plans are nowhere reviewed for consistency or even mentioned in the document. It is notable that the STAA access project appears to be inconsistent with a number of these plans. For example, while the original Draft EIR for the STAA project touted the fact that the then-current 1998 Interregional Transportation Strategic Plan (ITSP) identified US 199 and SR 197 as “high emphasis” routes, the new ITSP released in 2015 (attached) does not identify the corridor as any kind of priority, and indeed barely mentions it. Nor does the 2014 California Freight Mobility Plan (attached) bestow any kind of importance on the corridor for freight mobility. US 101 on the North Coast is, however, identified as a “strategic interregional corridor” and a “priority interregional facility” in the 2015 ITSP, underlining the importance of keeping it open by pursuing the Last Chance Grade project with all available resources.

Finally, the draft RTP provides no discussion or analysis to support the claim that the Policy Element is consistent with other relevant plans, and never even mentions consistency with regard to the other Elements.

### **Public Involvement in RTP Development**

Public involvement in the development of the 2016 RTP has not met requirements. In particular, the RTP Guidelines Section 4.1 specifies that public hearings should be held at “convenient and accessible locations and times.” Both initial public meetings prior to the release of the Draft 2016 RTP were held at 4:00 pm, during normal working hours, and therefore not “convenient and accessible” to most of the public. Furthermore, there has been no required documentation of “explicit consideration and response to public input on the RTP.”

Explicit feedback on public comments is also required by Policy 5 of the DNLTC’s own adopted Public Participation Plan and Policy, included in Appendix B of the draft RTP. However, the draft RTP contains no responses to the extensive public comments provided to date. In fact, the STAA access project—opposition to which was expressed in most of the public comments received—is mentioned only in passing in the draft document and never explicitly identified or described, nor the related issues addressed (see above).

Furthermore, during the initial public meetings, much of the public input was explicitly rejected. Members of the public were told at various times, inaccurately, that Last Chance Grade and the STAA access projects were not relevant to the RTP, and were discouraged from providing related input. This is a far cry from the goal articulated on p.1-1 of the draft RTP to “provide a forum for participation and cooperation, and facilitate partnerships that reconcile transportation issues which transcend boundaries.” Such open participation, cooperation and facilitation would be a much appreciated new approach to reconciling public disagreements for the STAA access project.

In general, the draft RTP does not align well with the priorities identified by the public. Opposition to the STAA access project is expressed in a large majority of public comments, and is the most common “additional comment” provided at the end of the online survey. Indeed, the prospect of allowing STAA trucks on these roads is the second most common safety concern identified in the unprompted



responses to Survey Question 12. Yet parts of this project are still included in the draft RTP, and public concerns are not addressed.

Furthermore, when asked to identify what types of transportation facilities they do want to see more of (Question 12), survey respondents overwhelmingly identified bicycle and pedestrian related infrastructure improvements. Appendix B of the draft RTP shows this clearly: various bicycle and pedestrian infrastructure improvements constituted 77 out of 94 responses (82%) to this survey question. Yet spending on such projects in the draft Action Element is a small fraction of total spending. Indeed, active transportation is one of the only parts of the Action Element where the DNLTC has not identified a “wish list” of desirable projects beyond projected revenues, leaving the agency underprepared for any unanticipated or redirected revenues which could be used for such projects.

Finally, it is important to note that the documentation of public comments contained in Appendix B is not complete. Extensive comments provided by EPIC are only partially included, and comments by the Coalition for Responsible Transportation Priorities (CRTP) are not included at all. The comments previously submitted by EPIC and by CRTP are both re-submitted in full as attachments hereto.

## **CEQA**

### *Scope of Review*

Consultant Green DOT’s May 2015 proposal to prepare the 2016 RTP and associated environmental document noted appropriately that “[t]he nature of RTPs and approaches to environmental compliance have changed since 1992,” and recommended the preparation of a new environmental document. Unfortunately, this approach was not followed, and instead a very limited Addendum to the 2002 Supplemental Program Environmental Impact Report (PEIR), which was itself a modification of the original 1992 PEIR, was prepared.

As an initial matter, an Addendum depends upon and derives its existence from earlier environmental review documents. In this instance, that includes the 1992 EIR and the 2002 Supplemental EIR. However, neither the Addendum, nor the DNLTC, have included or made available all of these documents. For example, the 2002 “Final Supplemental EIR” fails to include its Draft EIR, and it has not been made available for review. The Addendum purports to be tied to that document, but it is not accessible. As such, the public has been deprived its right of review and comment.

In an attempt to justify the use of the Addendum in this situation, it cites statutes and CEQA Guidelines governing the conditions under which modifications to a project require preparation of subsequent or supplemental Environmental Impact Reports (EIRs) (pp.1-2). In other words, the DNLTC assumes that an RTP is a single, eternal “project” under CEQA, and that the periodic updates required by statute are simply minor changes to the project. However, it is hard to justify the conclusion that a 1992 RTP with a twenty-year planning horizon is still the same project in 2016. Even apparently “minor” changes every few years add up over more than two decades (past the original bounds of project planning) to a significantly different—if not completely new—project.

The Project Description in the current Addendum suggests that the “project” for the purposes of this document consists merely of changes from the most recent (2011) RTP (p.3). The effect of successive CEQA reviews considering only incremental changes with each new RTP update, rather than

considering the sum of all changes since the original project's PEIR, is tantamount to project segmentation and does not meet CEQA requirements.

Even assuming *arguendo* that the approach taken by the DNLTC is valid, CEQA Guidelines Section 15162 would require a subsequent or supplemental PEIR. Since the 2011 Supplemental PEIR was adopted, there have been substantial changes to the project and the project's circumstances, as follows.

#### *Changes to the RTP*

Much of the Addendum focuses on the project list portion of the Action Element in its argument that not much has changed between 2011 and 2016. However, some significant changes to the project list have occurred. Perhaps the most significant is the change in anticipated scope of work at Last Chance Grade. In fact, the scope of work at Last Chance Grade appears to have changed significantly several times since the 1990 RTP, in which (as noted above) a "Wilson Creek bypass" was contemplated. By 2011, the only project at this location was described as "rehabilitation due to uneven pavement" (p.95). In 2016, the draft RTP appropriately identifies a "permanent solution" to the problems at Last Chance Grade in the Action Element (p.4-6) and places the project as its top priority. The draft delicately and vaguely states that "the community's preferred alternatives for this route" have been identified, but the project "has yet to be evaluated for cost" (p.6-1). However, this is not entirely true; estimates for the cost of various alternatives (all bypasses of Last Chance Grade) have been estimated by Caltrans to range from several hundred million to over one billion dollars. Clearly the growth of this project from mere bumpy pavement rehabilitation to the most important road project in the region in decades constitutes a significant change to the Action Element.

Furthermore, the project list does not comprise the entire RTP, and the rest of the document must be considered as part of the "project" under CEQA. The Addendum characterizes changes to the Policy Element as "minor" and does not elaborate (p.4). However, changes to the Goals, Objectives and Policies are significant. An overarching goal to "promote a coordinated and balanced transportation system" in the 2011 RTP (p.70) has disappeared from the 2016 draft RTP. Furthermore, much of the specificity of 2011 Objectives and Policies has been replaced by generalities in the current draft.

For example, Policies to "evaluate local transit needs annually" (p.70), "analyze the fixed route/dial-a-ride service combination annually (p.70), and "conduct an annual rider survey to determine the needs of senior, disabled, low-income and transit-dependent people" (p.71) have all disappeared between 2011 and 2016, replaced primarily with vague aspirational statements. Entire sections on maritime transportation and teletransportation and pipeline transmission in the 2011 Policy Element are missing from the 2016 draft. Detailed 2011 sections on recreational travel, integrated land use, air quality, and transportation planning, and climate change have been largely abandoned or condensed into vague statements incorporated into other sections in 2016.

It is also notable that, while a 2011 Policy called for DNLTC to "promote non-motorized facility improvements that meet the needs of seniors, children, people with low income, and people with disabilities" (p.72), in 2016 there is no mention made of the connection between such vulnerable populations and non-motorized transportation.

The general direction of the Goals, Objectives and Policies may be similar between 2011 and 2016. But the net effect of the changes to the Policy Element has been to eliminate most of the implementing details and specific targets, which substantially reduces accountability and changes the meaning of the

document. Furthermore, some of the changes dramatically reduce the RTP's focus on social equity. Taken together, these changes to the Policy Element certainly rise to the level of significance.

### *Changes to the RTP's Circumstances*

The Addendum blithely identifies the purpose of the Financial Element and confuses its purpose with its content to imply that no significant changes have occurred (p.5). But while the purpose of the Element may not have changed, its content surely has. Most importantly, revenue projections have changed dramatically. Table 5.1 of the draft 2016 RTP purports to compare projected revenues from the 2011 RTP with 2016 projections. It shows substantial drops in many funding sources, most notably STIP and Aviation Funding. However, for unknown reasons the table leaves out 2011 SHOPP projections, as well as several other funding sources from 2011 (see Table 33 of the 2011 RTP). This results in a bottom-line "Total Transportation Revenue" figure in the 2016 draft which shows a modest increase from 2011 to 2016, when in fact projected revenues over the planning period have dropped by almost half. For a transportation planning document which is required to be shaped by "realistic financing constraints and opportunities" (RTP Guidelines p.94), cutting revenue in half is a highly significant change in circumstances.

In addition to the financial circumstances, the County's environmental circumstances have changed significantly as well, particularly since the original PEIR was prepared in 1992. Census data show that the County's population was 23,460 in 1990, while the current population is estimated at 28,051 in the draft RTP (p.2-2). That represents a 20% increase in local population since the first PEIR was prepared, which alone is a highly significant change.

Furthermore, there has been a significant change in economic conditions in the County since 1990. The 1990 RTP PEIR describes a region still in transition from resource extraction economy to service economy. Major sectors included government and retail, but also wholesale trade ("fluctuations in employment...will depend on the outcome of the northern spotted owl situation"), construction and mining, and agriculture (p.3-15). In contrast, Table 2.4 of the draft 2016 RTP shows an economy completely dominated by the service sector, with government and other service jobs representing all but two of the major employers. The County has undergone a significant economic transformation since the 1990 RTP and PEIR.

### *Consideration of Alternatives*

The Addendum fails to update the 2002 Supplemental PEIR's comparison of alternatives, claiming that the previous analysis "would not be significantly affected by the inclusion of the projects identified in the 2016 RTP" (p.11). This assertion notably ignores the substantial changes from both 1990 and 2011 in the recognized scope of the Last Chance Grade project.

The draft RTP fails to consider any alternative in which funding is identified and the Last Chance Grade project is planned and constructed in the near term (as a "constrained" project). Twenty-four years after the proposal for a Wilson Creek bypass in the 1990 RTP FEIR, the DNLTC's failure to present any specific plan to for the Last Chance Grade project for the next twenty years is unacceptable. Further, the Last Chance Grade Engineered Feasibility Study notes that a 2000 study "mapped over 200 historical and active landslides" in the area of Last Chance Grade, that "landslide mitigation projects" have cost over \$36 million over the last several decades, and that the predicted "increase in frequency and severity of large storm events" increases the threat to Last Chance Grade (p.7). As a result of the Addendum's failure to analyze alternatives prioritizing the Last Chance Grade project, the ongoing financial, environmental, economic and social impacts of costly and only partially effective

maintenance and repair of the current route, along with the real risk of sudden and complete road failure at this location, are not considered.

The Addendum also fails to assess any alternative scenario in which the STAA project is not built. As noted above, the DNLTC has over-allocated its RTIP shares to the STAA project, preventing other needed projects from being funded. Delays and cancellations of other transportation projects as a result of the DNLTC's over-allocation also represent ongoing impacts not considered in the Addendum.

#### *Evaluation of Significant Environmental Effects*

There are numerous areas in which the potential for significant adverse environmental effects may occur, and which the Addendum fails to analyze. In addition to the failure to consider the alternatives identified above, the Addendum fails to consider the environmental effects arising from not undertaking those alternatives. Certainly this is true for not fully embracing the Last Chance Grade project, as it is for perpetuating the STAA access project. Nor does the Addendum adequately address and evaluate several impacts, including those as discussed: (1) impacts to safety, (2) capacity increases impacts, (3) maintaining greenhouse gas emissions, (4) using LOS rather than VMT to determine transportation impacts and capacity, (5) impacts to the poor and under-served by not providing for social equity and environmental justice in transportation planning, and (6) impacts due to inconsistencies with other planning documents. The Addendum fails to evaluate numerous other projects which must be considered for their related and cumulative impacts. And because the Addendum fails to consider feasible alternatives, and evaluate potential impacts, it misses the mark in terms of defining necessary mitigation. The Addendum fails to satisfy CEQA.

#### *Other Problems*

The Addendum is also insufficient in several other respects. Some of its assumptions contradict assumptions in the draft RTP itself. The Addendum asserts that projects in the RTP will encourage a mode shift to walking and bicycling to the benefit of air quality and the environment (p.6). However, as discussed above, the RTP itself assumes that no significant mode shift will occur (p.4-1) and projects and increase in VMT per capita (p.2-13).

Standards for determining significance of various impacts are also insufficient in the Addendum. The only potential types of significant "Climate/Air Quality" impacts recognized by the document are those which contribute to an air quality violation or cause a significant odor (p.6). The absence of any consideration of the potential for significant climate impacts from increased GHG emissions, or significant air quality impacts from localized air pollution threatening human or environmental health, results in a less than meaningful, indeed almost frivolous, assessment.

Similarly, the limitation of consideration of "Health and Safety" impacts to exposure to hazardous materials (p.8) is insufficient. At a minimum, the primary direct transportation-related threat to human (and wildlife) health and safety—collisions with automobiles—must also be considered.

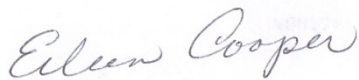
Finally, the Addendum admits that other agencies' policies are not binding on DNLTC and therefore cannot be relied upon to prevent or mitigate impacts of the RTP, and that references to such policies are "informational only" (p.5). However, the assessment of impacts nevertheless appears to rely heavily on such policies to reach the conclusion that significance thresholds have not been met. In particular, assessments pertaining to topography and noise impacts provide no other basis for concluding that impacts will be less than significant besides a claim that other agencies have sufficiently protective policies.

Thank you for your careful consideration of our comments.

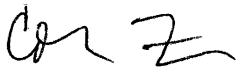
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## **ATTACHMENTS**

- [1] California Air Resources Board. May 12, 2015. EMFAC2014 Volume III – Technical Documentation.
- [2] California Energy Commission – California Climate Change Center. July 2012. Fire and Climate Change in California: Changes in the Distribution and Frequency of Fire in Climates of the Future and Recent Past (1911-2099).
- [3] California State Transportation Agency. September 2015. California Strategic Highway Safety Plan: 2015-2019.
- [4] California State Transportation Agency & Caltrans. December 2014. California Freight Mobility Plan.

- [5] Caltrans. June 30, 2015. 2015 Interregional Transportation Strategic Plan.
- [6] Caltrans. October 30, 2014. Memorandum Regarding Request for 10-Year Collision Analysis.
- [7] Caltrans. April 2013. 197/199 Safe STAA Access Project: Volume I: Final Environmental Impact Report/Environmental Assessment and Section 4(f) Evaluation (excerpt).
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