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Commissioners, Ms. Leighton & Mr. Schwein:

The Coalition for Responsible Transportation Priorities (CRTP) is a grassroots organization whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast. We appreciate this opportunity to comment on the development of Del Norte County's 2016 Regional Transportation Plan (RTP) Update.

### **General Priorities**

CRTP supports the following general priorities for transportation infrastructure funding and strongly encourages the Del Norte Local Transportation Commission (DNLTC) to mold the 2016 RTP Update around these common-sense ideas:

1. *Spend limited transportation dollars on maintenance and repairs first.* It is becoming increasingly clear that in Del Norte County as around the United States, we have built more infrastructure over the last century than we can afford to maintain in an acceptable condition. Locally, the rugged and unstable terrain combined with the age of our roads and bridges make this problem particularly acute. The maintenance funding crisis should be self-evident in the new RTP if it includes an honest accounting of the revenue sources and costs to operate and maintain the current system, as the state RTP guidelines encourage.<sup>1</sup> We must prioritize maintenance, repair, and rebuilding projects which protect basic access for residents and emergency services.
2. *Only build new projects that support healthy, livable, sustainable communities.* In addition to the funding crisis, our transportation infrastructure system faces a number of other significant challenges today. Many years of transportation planning focused almost

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<sup>1</sup> California Transportation Commission. 2010 California Regional Transportation Plan Guidelines. See <http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/>.



exclusively on moving increasing numbers of fossil-fueled vehicles farther and faster has left a legacy of environmental and human destruction which urgently needs to be addressed. Two facts are particularly striking in this regard: first, transportation accounts for nearly a third of US greenhouse gas (GHG) emissions;<sup>2</sup> second, the combination of traffic accidents with transportation-related emissions makes the transportation sector one of the top causes of death, injury and illness in North America and around the world.<sup>3</sup> In this context, it's clear that the kind of infrastructure we built in the twentieth century will not serve the needs of the twenty-first century. Indeed, RTPs are now required to include a strong consideration of safety as a planning factor. Furthermore, while many of the formal state requirements for planning for GHG reduction and sustainable communities do not apply to rural areas such as ours, such planning must nevertheless be central to any modern RTP.<sup>4</sup> New infrastructure we build today must focus on encouraging lower-emission, safer modes of transportation.

3. *Cancel counterproductive road expansion projects.* As noted above, we cannot afford—from a financial, environmental, or human health perspective—to continue to build new infrastructure catering to the biggest fossil fuel-burning vehicles. The bigger the vehicle and the higher the traffic volume, the more expensive and damaging to our roads, communities and environments. Unfortunately, due to the long timeline of the complex transportation planning and funding process, many projects planned in a different era with different priorities continue to hang on today. Such projects should be canceled.

## Specific Projects

Recent public statements from the DNLTC have incorrectly indicated that two of the biggest local transportation issues are irrelevant or inappropriate to the 2016 RTP Update process. We strongly encourage DNLTC to revisit its position on these projects.

### *Last Chance Grade*

Finding a permanent and responsible solution to the long-term problems posed by geologic instability at Last Chance Grade on US 101 is undoubtedly the most significant transportation planning challenge facing Del Norte County. It is a top goal of local residents, and would fit clearly into the category of “maintaining basic access” described as CRTP’s first priority above.

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<sup>2</sup> US EPA. US Greenhouse Gas Inventory Report: 1990-2013. See <http://www3.epa.gov/climatechange/ghgemissions/usinventoryreport.html>.

<sup>3</sup> World Bank. Transport for Health: the global burden of disease from motorized road transport. See <http://documents.worldbank.org/curated/en/2014/01/19308007/transport-health-global-burden-disease-motorized-road-transport>.

<sup>4</sup> 2010 California Regional Transportation Plan Guidelines.



However, Ms. Leighton has recently been described as saying that this project is not relevant to the 2016 RTP Update because it “won’t be funded” within the next 5 years.<sup>5</sup>

While the RTP is updated at least every 5 years, its planning horizon is significantly longer. In fact, an RTP is specifically required to consider “both short-term (0-10 years) and long-term (10-20 years) periods.”<sup>6</sup> Local officials and other stakeholders clearly (and appropriately) do not plan to wait until after 2036 to achieve a permanent solution to the problems at Last Chance Grade. Therefore, this project is well within the 20-year planning period and must be addressed in the 2016 RTP Update. In fact, it should be DNLTC’s top priority.

Furthermore, while we recognize that the funding requirements for this project will be formidable, DNLTC can’t simply pass the buck to the state and federal governments. It must at the very least plan to contribute some of its own funding allotment to the planning process to ensure its needs are met. In fact, the DNLTC’s current Overall Work Program includes instruction to “advocate for long term solutions to the instability of Last Chance Grade” and comments that “this work...informs the Regional Transportation Plan.” Given this recognition in its own adopted documents of the importance of local work toward a solution at Last Chance Grade, and of the link between Last Chance Grade and the RTP, DNLTC’s denial of the project’s relevance to the 2016 RTP Update is hard to understand.

#### *US 199 Safety Improvements & the “197/199 STAA Safe Access Project”*

Ms. Leighton recently stated that the 197/199 Safe STAA Access Project was not relevant to the 2016 RTP Update because “it’s already funded and in the construction phase.”<sup>7</sup> 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. Therefore, it is highly appropriate to discuss this project and related topics in relation to the 2016 RTP Update.

In both official documentation and public discussion, the STAA access project has often mixed up two distinct topics: STAA truck access and the safety of road users. The purpose of the project is clearly identified in the Final Environmental Impact Report as “to adjust the roadway alignment to accommodate STAA truck travel.”<sup>8</sup> Yet in the very next sentence, the document claims that the project would “also enhance safety of the routes” for other road users.

While it is possible that some of the components of the proposed project would improve safety for road users in the absence of STAA trucks, reclassifying the route and adding these additional oversized vehicles instead increases safety hazards for other users. The project incorporates

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<sup>5</sup> Welter, Laura Jo. January 11, 2016. “Last Chance, STAA Hot Topics.” *Del Norte Triplicate*.

<sup>6</sup> 2010 California Regional Transportation Plan Guidelines, p.93.

<sup>7</sup> Laura Jo Welter 2016.

<sup>8</sup> Caltrans. April 2013. 197/199 Safe STAA Access Project: Final Environmental Impact Report/Environmental Assessment and Programmatic Section 4(f) Evaluation: p.ii.



significant exceptions to the state's mandatory design standards for measurements such as curve radius, shoulder width, and sight distance.<sup>9</sup> In other words, while the 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.<sup>10</sup>

CRTP believes that safety improvements can and should be made on US 199. However, we do not believe that the proposed STAA access project will increase safety, nor that it targets the most dangerous locations. The 10-year collision analysis recently performed by Caltrans shows that fatal and injury accidents are not even above average for some of the locations targeted by the project.<sup>11</sup> Furthermore, the Caltrans analysis assesses the number of accidents relative to the number of vehicles and compares this rate to the statewide average collision rate for "similar" road segments. However, for Del Norte officials deciding which spots most urgently require safety improvements, the relative rate, the type of road and the statewide average should matter much less than the raw number of serious accidents compared to other spots within the county. A recent report by CRTP which took just this approach to analyzing fatal accident occurrences on the state highway system in Caltrans District 1 (attached) did find one particularly hazardous spot near one of the project locations, but found that none of the accidents had occurred within the project boundaries.

We urge the DNLTC to stop trying to justify the STAA access project with claims of safety improvement. Instead, the DNLTC should de-couple safety improvements on US 199 from the STAA project. It should take a systematic approach to identifying the most hazardous spots on US 199 and the causes of accidents at those locations, and then should propose effective and appropriate safety interventions to include in the 2016 RTP Update. We recognize that such an approach may require identifying alternate funding sources, but we do not believe this to be an insurmountable obstacle.

As for STAA access, CRTP feels strongly that this falls under the category of "counterproductive road expansion" and that the project should be canceled. There appears to be little remaining support for the project at the state level, as the recently adopted Interregional Transportation Strategic Plan and California Freight Mobility Plan do not list the 199/197 corridor as a priority freight corridor of any kind. Furthermore, a major project under construction on SR 299 is expected to open another corridor of STAA access between I-5 and US 101 in the near future, likely alleviating whatever minor latent demand may exist for

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<sup>9</sup> Caltrans 2013: p.1-14 and 1-18.

<sup>10</sup> Insurance Institute for Highway Safety. 2015. Large Trucks: Q&As. See at <http://www.iihs.org/iihs/topics/t/large-trucks/qanda>.

<sup>11</sup> Thomas, Bryan, Assistant Traffic Safety Engineer, District 1 Traffic Office. October 30, 2014. Memorandum to Tamera Leighton. Subject: Request for 10-Year Collision Analysis.



additional STAA truck access to Del Norte County. Conditions have changed since the project was proposed, and it is no longer necessary or appropriate (if it ever was).

In sum, we strongly encourage the DNLTC to include the Last Chance Grade project and specific, targeted safety improvements on US 199 in the 2016 RTP Update, while leaving out the 197/199 STAA access project.

Thank you for your time and consideration of our comments.

Sincerely,

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