



October 6, 2017

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

RE: Draft 2017 Regional Transportation Plan Update

Ms. Clem and Chair Sundberg:

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

Climate Change & Greenhouse Gasses

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

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

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

Mode Share & VMT

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

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

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

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

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

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

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

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

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

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

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

Goods Movement & Economic Analysis

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

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

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

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

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

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

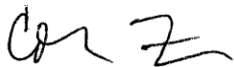
Finally, we encourage HCAOG to include consideration of short sea shipping in the Goods Movement Element. While there are certainly challenges to adoption of regional freight movement via this mode, we note that there are significant challenges to all modes of regional freight movement due to our “rugged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

Public Process

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

Thank you for your careful consideration of our comments.

Sincerely,



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