



July 13, 2017

Oona Smith, Senior Planner
Humboldt County Association of Governments
611 I Street, Suite B
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via email: oona.smith@hcaog.net

RE: Draft Regional Bike Plan

Dear Ms. Smith:

Thank you for the opportunity to comment on the draft 2017 Regional Bike Plan for Humboldt County. We applaud HCAOG for going “beyond the minimum requirements” and developing a document which, among other things, lays out in detail many of the benefits of active transportation and calls for increasing it. However, we do have some comments and concerns.

Mode Shift: Beyond “Complete Streets”

There are some notable inconsistencies in the document’s goals, policies and objectives. For example, listed objectives include increasing bicycle mode share and reducing bicyclist deaths and injuries. However, at the same time, the Plan calls for things like “Complete Streets” and “safety in equal measure for each mode of travel.” 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.

Other Comments

- The draft Plan does a great job of laying out the benefits of active transportation. However, one very significant benefit which is notably missing from the discussion in Chapter 1 is the reduction in greenhouse



gas (GHG) emissions. Instead, the climate crisis is only mentioned in the context of state legislation and regulation. There should be a full discussion of this important issue in the Plan.

- The Plan exempts new roads from having to provide bikeways where “sparse population or other factors evidence an absence of need” in urban areas, and when traffic is less than 1,000 car trips daily in rural areas. We suggest that sparse population and low traffic are not reasons to fail to provide infrastructure designed for active transportation. If there is a need for fossil fuel-powered transportation, evidenced by road construction or reconstruction, then there is a need for active transportation as well.
- The discussion of trip range in Chapter 3 correctly notes that many bicyclists commute between Arcata and Eureka. It should also be noted that many bicyclists commute between McKinleyville and Arcata, a similar distance.
- The discussion of types of bikeways in Chapter 3 implies that Class 1 bikeways are only popular with novice users. However, it is our experience that even most veteran bicyclists prefer Class 1 bikeways when they are well-designed and provide relatively direct routes. Potential conflicts with other bicyclists do not change this fact. For safety’s sake, any bicyclist is likely to prefer conflicts with other bicyclists or pedestrians to conflicts with vehicles, as long as the former are not so frequent as to substantially slow the pace of travel.
- “Sharrows” and similar signage should no longer be considered options for viable bike routes. Recent well-publicized research from the University of Colorado Denver shows that these types of “shared road” markings do nothing to increase safety or bicycle usage, and may even decrease bicyclist safety.
- The list of approved designs for experimental use should add Dutch-style “protected intersections” which can minimize turning conflicts with cars more effectively than bicycle boxes.
- The discussion of funding sources should include sources which are not dedicated to active transportation but can nevertheless be used for some projects, such as the State Transportation Improvement Program / Regional Transportation Improvement Program.
- The Regional Priorities & Projects listed on p.4-2 are incomplete compared to the list on p. 1-5.
- There is no description of the methodology for determining “major destinations” in each jurisdiction in Chapter 4. On its face, the lists seem to have some important omissions. A description of the methodology should be included.
- Assessment of the lists of projects contained in Chapter 4 would be greatly facilitated by maps showing each of the projects and how they connect to each other and to the existing active transportation system.

Again, thank you for your efforts to promote and coordinate active transportation in Humboldt County, and thank you for your consideration of our comments. Please don’t hesitate to contact us if you should have any questions.

Sincerely,

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