



July 31, 2019

California Coastal Commission
1385 Eighth Street, Suite 130
Arcata, CA 95521

RE: Application No. 1-18-1078 (California Dept. of Transportation (Caltrans), Humboldt Co.)

Dear Commissioners:

The Coalition for Responsible Transportation Priorities (CRTP) is a local non-profit organization serving Humboldt County and the broader North Coast region. Our 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 submit the following comments on the Coastal Permit application submitted by Caltrans for its proposed Eureka-Arcata Route 101 Corridor Improvement Project (“project”).

Bicycle and Pedestrian Access and Safety During and Post-Construction

As we have previously pointed out, the use of vehicle shuttles to move bicyclists and pedestrians through the construction zone is unworkable. The shuttles are likely to be unrecognized or ignored by bicyclists, and the system will result in conflict between bicyclists and vehicle drivers. We appreciate staff’s recommended Special Condition of Approval 19.A, which directs Caltrans to minimize the use of such shuttles. However, this is an important designated bicycle route, and we strongly believe that bicyclists should have full access whenever other vehicles do (i.e., whenever the road is not fully closed). Therefore, we encourage you to require that Caltrans ensure that the Humboldt Bay Trail is complete and provides an alternate route for bicyclists prior to any construction necessitating temporary closure of bicycle facilities in the subject corridor.

Regarding access after construction, we strongly support staff’s recommended Special Condition of Approval 4, which requires Caltrans to provide bicycle and pedestrian access between the Indianola Cut-Off and the Humboldt Bay Trail. However, we continue to be concerned that other median closures planned as part of the Project will block important and heavily-used bicycle and pedestrian access points along the corridor, including the Bayside Cutoff and Bracut. We continue to object to the closure of the median in these locations without accommodation for bicycle and pedestrian access to and from the Humboldt Bay Trail.

Finally, we continue to object to Caltrans’ apparent intent to increase the speed limit in the subject corridor upon the project’s completion. Increased vehicular speed has the well-

documented effect of increasing the risk of serious injury or death resulting from collisions with bicyclists, pedestrians, or other vehicles. Increased speed is therefore inconsistent with the purported purpose of the project, which is to improve safety in the corridor. It would significantly increase the dangers posed to members of the public using the corridor to recreate, appreciate, and otherwise access the coastline of Humboldt Bay. We strongly urge the Commission to add a Special Condition of Approval prohibiting Caltrans from raising the speed limit in the corridor.

Sea Level Rise

Commission staff have documented the significant threat that sea level rise (SLR) poses to the project and the surrounding area. Nevertheless, staff have proposed to allow Caltrans to defer adequate planning for SLR adaptation for up to ten years.

Bicyclists and pedestrians are generally the most vulnerable road users, and SLR is no exception. Bicyclists and pedestrians, particularly those who rely on these modes for commuting and other transportation, can easily become stranded by an unexpected inundation event. In the worst cases, they are vulnerable to injury or death from high and fast-moving water.

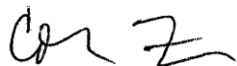
Sea level around Humboldt Bay is already rising. It will be significantly higher in ten years. The local community cannot afford to wait to start planning for SLR until the Eureka-Arcata corridor is already flooding regularly. We strongly urge you to require Caltrans to take SLR seriously and demonstrate feasible and adequate adaptation for its project now, not in the distant future.

In sum, we ask that you modify the project's conditions of approval as follows:

1. Require Caltrans to ensure that the Humboldt Bay Trail is complete and provides an alternate bicycle and pedestrian route prior to any temporary closure of bicycle facilities on Route 101.
2. Require Caltrans to provide alternate bicycle and pedestrian access to the Humboldt Bay Trail from the east side of Route 101 anywhere it intends to close the highway median.
3. Prohibit Caltrans from raising the speed limit in the subject corridor.
4. Adequately plan for SLR impacts on the corridor now.

Thank you for considering our comments.

Sincerely,



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