July 3, 2020

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via email: oona.smith@hcaog.net

Oona,

Please accept the following comments from the Coalition for Responsible Transportation Priorities (CRTP) on the Mobility-on-Demand Strategic Development Plan Draft Final Report ("report"):

- We support the report's recommended Redwood Transit System (RTS) route modifications, including both "short-turning" the route at the north and south ends and eliminating the identified low-ridership deviations, under the following conditions:
    - The changes are accompanied by an increase in the frequency of RTS fixed-route service. We recognize that the recent rejection of the southern short-turning by the HCAOG Board of Directors may present an obstacle to achieving this objective in the short term. However, if mobility-on-demand solutions are not eventually used to increase fixed-route frequency, the effect will likely be to damage rather than support the transit system, to everyone's detriment.
    - The replacement service in areas formerly served by RTS fixed-route service operates in a flexible carpool mode rather than a single-passenger-per-ride mode, in order to reduce additional vehicle miles traveled (VMT).
    - The replacement service has the same fare as RTS fixed-route service and includes fare-free connection to that service.
    - The replacement service is accessible to people with wheelchairs and other devices/mobility limitations.
    - Connection points between the replacement service and the RTS fixed-route service are located at weather-protected bus stops.
    - The replacement service is publicly operated, such as in the proposed "Humboldt e-Ride" service, rather than privately contracted, and uses electric rather than internal-combustion engine vehicles.
- We support pursuing the modern hitchhiking concept, but believe it needs to be developed in further detail with accompanying public input before it can be implemented.
- We support the recommended expansion of bikeshare, bike parking, and other bike-serving infrastructure. In addition, we note the following:

    - The departure of previous bikesharing service Zagster was not a result of Humboldt County-specific problems. Rather, it was the result of the company's entire national operation going out of business.
    - Bikeshare should be looked at as an extension of public transit. It is likely that in order for it to be affordable, extensive and well-maintained and managed, it will need to be subsidized and regulated, not just "facilitated." This isn't unique to Humboldt County or other rural areas. Even in big cities, bikeshare companies regularly fail to make a profit or fail to provide high-quality and equitable service, or both, if not heavily regulated and subsidized.
    - A community the size of McKinleyville needs more than one bikeshare station. In addition to the one proposed, there should be a station at the McKinleyville Shopping Center, and likely other locations as well.
    - Just as the current availability of widespread free car parking facilitates driving, we need a future availability of widespread free, high-quality bike parking to facilitate biking. Bike parking should be prioritized at transit stops, but there must also be a significant expansion in all commercial areas, along with abundant, secure, weather-protected short and long-term storage should be required in all future development.
- The report notes that there are many opportunities for personal mobility-on-demand services to fill existing public transit gaps beyond what is identified in the recommendations. We agree. We also believe that it would be unwise to assume that private companies will exploit those opportunities in our rural and relatively low-income area if left to their own devices. Regulations and incentives for e-hailing companies should be considered to ensure that they provide accessible vehicles, serve populations with the highest needs at reasonable rates, minimize environmental impacts by using electric vehicles, operate in carpool mode to minimize VMT, etc. We strongly encourage HCAOG to use the report as a jumping-off point for the development of a plan for implementing this kind of regulation, as well as for addressing likely future developments at the intersection of mobility-on-demand, smart infrastructure, and autonomous vehicles.
- The report dismisses the idea of local pedicab service because of assumed insufficient local demand. This may or may not be true from a commercial perspective. However, we encourage HCAOG to reconsider pedicabs as an extension of public transit to address first/last mile problems (similar to bikeshare), rather than as private enterprises.

Thank you for your consideration of our comments.

Sincerely,

Colin Fiske
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