



January 19, 2021

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**RE: 2020 Del Norte County Regional Transportation Plan, Initial Study and Mitigated Negative Declaration**

Ms. Alward and Ms. Leighton:

Thank you for the opportunity to comment on the Draft 2020 Del Norte County Regional Transportation Plan (RTP), as well as the associated Initial Study (IS) and draft Mitigated Negative Declaration (MND). The Coalition for Responsible Transportation Priorities (CRTP), the Environmental Protection Information Center (EPIC), and the Friends of Del Norte submit the following comments. All cited page numbers, tables and figures refer to the RTP unless otherwise indicated.

**Public Transit**

The RTP correctly notes that transit ridership has declined significantly in recent years as a result of Redwood Coast Transit Authority's reduction in service (p.28, p.33). This is a predictable pattern known as a transit "death spiral." The RTP also correctly notes the difficulty many transit riders and potential riders face in accessing bus stops along road networks without adequate pedestrian or bicycle facilities (p.33). Yet in spite of correctly diagnosing some of the major problems with the local transit system, the RTP makes no attempt to identify solutions, nor to establish goals, objectives and policies with the necessary ambition to address the problems. Instead, by establishing objectives such as to "tailor public transportation and transit service provisions to the area's population characteristics" and only to establish transit as a feasible mode choice "within the financial constraints of state and federal transit funding" (p.42), the RTP seems to be implicitly resigned to local transit providing only life-line transportation services. Finally, in its "COVID-19 Statement," the RTP state unequivocally that "transit

services will continue to be reduced and unpredictable” (p.5). This self-defeating approach will only result in furthering RCTA’s current “death spiral.”

A successful transit system requires not only transit-dependent riders, but also “choice” riders. Clearly, there are substantial challenges to recruiting such riders in a small, rural county like Del Norte. Nevertheless, there are several indications that the county has not exhausted the possibilities for transit system improvement, as follows:

1. Ridership actually increased in recent years on Route 199 (p.28, Table 2.23). The RTP should examine the sources of this success and apply lessons learned to the rest of the transit system.
2. The RTP establishes a policy of holding only one annual Unmet Transit Needs hearing (p.42, Policy 6.5) and one annual meeting of the Social Services Transportation Advisory Committee (p.42, Policy 6.10). The Unmet Transit Needs process and the SSTAC are both designed explicitly to gather public insights into how to meet local transit needs. As such, they are among the most likely sources of innovative ideas for improving local transit. But one meeting a year is simply not enough to gather adequate public input. The RTP should establish a much more robust public process.
3. One of the most promising emerging strategies for improving rural transit systems is coordinating traditional fixed-route systems with new mobility-on-demand solutions, operated either by the transit system itself or through a public-private partnership. When well designed, these strategies can help balance the requirement to meet the needs of transit-depend riders with the need to attract more “choice” riders in denser areas (i.e., Crescent City). The Humboldt County Association of Governments (HCAOG), the Regional Transportation Planning Agency for Del Norte’s neighbor to the south, has recently completed a strategic development plan for mobility-on-demand.<sup>1</sup> The RTP should look to HCAOG’s example and explore mobility-on-demand strategies for improving the local transit system.
4. The RTP projects an excess of transit funding available in both the short term and the long term (p.74, Table 5.2). Additionally, the RTP explicitly limits the possibilities for transit funding to only state and federal sources (p.42), failing completely to explore the possibilities of local funding sources or public-private partnerships. The RTP should identify all potential funding sources *and* make full use of all such sources for critical transit system improvements.

Finally, it is important to note an error in the RTP’s summary of the state’s zero emission vehicle mandates. The RTP currently states that transit fleets are subject to the state’s 2035 goal for all new vehicles to be zero-emission (p.36). In fact, transit fleets are also subject to the California Air Resources Board’s Innovative Clean Transit Rule, which requires 25% of new vehicles in small fleets to be zero-emission by 2026, and all new vehicles by 2029.<sup>2</sup>

### **Active Transportation**

The RTP accurately identifies the fact that needed pedestrian and bicycle facilities are lacking in much of Del Norte County (pp.31-2). The RTP also identifies many important strategies and specific

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<sup>1</sup> See <http://hcaog.net/documents/mobility-demand-strategic-development-plan>.

<sup>2</sup> See <https://ww2.arb.ca.gov/rulemaking/2018/innovative-clean-transit-2018>.

improvements for local bicycle and pedestrian networks. However, the RTP’s assessment of the issues, along with its proposed goals, objectives and policies, fall short in a number of important ways, as follows:

1. The RTP establishes an objective to improve walkability and bikeability only in downtown Crescent City (p.39). While it is true that the greatest demand for such improvements is in downtown Crescent City, there are also many urgently needed local bicycle and pedestrian improvements throughout the county, as well as completion of networks for regional connectivity. The RTP should establish objectives for improved walkability and bikeability throughout the county.
2. Proposed Policy 4.4 (p.40) calls for coordination among various agencies in the construction and maintenance of the local road system, but fails to identify the critical role of interagency coordination in constructing and maintaining bicycle and pedestrian infrastructure. We encourage you to address this omission.
3. The RTP completely fails to address electric pedal-assist bicycles (“e-bikes”). In rural areas like Del Norte County, with lots of elevation changes, e-bikes have enormous potential for allowing local residents to convert car trips to active transportation, helping to meet goals for reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT).<sup>3</sup> The RTP identifies the fact that many Del Norte residents have a very short commute to work, increasing the potential for mode shift, and e-bikes could play a critical role. The RTP should establish a goal and supporting objectives and policies to increase the use of e-bikes.
4. The RTP does not include any discussion of, or plans for, advisory bike lanes (also known as edge lane roads). This design technique has great potential for rapidly and inexpensively expanding and closing gaps in the active transportation network, particularly in small town and rural environments with relatively narrow rights-of-way. The RTP should include a discussion of advisory bike lanes.
5. The RTP identifies “establishing an adequate electric grid” as a critical solution for increasing “non-auto” transportation (p.37). Unless this is meant to refer specifically to charging infrastructure for electric buses or e-bikes, improvement of the electric grid is unrelated to non-auto transportation. Notably, if this idea is meant to refer to charging infrastructure for light-duty electric vehicles (EVs), such vehicles are still “autos” and improvement of the grid will do nothing to increase non-auto transportation.
6. Goal 2 of the RTP is to “support recreational travel by making it safe, easy and inviting,” yet none of the supporting objectives or policies include strategies to improve the safety, comfort or convenience of recreational pedestrian and bicycle use of local and state roads. This is a critical oversight, particularly given the heavy recreational pedestrian use of major roads in the county—such as tourist use of Highway 199 in Jedediah Smith Redwoods State Park—as well as the popular Pacific Coast Bike Route which traverses the county. In fact, the RTP already identifies the fact that one of the top three problem areas for the PCBR on the entire Pacific Coast lies within Del Norte County (p.31), yet proposes no solutions. The RTP should propose objectives and policies for supporting recreational bike and pedestrian use of the local and state roads.

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<sup>3</sup> See for example <https://www.localmotion.org/ebikes>.

7. A significant portion of identified “bicycle and pedestrian projects” in the RTP appear to actually be improvements to parking lots for cars (p.57). Even if such parking lots are intended to increase vehicular access to recreational trails, they cannot be counted as bicycle or pedestrian projects, as they primarily serve cars and trucks.
8. The RTP’s assessment of funding sources for bicycle and pedestrian projects is severely deficient. as follows:
  - a. The RTP assumes that the state’s Active Transportation Program (ATP) is the only potential source of funding for bike and pedestrian projects (p.56). This is demonstrably incorrect. For example, the State Highway Operation and Protection Program (SHOPP) can fund both safety and operational improvements—including for bicycles and pedestrians—on the state highway system. In fact, the California Transportation Commission recently approved a \$100 million set-aside for “complete streets” projects from the SHOPP, and both the CTC and Caltrans at the same time indicated a commitment to funding more active transportation projects through the SHOPP in the future. Yet the RTP inexplicably and incorrectly assumes no SHOPP funding for active transportation (p.74, Table 5.2).
  - b. In addition to the ATP and the SHOPP, active transportation projects can also be funded through the regional or interregional portions of the State Transportation Improvement Program (STIP). Such projects can also be funded from revenues such as the Highway Users Tax and the Local Streets and Roads Program, both of which are identified elsewhere in the RTP. In fact, the RTP projects a \$16.5 million excess in near-term road funding (p.74, Table 5.2), most or all of which could be used for active transportation projects. Such projects can also be funded through many local funding sources, including local agencies’ general funds. And they can even be funded through private grants or public-private partnerships.
  - c. The RTP assumes that no funding from the ATP or the Highway Safety Improvement Program (HSIP) will ever come to Del Norte County (p.72, Table 5.1). According to a presentation by RTP preparer Jeff Schwein to the DNLTC on January 12, 2021, this is a result of the fact that ATP and HSIP funding come through competitive grant programs. Nevertheless, the assumption of zero dollars from these programs in the future is unsupportable in the context of the state’s steadily increasing funding for active transportation (ranging from SB 1’s dramatic increase in ATP funding to the recent SHOPP complete streets set-aside). The state has committed to increasing active transportation mode share, and the RTP can only reasonably assume that increasing amounts of funding will be available from dedicated active-transportation sources such as the ATP, and that some of this funding will be awarded to projects in Del Norte County over the 20-year planning period if local agencies apply. Furthermore, other funding sources estimated in the RTP, such as the SHOPP, while not officially “competitive,” are nevertheless financially constrained, resulting in competition between various projects and priorities and uncertainty regarding future funding availability for projects in the county. This uncertainty does not prevent the RTP from estimating future funding from these sources, and should not prevent it from estimating ATP funding either.

The result of this overall deficient funding assessment is that the RTP identifies *no short-range bicycle and pedestrian projects* (p.56). Given the urgent need for bicycle and pedestrian safety and operational improvements in the region, as well as for reductions in VMT and GHG emissions, this outcome is completely unacceptable. The RTP must consider all potential funding sources, must make reasonable assumptions about the availability of funding from each of those sources, and must schedule urgently needed short-range bicycle and pedestrian improvements.

### **Vehicle Miles Traveled, Traffic Volumes, and Congestion**

The RTP consistently confuses the significance and relevant applications of measures of overall driving (VMT), localized traffic volumes, and traffic congestion. For example, while the RTP accurately notes that VMT is not a good measure of congestion (nor is it intended to be), it claims incorrectly that VMT *can* be used to identify “bottlenecks or high delay ‘hot spot’ locations” (p.23; see also IS p.66). In fact, VMT cannot and should not be used to indicate congestion or delay in any particular location, because it does not measure traffic in a given location at a given time nor compare traffic to capacity. Rather, VMT measures overall driving activity in a general area, and as such is a good proxy for many of the environmental and social costs of driving, including GHG and other emissions, safety and collision risk, etc. These are the primary reasons that VMT was chosen by the state as the new measure of transportation impacts under CEQA.<sup>4</sup>

In fact, VMT reduction and congestion relief are sometimes incompatible and conflicting goals. Efforts to reduce congestion often involve increasing vehicular capacity, a strategy which decades of research has shown leads directly to more driving (increased VMT). Efforts to reduce VMT, in contrast, may involve reduction in capacity as street space is reallocated to other modes, which can have the temporary effect of increasing congestion or delay (although over the longer term it tends to reduce driving). The apparent failure to grasp this distinction is evident in the RTP, which establishes overarching aims of both maintaining “adequate LOS” (i.e., minimum congestion) *and* prioritizing projects which reduce VMT (p.37). Separately, however, the RTP accurately identifies the fact that there are no real congestion problems in Del Norte County, and states that “expanding the traffic capacity of roadways is not a priority” (p.38). Level of Service and other congestion measures are generally irrelevant to both local and state goals and should be abandoned and removed from the RTP entirely.

The RTP’s assessment of recent VMT trends and projections of future VMT are also unsupportable. The RTP notes that local VMT has increased far out of proportion with population growth in recent years (p.23, p.37), but fails to investigate any potential causes for this trend. Instead, the RTP attempts to use this recent trend to forecast future traffic (p.20), which leads to estimates of continuing VMT growth (p.24, Table 2.20)—in spite of projections of substantial local population decline and local and statewide goals of VMT reduction. In order to meet the state’s GHG reduction goals, per capita VMT reductions must be achieved. Assuming constantly increasing VMT is planning for failure and is completely unreasonable in the face of a declining population. The RTP should analyze recent VMT increases, identify strategies to combat the trend, and reassess its future VMT projections.

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<sup>4</sup> See <https://opr.ca.gov/ceqa/updates/sb-743/>.

Finally, the RTP establishes another overall aim of ensuring “adequate road width to support the travel and tourism industry” (p.37). It is not at all clear what this is intended to mean. However, if it is intended to mean that roads should be widened to accommodate new classes of vehicle, this would establish a policy of capacity increases that is internally inconsistent with the rest of the RTP. We encourage you to address this potential inconsistency.

### **Climate Change & Greenhouse Gas Emissions**

The RTP’s goals, objectives and policies do not reflect the needed ambition for targeting the climate crisis and meeting the state’s GHG reduction targets. For example, the RTP establishes an objective to “reduce or maintain” GHG emissions from transportation over the document’s 20-year planning horizon. In contrast, the state’s target, as dictated by climate science, is to achieve carbon neutrality—i.e., net zero GHG emissions—by 2045, just a few years beyond the RTP planning horizon.<sup>5</sup> Therefore, this objective is in direct conflict with proposed Policy 11.10, which is to “comply with state and federal climate change regulations and standards” (p.46). Del Norte may be a small county, but its residents have high per capita VMT and GHG emissions, and it must remain on track to meet state targets.

Part of the RTP’s climate ambition problem may stem from its assessment that the only way to reduce GHG emissions from transportation is to reduce or eliminate trips (p.45). This assessment ignores another major strategy, arguably even more important, which is transportation mode shift. As discussed at length above, there is much more the RTP should do to encourage a shift away from single-occupancy vehicles and toward transit and active transportation. The RTP also gives EV charging infrastructure, another major strategy, short shrift.

The RTP should focus significantly more on goals, objectives and policies to encourage mode shift and transportation electrification. Furthermore, we strongly recommend that the RTP go beyond minimum requirements and establish specific, quantitative, measurable targets for VMT and GHG emission reduction. HCAOG is in the process of establishing such targets for Humboldt County’s upcoming RTP update, and has recently released some preliminary draft targets. We recommend that the Del Norte Local Transportation Commission (DNLTC) follow HCAOG’s lead.

Finally, while the RTP recognizes the need to plan for sea level rise as a climate adaptation strategy (p.48), the document fails to address another risk that climate change poses, that of increasing frequency and severity of wildfires in the county’s inland areas. The RTP must address this critical threat to infrastructure and transportation safety.

### **Equity**

The RTP appropriately includes an objective and two supporting policies which encourage equity in transportation systems and programs (p.41, Policies 5.5 and 5.6). However, the wording of these policies is vague to the point of meaninglessness (“promote equity,” “work to make...equitably available”). The RTP’s Existing Conditions chapter includes a discussion of many of the reasons that transportation equity

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<sup>5</sup> See <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>

is critical in Del Norte County, including high rates of poverty and disability, and many households without access to a vehicle. The RTP's Policy Element should increase its specificity and its ambition, describing actual targets and implementation actions. Furthermore, there should be equity policies which apply to all RTP areas, not just active transportation. For example, equity issues are also key in any reasonable assessment of transit and road planning.

### **Goods Movement**

Although the RTP does not specifically mention the long-planned 197/199 Safe STAA Access Project ("STAA project"), the project is mentioned in the MND (MND p.3), and the RTP contains many misleading statements and inappropriate policies which seem intended to bolster support for that project. For example, the RTP claims that Highways 101 and 197/199 "limit access for industry standard trucks" (p.34). There is not now, nor has there ever been, a standard truck for all industries and applications. Additionally, proposed Policy 8.3 is to "design roadways to current standards," which is presumably intended to refer to freight standards, as the policy supports a goods movement goal (p.44). However, there are no universal freight standards for road design. The policy may be intended to refer to STAA standards, but STAA standards only apply to 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)), none of which are found in Del Norte County, and designated "Terminal Access" (TA) routes between the National Network and freight terminals or facilities (23 CFR §658.19, California Vehicle Code Section 34501.5(c)-(d)). STAA standards do not and were never intended to apply to all roads or highways.

The best principle for safe road design (p.44, Policy 8.2) is to design roads for local conditions and require vehicles to adapt accordingly, not vice versa. Moreover, designing roads to meet 1982 STAA truck standards is particularly inappropriate in the current industry context. Governor Newsom recently directed that all heavy-duty trucks be zero-emission vehicles by 2045, and autonomous vehicle technology is being deployed with increasing speed in the trucking industry. No one can predict what the trucks of the future will look like, except that they are unlikely to meet today's design specifications.

It is further important to note that Policy 8.3—and any other goals, objectives or policies calling for access for new classes of vehicles—would be in conflict with proposed Policy 11.3, which calls for prioritizing projects which do *not* increase vehicular capacity. Adding capacity for a new class of vehicle is a de facto capacity increase. Additionally, the RTP states clearly at p.47: "Should a capacity increasing project become a regional priority, it shall be initiated only when fully or largely funded by revenue sources that otherwise could not be used for maintenance activities." The STAA project would be funded in part by the SHOPP, the purpose of which is in fact to fund non-capacity increasing maintenance and repair projects.

The RTP should remove proposed Policy 8.3 and all other misleading references to freight transportation standards.

## Performance Measures

Some of the RTP's proposed Performance Measures do not appear to correlate reasonably with the proposed goals, objectives and policies, and are in some cases internally inconsistent or unclear:

- Performance Measure 1 is entitled "Transportation System Investments," but is apparently intended to measure roadway condition by distressed lane miles. This performance measure should be re-titled, as investment does not correlate directly roadway condition. Additionally, sub-measures should be added to track the condition of bicycle and pedestrian facilities as well.
- Performance Measure 2 is entitled "Preservation/Service Fuel Use/Travel Distance/Time/Cost." The title is overly broad and does not correlate with the intended metric, which is pavement condition. Furthermore, pavement condition measure essentially the same thing as distressed lane miles (Performance Measure 1). This measure should at minimum be re-titled. Preferably, it should actually establish metrics which measure reduction in fuel use and travel distance/time/cost and avoid redundancy with Performance Measure 1.
- Performance Measure 3 is intended to measure safety improvements. The RTP proposes to establish a baseline of traffic fatalities over a three-year period. However, for a population as small as that of Del Norte County, an accurate baseline cannot be established in such a short period, due to substantial random variation in the relatively low numbers of collisions. The RTP should increase its sample size by including injury collisions as well. DNLTTC may also wish to expand its options as well by employing a tool such as Street Story which records near misses and hazards.<sup>6</sup> Additionally, Table 4.7 describes this performance measure as "total accident cost." Cost, however, is not the same as the number or rate of crashes, which is the measure described in the document text (p.67). The actual performance measure should be clearly identified.
- Performance Measure 5 relies solely on cost per mile to assess the effectiveness of public transit. While cost is important, transit utilization is another key metric. Therefore, ridership should be added as another metric under Performance Measure 5.
- Performance Measure 6 is entitled "Congestion/Delay/VMT." As discussed above, congestion/delay and VMT are very different and sometimes opposing measures. In fact, however, it appears that the actual "congestion" metric proposed by the RTP is traffic volume rather than congestion or VMT. Traffic volume metrics reflect the number of cars and trucks on the road at a given time, but not how far they travel, their speed of travel, or any delay. It is unclear how traffic volumes measure anything of importance to the goals, objectives and policies of the RTP that is not more accurately measured by VMT. Therefore, this performance measure should be re-titled and should measure VMT only.
- Performance Measure 7 is entitled "Land Use Efficiency." We strongly support this as a performance measure, because increased land use efficiency can help achieve many of the RTP's goals related to active transportation, transit, VMT, and GHG emissions. However, no indication is given in the description on p.68 or in Table 4.7 on p.69 of the actual proposed metric for land use efficiency. The RTP should specify a metric which accurately measures land use efficiency.
- The RTP does not specify data sources for any of the proposed Performance Measures except Performance Measure 6 (p.69, Table 4.7). Knowledge of data sources is critical for ensuring that

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<sup>6</sup> See <https://streetstory.berkeley.edu/>.



Performance Measures accurately indicate progress toward meeting the RTP's goals, objectives and policies. The RTP must specify data sources for all performance measures.

### **CEQA Comments: Vehicle Miles Traveled & Greenhouse Gas Emissions**

The IS/MND state variously that the RTP will cause no increase in VMT (IS p.28, IS p.66) and that the increase in VMT will be only "slight" (IS p.37) or "minimal" (IS p.67). In fact, the RTP and the IS itself project a VMT increase of over 10% over the planning period (p.24, IS p.42). Since Del Norte County's population is expected to decline over the same period (p.9, IS p.42), this translates into a projected 13% increase in per capita VMT. This is a prima facie significant increase.

The IS's hand-waving attempt to explain away this increase by simply citing Del Norte County's "rural nature" is not supportable (IS p.42). Even assuming *arguendo* that rural areas have inherently higher per capita VMT than urban areas, there is no reason to conclude that current per capita VMT cannot be reduced to some extent. Furthermore, there is certainly no reason to predict that Del Norte County will become *more* rural over the planning period in some way that might lead to the even greater per capita VMT projected by the RTP and the IS/MND. In fact, research indicates that there are many effective strategies for reducing VMT in rural areas.<sup>7</sup>

For the same reason, it cannot be reasonably argued that the projected VMT increase is a "background condition" not subject to CEQA analysis. Given the county's declining population and lack of plans for substantial new development, any increase in VMT must be attributable to planned changes in the transportation system, ergo, the RTP itself.

This major increase in both total and per capita VMT contradicts several of the IS/MND's assertions of less than significant impacts, as follows.

- The IS argues that the RTP will result in only a "slight change" in VMT, and thus concludes that transportation-related energy use impacts are less than significant (IS p.37). In fact, as described above, the project will result in substantial VMT increases, and thus potentially significant impacts from increases in transportation-related energy use.
- The IS asserts that the RTP's associated VMT increase is "minimal," and thus concludes that GHG emission impacts are less than significant (IS p.42). In fact, as noted above, a 10% overall and 13% per capita increase in VMT is prima facie significant. This obvious conclusion is strengthened by the fact that the Governor's Office of Planning and Research (OPR) recommends a CEQA significant threshold of 15% *below* existing per capita VMT in order to ensure consistency with state GHG reduction plans and targets.<sup>8</sup> The importance of reducing VMTs from a GHG perspective is even greater in a rural area like Del Norte County. While the IS notes that transportation accounts for "about a third of the GHG emissions in most areas" (IS p.42), that proportion is markedly higher in most rural areas. In neighboring Humboldt County, for example, transportation accounts for over half of emissions.<sup>9</sup> Therefore, the increase in VMT will result in potentially significant impacts from GHG emissions, as well as potentially significant

<sup>7</sup> See for example [https://opr.ca.gov/docs/Mitigating\\_Vehicle-Miles\\_Traveled\\_\(VMT\)\\_in\\_Rural\\_Development.pdf](https://opr.ca.gov/docs/Mitigating_Vehicle-Miles_Traveled_(VMT)_in_Rural_Development.pdf)

<sup>8</sup> [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

<sup>9</sup> <https://humboldt.gov/DocumentCenter/View/79805/PowerPoint-Presentation?bidId=>

impacts from conflicts with applicable GHG reduction plans ranging from the California Air Resources Board's 2017 Scoping Plan<sup>10</sup> to Caltrans' Strategic Management Plan, which calls for substantial reductions in both overall GHG emissions from transportation and per capita VMT.<sup>11</sup>

- The IS claims that the RTP will result in no VMT increases on local roadways, and therefore concludes that there will be no significant impact from conflicting with a transportation plan or policy nor any significant impact under CEQA Guidelines Section 15064.3(b) (IS p.66 et seq.). In fact, as noted above, the RTP will result in a significant increase in VMT, and thus a potentially significant impact from conflicts with several state plans. Furthermore, the IS itself quotes CEQA Guidelines Section 15064.3 as follows: "Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact." The RTP clearly does not fall under this exemption, as it substantially increases VMT. In fact, given OPR's recommended threshold of per capita VMT 15% below existing levels, it is clear that there is a potentially significant impact under CEQA Guidelines Section 15064.3(b).

Thus, the only reasonable and defensible conclusion is that the RTP will have several potentially significant impacts related to VMT increases which must be addressed through the CEQA process. A full Environmental Impact Report (EIR) may be warranted.

### **Additional CEQA Comments**

We submit the following additional comments on the project's draft MND and IS.

- The IS states that the RTP will "reduce congested conditions throughout the system while accommodating additional traffic generated by the increase in population projected for Del Norte County" (IS p.29). This statement contains two incorrect assertions. First, as noted above, the RTP establishes specifically that there are no congestion problems in Del Norte County and that capacity increases are not a priority (p.38). Second, the county's population is projected to decline, not to increase (p.9, IS p.42). These errors should be corrected.
- The draft MND (MND p.6) and the IS (IS p.60) propose a mitigation measure to limit the noise-related impacts from the RTP that includes the following provision: "Establish speed limits and limits on hours of operation of transit systems." While lowering speed limits is an established and evidence-supported method for reducing noise impacts, there is no reason to limit transit hours of operation in Del Norte County. The county's transit system consists entirely of buses and other on-road vehicles, which should not be subject to any additional or greater restrictions than other on-road vehicles. The mitigation measure should be amended to remove references to transit.
- As noted above, Draft RTP Policy 8.3 appears to call for redesigning local roadways for new classes of freight vehicles. If this policy remains in the final document, it can be reasonably predicted that the result will be increased numbers of trucks on these roadways, some of which will carry hazardous materials. Many of the affected roadways, including Highways 101, 197 and 199, travel through sensitive natural habitats and adjacent to sensitive waterways. This would

<sup>10</sup> [https://ww2.arb.ca.gov/sites/default/files/2019-01/2017\\_sp\\_vmt\\_reductions\\_jan19.pdf](https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf)

<sup>11</sup> <https://dot.ca.gov/-/media/dot-media/programs/risk-strategic-management/documents/2019-csm-plan-update-a11y.pdf>

result in potentially significant impacts through both the routine transport of hazardous materials and a reasonably foreseeable increase in accident conditions, in contrast with the conclusion reached in the IS (IS p.44 et seq.). Thus, as long as Policy 8.3 remains in the RTP, a full EIR may need to be prepared to address these impacts.

- The IS concludes that the RTP will have a less than significant impact on wildfire risks (IS p.77). However, the IS fails to assess the implications of changes to wildfire frequency and severity due to global climate change, just as the RTP itself does (see above). The IS cannot reasonably conclude that wildfire impacts will be less than significant without considering predicted changes to the local wildfire regime and how they will interact with the transportation system.

Thank you for your consideration of our comments.

Sincerely,

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