



November 5, 2021

Beth Burks, Executive Director
Mike Johnson, Chair
Humboldt County Association of Governments
611 I St, Suite B
Eureka, CA 95501

via email: beth.burks@hcaog.net; mjohnson@ci.fortuna.ca.us
cc: oona.smith@hcaog.net; stephen.luther@hcaog.net

Dear Ms. Burks and Mr. Johnson:

Thank you for the opportunity to comment on the draft 2021 update of the Regional Transportation Plan (RTP). As you know, the Coalition for Responsible Transportation Priorities (CRTP) has participated as a stakeholder throughout the process of developing this RTP update. We appreciate the strong working relationship we have with Humboldt County Association of Governments (HCAOG) staff and Board members, and the fact that many of our concerns and priorities are addressed in the draft. Nevertheless, we believe the document can be strengthened even further. To that end, we submit the following comments.

We Strongly Support Many New Elements Introduced in the 2021 RTP Update

To begin, we want to emphasize the many features of the draft RTP update that we strongly support, including but not limited to the following:

- The inclusion of carbon neutrality, safety, equity, and societal benefit in the RTP's Overall Goal, and the focus on aligning funding with planning priorities in the Overall Objective.
- Strong, specific regional targets for mode shift, reduction of greenhouse gas (GHG) emissions and vehicle miles traveled (VMT), land use planning improvements, traffic safety, and related measures ("Safe and Sustainable Transportation Targets").
- An increased focus on transportation equity, including acknowledgement of the inequities resulting from both historical and current planning and investment practices and adoption of specific policies to promote equity (e.g., 2-20 et seq.).
- The continued focus on both mitigating the climate crisis and adapting to its local impacts ("Global Climate Crisis" Element).
- Acknowledgement of the interconnected nature of transportation and land use and adoption of specific policies for HCAOG to engage actively in land use planning processes to achieve its goals and targets ("Land Use and Transportation" Element).
- An increased focus on the many negative consequences of centering the transportation system on cars and trucks, and the many benefits of centering it on walking, biking, rolling and transit (e.g., p.2-1 et seq.).
- Acknowledgement of the role of the climate crisis and development patterns in exacerbating emergency transportation problems (p.5-1).

Projects and Performance Measures Must Be Aligned with New Targets

It is critically important that the projects and performance measures included in each element of the RTP update be aligned with the new Safe and Sustainable Transportation Targets (SSTs). Without such alignment, it is unlikely that the SSTs will be met. Meeting the SSTs is a critical component of any serious attempt to address the climate crisis and the road safety crisis.

The RTP's Overall Objective is to "Program all transportation funds based on multi-modal transportation goals and objectives, and needs and priorities as established in the Regional Transportation Plan" (p.1-2). However, current project lists and performance measures do not clearly align with the SSTs.

For example, Tables *Streets-4*, *Streets-5* and *Transit-2* include space for each proposed project to indicate its alignment with some of the SSTs, but few projects in Tables *Streets-4* and *Streets-5* are actually assessed. Furthermore, for those which have been assessed, their alignment with the SSTs is self-attested by the agency proposing them, which can call into question the objectivity of the assessment. Other project tables in the RTP update, including Tables *Goods-3* and *Aviation-4*, do not even include this self-assessment of alignment with the SSTs. *All* projects included in the RTP update should be assessed by HCAOG (not the project proponent) against the SSTs. Those which significantly help the region meet the SSTs should be prioritized, and those which make it more difficult to meet the SSTs should be removed from the RTP altogether.

Similarly, performance measures included in several elements of the RTP update (see for example Tables *Streets-6*, *Transit-3*, *Goods-4*, and *Aviation-5*) do not directly align with the SSTs, and in some cases run contrary to them. For example, Table *Streets-6* includes performance measures related to congestion reduction, which the RTP update elsewhere explains is an outdated practice which works contrary to the goals of mode shift and VMT reduction (pp.7-11 to 7-12). We understand that certain performance measures may be mandated by state or federal rules. However, to the greatest extent possible, we urge HCAOG to replace the performance measures in each element with the SSTs or at least align them more closely.

Other Comments

We submit the following additional comments for your consideration:

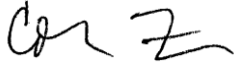
- We encourage HCAOG to adopt specific, quantitative equity-related targets for transportation investment. The Environmental Justice performance measures in Table *Streets-6* provide a good framework for these targets.
- The draft Transit Element mentions SB 742, which allows Amtrak to run busses which don't connect directly to a train line. This provides a significant opportunity for our region to increase interregional transit options. We encourage HCAOG to include a policy in the Transit Element which explicitly supports implementation of new bus routes under the authority of SB 742.
- The draft Transit Element mentions both the McKinleyville Transit Study and the Mobility-on-Demand Strategic Development Plan. However, it is not clear whether the projects recommended by these two studies are included in the project list found in Table *Transit-4*. We encourage HCAOG to ensure that these projects are included in the list to guarantee their eligibility for future funding.
- Air travel is generally the most GHG-intensive mode of transportation. The SSTs and much of the rest of the RTP focus on reducing GHG emissions from transportation. However, the Aviation Element focuses on encouraging air travel, which would certainly increase emissions. The Aviation Element

should clearly describe the climate impacts of air travel and discuss how the region will mitigate those impacts.

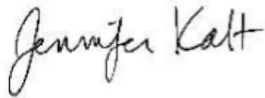
- We ask HCAOG to remove “reducing traffic congestion” from its transportation efficiency objective (p.2-11). Traffic congestion is not a major problem in Humboldt County, and a focus on reducing vehicle delays will only make it harder to meet the SSTs.
- We encourage HCAOG to add revenue from metered parking programs to the section on “Additional Potential Funding Sources” (p.12-8 et seq.).

Thank you for your consideration of our comments.

Sincerely,



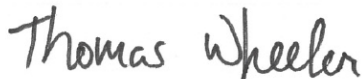
Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
145 G Street, Suite A
Arcata, CA 95521
colin@transportationpriorities.org



Jennifer Kalt, Director
Humboldt Baykeeper
600 F Street, Suite 3 #810
Arcata, CA 95521
jkalt@humboldtbykeeper.org



Caroline Griffith, Co-Executive Director
Northcoast Environmental Center
PO Box 4259
Arcata, CA 95518
carolineneemail@gmail.com



Tom Wheeler, Executive Director and Staff Attorney
Environmental Protection Information Center (EPIC)
145 G St, Suite A
Arcata, CA 95521
tom@wildcalifornia.org