



May 19, 2023

Stevie Luther
Humboldt County Association of Governments
611 I Street, Suite B
Eureka, CA 95501

via email: stephen.luther@hcaog.net

RE: Comments on Transit Development Plan Technical Memo #2

Dear Mr. Luther:

The Coalition for Responsible Transportation Priorities (CRTP) submits the following comments on the Humboldt County Transit Development Plan (TDP) 2023-28 Technical Memorandum 2: Alternatives Analysis (“Memo”).

General Comments

Many factors can be used to predict transit ridership, including residential density, land use mix, and demographic variables such as age, income, disability, and household vehicle access. Zero-car households tend to be particularly reliant on public transit. However, these variables and their relationship to transit ridership can change over time, particularly as land use patterns change and the transit system itself improves. Between the expansion of Cal Poly Humboldt, plans for several new potential employment centers, and ambitious infill development plans, Humboldt County may currently be on the brink of significant population, land use and demographic shifts which will likely change the transit landscape in the near future.

The adopted Regional Transportation Plan for 2022-2042 includes targets to double transit trips by 2025, then double them again by 2030, and again by 2040. In order to meet these ambitious but necessary targets, the system needs to not only serve those who are currently transit-dependent, but also be effective and attractive enough to allow people who could drive a car to choose not to. Among other features, this requires transit service at all times of day and days of the week. Although such service can be a daunting prospect in the short term due to relatively lower ridership levels on off-peak hours and weekends, it is necessary to allow access to many jobs, recreational activities, events, public services (including public meetings), and more. Thus, building long-term ridership may require service expansions that are financially challenging when assessed independently, particularly in the short term.

Additionally, multiple system improvements implemented concurrently can have synergistic effects in terms of increased ridership, particularly when certain service thresholds are crossed (e.g., decreasing headways to roughly 15 minutes or less).

We do not wish to advocate for transit routes which will not succeed, and we acknowledge that predicting ridership is difficult. However, given all of the factors discussed above, we do believe it is problematic to predict ridership based solely on current ridership trends, which the Memo generally does. We ask that, at the least, the TDP take residential and employment density and demographic characteristics of the service areas into account when attempting to predict ridership.

Redwood Transit Service (RTS) Service Alternatives

CRTP continues to support calls for 15-minute headways on RTS between McKinleyville and College of the Redwoods (CR) in order to attract greater ridership in the region's population and employment centers, and we ask that the TDP present this as an alternative.

We also request that later weekday service and Sunday service not be removed from consideration, as the Memo proposes. As noted above, these services are needed for a functional and successful transit system. If fixed-route service isn't financially feasible in the near term, we ask that HCAOG and HTA consider microtransit during these off-peak times.

We support the following specific RTS service alternatives presented in the Memo:

- A McKinleyville-CR express route, to reduce headways and travel times for areas including the population center of McKinleyville and the key destination of CR. Although a shorter express route may better meet certain performance standards, we believe the long-term benefits of including McKinleyville and CR in the route will be substantial.
- Samoa peninsula microtransit service, in place of the current RTS mainline diversion to Manila.
- Sunday service and later Saturday service. We note that both have already been determined to be unmet transit needs that are reasonable to meet, and will therefore be provided soon.

Eureka Transit Service (ETS) Service Alternatives

CRTP supports restructuring ETS service to follow a hub-and-spoke system. We note, however, that the "spokes" of the proposed systems are really still loops, which may have some negative impact on the legibility of the system for riders, particularly new riders.

CRTP does not currently have a position on whether the ETS hub should be at F and Harris Streets or at the future EaRTH Center. However, we note that while F/Harris is more geographically central, the EaRTH Center is located in the area of highest employment and service density, and a hub here would decrease travel times to and from downtown destinations and provide easy transfers to RTS. We also presume that a hub at F/Harris would require construction of a new facility, while the EaRTH Center is already planned and funded.

We find it challenging to evaluate many of the other proposed ETS service alternatives—including extension of service hours, increased frequency, and microtransit—because the Memo evaluates these

proposals in terms of the current route structure, rather than in conjunction with one of the proposed transit hub route structures. In general, however, CRTP supports the maximum extension of service hours and increased frequency that is financially feasible.

CRTP also supports implementing microtransit in Eureka. However, rather than a citywide service which could compete with fixed-route transit, we support a system which fills in gaps in the fixed-route system and potentially replaces fixed routes in lower density parts of the city, allowing the two systems to complement each other rather than compete for ridership.

Willow Creek Service Alternatives

Service from Willow Creek to the coast is a lifeline service that some people rely on for access to jobs, school, services and medical care. We also expect ridership on the Willow Creek service to increase now that the Yurok Tribe is providing fixed-route service connecting to Orleans and Weitchpec. For these reasons, we support the retention of at least some Willow Creek service on Saturdays.

Arcata & Mad River Transit Service (AMRTS) Service Alternatives

CRTP supports the proposed Green Route all-day service, at least while Cal Poly Humboldt is in session. We note that the university increasingly enrolls students in summer session courses as well, and ask that this be considered when determining “in session” dates and times of service. We also support the maximum financially feasible expansion of service hours for AMRTS, particularly given an expected increase in evening classes at the university.

We request an evaluation of microtransit service in lower density, outlying Arcata neighborhoods to complement AMRTS fixed-route service.

Fortuna Service Alternatives

CRTP supports implementing a microtransit service in Fortuna. We believe that this is an appropriate model for providing needed transit service to a community with Fortuna’s characteristics, including relatively low density and small population size.

McKinleyville Service Alternatives

CRTP supports microtransit in McKinleyville, based on the findings of the 2021 McKinleyville Transit Study.

Performance Standards

We recognize that performance standards of the types included in the Memo are widely used across the industry. However, the specific numerical standards applied to various routes and services in the Memo appeared to be somewhat arbitrary. We request further elaboration of the reasons for selecting the specific numerical performance standards for each service.

CRTP believes that safety performance should be measured not by the overall number of collisions, but rather by collisions that result in injury or death. Minor collisions, while certainly inconvenient, do not

necessarily correspond to safety risk. We further request that the risk of injury or death while riding transit be compared to the analogous risk while driving or riding in a private vehicle.

Finally, we stress that standards such as passengers per hour and user fee cost recovery, widely used in the transit industry, are almost never applied to streets, highways or other transportation systems. Public transit is in many ways unfairly held to standards that other transportation systems could never meet. We believe that public transit should be viewed as a public good, a civil right, and a key strategy for fighting climate pollution. We further believe that positive externalities of public transit—ranging from benefits to climate to health to local economic activity—should be internalized into metrics whenever possible.

Facilities

C RTP strongly supports additional bike lockers and bike racks associated with transit stops. We request that these improvements be considered not only for ETS, but for all other major transit systems. We also strongly support both the EaRTH Center and the proposed McKinleyville transit hub.

C RTP supports park and rides when appropriate for allowing low-density residential areas improved access to fixed-route transit. However, we do not support building new parking lots near high-demand destinations, as also contemplated in the Memo. Rather, transit should provide service directly to these destinations, or within a walkable radius.

We request consideration of the following additional facility investments:

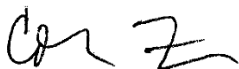
- Significant upgrades to the Arcata Transit Center to increase multimodal first-mile/last-mile facilities and create a more welcoming environment for riders.
- Systemwide bus stop upgrades, including shelters, benches, digital signs showing bus status, lighting, and other improvements for the comfort and safety of riders.

Funding

We request that downtown parking meters be considered as a potential funding source for local public transit systems.

Thank you for your consideration of our comments.

Sincerely,



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Coalition for Responsible Transportation Priorities
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