



August 31, 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 Draft Humboldt County Transit Development Plan

Dear Mr. Luther:

The Coalition for Responsible Transportation Priorities (CRTP) submits the following comments on the draft Humboldt County Transit Development Plan 2023-28 (TDP). Many of these comments are similar or related to those in our letter dated May 19, 2023, commenting on TDP Technical Memo #2, and we incorporate those comments by reference.

Ridership Projections

The draft TDP uses existing ridership data as the basis for predicting future ridership changes. Appendix H provides some methodological information, which makes it clear that these predictions are based mainly on elasticity factors derived from an older study of “incremental changes” to transit service. However, as we noted in our May 19, 2023 letter, both the transit system and the surrounding community are likely to undergo substantial—not “incremental”—changes over the planning period. These include changes to community characteristics that are often correlated with transit ridership, including residential density, land use mix, and demographic variables such as age, income, disability, and household vehicle access.

Additionally, as we also noted in our May 19 letter, 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). This is particularly important to consider for a community like McKinleyville, with a large population but very limited transit service, which could see multiple substantial improvements in service over the planning period.

Therefore, we repeat our request that the TDP at least take residential and employment density and demographic characteristics of the service areas into account when attempting to predict ridership impacts of service alternatives.

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.

We support the draft TDP's recommendation to eventually implement express bus service from McKinleyville to College of the Redwoods. However, we request that this full service not be delayed until FY 2026-27, but rather implemented as soon as funding can be secured.

We also support the recommendation to reinstate RTS Sunday service, along with ETS and AMRTS Sunday service. For the same reason, we request that the TDP also include a recommendation for later evening service on all days. These services are needed for a functional and successful transit system—in other words, to ensure needed mobility for transit-dependent populations, and to make reliance on transit a feasible option for those who could choose car ownership.

Finally, we support the proposed implementation of a microtransit service for the communities of Samoa and Manila. We believe this service will adequately serve demand in these communities, and we therefore request that implementation of the service be combined with a streamlining of the RTS mainline route, so that fixed-route buses can avoid the time-consuming detour to Manila. When combined, these changes will benefit a substantially greater number of riders.

Eureka Transit Service (ETS) Service Alternatives

CRTP supports the recommended restructuring of ETS service to follow a hub-and-spoke system. As we noted in our May 19 letter, however, the "spokes" of the proposed systems are really still loops, which presents some legibility challenges for new riders.

CRTP also supports the recommendation to implement microtransit in Eureka. However, it appears that the recommendation would lead to a citywide service that largely overlaps the fixed-route service in terms of hours and coverage. We reiterate our previous comments that a microtransit system should fill in gaps in the fixed-route system and potentially replace 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

As we noted in our May 19 letter, 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. Therefore, we do not support the recommendation to completely eliminate Saturday service to Willow Creek.

Arcata & Mad River Transit Service (AMRTS) Service Alternatives

CRTP supports the recommended Green Route all-day service, at least while Cal Poly Humboldt is in session. We also reiterate 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 (the draft TDP appears to consider only spring and fall semesters as "in session").

We also support the recommended expansion of early morning and Sunday service. However, we request additional consideration of late-night service as well, particularly given an expected increase in evening classes at the university.

Finally, we appreciate the evaluation of microtransit service in Arcata, which we requested in our May 19 letter, and the recommended implementation of “incremental” microtransit service. However, we note an apparent inconsistency in the ridership projections on p.104 of the TDP. Ridership is first estimated at 59 passenger trips/weekday and 18 trips on Saturdays, which equates to approximately 5 trips per service hour. In the next paragraph, however, the document asserts that only a maximum of 4 trips per service hour can be expected. This inconsistency should be explained or corrected.

Fortuna Service Alternatives

CRTP supports the recommendation of Fortuna microtransit combined with RTS streamlining.

McKinleyville Service Alternatives

CRTP supports proposed implementation of a microtransit service for McKinleyville. We request that implementation of the service be combined with a streamlining of the RTS mainline route, so that fixed-route buses can avoid the current time-consuming loop through McKinleyville. When combined, these changes will benefit a substantially greater number of riders.

Performance Standards

We reiterate the comments from our May 19, 2023 letter regarding performance standards, including:

- Safety performance should be measured not by the overall number of collisions, but rather by collisions that result in injury or death. Risk of injury or death while riding transit should also be considered relative to the same risk while traveling in a private vehicle.
- Positive externalities of public transit—ranging from benefits to climate to health to local economic activity—should be internalized into metrics whenever possible.
- Further justification should be provided for the specific numerical performance standards recommended.
- 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.
- In order to meet ambitious but necessary regional ridership targets, transit operators will have to implement service expansions that are financially challenging when assessed independently and in the short term.

Until all of these issues are fully addressed, we cannot support the formal adoption of recommended performance standards for local transit operators (see p.175 of the draft TDP).

Facilities

C RTP supports the recommendation for an HCAOG study of bus stop conditions. However, we also note that in many cases no study is needed, and local transit operators should not wait for the results of a study to implement needed improvements.

C RTP continues to support recommendations for both the EaRTH Center and the proposed McKinleyville transit hub. We also appreciate recommendations for certain upgrades to the Arcata Transit Center, which may have been prompted by comments in our May 19 letter. However, we do not support the recommendation for increased fencing and police presence, as this may actually create an uncomfortable and unwelcoming environment for many people. The history and present experience of transit policing in the United States is fraught with unequal outcomes, violence and tragedy. Instead of focusing on exclusionary or punitive measures, we request that the transit center upgrades focus on high-quality public space design and include additional upgrades related to multimodal first-mile/last-mile facilities.

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.

Funding

We reiterate and emphasize our request that downtown parking meters be recommended as a potential funding source for local public transit systems.

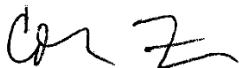
We support the recommendation to consider urbanized area designation as a potential avenue to access more federal funding. We note that while the Eureka “urbanized area” is currently considered to be just under the population threshold of 50,000, this population cluster for all practical purposes also includes Arcata, Fortuna and McKinleyville, comprising a Census-designated “micropolitan area” which far exceeds the threshold.

Going Fare Free

C RTP supports the recommendation to study going fare free as a strategy to help meet ridership goals. However, we note that a fare free strategy should only be implemented if a source of funding can be secured that replaces not only current fare revenues, but also future revenues as ridership grows. Partial fare-free strategies targeted at low-income riders should also be carefully considered.

Thank you for your consideration of our comments.

Sincerely,



Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org