



May 10, 2024

Elaine Hogan, Executive Director
Great Redwood Trail Agency

Sent via email

RE: Draft Great Redwood Trail Master Plan

Dear Ms. Hogan:

The Coalition for Responsible Transportation Priorities (CRTTP) and Environmental Protection Information Center (EPIC) are deeply supportive of the Great Redwood Trail. We appreciate the draft Great Redwood Trail Master Plan for its thoughtful, comprehensive approach to trail planning, and we are excited about the promise of the Great Redwood Trail to improve the quality of life in the many communities it will pass through.

Although we are broadly supportive of the trail, the draft Master Plan (“plan”), and the Great Redwood Trail Agency (“agency”), as with any planning effort of this scope, there are opportunities for improvement. In that spirit, we offer the following comments. All page number, figure and table references are to the draft plan unless otherwise noted.

Greater Emphasis on Active Transportation

The summary of public feedback provided in the plan notes that 40% of survey respondents said they’d use the trail for transportation (p.62), and the plan further specifies that the most frequent use of the trail will be in populated areas for “everyday transportation and recreational needs” (p.96). In many communities, the trail will form the backbone of the safe, low-stress active transportation network.

The plan reflects this reality in many respects. However, the foundations on which the plan is built focus almost exclusively on recreation, rather than transportation. For example, the “Guiding Values” all seem to reflect recreational use of the trail (pp.17, 37), making no mention of the trail’s potential for improving access to destinations, improving transportation safety, and decreasing emissions and vehicle miles traveled. Lists of trail user types also do not include active transportation commuters.

We do not want to deny or minimize the massive recreational potential of the trail. However, we request that the plan’s values and vision place greater emphasis on transportation users such as commuters, alongside recreational users.

Tribal Engagement

We appreciate the plan’s recommendations for significant engagement with tribal communities and the approaches listed on page 118 of the plan. We are particularly excited by the suggestion of co-management of trail segments with local tribes, and we encourage the agency to pursue this idea further. We encourage the agency to consult with tribes and tribal representatives early and often and to use these consultations to listen to tribes’ concerns. However, because the agency has heard some tribal concerns already, it’s important to begin proposing how to concretely incorporate those concerns into the plan—for example, offering to develop MOUs with the agency and the tribes and tribal community organizations, especially for employment opportunities, tribal hiring preferences, and cultural monitoring. It would also be helpful to have a presentation series for tribes on the process of loop trail/parallel routes alternatives (discussed on pages 118 and 130-31) to avoid culturally sensitive areas. We also reiterate the recommendations for engagement with Indigenous people found in the letter we submitted to the agency with Friends of the Eel River, Bear River Band of Rohnerville Rancheria, and Northcoast Environmental Center dated March 26, 2024.

Designing for a Variety of Trail Users

We appreciate the plan’s stated intent to follow universal design principles wherever possible. The trail will be used by a wide variety of users, particularly the paved and crushed stone segments, and should be designed to allow and encourage the broadest possible spectrum of users while mitigating for potential conflict between them.

With that in mind, we encourage the agency to review the Public Right-of-Way Accessibility Guidelines (PROWAG) produced by the U.S. Access Board, which are the most recent, authoritative and comprehensive guidelines for public right-of-way accessibility in the United States, and add PROWAG to the list of standards and guidelines found on p.100.

We also believe that Table 10 (p.104) may be overly optimistic about the ability of commuter bicycles and e-bikes to handle a crushed stone surface; this may depend greatly on the condition of the surface as well as the bike type, weight, and speed, and the skill of the bicyclist. We further note that Table 10 does not account for users of smaller-wheeled devices such as scooters and skateboards. These devices are much more sensitive to surface irregularities than bicycles,¹ and they should be considered in trail design.

Trailhead & Trail Amenities

We submit the following comments on proposed trailhead and trail amenities:

- We strongly encourage the agency to coordinate with the Humboldt Transit Authority (HTA) to ensure transit access to the trail wherever possible, including the colocation of bus stop facilities at some trailheads.
- Lighting is mentioned in the plan primarily in the context of crime prevention (p.49) and as a trailhead amenity (p.156). However, lighting is also an important feature for safe and comfortable after-dark trail use by active transportation commuters, both at and between

¹ See <https://nacto.org/publication/designing-for-small-things-with-wheels/>

road crossings. In urban and suburban environments, pedestrian-scale trail lighting should be encouraged wherever feasible.

- The plan states that “community connectors will connect to the GRT at trailheads” (p.151). We appreciate the desire to provide amenities at trail connections, but we do not want to see valuable trail connections delayed by a policy that requires the construction of specific facilities. We encourage this policy to be restated to allow more flexibility.
- Table 12 indicates that vehicular parking is “strongly recommended” at Community Gateways and “Community Trailheads.” We urge the agency to provide a more flexible and context-based recommendation that accounts for the already existing public parking available in the vicinity of such facilities. In many instances, abundant free parking is available, and there is no need to spend limited funding on another parking lot.
- In many environments, we believe it would be appropriate to provide bike parking and electric bike charging stations at Rest Areas (p.168). We also note that in areas where longer term bike parking is needed, those facilities should be not only weather-protected but also secured from theft and vandalism (p.180).
- Trail-oriented development opportunities include not just private bike rentals (p.190), but public bikeshare stations. We encourage the agency to actively partner with other local agencies in expanding local bikeshare systems and placing new stations at trail access points and trailheads.

Trail User Safety

We feel strongly that trail user safety and comfort should be prioritized over driver convenience at access points and road crossings. Therefore, the emphasis on speed management at crossings should be on vehicles, not trail users (p.141), and stop signs for trail users should be minimized (e.g., p.143), while stop and yield signs for drivers should be used more liberally (e.g., p.144). We also strongly encourage greater emphasis on raised crossings (p.149), and ask the agency to use pedestrian hybrid beacons (“HAWKS”) rather than the less effective rectangular rapid flashing beacons at busy road crossings.

Other Design Considerations

We submit the following additional comments on general trail designs:

- The plan identifies a procedure for maintaining railroad tracks where “rail with trail is desired” (p.107) or where there is an “anticipated future rail use” (p.117). There is no legitimate anticipated future rail use in the area covered by the plan, and local agencies know from long experience that “rail with trail” adds enormously to trail project cost and complexity. This consideration does not need to be included in the plan.
- The plan briefly mentions the need for livestock crossings (p.129). We also encourage the agency to consider the need for wildlife crossings in areas where fencing or other barriers are proposed.

Segment Prioritization

The two main spur trails at the north end of the trail, the “Annie & Mary Trail” to Blue Lake and the Manila/Samoa spur, are prioritized fully or partially at Tier 2. In the case of the Annie &

Mary Trail, two segments are rated Tier 1, while the segment in the middle (called the Glendale segment) is Tier 2. While we recognize that the middle segment faces significant challenges for trail construction, the greatest value for this spur comes from having a complete connection between the population centers at Arcata and Blue Lake, and it therefore makes little sense to prioritize two ends of the spur but not the middle. We encourage the agency to reassess and increase the access value of the Glendale segment in this light (see Table 19).

Pertaining to the Manila/Samoa spur trail, we question why “Readiness” is rated so low. The need for trail facilities in this corridor has been identified in plans dating back decades, and there is a bicycle and pedestrian need identified in the Caltrans District 1 Active Transportation Plan. Additionally, the Humboldt Bay Harbor, Recreation, and Conservation District recently won a large grant which includes funding to construct a 1.1 mile portion of this spur along its property in Samoa. With anticipated future development in Samoa the need for active transportation facilities will only increase. Considering all of these factors, we believe these segments should be rated as Tier 1 priorities.

Specific Segment Routes & Designs

We have the following comments on design and route concepts for specific segments. We have limited our comments to segments in Humboldt County:

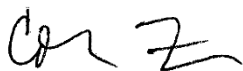
- Figure 1 identifies the trail through Eureka as “existing,” and Table 19 says that it “exists with some parallel routes.” In fact, there is no Class I or similarly safe and low-stress facility for bicyclists and pedestrians in the agency’s right-of-way from C Street to Y Street, and no equivalent parallel route exists or is planned for the segment from C to L Street. Addressing this gap in the trail is critical both for local commuters and for tourists and other recreational users. In fact, given its location in the heart of the region’s largest city, it would not be unreasonable to project that this segment could have the highest usage of any segment covered by the plan, if it were completed to Class I standards. However, because it is labeled “existing,” it has not been prioritized for completion. We strongly urge the agency to correct this error and to assign this segment a Tier 1 priority.
- There appears to be some confusion about the status of trail segments in Arcata. For example, the plan identifies an “Arcata Rail with Trail” project as “planned” and under construction (p.82). This appears to refer to the segment from Highway 255 north to either Shay Park or Sunset Avenue. However, this segment already exists, and it is correctly identified as such in Table 19—although it is important to note that many parts of this segment do not meet Class I standards and should be improved. Similarly, the North Arcata segment is identified as “planned” in the map on p.392, but not in the mileage listed on p.391. In fact, this segment is both planned and already funded through construction.
- We fully support the development of trail facilities into and through Scotia (p.356 et seq) and Rio Dell (p.365 et seq), outside of the agency’s right-of-way, in order to provide safe bike and pedestrian facilities for local residents, as well as connections to local businesses for tourists. However, the design concepts for these segments presented in the plan do not preserve the safety and comfort of a Class I facility, which is critical for widespread acceptance and use of the facility for both transportation and recreation. If a Class I or

equivalent facility cannot be maintained through the towns, then a facility that does meet Class I standards should also be built in the agency's right-of-way or some other parallel route.

- The McCann to Founders Grove segment (p.342) is the first place where the trail approaches Highway 101 north of Willits. As such, it is also the first significant opportunity for trail access via public transit. HTA already maintains a flag stop in this location on its Southern Humboldt Intercity service. We encourage the agency to work with HTA to formalize transit access to the trail in this location.
- The trail crossing of Highway 36 at Alton (p.372) is in a location with heavy, fast-moving traffic, and as such requires a pedestrian hybrid beacon to ensure trail user safety. An advisory rectangular rapid flashing beacon is not sufficient.
- The proposed design of the Kenmar Road roundabout crossing in Fortuna (p.376) has the trail crossing five separate lanes of traffic in a complex configuration. Despite the roundabout, some of these lanes are likely to feature high-speed traffic; for example, the lane connecting Kenmar Road to the northbound Highway 101 on-ramp skips the roundabout altogether and provides a relatively wide turning radius, allowing higher speeds. Taken together, we believe this segment represents too high a risk for trail users. We encourage the agency to work with the City of Fortuna to redesign the proposed roundabout to limit trail user crossing exposure and driver speed, and to provide additional safety features such as raised trail crossings and pedestrian hybrid beacons.
- The description of the Blue Lake segment raises the potential for a parallel route in the Highway 299 right-of-way, saying that this route "was studied in 2018 Caltrans Planning study." In fact, this project has proceeded further than that. Caltrans recently developed a Project Initiation Report (PIR) for this trail segment with the intent to incorporate it into the 2026 State Highway Operation and Protection Program (SHOPP).

Thank you for your consideration of our comments.

Sincerely,



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