



December 9, 2024

Jeff Schwein, Project Manager  
Green Dot Transportation  
627 Broadway, Suite 220  
Chico, CA 95928

Tamera Leighton, Executive Director  
Del Norte Local Transportation Commission  
900 Northcrest Drive, PMB 16  
Crescent City, CA 95531

via email: [jeff@greendottransportation.com](mailto:jeff@greendottransportation.com); [tamera@dnltc.org](mailto:tamera@dnltc.org)

RE: Draft 2024 Del Norte County Regional Transportation Plan

Mr. Schwein and Ms. Leighton:

Thank you for the opportunity to comment on the Draft 2024 Del Norte County Regional Transportation Plan (RTP). Please accept the following comments from the Coalition for Responsible Transportation Priorities (CRTP) and the Environmental Protection Information Center (EPIC):

- Objective 1.4 calls for investing in walkability and bikeability in “downtown areas.” Policy 1.4.1, which is intended to implement Objective 1.4, specifies “traffic calming and streetscape projects in the downtown Crescent City area.” We strongly support greater investment in safety and comfort for people walking, biking and rolling in downtown Crescent City. However, the need for bike and pedestrian safety improvements is not limited to Crescent City. The need is also acute in other “downtown” or high-activity areas, such as Gasquet, Hiouchi, Smith River, and Oceanview. Furthermore, there is also a need for bike and pedestrian improvements in rural parts of the county as well. State highways and other arterial roadways designed for high-speed traffic are often the only routes between communities, and consequently must often be used by non-drivers despite the lack of safe facilities. We request that Objective 1.4 and Policy 1.4.1 be amended to reflect the need for traffic calming and bike and pedestrian facilities in all of Del Norte’s communities, as well as on key routes between those communities.



- Objective 10.3 is to “reduce or freeze GHG emission levels” from transportation. Del Norte County, like all regions, must do more than merely stopping GHG emissions from increasing. Rather, the region must pull its weight by reducing transportation emissions proportionately as required to meet the state’s science-based targets. Specifically, the region must commit to reducing emissions by at least 85% by 2045, and complying with the California Air Resources Board 2022 Scoping Plan transportation targets including per capita VMT reductions of 25% by 2030 and 30% by 2045. Although other objectives and policies hint at somewhat greater ambition, Objective 10.3 should be amended to clarify the need to meet state Scoping Plan targets.
- The RTP’s Action Element does not include any bike or pedestrian projects. The explanation offered is that the Active Transportation Program (ATP) is the “most substantial” funding source for these projects, but is highly competitive and therefore not reliable. While the ATP is the biggest funding program solely dedicated to bike and pedestrian projects, many other sources of funding are available. Other state and federal programs that can fund active transportation projects include the State Highway Operation and Protection Program (SHOPP) (projects on the state highway system), State Transportation Improvement Program (STIP) (projects on and off the state highway system), Highway Safety Improvement Program (HSIP) (projects on and off the state highway system), and many others. Local funding can also be used, particularly for low-cost bike and pedestrian improvements that can be wrapped into existing repaving projects. All of these funding sources must be considered, and high-priority bike and pedestrian projects must be incorporated into the near-term funding plan in the RTP.
- Performance Measure 6, “Congestion/Delay/Vehicle Miles Traveled,” is described as monitoring “how well State and County roads are functioning based on peak volume/capacity and VMT.” This name and description conflate vehicle delay (congestion) with vehicle miles traveled, which are completely different metrics. 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 volume 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. 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). Congestion is largely non-existent in Del



Norte County, but per capita VMT is a major issue. To ensure consistency and relevance, the congestion, delay, and vehicular capacity elements must be removed from this Performance Measure, and it should exclusively focus on measuring VMT.

- Policy 8.1.3 is to “Promote roadway designs that will allow for safe movement of larger freight and Surface Transportation Assistance Act trucks.” We continue to object to the promotion of projects solely to accommodate larger truck traffic or STAA truck traffic in particular. 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. Moreover, designing roads to meet 1982 STAA truck standards is particularly inappropriate in the current industry context. The trucking industry is in the midst of a state-mandated transition to zero-emission vehicles, and other new technologies including autonomous driving features are increasingly being developed and deployed. It is impossible to predict what the trucks of the future will look like. The best practice for safe transportation (of freight and people) is to design safe roads and let vehicles adapt accordingly, rather than to design roads for a particular model or type of vehicle. The references to designing roads for larger freight and for STAA trucks should be removed.
- Policy 6.1.2 establishes a goal of “a minimum of one” annual Unmet Transit Needs hearing. The Unmet Transit Needs process is designed explicitly to gather public insights into how to meet local transit needs. As such, it is among the most likely sources of innovative ideas for improving local transit. One meeting a year is simply not enough to gather adequate public input. The RTP should establish a much more robust public input process for unmet transit needs.
- The RTP’s Existing Conditions section includes the following statement: “A study to evaluate the transit system, including researching a transit or mobility hub for the region and on-demand mobility options, could be submitted for funding consideration through the Caltrans Sustainable Communities grant program.” We support this concept. On-demand mobility systems hold significant promise for meeting basic transit needs in low-density areas, including most of Del Norte County, where high-quality fixed-route service is not feasible. The RTP’s Policy Element should include a commitment to evaluating on-demand systems, rather than relegating this topic to the non-actionable Existing Conditions section.
- Section 3.2.7 is titled “Climate Change and Environmental Justice,” but includes no explicit objectives or policies to promote environmental justice. The RTP’s Existing



Conditions chapter includes a discussion of many of the reasons that environmental justice, and specifically transportation equity, is critical in Del Norte County, including high rates of poverty, and many households without access to a vehicle. The RTP's Policy Element should include specific and ambitious environmental justice targets and implementation actions.

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](mailto:colin@transportationpriorities.org)

Josefina Barrantes, Del Norte Advocate  
Environmental Protection Information Center  
145 G Street, Suite A  
Arcata, CA 95521  
[josefina@wildcalifornia.org](mailto:josefina@wildcalifornia.org)

Donna Thompson  
Friends of Del Norte Board Bookkeeper & Community Member  
[kitacoastdonna@charter.net](mailto:kitacoastdonna@charter.net)