



April 15, 2025

Jacob Rightnar
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via email: jacob.rightnar@dot.ca.gov

RE: Comments on Draft State Route 255 Corridor Management Plan

Dear Mr. Rightnar,

The Coalition for Responsible Transportation Priorities (CRTP) and the Environmental Protection Information Center (EPIC) appreciate the opportunity to comment on the draft State Route 255 Corridor Management Plan (CMP). We support the CMP's increased focus safety, and especially on bicyclist and pedestrian safety and access, as well as on public transit. However, we believe there are still a number of areas where the CMP could be strengthened, particularly regarding bicycle and pedestrian facilities. We submit these comments in the hope that the CMP will reflect a vision for a truly safe, accessible, and multimodal facility.

Safety Must Be the Top Priority

Safety should be the top priority for this and all Caltrans plans, and prioritizing safety for vulnerable road users like pedestrians and bicyclists generally improves safety for everyone. To strengthen the CMP's commitment to safety, we request the following changes:

- The CMP's safety objective should be to eliminate fatalities and serious injuries, in line with Caltrans' adopted Vision Zero policy,¹ not merely to "reduce [the] accident rate" relative to other facilities or vehicles miles traveled. The CMP itself asserts that "Deaths and serious injuries are unacceptable," but the safety objectives and performance measures do not reflect this philosophy.
- The CMP's performance measures for improved multimodal facilities should specify target levels of traffic stress (LTS), preferably LTS 1 or 2.
- The CMP should commit more clearly and unequivocally to investing in safe facilities. Qualifying phrases like "where feasible" should be removed in reference to adding pedestrian and bicycle facilities. The Concept Summary should clearly state that safety is the priority, rather than asserting a goal of "balancing" safety and operational goals.
- In the discussion of recent crash history, the CMP should acknowledge that relatively low levels of bike and pedestrian-involved collisions are likely in part a result of bicyclists

¹ See for example Director's Policy DP-36

and pedestrians avoiding the current SR 255 facilities whenever possible, due to real and perceived dangers.

- The CMP identifies “average” paved shoulder widths in the SR 255 corridor. However, it is the minimum width, not the average width, which determines the safety and LTS of a segment. In many cases, paved shoulders on 255 narrow substantially—or disappear entirely—for short distances, requiring bicyclists and pedestrians to mix with high-speed traffic. Even if shoulders are wide on other portions of the segment, these narrow or non-existent locations determine the safety risk and user experience. The minimum paved shoulder width on each segment should be documented in the CMP.

Urban Corridor Needs in Eureka Must Be Incorporated (Segment 1)

A small but important part of Segment 1 is in an urban setting in the city of Eureka. This should be acknowledged in the CMP’s description of Land Use and Community Characteristics (currently Segment 1’s land use is described only as “natural resource”). In recognition of this fact, the Corridor Concept and Complete Streets discussion of Segment 1 must differentiate the urban portion from the rest of the segment.

Currently, the Concept Summary for Segment 1 is identified as “2/4 Lane Expressway.” Expressways are defined by at least partially controlled access, which is not a relevant concept for the portion of Segment 1 between 3rd and 5th Streets. The Complete Streets discussion of Segment 1 also fails to identify or address the urban portion of the segment.

The Corridor Concept for the urban portion of Segment 1 in the city of Eureka should focus on traffic calming for increased safety in this busy multimodal corridor, as well as improved bicycle facilities and bicycle and pedestrian crossings of SR 255 at 3rd, 4th and 5th Streets. The need for improvements can be seen in the pedestrian collisions documented in the CMP itself, as well as on Street Story, where there are a number of reports.²

Bike and Pedestrian Facilities Must Be Planned for the Samoa Bridges (Segment 1)

The Samoa Bridges are the key connection between the city of Eureka—the region’s biggest residential, service and employment center—and the Samoa Peninsula. Safe bike and pedestrian facilities are desperately needed, and must be unequivocally included in the Corridor Concept for Segment 1. The current statement that “bridge deck widening can be pursued when feasible” is not a sufficient commitment. While the draft CMP references a 2013 study of options for adding bike and pedestrian facilities to the bridges, Caltrans staff previously indicated to CRTP that up-to-date investigations of current materials and techniques would be performed for this CMP. There is no discussion of recent investigations in the CMP, and it is not clear if such investigations occurred.

Furthermore, while transit service is crucially important, it is not a replacement for bike or pedestrian facilities on this segment. As noted in the CMP, microtransit service to the Samoa Peninsula has and will continue to have limited service hours, and “microtransit vehicles do not have bike racks,” limiting their utility for multimodal trips.

² See https://streetstory.berkeley.edu/reports.php?juris_type=county&juris_name=HUMBOLDT

Finally, we object to the CMP's concept of "prioritizing" truck movement on Segment 1. The CMP itself acknowledges that the port expects to "operate unimpeded at full build-out" without any truck-related improvements to SR 255. In contrast, the complete lack of bike and pedestrian facilities on the bridges is a major problem. The prospect of increased truck speeds on the bridge in the name of operational improvement is particularly concerning, as high-speed trucks increase safety hazards for bicyclists and pedestrians, both through increased kinetic energy and through the generation of strong wakes that can blow bicyclists off course. Safety, not freight improvements, should be the top priority for the Samoa Bridges, with a particular focus on bicyclist and pedestrian safety.

Significant Traffic Calming and Accessibility Upgrades Are Needed in Manila (Segment 2)

We support the Corridor Concept's inclusion of pedestrian hybrid beacons (PHBs) in Manila, including in conjunction with potential roundabouts. PHBs are critical at roundabouts to allow safe use by blind and low-vision pedestrians. The Corridor Concept for Segment 2 should also specify other concepts to ensure bike and pedestrian safety and low LTS at roundabouts. Significant additional traffic calming measures are also needed to lower speeds between future intersection improvements.

Caltrans Must Provide Clear Commitments & Acknowledge Responsibility for Safe Bike and Pedestrian Facilities Between Arcata and Samoa (Segments 2 & 3)

We agree that a Class I path is an appropriate design concept for bicyclists and pedestrians on Segments 2 and 3. However, the current draft CMP appears to defer all responsibility for developing such a Class I facility to the Great Redwood Trail Agency (GRTA). GRTA trail development is identified as the "preferred concept," and the CMP only vaguely refers to Caltrans "providing support" and says Caltrans will "participate" in development within its own right-of-way and "may participate" in funding.

This is not a sufficient commitment to safe bike and pedestrian facilities. SR 255 is a Caltrans facility, and Caltrans is responsible for ensuring its safety and accessibility for all users. The CMP must identify exactly how Caltrans will support trail development, including outside of its own right-of-way, and including an unambiguous commitment to financial support. The CMP must also include an alternative concept for providing safe bike and pedestrian facilities within the SR 255 right-of-way if for any reason the GRTA trail facility is not or cannot be developed during the planning period.

Additionally, a separate Class I facility heightens the need for frequent safe bike and pedestrian crossings of SR 255, in order to provide needed access to destinations. Therefore, the CMP must go beyond its current vague statement that "highway crossing improvements in Arcata and Manila may be necessary to provide connectivity to the trail," and clearly commit to implementing frequent safe crossings of SR 255 in these segments.

We submit the following additional design concepts for Segments 2 and 3:

- The "rail-with-trail" concept promoted by the Timber Heritage Association dramatically increases costs and impacts of trail development. We do not support this concept unless the THA or another private party commits to funding it.

- These segments are at risk from sea level rise, but no clear plan is provided in the CMP for adaptation, nor is there a detailed discussion of how the risk of sea level rise affects the concept of developing a Class I facility in GRTA right-of-way rather than in Caltrans right-of-way.
- We support the Corridor Concept of reducing four-lane portions of Segment 3 to two lanes for safety and traffic calming purposes.

Arcata Needs Bike and Pedestrian Improvements Too (Segment 4)

While Arcata's segment of SR 255 includes better bike and pedestrian design than the corridor's other segments, additional improvements are still needed. The CMP itself shows recent pedestrian crashes in Arcata, and Street Story shows numerous hazard, near-miss, and crash reports.³ We appreciate the CMP's acknowledgement of ongoing planning efforts including the South Arcata Multimodal Safety Improvements Plan (SAMSIP), but this is not an excuse for failing to include needed improvements in Segment 4 in the CMP itself.

The SR 255/US 101 interchange is particularly dangerous and in need of a complete design overhaul, but the rest of Segment 4 also requires safer bike facilities, sidewalk accessibility improvements, and upgraded pedestrian crossings. All of this should be included in the Segment 4 Corridor Concept.

Finally, the CMP's Complete Streets discussion suggests that 5th Street is a feasible alternative route for bicyclists and pedestrians on Segment 4. This is incorrect. 5th Street has no bike facilities and features multiple uncontrolled crossings of arterial streets with no pedestrian or bike improvements.

Relinquishment Must Be Carefully Considered

The CMP suggests that Caltrans is interested in relinquishing all of SR 255 except the Samoa Bridges to local control. Given that most of SR 255 is in unincorporated Humboldt County, and the county has historically struggled to maintain and improve its facilities, extreme caution must be exercised when considering this option. Relinquishing the smaller sections of the corridor within the city limits of Eureka and Arcata may be more feasible.

CRTP's Stakeholder Participation Should Be Acknowledged

CRTP met with Caltrans staff and provided input during the development of CMP. While the meeting is listed in Appendix E (albeit with CRTP incorrectly identified as "Citizens for Responsible Transportation Priorities"), no summary of CRTP's input is provided, as it is for all other stakeholder meetings, nor is CRTP mentioned in any of the Summaries of Stakeholder Feedback. CRTP is listed as a stakeholder at the beginning of the CMP, and its feedback should be duly summarized and acknowledged in the document, just as was done for all other stakeholders.

³ See https://streetstory.berkeley.edu/reports.php?juris_type=county&juris_name=HUMBOLDT

Thank you for your consideration of our comments.

Sincerely,

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