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RE: Comments on Draft US 101 Corridor Management Plan

Mr. Robertson:

The Coalition for Responsible Transportation Priorities (CRTP) and Friends of the Eel River have reviewed the draft Caltrans District 1 US 101 Corridor Management Plan (CMP). We appreciate the opportunity to comment.

Congestion Management Goals, Objectives, and Performance Measures

The draft CMP notes that US-101 is categorized as a Principal Arterial, which it asserts "by definition, is intended to prioritize mobility over access" (p.6). Fundamentally, the CMP prioritizes not just mobility, but an extremely limited concept of mobility. Rather than conceiving of mobility broadly as the ability of people and freight to reach necessary definitions, the CMP focuses on vehicular travel times. Specifically, the CMP "seeks to preserve the existing level of mobility by maintaining existing travel times" (p.7).

Travel times, however, are never mentioned in the Federal Highway Administration definition of Principal Arterial, which is quoted in full on p.18 of the CMP. Nor does the definition "prioritize mobility over access," noting instead that: "Unlike their access-controlled counterparts, abutting land uses can be served directly. Forms of access for Other Principal Arterial roadways include driveways to specific parcels and at-grade intersections with other roadways."

This means that the CMP does not have to prioritize mobility over access, and certainly does not have to prioritize travel time or vehicular delay over the ability of all road users to safely reach their destinations.

Perhaps anticipating this critique, the draft CMP asserts: "Level of Service [LOS, a measure of vehicular delay] was not discarded because it is a readily understood indication of route performance" (p.75).

This is a weak defense of congestion management as a corridor management goal, objective, or performance measure. For one thing, the comprehensibility of a measure is not an indicator of its usefulness. For another, LOS is in fact widely misunderstood. By assigning letters that correspond to other widely used grading systems, the purportedly neutral LOS system gives the distinct impression that LOS A is better than LOS B, which is better than LOS C, and so forth. In fact, even jurisdictions using LOS as a performance measure usually have a target of LOS C or D, recognizing that LOS A and B generally indicate an overbuilt road, with more capacity than needed.

The draft CMP acknowledges that LOS "has ceased to become the standard for managing highway performance" (p.82). But inexplicably, it goes on to assert: "Although LOS is not a performance standard, it is able to describe how well a facility functions or is able to meet (travel) demand" (p.82). Of course, a metric of "how well a facility functions" is a precise definition of a performance measure.

This semantic wordplay is found throughout the document, with words like "mobility" and "system reliability" standing in for LOS, and allowing vehicular delay to remain the central concern of the CMP while claiming it is not. Of note, the vehicular delay metrics of travel time delay and vehicle/capacity ratio are two of the four metrics proposed for "system reliability" (Table 25), while the delay metrics of LOS, vehicle speed, and vehicle hours traveled are three of the five metrics of "highway performance" proposed in the draft CMP (Tables 17-29).

Using LOS or other vehicular delay metrics as explicit or de facto performance measures repeats the mistakes of years past. As the state discovered over decades of using vehicular delay as a transportation impact metric under CEQA, this approach is counterproductive. Because of the phenomenon of induced demand, attempts to reduce vehicular delay inevitably result in more driving and more hours stuck in traffic.[1] The state itself has extensively documented many of the reasons not to use vehicular delay as a performance metric.[2] This is precisely why LOS and other measures of congestion have "ceased to become the standard for managing highway performance."

Even though the draft CMP does not propose vehicular capacity increases, the problems with using vehicular delay as a standard show themselves throughout the document. Notably, with an overall goal of "preserving the level of existing mobility and travel times," the CMP prioritizes maintaining many miles of overbuilt highway.

The fact that most US 101 segments in District 1 receive an LOS score of A or B (Tables 27-29) is a clear indication that they are overbuilt, as anyone who has traveled on these wide highways through rural areas with almost no traffic can attest. A focus on maintaining existing capacity precludes the potential for repurposing some of that asphalt for safety purposes and for other modes of transportation, which is sorely needed in many rural and urban parts of the corridor (see below).

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[1] Handy, Susan and Jamie Volker. January 2025. Induced Travel Primer. https://escholarship.org/content/qt0kj840w2/qt0kj840w2.pdf.

[2] Governor's Office of Land Use and Climate Innovation (LCI). 2020. Transportation Metrics: Disadvantages of LOS and Auto Delay. https://lci.ca.gov/ceqa/sb-743/.

LOS and all other measures of vehicular delay should be removed from the CMP's goals, objectives, and performance measures.

Safety for All Road Users

Caltrans has adopted a Vision Zero goal to eliminate fatalities and serious injuries by 2050. To support that goal, the CMP must make safety for all road users—including motorists, bicyclists, pedestrians, and transit users—its central concern. Prioritizing safety for all road users requires several important changes to the draft CMP:

- The overall corridor concept must not be to "preserve the existing level of mobility" with safety improvements "as needed" and complete streets improvements "where feasible" (p.97). Rather, the corridor concept must be to systematically address unsafe segments and gaps in safe bike, pedestrian, and transit infrastructure, while minimizing vehicular delay "where feasible."
- The 20-25 Year Operation and Maintenance Concepts for all segments, not just main street segments, must include complete streets (i.e., bike and pedestrian safety) projects (see Table 4). Even on freeway and expressway segments, complete street projects are necessary because:
    - there are multiple proposed crossings of the corridor by the Great Redwood Trail (see p.53 and Appendix F);
    - there are many locations where bike and pedestrian safety improvements are needed at interchanges, overcrossings, and undercrossings;
    - bikes are allowed throughout the entirety of the corridor, but existing "multiuse shoulders" are not safe for bicyclists in many locations, and some segments labeled as having "multiuse shoulders" (see Tables 17-19) have stretches with no shoulder at all;
    - segment HUM-4, which currently has a parallel Class I trail to accommodate bicyclists and pedestrians, will need to plan for new complete streets facilities as part of long-term sea level rise adaptation;
    - DIB-94 calls for bicycle and pedestrian facilities on Intercommunity Connectors, which most rural US 101 corridor segments are.
- The 20 Year Facility Concept and Post-25 Year Concept must allow for the potential to change existing lane configurations for safety purposes, as follows:
    - As noted above, many rural segments have excess capacity. The draft CMP notes that "environmental constraints, limited funding, topography, and existing structures limit the capacity to expand shoulders throughout the route" (p.52). Thus, providing safe facilities for bicyclists will sometimes require converting an existing general travel lane into a bicycle facility or expanded multi-use shoulder.
    - Urban segments including HUM-3 and DN-3 have existing roadway configurations that are inherently dangerous for bicyclists and pedestrians. Facility concepts for these

segments must specifically allow for the possibility of lane reductions or lane conversions to bicycle, pedestrian, and/or transit facilities.

- Goals, objectives, and performance measures (see Table 25) must be adjusted as follows:
    - The objective for the "Improve Travel Safety" goal must be to reduce and eliminate all injuries and deaths, not the *rate* of injuries and deaths.
        - Performance measures for this objective must measure the rate of injuries and deaths per capita, rather than per 100 million VMT. It has been commonly noted that measuring rates of traffic fatalities per VMT is like measuring rates of cancer per cigarette smoked. Reducing the population-level burden of deaths and injuries is the goal, regardless of how many miles people drive. In fact, VMT is the strongest predictor of population-level road safety outcomes, and reducing overall VMT concurrently increases road safety.[3]
        - The performance measure calling for a reduced number of crashes "compared to facility type average" must be amended. The existing average safety of other facilities is irrelevant; injuries and deaths must be reduced to zero on all facilities.
    - Performance measures for the "Fix It First" goal must include the condition of complete streets (i.e., bike and pedestrian safety) assets, which do not tend to be considered "anchor assets."
- The list of "key corridor issues" must include the poor safety record of the corridor generally, and particularly the most dangerous part of the corridor, segment HUM-3 in Eureka.
- The list of "significant intersections" with "anticipated improvement needs" (Tables 33-35) must include major urban intersections with poor safety records, particularly in the city of Eureka. Such intersections include but are not limited to: Broadway & McCullens Ave, Broadway and Highland Ave, Broadway and Henderson St, Broadway and Hawthorne St, Broadway and Wabash Ave, Broadway and Washington St, Broadway and 5th St, 5th St and E St, 4th St and R St/SR 255, and 5th St and Myrtle Ave/R St.
- Safety improvements currently under investigation via the Eureka 4th and 5th Street Feasibility Study must be incorporated into the CMP, not relegated to the section on low-priority, unvetted "concepts" (p.100). Furthermore, lane conversion/reduction must be considered in both the feasibility study and the CMP. The poor safety record of this segment is well established, as are evidence-based solutions.[4]

[3] Ferenchak, Nick, Abbas Sheykhfard, and Todd Litman. 2026. Is Reducing Exposure to Motor Vehicles a Road Safety Strategy? SSRN. https://ssrn.com/abstract=7037279.
[4] CRTP. 2025. Dangerous Downtown Streets. https://transportationpriorities.org/wp-content/uploads/2025/10/Dangerous-Downtown-Streets.pdf.

Environmental Issues

District 1's portion of US 101 carries a relatively high and consistent volume of traffic, through virtually all conditions, despite the remoteness of the region. The US 101 corridor in Northwestern California intersects with, and impacts, a number of watercourses that provide key habitat for coho salmon and coastal cutthroat trout.

All coho salmon within District 1's portion of the US 101 corridor are both state and federally listed. The Evolutionarily Significant Unit of Southern Oregon/ Northern California Coast Coho Salmon (SONCC) is listed as Threatened under the federal Endangered Species Act (see 62 FR 24588, 70 FR 37159, and 79 FR 20802), and coho salmon north of San Francisco Bay are listed are also listed as threatened under the California Endangered Species Act.

The coastal cutthroat trout in California are at the southern edge of their range. This species was listed as a California Species of Special Concern in 1995 and 2015,[5] and populations have been documented from the Smith River to the lower Eel River (likely Strongs Creek, in Fortuna). Research has demonstrated that, while coho are the salmonid species most susceptible to harm from the antiozonants, coastal cutthroat are susceptible to harm at levels within the same order of magnitude as coho salmon. Other species, including steelhead trout and Chinook salmon, appear to be far less sensitive to the effects of these compounds.

Over the last several years, research in Washington state and elsewhere has demonstrated that antiozonant compounds leaching from tire fragments can and have caused significant harm to coho and coastal cutthroat trout, including pre-spawning mortality of adults exposed to high levels of the compounds 6-ppD and 6-ppQ in Puget Sound urban areas. In general, researchers have found that both the relative extent of impermeable surface (i.e. pavement) in a subwatershed and traffic volumes are variables which can dramatically increase the levels of antiozonants present in receiving waters.

We have two primary areas of concern with respect to the draft CMP and potential harm to coho salmon and coastal cutthroat trout attendant on Caltrans' decisions and actions in and around the US 101 corridor.

First, areas of US 101 adjacent to fisheries habitat and specific pieces of infrastructure, particularly bridges, should be assessed and remediation should be provided as necessary to reduce the potential for tire particles and their breakdown products to enter habitat waters directly. Containing the tire particles to areas where soil activity can break down the antiozonants should generally be the objective. Areas like the stretches of US 101 around Humboldt Bay, and the long stretches adjacent to the South Fork and mainstem Eel River, stand out as areas where critical fisheries habitat may most directly be affected by tire particles from US 101. We also flag areas around the Smith River, Redwood Creek, Lower Klamath River, and Mad River as particularly important habitat for these species. We

[5]California Department of Fish and Wildlife. 2024. Coastal Cutthroat Trout in California: Population Monitoring, Status, and Management. https://www.coastalcutthroattrout.org/wp-content/uploads/2024/04/05-Ricker.CCT_.California.2024.pdf.

strongly encourage Caltrans to consult with the California Department of Fish and Wildlife (CDFW) and the National Marine Fisheries Service (NMFS) in assessing these issues.

Second, we are concerned that Caltrans' requirement to use an asphalt mix that includes recycled tires in a significant part of its projects may lead to the installation of roadways which are themselves leaching the dangerous antiozonants. Unlike tire particles originating from traffic which could change in magnitude depending on the level of traffic, the tires embedded in the highway may continuously leach the dangerous antiozonants. Given the potential for harm, we strongly encourage District 1 to adopt a policy of forbearing from the use of recycled tires in any project that could have any impact on coho salmon or cutthroat trout habitat. If Caltrans, the California Department of Toxic Substances Control, CDFW, NMFS, and other relevant agencies conclude after appropriate analysis that recycled tire mix does not leach antiozonants and/or poses no problems, District 1 could reverse the policy.

The following additional changes should be made to the draft CMP to address significant environmental concerns in the corridor:

- The CMP should include a wildlife and fish connectivity goal (see Table 25).
- The CMP should acknowledge that many other segments in addition to DN-2 and DN-5 are located partly or primarily in or adjacent to protected lands necessitating special design considerations (see Table 10).

Other Comments

We submit the following additional comments on the draft CMP:

- The list of plans and projects that could affect land use and/or travel on US 101 (p.44) should include: Eureka Bike Plan; EaRTH Center; Eureka downtown housing projects under construction by Linc Housing and the Wiyot Tribe; South Arcata Multimodal Safety Improvement Project (SAMSIP); Reconnect Arcata project; Eureka 4th and 5th Street Feasibility Study; Housing Element updates in Humboldt County, Arcata, and Eureka; Arcata's Gateway Area Plan; Del Norte Active Transportation Plan; Humboldt County Regional Climate Action Plan; Tolowa Dee-ni' Nation Complete Streets project; District 1 Transit Plan; Arcata Sunset Avenue project.
- Table 36 mischaracterizes the Richardson Grove Operational Improvement Project which is, as the name suggests, an operational project, not a safety project.
- The Broadway "Middle Couplet" project is listed as having no identified funding source (Table 37). However, District 1 staff have reported that safety funding has been identified for many components of the project.

- Many of the projects in Table 39, for example those on Broadway in Eureka, are well beyond the "conceptual" or "potential" phase. In fact, many also appear in other CMP tables as either constrained or unconstrained projects.
- The Hiller Road Overcrossing project should be removed from the CMP (p.101). As a project that "increases average travel speed, increases travel time reliability, [and/or] provides access to previously inaccessible areas,"[6] it would induce significant new VMT, in opposition to the state's safety and climate goals.

Thank you for your consideration of our comments.

Sincerely,

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[6] Handy and Volker 2025