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Dan Leavitt  
Manager of Regional Initiatives  
San Joaquin Regional Rail Commission  
949 East Channel St.  
Stockton, CA 95202

*via email:* [dleavitt@sjrrc.com](mailto:dleavitt@sjrrc.com)

**RE: Comments on Draft Gold Runner Thruway Bus Study Report**

Mr. Leavitt:

The Coalition for Responsible Transportation Priorities (CRTP) has reviewed the draft Gold Runner Thruway Bus Study Report (“report”). We appreciate the opportunity to comment.

CRTP is an education and advocacy organization working in Humboldt County and the broader North Coast region to improve transportation safety, equity, and sustainability. Our region is served by Gold Runner Thruway Bus Route 7, which connects Arcata and Eureka in Humboldt County to the major population centers in the San Francisco Bay Area.

Since Greyhound withdrew from the North Coast several years ago, Route 7 has provided the only long-distance intercity bus service in the region. Local residents use Route 7 to access work, school, and family, as well as medical care and other services not available in our rural region. Route 7 is a literal lifeline for us.

**Potential Route 7 Service Reductions**

Your agency has already reduced service on Route 7 in recent years, as outlined in the draft report (p.35). Further reductions to this limited, twice-daily service to Humboldt and Mendocino Counties would severely impact intercity transportation options for North Coast residents. In addition to the impacts on local residents, we are also concerned that significant service cuts could lead to a “death spiral” for Route 7, in which reduced service leads to reduced ridership, leading to further service reductions, until the route is no longer operationally viable.

Specifically, we object to the following proposals for service reduction:

- Truncating an additional round-trip at Santa Rosa (p.76). Humboldt Transit Authority (HTA) service reaches only as far south as Ukiah. Truncating service at Santa Rosa necessitates travelers making additional transfers, and schedule coordination is not always possible, leaving this round-trip potentially out of reach for Humboldt County travelers.
- Reducing mid-week service (p.75). “Better aligning service with demand” sounds like a good idea. But the fact is that mid-week and off-peak seasonal services, though they have lower ridership, are critical for North Coast residents. In particular, many seniors and others use mid-week buses to access medical care in the San Francisco Bay Area which is not available in our rural region. See below for more discussion of “aligning service with demand.”

Additionally, HTA has clearly stated its lack of interest in taking over service north of Ukiah, as proposed in the draft report (p.78). HTA is facing its own significant budget challenges, as well as perennial logistical challenges inherent to serving a very large rural region. The report should not highlight the option of handing over the northern part of the route to HTA as long as HTA is not prepared to take on this new responsibility.

### **Potential Route 7 Service Improvements**

We support many of the potential improvements suggested in the draft study, including:

- Extending service from Martinez to Richmond (p.79). This would allow much more convenient connections to local San Francisco Bay Area transit services, which we believe could significantly increase bus-only ridership on the route.
- Investigating ways to improve safety and comfort of passengers at Route 7 bus stops (p.79).
- Coordinated promotion of Route 7 service with universities and other local agencies (p.79).
- Adding a “college express bus” to provide more service during periods with high student ridership (p.76).
- Better coordinating stop locations and schedules with local transit services (see e.g. pp.77-78).

We also encourage your agency to explore the following additional possibilities:

- Improve infrastructure at bus stops, beyond just upgraded signage (p.63). Most Route 7 stops are marked only by a small, inconspicuous sign. That means not only that passengers have no amenities as they wait for the bus, but also that other community members are often not even aware of the stop or the service associated with it. Shelters, benches, schedules, real-time signage, and more would not only improve the passenger experience, but also offer an invaluable marketing opportunity.
- Investigate the number of passengers who are buying separate bus and train tickets to ensure that connected train trips are fully accounted for in “cost effectiveness” calculations. The draft

report includes a recommendation for this kind of investigation for Route 15 (pp.84-85). Route 7 would also benefit from this kind of data collection, which could potentially be accomplished using passenger surveys.

### **The Basis for Potential Route and/or Schedule Changes**

Route 7 has the third highest ridership of any route in the Gold Runner Thruway system (p.35). The relatively lower “cost effectiveness” of the route is almost entirely due to escalating operating costs related to the length of the route (p.37). There is no way to shorten Route 7 while still serving the cities of Arcata and Eureka, which collectively provide 28% of the route’s annual riders (see Table 14).

To improve the “cost effectiveness” metric, one strategy repeatedly proposed for Route 7 in the draft report is to adjust service to meet existing “market demand,” particularly “temporal demand” (p.61). The problem with this approach is partly that many of the people who rely on the service the most may use it during times or relatively lower ridership. Another problem is that demand for transportation services is not fixed. Rather, ridership responds to the convenience and quality of the service. In some cases, reducing service at certain times and in certain places based on existing ridership risks becoming a self-fulfilling prophecy of future ridership.

Furthermore, reductions in service meant to improve “cost effectiveness,” even if successful, undermine your agency’s important goals of providing “a preferred and convenient option” that “drives mode shift away from the highway network” (p.57), and providing “safe, reliable, and competitive connectivity...particularly for transit-dependent markets” (p.59).

It is impossible to avoid the conclusion that “cost effectiveness,” as narrowly defined in statute, cannot be the only basis for making decisions about routes and schedules. In particular, environmental and equity impacts must receive significant weight in these decisions in order to ensure progress toward achieving your agency’s—and the state’s—goals.

The draft report quantifies one metric in addition to cost effectiveness. The vehicle miles traveled (VMT) to passenger miles traveled (PMT) ratio (p.26 et seq.) is intended as a proxy for greenhouse gas reduction. To further refine environmental and equity impacts, your agency should investigate the trip purposes of Route 7 riders, as well as potential alternative modes of transportation. For example, a bus trip that would otherwise have been taken by airplane represents a significant emissions reduction, while a medical trip that would otherwise not have happened at all represents a significant positive economic and equity impact.

Passenger surveys would be extremely helpful in this regard. Using multiple other methods to actively engage both existing and potential passengers in decisions about routes and services is also essential.

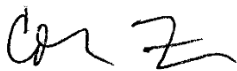
## The Need for State Law Reform

It is possible that fully empowering your agency to appropriately weigh factors other than cost effectiveness in service decisions may require statutory reforms. Reforms could also help empower residents on the North Coast and along other Gold Runner Thruway bus routes to fully participate in the decision-making that affects their transportation options. Therefore, we urge you to advocate for reforms to:

- Reduce or remove the stringent “cost effectiveness” standard found at California Government Code §14035.2(a)(3).
- Introduce new equity and environmental service standards.
- Provide representation for North Coast residents and others served by Gold Runner Thruway buses on the San Joaquin Joint Powers Authority Board of Directors.

Thank you for your consideration of our comments.

Sincerely,



Colin Fiske  
Executive Director & President  
Coalition for Responsible Transportation Priorities  
[colin@transportationpriorities.org](mailto:colin@transportationpriorities.org)