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RE: Draft Humboldt County Vision Zero Action Plan

Mr. Luther:

The Coalition for Responsible Transportation Priorities (CRTP) has reviewed the draft Humboldt County Vision Zero Action Plan ("plan"). We deeply appreciate and support the region's commitment to Vision Zero, and the effort that has gone into developing the draft plan. There are many important and effective measures included in the plan that we are confident will save lives and prevent serious injuries if implemented. However, there are also significant opportunities for improvement.

Need for a Specific Vision Zero Target Date and Timeline

The plan is notably missing a target year for achieving the central goal of zero deaths and serious injuries.

Prominent US communities that have achieved their Vision Zero goals, such as Hoboken, New Jersey, and Somerville, Massachussets, have taken a decade or less to achieve success. Humboldt County is geographically much larger than these communities, so it is reasonable to extend that time frame for our plan. However, we believe Humboldt's target year should be no later than 2040. Every year that we take to achieve Vision Zero means more people dead and more people with life-changing injuries.

We also believe that the plan should establish annual interim targets. Annual targets will allow assessment of progress in the planned annual progress reports. Longer time periods between interim targets will make timely course correction much more difficult in the event that sufficient progress is not being made.

Regarding the actions and performance measures already included in the plan, we ask for two clarifications:

- Specific time frames should be associated with actions labeled “short-term,” “medium-term,” and “long-term.” Without specific implementation dates, it will be nearly impossible to measure implementation progress.
- The plan includes numerous performance measures related to reductions in specific kinds of collisions. It should be clarified that these measures apply only to fatal and serious injury crashes, which are the relevant metrics for Vision Zero.

Need for Greater Ambition

As the examples cited above make clear, it is possible for communities to achieve Vision Zero where there are strong policies, dedicated leaders, and public support. The genuine possibility of eliminating serious injuries and deaths is the inspiration and basis for the Humboldt County Vision Zero Action Plan. But the actions included in the plan, while they will help, are not sufficient to achieve the goal.

This is perhaps most clear in Tables 6.4 and 6.5, which identify expected crash reduction factors CRFs) for the recommended countermeasures in high-priority locations. For the countermeasures selected, the CRFs simply don’t add up to zero deaths and serious injuries in these locations. This is especially true for locations on the US 101 corridor in Eureka, where the countermeasures are particularly under-ambitious for the scale of the crisis.

In fact, many of the most effective and transformative interventions mentioned in the Goals, Strategies, and Actions section of the plan—such as road diets—are not recommended at all in the priority countermeasures for specific locations on the High-Injury Network (HIN). The region can’t afford to leave the most effective tools on the table.

Greater ambition is needed. Achieving Vision Zero will require local agencies to make safety truly the top priority. Agencies can’t only make roads safer when conditions are ideal—when safety improvements don’t inconvenience anybody, or when there is some money left over from other projects. Instead, they must make safety the reason for everything they do, and take every opportunity to maximize safety benefits. If the Vision Zero plan itself does not take this approach, there is not much hope for success.

High-Injury Network Methodology

The High-Injury Network (HIN) and priority segments and intersections included in the plan raise a number of questions. We request the following clarifications:

- What are the exact boundaries of each identified segment? The descriptions of segment endpoints in Table 6.2 include names of roads that don’t seem to exist, and at least two of the segments appear to overlap. A high-resolution map would be extremely useful.

- The lengths of priority segments vary dramatically, from less than a mile to more than 7 miles. Some include locations with concentrations of serious crashes as well as stretches of road with no recent crashes at all, and endpoints are often not at intersections or other logical locations. What was the process used to determine the lengths and endpoints of these segments?
- At p.112, the plan specifies that "some locations were removed and replaced" based on stakeholder feedback. What locations were removed from the HIN despite the analysis suggesting they belonged there, and for what reasons?

One thing is clear to us: equivalent property damage only (EPDO) scores are not the right metric for identifying the HIN. Property damage only (PDO) crashes, by definition, do not cause death or serious injury, and are therefore irrelevant to Vision Zero.

The plan attempts to justify including PDO crashes in the analysis by pointing out that, due to Humboldt County's small population, fatal crashes alone do not provide sufficient data over the 7-year analysis window. This is not a justification for including irrelevant data, however. Including both fatal and injury crashes results in a fairly robust data set, and the data set could be expanded further by increasing the number of years analyzed from 7 to 10.

This is important because, as the plan itself notes, total crashes can follow a very different pattern from fatal and severe injuries, as indeed they did during the time period analyzed: "As PDO collisions have decreased, the number of fatal and injury collisions remained steady" (p.35). Furthermore, certain safety interventions can actually increase PDO collisions while improving safety, as the plan notes for roundabouts: "Roundabouts can increase minor crashes while reducing serious ones" (p.151). PDO crashes are therefore inappropriate to include, and with 67% of recorded crashes being PDO (p.32), the decision to include them surely skews the results.

While it may be too late to reanalyze the data used to develop the HIN before plan adoption, the methodology nevertheless must be changed for the future. The HIN network is scheduled to be updated every five years (p.121), and it is crucial for future analyses to produce more accurate and relevant results.

Eureka's US 101 Corridor Must Be Fully Included in the High Injury Network

A cursory analysis suggests that Eureka's US 101 corridor, which is locally recognized as the center of the region's safety crisis, has a rate of fatal and serious injury crashes an order of magnitude higher than most of the identified high-priority HIN segments. Yet much of the corridor is excluded from the HIN. Using our best guesses as to the endpoints of the priority HIN segments based on the descriptions provided, we reviewed fatal and serious injury crashes from 2015-2024 in UC Berkeley's Transportation Injury Mapping System (TIMS) and compared them to Broadway, 4th, and 5th Streets, with the following results:

Segment	Apx. Length (mi)	FSI Crashes (2015-2024)	Fatal Crashes Only (2015-2024)	FSI Rate per Mile	Fatal Crashes Rate per Mile
US 101: 4th and 5th Street in Eureka	2	55	6	27.5	3.0
US 101: Broadway in Eureka	3	57	13	19.0	4.3
SR 299: 1.1 mi east of Cedar Creek Rd to 200 ft east of Willow Creek	7	19	6	2.7	0.9
SR 96: 0.6 mi south of Bull Creek to Mill Creek Rd	5.2	3	0	0.6	0.0
US 101: Redwood Trails Circle to Old State Hwy	2	6	1	3.0	0.5
Broadway: W Hawthorne St to Vigo St	0.4	10	3	25.0	7.5
US 101: LP Mill Rd to Kane Rd	3	6	1	2.0	0.3
US 101: Hidden Creek Rd to SR 299	1	8	3	8.0	3.0
299: New 3 Creeks Rd to M and W Ranch Rd	7.4	17	6	2.3	0.8
SR 255 Bridge: 100 ft east of Vance Ave to Startare Dr	1.2	3	1	2.5	0.8
US 101: 1.6 mi south of Humboldt/Del Norte County border to 600 ft south of Humboldt/Del Norte County border	1.5	5	0	3.3	0.0
US 101: 0.6 mi north of Lake Benbow Drive to US 101 Redwood Drive Off Ramp	1.6	6	0	3.8	0

The plan itself identifies that "Downtown and Western Eureka"—essentially the US 101 corridor—has the "strongest overlap between high-injury locations and census blocks with low equity scores" (p.46). Yet only scattered locations on the corridor are highly prioritized, and much isn't included in the HIN at all. It makes no sense for this corridor to be excluded from the HIN, nor for intermittent segments and intersections to be included and others excluded. The entire US 101 corridor in Eureka must be included and prioritized in the HIN, and sufficient countermeasures identified to achieve Vision Zero in this dangerous corridor.

Identification of Countermeasures

The plan uses violation categories from official collision reports to identify countermeasures for specific high-priority locations. However, violation categories are of limited use for this purpose. These categories:

- are generally based on police guesswork trying to reconstruct the crash after the fact;

- are not effective at identifying all proximate and ultimate causes;
- do not allow the identification of infrastructure as a cause or contributing factor.

Therefore, we discourage the overreliance on violation categories, and encourage the identification of countermeasures based on known risk factors such as speed, surrounding land use, and bike and pedestrian infrastructure quality, as well as environmental conditions at the time of the crash.

To the extent violation categories—or any other variables included in police reports—are used to identify countermeasures, only data for fatal and serious injury crashes should be considered.

Resources and Staffing

The very first implementation action included in the plan is to apply for grant funding to support the plan's implementation. However, there is another option. Local jurisdictions have recently joined together to support implementation of Humboldt County's Regional Climate Action Plan by pledging contributions toward funding a regional implementation staff position for the period of the plan. This creates a sustainable support structure for pursuing the work without any single agency having to contribute a large amount of money. HCAOG should consider this model for sustainable funding of Vision Zero implementation staff. If the model is pursued, Caltrans—as the agency with the bulk of the region's HIN—should be a participant and contributor.

Additionally, given the significant overlap between this plan and certain aspects of the Regional Climate Action Plan, it may be advisable to include the Redwood Coast Energy Authority (RCEA) in the implementation working group (see Action 1.3a).

Implementation & Public Process

We strongly support the plan's call for a quantitative ranking score to ensure that discretionary funding has the biggest possible safety impact (p.128). As the draft plan appropriately expresses: "…every road project, maintenance decision, land use approval, and budget prioritization [must be] understood as a safety decision and prioritized accordingly" (p.21). However, as noted above, PDO crashes should be excluded from this score. Additionally:

- The ranking score must consider not just data about the project's location, but also about the projected safety gains from the project. Not every project in a dangerous location will actually improve safety.
- HCAOG must ensure not only that funded projects are "aligned" with Vision Zero (see Action 1.3d). HCAOG must ensure that funding goes to the most impactful projects.

- Performance Measure PM-1L should not measure the percentage of funded projects "aligned" with Vision Zero, but the actual reductions in fatal and serious injury crashes achieved by projects.
- The example checklist provided in Appendix J is not sufficient to ensure that discretionary funding has the biggest safety impact. The projected impact must be quantified. Additionally, there must be an objective process for determining whether agency decisions to "not include" or "not consider" certain safety upgrades are defensible.
- Prioritizing projects for funding (Action 1.3i) must be an immediate action, not delayed to the "medium-term." This does not require significant resources, only political will.

Safe Roads

Strategies, actions, and performance measures under the "Safe Roads" goal are in many ways the heart of the plan. We call for the following edits to refine and strengthen these crucial aspects of the plan:

- Road diets and similar road space reallocations are critical safety countermeasures for some of the region's most dangerous roads (see Action 2.1d). Those roads are few enough in number that there is little need for more study to identify them. Specifically, the list of multi-lane roads with safety concerns includes: Eureka's Broadway, 4th and 5th Streets, McKinleyville's Central and Murray Avenues, Arcata's G and H Streets, and Fortuna's Fortuna Boulevard. In fact, road diets and other lane reductions have been proposed for several of these streets, yet no jurisdiction has yet been willing to implement one. The plan must not punt on this issue. Rather, it must specify the streets in need of lane reductions for safety, including Broadway, 4th and 5th Streets, and Central Avenue.
- Trail crossing improvements are sorely needed to ensure that practical trail use is actually safe and comfortable (see Action 2.3c). In addition to the improvements identified in the draft plan, raised crossings should be considered. Additionally, given the limited scope of these interventions and the relative ease of planning, this action should be moved to the "short-term" timeframe.
- Action 2.4b should specify that *automatic* pedestrian recall should be implemented. Automatic pedestrian signals are key to a pedestrian friendly intersection. Without them, unpredictable signals and long wait times invite dangerous crossings.
- A prohibition on right turns on red (Action 2.4c) should be implemented countywide. This is a recognized best practice, and piecemeal adoption will lower compliance. Furthermore, there are few enough traffic signals in the county that this action can and should be moved to the "short-term" timeframe.

- Complete Streets Policy adoption, Action 2.1a, should be an "Immediate" action item. Eureka, Arcata, and Caltrans all have established policies. There is no need for other local agencies to take years to develop and adopt their own.
- Performance Measures PM-2A and PM-2B should apply countywide, not only in locations where projects are done. This should be a source of information not only about whether projects are effective, but whether they are happening in the right locations.
- Performance Measure PM-2F and PM-2P should also apply countywide, not just on the HIN. This is a more important metric and provides useful information about whether the right locations are included in the HIN.

Education Campaign

The proposed education campaign includes a number of important elements, including evidence-based messaging strategies, peer-to-peer message delivery, avoiding contributing to victim-blaming narratives, and training police department public information officers.

As the plan notes, however, public education campaigns by themselves are typically not very effective at changing behavior, and campaigns "timed to coincide with engineering changes or enforcement waves, offer the most credible path to measurable benefit" (p.74). Since the education campaign will kick off prior to most of the engineering interventions, it is especially crucial for the campaign to be used to build public support for those future interventions. Engineering changes will in the end have a larger safety benefit, but they will not be implemented without community support.

Further, the training of public information officers should be moved to the "short-term" time frame to ensure consistent messages across all government agencies before the public education campaign begins.

Safe Speeds

The speed limit setting flexibilities for local roads introduced by AB 43 and AB 1938 have been extended to state highways by AB 1014. The plan text and Action 1.2g should be updated accordingly. Additionally, evaluating speed limit reductions (Action 4.1c) is a relatively simple process requiring few resources, and should be moved to the "short-term" time frame.

Safe Vehicles

Intelligent Speed Assistance (ISA) is a relatively mature technology. Rather than merely "promoting" it (Action 5.2c), ISA should be required on all new public fleet vehicles, and existing vehicles should be

evaluated for retrofit opportunities. Furthermore, as a vehicle-based technology, there is no need or sense in limiting it to certain locations or corridors; rather, it can and should be used wherever a fleet vehicle travels. Adoption of an ISA policy is simple and straightforward, and should be moved to the "short-term" time frame.

To further support the Safe Vehicles goal, an action should be added to the plan to evaluate adoption of ignition interlock devices on fleet vehicles. Such devices should be required on any fleet vehicles that employees are allowed to take home with them.

Finally, Strategy 5.3 should include an action calling for review of proposed development projects which will generate new truck traffic. Such traffic may not be entirely on designated truck routes, especially in the immediate vicinity of the project.

Safe Post Crash Care

The Safe Post Crash Care goal should include an action calling for adoption of the Emergency Streets protocol or a similar policy. Immediate, public intervention after a deadly crash is key both to identify needed safety interventions and to end the normalization of traffic violence.

We also call for the following refinements of Safe Post Crash Care measures in the plan:

- To ensure public accountability, the crash data dashboard called for by Action 6.1a should be viewable by the public.
- PM-6I measures the speed of emergency response. However, it is well known that prioritizing emergency response speeds can work at cross purposes to effective engineering interventions. The plan should acknowledge the potential conflict and prioritize effective prevention measures to keep crashes from happening in the first place.

Safe Land Use

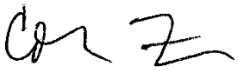
We appreciate the inclusion of Safe Land Use as an aspect of the plan, given the close relationship between land use and traffic safety. We call for the following refinements of Safe Land Use measures in the plan:

- The incorporation of safety considerations in development review (Action 7.1c) is something that can happen immediately; there is no need to delay it to the "medium term."
- Performance Measure PM-7B should measure the countywide reduction in VMT per capita, not just on the HIN. VMT is closely correlated to crash risk. VMT distributed over a large road network can result in a significant accumulation of crashes without a single location of

concentration. The plan is concerned with eliminating fatal and serious injury crashes countywide, not just on the HIN.

Thank you for your consideration of our comments.

Sincerely,



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