

VROOM 2022-2042 – Comments on Full Public Draft
 Written comments received as of Friday, November 5, 2021

Formal public comment period: Oct. 22 to Nov. 21, 2021

date rec'd	issue/element	Comment on VROOM 2022-2042 Full Draft (released 10/22/21)
11/2/21	active transportation, separated lanes	<p>From: Kris Date: Tue, Nov 2, 2021 at 5:09 PM Subject: Comments on 2021 RTP Update To: oona.smith@hcaog.net</p> <p>Thank you for the work in planning for the future transportation priorities for Humboldt County. My family and I live in Arcata, and appreciate the opportunity you have to help guide transportation priorities in the county.</p> <p>I liked the emphasis in the plan on the bike routes and the work on the CCT, but I urge you to consider what more could be done to make active transportation safe and available and part of the culture of Humboldt County. I believe that means more separated lanes for cyclists and pedestrian traffic wherever possible, and to vastly prioritize that work over any projects which will increase vehicle speeds, miles driven, or proximity to pedestrians.</p> <p>While the work on the CCT is important and I hope to use it to its full extent one day, what I believe is more important is ensuring safe, separated bike and pedestrian lanes connect people from their home to their work. Nobody should be injured or killed by a vehicle walking or riding a bike in our county, ever - and if that is the goal then more ambitious plans might be needed.</p> <p>Thank you!</p> <p>Kris</p>
11/2	Safe & Sustainable Transportation (SST) targets	<p>From: Robert Eckart Date: Tue, Nov 2, 2021 at 8:38 PM Subject: Comments on 2021 RTP Update To: <oona.smith@hcaog.net></p> <p>Dear HCAOG:</p> <p>Thank you for the efforts on current review and update of the Regional Transport Plan. Please pay attention to all the targets in the Safe and Sustainable Transport segment. We need those which are really attainable. Humboldt County can lead the way, and you are in the wheelhouse.</p> <p>Thank you for taking this letter under advisement.</p> <p>Robert Eckart [REDACTED] Arcata, CA</p>
11/3	rail-banking, multi-modal trails;	<p>From: Peter Albert Date: Wed, Nov 3, 2021 at 9:23 AM Subject: Comments on 2021 RTP Update To: oona.smith@hcaog.net</p>

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excursion
rails

I am happy to be able to review the draft updates to the Humboldt County RTP, and I especially appreciate the multi-modal promise of key corridors that were formerly active railroads. The concept of rail-banking while developing pedestrian and bicycle trails is laudably forward-thinking: it's natural that as the Humboldt County cities grow and infill development addresses housing needs, the pressures on Highway 101 will also grow.

I see the future ability to move people and goods along the rail right-of-way, particularly between the "core" between Scotia and Arcata, as key to ensuring sustainable livability and equitable mobility. This helps defer or put off indefinitely the widening and grade separation of the highway itself, which would otherwise have a devastating effect on the neighborhoods, farmlands, forests and air quality of the area.

I also imagine a new focus on the connections between Willits and this core as SMART extends its reach from Cloverdale, and as clean-fuel locomotive rail cars offer more sustainable and agile options to ride the rails on winding corridors.

It all might seem too far-out in the future to be of concern, but a similarly-sized city (Burlington, VT) has managed to protect its inactive railway corridors and now stands to gain rail passenger access once again after thirty+ years of inactivity. Trains are once again proposed to connect Burlington to New York and Montreal. The distances and connections (allowing access without the environmental degradation of highway expansion and increased auto traffic) are not unlike the potential that multi-modal trails/rails have for the Bay Area and Eureka.

I've always seen similarities between the cities of Burlington and Eureka: and the general success of the "Queen City" of Vermont in reinventing and diversifying its economy, harnessing the academic brainpower of its universities and colleges, and drawing on its natural beauty and relative isolation to attract a robust visitor economy, and preserving the integrity of its spectacular natural surroundings all seems to be valuable "lesson" examples for Humboldt County.

Sincerely,
Peter Albert

From: Peter Albert
Date: Wed, Nov 3, 2021 at 2:08 PM
Subject: Re: Comments on 2021 RTP Update
To: Oona Smith

Thanks, Oona!

I'm curious about how much the Timber Heritage Association has been connected to the RTP update. That group has certainly been trying to make use of the rails for passenger/recreational purposes, with excursion runs around Loleta and Samoa.

They're certainly not operating yet on the scale of the Skunk Train or Roaring Camp, but the THA has inspired enthusiasm for envisioning some more like these systems.

Even closer to home than Burlington VT is the Coast Futura, the excursion rail runs in and around Santa Cruz. I think all these examples are compelling not necessarily because they're about heavy-duty goods movement or regularly-scheduled workhorse passenger systems, but because they're fun...and they highlight the heritage and beauty of their setting.

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		<p>I feel too often that the “fun” aspects of transportation don’t get taken seriously in transportation planning, and yet with the value of tourism in Humboldt County, I’d think a focus on visitor transportation and recreational services (not unlike the little water taxi) would be worth considering in the planning efforts.</p> <p>Sincerely, Peter Albert</p>
11/3/21	carbon emissions, SST targets	<p>From: Janet Gilbert Date: Wed, Nov 3, 2021 at 8:11 PM Subject: Comments on 2021 RTP Update To: oona.smith@ hcaog.net</p> <p>Dear Humboldt County Association of Governments, Regarding your proposed Transportation Commission, RTP</p> <p>I greatly appreciate your RTP Update safety plans, walkability, electric charging plans, transit usage increased ridership. Your plan certainly is attempting improvement in safety and addresses Climate Change and our needs to cut out carbon emissions and change how we move about. Please try to analyze and test all your proposed ideas as to meeting your hoped for targets. Let’s hope we can accomplish “greening” our transportation systems and reducing our carbon footprint while also improving safety.</p> <p>Sincerely, Janet Gilbert</p>
11/4/21	SST	<p>From: Elaine Weinreb Date: Thu, Nov 4, 2021 at 10:14 AM Subject: Comments on 2021 RTP Update To: oona.smith@ hcaog.net</p> <p>Safe & Sustainable Targets is an excellent idea. I support the following:</p> <ul style="list-style-type: none"> • Reducing bike & pedestrian deaths to zero. • Reducing vehicle miles driven by 25% by 2030. • Doubling transit trips by 2025, and doubling them again by 2030. • Putting electric vehicle charging stations practically everywhere. • Ensuring new housing is walkable and transit-oriented. <p>Please evaluate proposed projects in the RTP to make sure they move towards these goals.</p> <p>Elaine Weinreb</p>
11/4/21		<p>Letter from Coalition for Responsible Transportation Priorities, Humboldt Baykeeper, Environmental Protection Information Center , Northcoast Environmental Center (see below)</p>



November 5, 2021

Beth Burks, Executive Director
Mike Johnson, Chair
Humboldt County Association of Governments
611 I St, Suite B
Eureka, CA 95501

via email: beth.burks@hcaog.net; mjohnson@ci.fortuna.ca.us
cc: oona.smith@hcaog.net; stephen.luther@hcaog.net

Dear Ms. Burks and Mr. Johnson:

Thank you for the opportunity to comment on the draft 2021 update of the Regional Transportation Plan (RTP). As you know, the Coalition for Responsible Transportation Priorities (CRTP) has participated as a stakeholder throughout the process of developing this RTP update. We appreciate the strong working relationship we have with Humboldt County Association of Governments (HCAOG) staff and Board members, and the fact that many of our concerns and priorities are addressed in the draft. Nevertheless, we believe the document can be strengthened even further. To that end, we submit the following comments.

We Strongly Support Many New Elements Introduced in the 2021 RTP Update

To begin, we want to emphasize the many features of the draft RTP update that we strongly support, including but not limited to the following:

- The inclusion of carbon neutrality, safety, equity, and societal benefit in the RTP's Overall Goal, and the focus on aligning funding with planning priorities in the Overall Objective.
- Strong, specific regional targets for mode shift, reduction of greenhouse gas (GHG) emissions and vehicle miles traveled (VMT), land use planning improvements, traffic safety, and related measures ("Safe and Sustainable Transportation Targets").
- An increased focus on transportation equity, including acknowledgement of the inequities resulting from both historical and current planning and investment practices and adoption of specific policies to promote equity (e.g., 2-20 et seq.).
- The continued focus on both mitigating the climate crisis and adapting to its local impacts ("Global Climate Crisis" Element).
- Acknowledgement of the interconnected nature of transportation and land use and adoption of specific policies for HCAOG to engage actively in land use planning processes to achieve its goals and targets ("Land Use and Transportation" Element).
- An increased focus on the many negative consequences of centering the transportation system on cars and trucks, and the many benefits of centering it on walking, biking, rolling and transit (e.g., p.2-1 et seq.).
- Acknowledgement of the role of the climate crisis and development patterns in exacerbating emergency transportation problems (p.5-1).

Projects and Performance Measures Must Be Aligned with New Targets

It is critically important that the projects and performance measures included in each element of the RTP update be aligned with the new Safe and Sustainable Transportation Targets (SSTs). Without such alignment, it is unlikely that the SSTs will be met. Meeting the SSTs is a critical component of any serious attempt to address the climate crisis and the road safety crisis.

The RTP's Overall Objective is to "Program all transportation funds based on multi-modal transportation goals and objectives, and needs and priorities as established in the Regional Transportation Plan" (p.1-2). However, current project lists and performance measures do not clearly align with the SSTs.

For example, Tables *Streets-4*, *Streets-5* and *Transit-2* include space for each proposed project to indicate its alignment with some of the SSTs, but few projects in Tables *Streets-4* and *Streets-5* are actually assessed. Furthermore, for those which have been assessed, their alignment with the SSTs is self-attested by the agency proposing them, which can call into question the objectivity of the assessment. Other project tables in the RTP update, including Tables *Goods-3* and *Aviation-4*, do not even include this self-assessment of alignment with the SSTs. *All* projects included in the RTP update should be assessed by HCAOG (not the project proponent) against the SSTs. Those which significantly help the region meet the SSTs should be prioritized, and those which make it more difficult to meet the SSTs should be removed from the RTP altogether.

Similarly, performance measures included in several elements of the RTP update (see for example Tables *Streets-6*, *Transit-3*, *Goods-4*, and *Aviation-5*) do not directly align with the SSTs, and in some cases run contrary to them. For example, Table *Streets-6* includes performance measures related to congestion reduction, which the RTP update elsewhere explains is an outdated practice which works contrary to the goals of mode shift and VMT reduction (pp.7-11 to 7-12). We understand that certain performance measures may be mandated by state or federal rules. However, to the greatest extent possible, we urge HCAOG to replace the performance measures in each element with the SSTs or at least align them more closely.

Other Comments

We submit the following additional comments for your consideration:

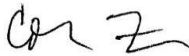
- We encourage HCAOG to adopt specific, quantitative equity-related targets for transportation investment. The Environmental Justice performance measures in Table *Streets-6* provide a good framework for these targets.
- The draft Transit Element mentions SB 742, which allows Amtrak to run busses which don't connect directly to a train line. This provides a significant opportunity for our region to increase interregional transit options. We encourage HCAOG to include a policy in the Transit Element which explicitly supports implementation of new bus routes under the authority of SB 742.
- The draft Transit Element mentions both the McKinleyville Transit Study and the Mobility-on-Demand Strategic Development Plan. However, it is not clear whether the projects recommended by these two studies are included in the project list found in Table *Transit-4*. We encourage HCAOG to ensure that these projects are included in the list to guarantee their eligibility for future funding.
- Air travel is generally the most GHG-intensive mode of transportation. The SSTs and much of the rest of the RTP focus on reducing GHG emissions from transportation. However, the Aviation Element focuses on encouraging air travel, which would certainly increase emissions. The Aviation Element

should clearly describe the climate impacts of air travel and discuss how the region will mitigate those impacts.

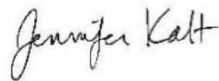
- We ask HCAOG to remove “reducing traffic congestion” from its transportation efficiency objective (p.2-11). Traffic congestion is not a major problem in Humboldt County, and a focus on reducing vehicle delays will only make it harder to meet the SSTs.
- We encourage HCAOG to add revenue from metered parking programs to the section on “Additional Potential Funding Sources” (p.12-8 et seq.).

Thank you for your consideration of our comments.

Sincerely,



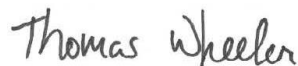
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11/5/21	SST	<p>From: Molly Cate Date: Fri, Nov 5, 2021 at 9:28 AM Subject: Transportation Targets To: beth.burks @ hcaog</p> <p>I commend HCAOG for championing Safe and Sustainable Transportation targets in our region. I write today to ask that these stated goals be funded and fulfilled.</p> <p>These critical new targets include:</p> <ul style="list-style-type: none"> • Reducing bike & pedestrian deaths to zero. • Reducing vehicle miles driven by 25% by 2030. • Doubling transit trips by 2025, and doubling them again by 2030. • Putting electric vehicle charging stations practically everywhere. • Ensuring new housing is walkable and transit-oriented. <p>Thanks for holding a vision for greater safety and reduced vehicle use!</p> <p>Molly Cate Fortuna</p>
11/5/21	SST, climate action plans	<p>From: Nancy Ihara Date: Fri, Nov 5, 2021 at 4:30 PM Subject: Comments on 2021 RTP Update To: Oona Smith @hcaog.net</p> <p>I am impressed with the Safe and Sustainable Transportation targets. At a recent meeting of a 350 Humboldt subcommittee on the CAP Colin commented that the RTP targets are more ambitious than the CAP's. Also mentioned at this meeting was the thought that RCEA should dedicate a staff person to work on the CAP with whomever is eventually selected to administer the CAP-if the jurisdictions adopt it. If this occurs perhaps there should be a dedicated staff person to assist with the CAP from HCAOG.</p> <p>Nancy</p>