

Sent by: Colin Fiske

Mon, Nov 3, 12:16 PM (1 day ago)

By email to: HCAOG TAC Members,

At your meeting this Thursday, you will make a recommendation about the administrative draft RTP developed by staff (based in part on past TAC recommendations). As you know, CRTP believes the current RTP presents a strong vision for regional transportation, and we support largely keeping the current document intact, with minor changes.

That said, we have several concerns about the administrative draft RTP before you on Thursday, as follows.

Delay of Walkable Housing Target

One proposed edit pushes back the date by which 80% of new housing should be walkable, bikeable, and transit accessible to 2030 (p.2-19). The staff report suggests this is because of a "small amount of housing continuing to be allocated to high-VMT jurisdictions" per the proposed RHNA methodology. This highlights serious concerns we have with the proposed RHNA methodology, as we have previously expressed.

Moreover, a target of 80% low-VMT new housing already allows 20% - more than a "small amount" - of high-VMT housing. And even with the proposed RHNA methodology, only about 3.7% of housing units are allocated to exclusively high-VMT jurisdictions (Trinidad, Blue Lake, Rio Dell, and Ferndale). If the county meets its RHNA allocation by building mostly in lower-VMT places like Myrtle town and McKinleyville, the proposed RTP change would not be necessary. It is only necessary if the county tries to meet its RHNA allocations by pursuing high-VMT sprawl, which is exactly our concern, and contrary to local and state goals.

We request that the RTP target for 80% of new housing to be walkable, bikeable, and transit accessible be effective immediately, and not be delayed to a future year.

Housing and VMT Reduction

Another proposed edit changes the target for "all new housing contributes to" VMT reduction to "RHNA housing allocations contribute to" VMT reduction (p.2-19). This change is unnecessary and confuses the issue. As illustrated above, it's where housing is built within jurisdictions - particularly the county - that will make the biggest difference in VMT reduction, and we have seen the RHNA process struggle to address this issue.

We request that the original language specifying that all new housing should contribute to VMT reduction be retained.

Delay of EV Charging Station Target

A proposed RTP edit delays the target for installation of private EV charging stations all the way to 2050 (p.2-17). This extension is far too long, considering that California law requires the state to be carbon neutral by 2045. Given that installation of chargers is often a prerequisite for adoption of EVs, the target must be moved up substantially to ensure consistency with state law.

We request that the RTP target for private EV charging stations be moved up to 2035 at the latest.

Climate Crisis

The new draft RTP replaces the phrase "climate crisis" with the term "climate change" throughout the document, at the TAC's recommendation. We acknowledge that this does not change the document's actual policies. However, the change is troubling, especially at a time when the federal government is working actively to undermine any sense of urgency to address the crisis and literally scrubbing the word "climate" from federal documents and websites.

In reality, scientists tell us that the urgency of reducing GHG emissions has only grown in the last four years, and it most certainly qualifies as a crisis. If the TAC is concerned that other urgent issues - such as transportation safety, which we believe is also at crisis levels - are not also so identified, then we recommend addressing that language separately.

We request that the RTP restore the previous language identifying climate change as a crisis.

Complete Streets Projects

The table of "Complete Streets" projects in the administrative draft RTP includes a number of projects that do not appear to include any complete streets features, such as repaving/road maintenance projects that don't specify any bike, pedestrian, or transit improvements. While road maintenance and repair is important, these projects cannot be identified as complete streets projects if they do not include infrastructure for all road users.

We request that projects in the RTP's "Complete Streets" table of project that do not include bike, pedestrian, and transit improvements in their descriptions either be removed from the table or specify that such improvements will be included.

Other Concerns

- The RTP continues an outdated practice of measuring safety goals in terms of the rate of collisions (per miles, per bicyclist, etc.) rather than the absolute number of fatal and sever injury collisions (p.7-26). The RTP has an official Vision Zero goal, and Vision Zero doesn't care about the rate - it cares about the absolute number. The RTP should change its measurement of safety progress to considering absolute numbers of fatal and serious crashes, not rates.
- Language on p.2-5 that pointed out that an aging population will mean more nondrivers and a greater demand for transit and active transportation is proposed for removal. This fact has not become any less true in the last four years, and makes an important policy point. The language should be retained.
- The controversial Richardson Grove highway expansion project is included in the Goods Management element. This project is unnecessary, environmentally damaging, has been mired in litigation for almost 20 years, and will probably never be built. It should be removed from the RTP.

Thank you for your consideration of our concerns.

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Executive Director

CRTP - Coalition for Responsible Transportation Priorities

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