

California Department of Transportation

DISTRICT 1
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January 9, 2026

Mr. Brendan Byrd
Executive Director
Humboldt County Association of Governments
611 "I" Street, Suite B
Eureka, CA 95501

Dear Mr. Byrd:

Thank you for the opportunity to review and comment on the Humboldt County Association of Governments (HCAOG) Draft 2026 Regional Transportation Plan (RTP). We appreciate the effort to develop a comprehensive plan addressing multimodal needs and regional priorities. The RTP is the mechanism that the Regional Transportation Planning Agencies (RTPA) use to conduct long-range (20-year horizon) transportation planning to achieve local and regional goals in consideration of state and federal goals. The purpose is to encourage and promote safe and efficient management, operation, and development of a regional intermodal transportation system that, when linked with appropriate land use planning will serve the mobility needs of goods and people. It is developed to provide a clear vision of regional transportation goals, objectives, and strategies. The following comments are provided for consideration prior to finalizing the RTP.

General Comments

- The 2024 Regional Transportation Plan Guidelines for Regional Transportation Planning Agencies (January 2024) provides guidance for RTP components for a coordinated and balanced regional transportation system including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation. For future updates to the HCAOG RTP, please consider including a state highway system (SHS) element with a regional vision for the highway network (Chapter 6.8: State Highway System).
- The climate change language/terminology selected for the RTP should be consistent with the language the federal government is using to ensure HCAOG remains eligible for future federal grant opportunities.
- It is our understanding that the Appendices for HCAOG's RTP are not available yet. Please submit the Appendices when they are made available so our Office can review its compliance with the RTP requirements.

- Please ensure that the RTP includes information about periodic reviews that are conducted on the effectiveness of the procedures and strategies contained in the public participation plan as it is a requirement noted in the RTP Checklist.

Comments by Report Section

Introduction (Chapter 1)

- Please note that the California Department of Finance projects Humboldt County's population to decline to 100,940 by 2070: <https://dof.ca.gov/forecasting/demographics/projections/>. This is consistent with the population trends reported for the years 2020 through 2024, which shows a drop of nearly 3,000 people over that timeframe. National Oceanic and Atmospheric Administration (NOAA) shows projections for 2025 that weren't realized and population decline for Humboldt County beginning after 2035: <https://www.noaa.gov/sites/default/files/legacy/document/2020/Oct/07354626731.pdf>. (page 1-3)
- The County Population section states that "Humboldt State University's proposed designations as a polytechnic university". This designation has already been made. (page 1-3)

Renewing Our Communities (Chapter 2)

- The "What do Humboldt folks tell us?" section appears outdated; lacks recent engagement findings. (pages 2-5 to 2-9)
- We suggest adding a column on to Table 3 which indicates stakeholders involved in implementing certain actions/strategies to meet specific regional targets. (page 2-15)
- 100% Electric Vehicle Charging Station (EVCS) permit streamlining in Humboldt jurisdictions could be a Regional Target or referenced elsewhere to support compliance with AB 1236 (2015) and AB 970 (2021). See [best practices and the associated map](#) for EVCS permit streamlining status by jurisdiction. (page 2-16)
- For the third footnote and associated Regional Target (iii) on 2-16, there is a more recent [AB 2127 EV Charging Infrastructure Assessment \(2024\)](#) available. (pages 2-16 and 2-20)
- A best practice for public engagement would be to document the outreach and include the comments received and how it has changed or impacted the RTP 2026 draft. (general)

Global Climate Change (Chapter 3)

- Overall, many of the climate change materials referenced in the Regional Transportation Plan are out of date. The Caltrans District 1 Climate Change Vulnerability Assessment and Pilot Study (2014) was superseded and is no longer the most recent and/or relevant plan. D1 staff do not use this plan for adaptation planning. Please consider the most recent version(s) of these plans

and documents:

- In 2019, the [Caltrans Climate Change Vulnerability Assessment – Summary Report](#) and [District 1 Summary Report](#) was published and is the current resource for climate adaptation and vulnerability plans.
- The [CA Ocean Protection Council has the latest Sea Level Rise \(SLR\) data and projections](#). Please consider using this as a resource.
- The [Sea Level Rise Adaptation Plan for Transportation Infrastructure and Other Critical Resources in the Eureka Slough Hydrographic Area, Humboldt Bay \(2021\)](#) is another critical, local resource for SLR planning which was funded by Caltrans' Sustainable Transportation Planning Grant Program (STPG) and awarded to Humboldt County Public Works.
- Please also consider reviewing and referencing the [CA Coastal Commission Sea Level Rise](#) guidance, which includes more up to date information that referenced in this draft plan.
- [Sea Level Rise Coastal Adaptation Planning Guidance for Critical Infrastructure](#) is another great resource for the RTP to consider in the plan.
- Another great resource on SLR is the Cal Poly Humboldt SLR Institute and the publication [Transformative Sea-level Rise Research and Planning](#), which discusses the intersectionality of tribes, education, and government as it relates to SLR in Humboldt. (page 3-9)
- The [Adaptation Strategies for Transportation Infrastructure \(2023\)](#) was created as an educational resource. Please consider reviewing these documents for consistency with the draft RTP. Also, see the [Climate Vulnerability Map](#) for the North Coast. In future updates of the RTP please reach out to Caltrans for resources and references. (general)
- Discuss the Caltrans Comprehensive Adaptation and Implementation Plan (CAIP) for the Eureka-Arcata Corridor. CAIP is a roadmap that informs and prioritizes project planning and allows Caltrans to chart a course of action for this section of US 101 using information obtained through technical research, scientific analysis, policy review, and community outreach regarding landscape features, exposure, and sensitivity to SLR. Additional resources and references are available on the project website: [North Coast Climate Action](#). (pages 1-6, 3-11, 3-12, and 3-25)
- There are several models of zero-emission vehicle (ZEV) pickup trucks currently available on the market (second paragraph), some of which have been incorporated into the Caltrans District 1 fleet. (page 3-13)
- There are more recent [CEC statistics \(2024\)](#) available for electric vehicle (EV) adoption that could be used for Figure Climate-6. (page 3-14)
- Please use the full name for Redwood Coast Energy Authority in the first sentence of the last paragraph on this page. (page 3-14)
- Add [Executive Order N-27-25](#) to greenhouse gas (GHG) emission targets table as a reference. (page 3-16)

- Please include parties/stakeholders involved in projects identified on the table. (pages 3-16 and 3-17)
- The document should indicate which areas within the county are impacted by erosion and coastal flooding from sea level rise to prioritize strategies for adaptation and resiliency. (page 3-22)

Tribal Transportation (Chapter 4)

- The third paragraph references the 2017 Regional Transportation Plan Guidelines. Please update this reference to the 2024 Regional Transportation Plan Guidelines. (page 4-2)

Emergency Transportation (Chapter 5)

- Consider including a policy and/or under project action for HCAOG to apply for a STPG grant to develop an emergency evacuation preparedness transportation plan that integrates transit for the Humboldt region (and/or interregional - including adjacent counties). (page 5-1)
- We recommend replacing outdated Hurricane Katrina example with local wildfire evacuation examples. Similar comment regarding the sidebar (p. 5-6) under Emergency Response, Transportation and Evacuation which could use a local example.
- Public transit, paratransit and their role in emergency transportation evacuation are discussed in several sub sections of Element 5 and could have been included as specific policies or objectives in this section for consistency, such as in the Table, Emergency Transportation Sub-Objectives and Policies (pages 5-7 and 5-8).
- The narrative and objectives Table could specifically list Humboldt Transit Authority (HTA), Tribal transit and paratransit providers. (pages 5-7 and 5-8)
- HCAOG may consider including a commitment to work with CalOES and the National Weather Service to prepare all Humboldt coastal communities to be Tsunami Ready certified. This may include developing official emergency evacuation routes.
- Please mention previous efforts made regarding evacuation planning in the county. If extensive evacuation planning has not been done yet, list actions to begin evacuation planning for the county and assign responsibilities to different parties or subject matter experts. (general)

Land Use – Transportation Element (Chapter 6)

- Include a SHS element with a regional vision. (page 6-8)

Public Transportation (Chapter 9)

- Please list how many lane miles within the county and external to the county are accessible/covered by the county's public transportation network. (page 9-1)

- Please ensure transit route names are up to date and consistent in the RTP narrative sections (page 9-1), including:
 - North State Express: Route 101; and
 - North State Express: 299. Also known as the Arcata-Willow Creek transit service along State Route (SR) 299 (transfer to Trinity Transit to travel between Willow Creek and Redding). Recommend clarifying the two transit service names in the introductory narrative a little more to avoid confusion for the reader (such as on page 9-4).
 - Please ensure the RTP is consistent in using the correct acronym for the North State Express (NSE). This is noted correctly in Element 9's Table Transit-2 (p. 9-11, pdf 139) list of projects.
- Also note, the name changed for the Amtrak Thruway Bus, formerly known as "Amtrak San Joaquins" (Route 7 bus along US 101 north between Arcata and Martinez train station).
 - It is now known as, "Gold Runner" Thruway Bus (Route 7).
- Ridership data would be helpful to get an idea of how much of the population/which groups are utilizing public transit services, and where they are taking trips to/from to inform future investment/funding. (page 9-2)
- We recommend including discussion on Caltrans' District Transit Plan and the Caltrans Director's Policy for Public Transit that will guide and prioritize transit planning, needs, facilities and implementation on the SHS, and aims to address transit objectives. (pages 9-12 and 9-13)
- SR 255 has periodic non-recreational pedestrians and cyclists crossing the Samoa bridges to get back and forth from Manila and Samoa to Eureka for work, shopping, and services. The same is true for the section of SR 255 connecting Manila to Arcata. Table Transit-2 mentions an unfunded HTA feeder bus line in Manila (but not Samoa) and page 9-10 mentions the Transportation Development Plan (TDP) 2023-2028 recommends microtransit in Manila and Samoa. Details for either alternative are not provided. (page 9-10)
- HCAOG may want to consider seeking funding to develop a county-wide plan for developing a prioritized list of locations for mobility hubs (of all sizes), especially on or near the state highways (including park and rides) in the Humboldt Bay area between Trinidad and Scotia. Mobility hubs would also pair well with any plans for rapid intra-city bus service.
- This chapter could elaborate more on transit-related projects and improvements, including grant projects in Humboldt County.

Aviation (Chapter 10)

- While individual travel decisions are important, there are emerging technologies which may help reduce the carbon intensity of aviation over medium/long-term timeframes. Examples are [Sustainable Aviation Fuels \(SAF\)](#), [electric vertical take-](#)

[off and landing](#) (eVTOL) aircraft, and other [electric aircraft](#). The primary airline serving the region is pursuing a [SAF program](#). (page 10-16)

- The Caltrans Division of Aeronautics would support a multimodal hub at Eureka-Arcata commercial airport (ACV) and would be interested in any conversations related to this as early coordination may be necessary to get the Airport Layout Plan updated for any use changes or structures within airport property. (general)
- The aviation un-constrained and constrained project lists do not have calculated subtotals. Please ensure this table is updated in the Final RTP. (page 10-24)

Goods Movement (Chapter 11)

- Update Richardson Grove project status on Table Goods-3 with current data. This is now the 2022 State Highway Operation and Protection Program (SHOPP) and construction funding is \$9,272k. If Implementation Year(s) means construction start, then 2026. If it is completion year, then 2027. (page 11-3 and 11-19)
- Please replace the Richardson Grove project paragraphs in the Goods Movement "Major Truck Routes" section (page 11-3) with the following:

"However, Caltrans (District 1) has designed a project for U.S. 101 through Richardson Grove State Park to give STAA trucks access northbound into Humboldt. The project proposes to reconstruct 1.1 miles of U.S. 101 to "realign and widen curves and obtain two-foot shoulders in the park where possible, and four-foot shoulders outside the park without removing or significantly impacting old growth redwood trees" (Caltrans 2011). Caltrans faced legal challenges on the project's CEQA (State) and NEPA (federal) environmental reviews. Caltrans prevailed in the CEQA case in November 2024. Plaintiffs filed a final appeal in February 2025, but no injunction is in place at this time and construction is planned for spring 2026."
- Please update the Last Chance Grade project information in the U.S. Highway 101 section (page 11-14), third paragraph, with the following:

"In Del Norte County, coastal erosion and geological movement along a three-mile segment of highway known as Last Chance Grade (between Klamath and Crescent City) has caused landslides and road failures for decades. Caltrans District 1 has selected Alternative F, a 6,000 foot tunnel bypass, as the preferred alternative. The project timeline currently has construction beginning in 2031. The estimated capital cost in today's dollars is \$2.6 billion."
- Consider adding a discussion of truck parking deficiencies and warehousing. (general)
- Please use the following updated information for the Table Goods-3: Regional Goods Movement Projects. Funding Source is 2022 SHOPP, Implementation Year

(construction start 2026, completion year 2027), Estimated Cost (\$9,272K). (page 11-19)

Financial Element (Chapter 12)

- In the Finance-2 table, the Table Header of "Annual Revenue for Roads/Transportation" might be better rephrased. It reads as the funds listed are dedicated to transportation. Most, if all, are general tax measures with no binding commitment to fund transportation projects and are understood to fund other elements. It may set an incorrect expectation as titled. (page 12-5)
- Include the Safe Streets For All Program (SS4A) in the Finance-3 table. (page 12-7)
- In the Future Funds Constant paragraph, consider including in parentheses after "(flat except for inflation)" - "and not accounting for declining gas tax revenues at both state and fed levels", or similar. With the point being trying to remind people that gas tax is going the opposite direction of costs and will have to be revised or more likely replaced. (page 12-8)
- The number of projects in the ten-year plan is expected to decrease. What is stated in this section is correct, but please add a data date (July 2025) because the projects in the last five years are subject to change with the 2025 Ten-Year Plan. This section is based on the 2023 Ten-Year Plan. (page 12-10)
- Please consider re-wording the last 2 sentences of the SHOPP Funding paragraph. It currently states "SHOPP funded projects will only occur on the State Highway system. SHOPP funding for local jurisdictions' projects are included in the Complete Streets Project Table". Is the intent "SHOPP funding for SHS facilities within the local jurisdiction..."? Table 4 does not appear to list any SHOPP funded projects. (12-11)
- In the Locally Generated Tax Revenue paragraph, consider adding a note that the \$31 million generated annually is under a general tax and therefore not dedicated to transportation funding. The actual amount dedicated to transportation may be substantially less. (This may affect calculations in the tables following). (page 12-11)
- In Table 4, consider adding footnotes above into table for relevant sections. (page 12-11)
- In Table 5, consider adding more descriptions or notes preceding this table. It's hard to determine how the two tables connect with one in (\$1,000) and one (\$000). It can be assumed the first is complete streets and the second is maintenance, but it is not clear. If the overall deficit is \$410,182,000 (for Complete streets years 1-5) it might be good to say it (with all the decimal places) in the notes above or after to show the significance or reinforce it. (pages 12-11 and 12-12)

Editorial and Typos

- Use “drier” vs. “dryer.” (page 1-3)
- Correct typo in Global Climate Change section at the beginning of the fifth sentence on this page. (page 3-13)
- Use “buses” consistently instead of “busses.” (pages 3-14, 9-1, 9-11, and 9-15)

If there are specific comments that may need further clarification, we would be happy to facilitate meetings with District functional units to go over these. Please note that administrative and editorial comments for the RTP Checklist will be shared with HCAOG separately. Please contact Catharine Crayne with questions or for further assistance at (707) 684-6880 or by email at, catharine.crayne@dot.ca.gov.

Sincerely,

Brandon Larsen
Deputy District 1 Director
Division of Planning and Local Assistance
Caltrans District 1

c: Priscilla Martinez-Velez, Office Chief, Caltrans District 1
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HCAOG VROOM 2026 RTP District 1 Comment Letter - Final

Final Audit Report

2026-01-09

Created:	2026-01-09
By:	Catharine Crayne (s142031@dot.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAA7Z6RxdC0zYOr9r7rTCGs0xjgud3e30W

"HCAOG VROOM 2026 RTP District 1 Comment Letter - Final" History

-  Document created by Catharine Crayne (s142031@dot.ca.gov)
2026-01-09 - 9:24:42 PM GMT- IP address: 149.136.17.246
-  Document emailed to Brandon Larsen (brandon.larsen@dot.ca.gov) for signature
2026-01-09 - 9:24:46 PM GMT
-  Email viewed by Brandon Larsen (brandon.larsen@dot.ca.gov)
2026-01-09 - 10:08:34 PM GMT- IP address: 172.226.212.28
-  Document e-signed by Brandon Larsen (brandon.larsen@dot.ca.gov)
Signature Date: 2026-01-09 - 11:37:30 PM GMT - Time Source: server- IP address: 174.208.167.127
-  Agreement completed.
2026-01-09 - 11:37:30 PM GMT