

APPENDIX D.

**PUBLIC & AGENCY
WRITTEN
COMMENTS**

Appendix D. Public & Agency Written Comments
HCAOG RTP UPDATE “VROOM 2022-2042”
PUBLIC & AGENCY COMMENTS on RTP DRAFTS (chronological)

date received	issue/element	comment
1/11/21	PT – amenities	<p>From: Siena Klein Date: Mon, Jan 11, 2021 Subject: Re: Regional Transportation Plan (RTP) Draft: climate/GHG targets</p> <p>Hi Oona, this is good. People from SoHum like to shop up north, as you know. If there was a transit center with lockers and some security we could store our purchases until we took the bus home. Santa Cruz had that over 30 years ago. Not sure if they do now but it would be interesting to know.</p>
1/11/21	PT, AT (Ferndale)	<p>From: Thea Stewart Date: Mon, Jan 11, 2021 at 5:24 PM Subject: Re: Regional Transportation Plan (RTP) Draft: climate/GHG targets To: Oona Smith</p> <p>I am visually impaired, unable to drive and wish we had a bus system to take us too and from Ferndale. Approximately a year and a half ago a student from HSU(who does not drive) was asking me how to get to Ferndale. I explained that there is no taxi service and it is a LONG walk to town. I mentioned that you could ride a bike, but it is NOT SAFE going over the narrow bridge.</p> <p>I think transportation can and should be improved on.</p> <p style="text-align: right;">Sincerely: Thea Stewart</p>
1/14/21	GHG	<p>From: Colin Fiske, CRTP Date: Thu, Jan 14, 2021 at 12:44 PM Subject: Re: Regional Transportation Plan (RTP) Draft: climate/GHG targets To: oona smith</p> <p>Thanks again for all your work on this, and for your continued openness to all of the feedback from CRTP and other stakeholders! I'm very excited about the direction this is going, and I think it will lead to a vastly improved RTP. That said, I do have a few additional comments on the table:</p> <ol style="list-style-type: none"> 1. For the first bullet under the EV Charging Stations target, I appreciate the caveat that adjustments will be made for over-sized parking lots. Building on that, I would suggest that a specific note be made that one acceptable strategy for reaching the target is to reduce the number of parking spaces overall. 2. Under "Efficiency & Practicality in Locating New Housing," target (ii), I would suggest defining "buildable parcels." I appreciate that infill is explicitly called out, but I also think that it would be wise to specify that this includes parcels that already have structures on them but could be densified (e.g., ADUs, lot splits, or even demolition and building taller structures). 3. Under "Efficiency & Practicality in Locating New Housing," target (iv), I recommend changing the target from no new housing contributes to a net increase in per capita VMT to the more ambitious "all new housing contributes to a countywide reduction in per capita VMT." OPR recommends 15% below per capita existing VMT as the CEQA threshold of significance, and we are establishing ambitious VMT reduction targets of our own, so it makes sense to me that the target should be reduced VMT per capita, not just holding steady.

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4. Under "Convenient Access to Destinations," I understand the desire to pragmatically differentiate between urbanized and non-urbanized areas. However, I think it will be difficult to viably assess whether a carpool is meaningfully "available" in non-urbanized areas. I think the fact that the targets for this area top out at 80% of the population provides adequate accommodation for the non-urbanized areas. Even if all 80% had to live in urbanized areas to achieve this target, that would only require a relatively slight increase in the proportion of today's Humboldt County population that lives in urbanized areas. Therefore, I'd recommend removing the distinction between urbanized and non-urbanized areas in this target.
5. Under "Invest in Complete Streets," target (i), I'd like to clarify that the 10% increase applies to permanent projects as well as pop-up or temporary projects. I would also recommend that we establish an additional higher target - perhaps 25% - for a few years later.
6. Under "Invest in Complete Streets," target (ii), I'd like to clarify that the specified funding sources apply *exclusively* to active transportation and transit. As we've seen over and over, the mere eligibility of active transportation and transit for funds does not guarantee any actual funding.
7. I think it's important for us to add specific targets for reducing GHGs from local freight/commercial/retail transportation. I think they could largely mirror the state's recently established truck electrification targets. However, I'd also like to see some targets around commercial mode shift, particularly for applications like local delivery. Many shipping companies have used modes like e-bike, trikes, mini-e-trucks, etc., for deliveries in some urban areas for years, and we should explore the possibilities for those kinds of things here.

I'm happy to discuss any of this with you any time. Again, thanks!

Colin

1/22/21 GHG performance targets

From: Jerome Carman
 Date: Fri, Jan 22, 2021 at 9:46 AM
 Subject: Re: Regional Transportation Plan (RTP) Draft: climate/GHG targets
 To: Oona Smith oona.smith@hcaog Cc: Beth Burks beth.burks@hcaog

Hi Oona,

Thank you for the opportunity to review and comment on the draft performance targets for the RTP update. I applaud HCAOG's decision to include these targets.

If you have any questions regarding my comments please don't hesitate to reach out.

Best,
 Jerome

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Jerome Carman
 Owner, Principal Analyst | Environmental Indicator Accounting Services

(Attached letter is reproduced below)

Summary of Comments on 2021.01.01-Draft-RTP-GHG-Performance-Measures-Table_jerome-carman.pdf

Page: 1

Author: Jerome Carman	Date: 1/16/2021 4:42:26 PM	How well does the TDM capture travel by homeless and transient population?
Author: jerome	Subject: Insert Text Date: 1/22/2021 7:23:44 AM	+ Connectivity
Author: Jerome Carman	Date: 1/22/2021 7:23:52 AM	Consider ways to include homeless and transient populations in the network + connectivity analysis
Author: Jerome Carman	Date: 1/16/2021 4:03:54 PM	at LTS level 1 or 2
Author: jerome	Subject: Typewriter Date: 1/22/2021 7:16:28 AM	- % connection modes at LTS levels 1 or 2
Author: jerome	Subject: Typewriter Date: 1/22/2021 7:18:40 AM	- # of Transit Trips
Author: jerome	Subject: Typewriter Date: 1/22/2021 7:19:18 AM	> census
Author: Jerome Carman	Date: 1/16/2021 4:11:27 PM	an LTS + Connectivity analysis
Author: jerome	Subject: Insert Text Date: 1/22/2021 7:23:17 AM	+ Connectivity
Author: Jerome Carman	Date: 1/16/2021 3:57:21 PM	2021/22
Author: Jerome Carman	Date: 1/16/2021 4:39:04 PM	zero emission

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Author: jerome	Subject: Insert Text Date: 1/22/2021 7:22:56 AM	on-road
Author: Jerome Carman	Date: 1/16/2021 4:22:08 PM	the cec source does not include red dye diesel, confirm that vroom does not apply to offroad vehicles, also, note that red dye is a loop hole that diesel vehicle drivers could abuse if volume or price changes threaten availability
Author: Jerome Carman	Date: 1/21/2021 9:49:32 PM	Zero Emission Vehicle Fueling Infrastructure
Author: Jerome Carman	Date: 1/22/2021 7:51:59 AM	at the TAZ or census block level. This will help identify inequity in infrastructure access.
Author: Jerome Carman	Date: 1/22/2021 7:57:08 AM	Add hydrogen fueling infrastructure goals. I suggest the following. Note that target years suggested below are not based on existing plans or documents. They are informed by a best guess of what seems reasonable to me, and rests on the following: - HTA will both adopt hydrogen buses and continue pushing for public availability of hydrogen fuel - the state will sustain funding for hydrogen fueling infrastructure By 2024 hydrogen fuel is available for public and private fleet vehicles. By 2028 there is sufficient hydrogen fueling infrastructure to enable the sale of light duty FCEVs at local dealerships. By 2030 there is sufficient hydrogen fueling infrastructure and availability to enable inter-county travel of medium and heavy duty FCEVs.
Author: Jerome Carman	Date: 1/22/2021 7:52:06 AM	at TAZ or census block level. This will help identify inequity in infrastructure access.
Author: jerome	Subject: Sticky Note Date: 1/22/2021 7:57:10 AM	One critical barrier associated with widespread adoption of EVs is limited electrical panel capacity at many homes to accommodate the addition of home charging loads. There are a lot of single family homes in the County, and the large majority of these homes are 40+ years old. There are many 60A electrical panels where adding 240V charging loads requires electrical panel upgrades. This is also an equity issue, and is also an issue with electrifying our housing stock (electric water and space heating, cooking, etc.) I mention this here in case HCAOG staff feels it may be appropriate to include a goal related to this. A suggested goal would be: By 2024 all jurisdictions have adopted building codes that encourage / require electrical panel upgrades for residential alteration permits, and require 200A utility panel ratings for all new residential units. Funding will have been identified to subsidize utility panel upgrades on existing homes.
Author: Jerome Carman	Date: 1/22/2021 7:52:10 AM	at TAZ or census block level. This will help identify inequity in infrastructure access.

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- A Author: jerome Subject: Sticky Note Date: 1/22/2021 8:09:00 AM
It would be useful to add clarity of scope here.

This could be a relatively less complex recommended count of L2 and L3 stations at the TAZ or census block level based on the TDM.

Or this could be detailed designs and cost estimates for individual sites.

If the intent is to program installation projects and cost estimates are needed, note that optimal siting is labor intensive. Given that charging stations represent a loss in parking spaces, ADA requirements complicate designs and land owner acceptance, and electrical grid interconnection and internet connectivity requirements add complexity, optimally siting individual stations requires site visits and engaging with land owners and PG&E.
- T Author: jerome Subject: Cross out Text Date: 1/22/2021 8:10:43 AM
percentage of public fleet vehicles that are zero emission
- T Author: jerome Subject: Cross out Text Date: 1/22/2021 8:11:23 AM
100% of public transit vehicles and school buses are zero emission
- T Author: Jerome Carman Date: 1/16/2021 3:46:03 PM
transit vehicles
- A Author: jerome Subject: Sticky Note Date: 1/22/2021 8:14:21 AM
Consider ways to include homeless and transient populations in the plan
- T Author: Jerome Carman Date: 1/16/2021 3:39:20 PM
zero emission
- T Author: Jerome Carman Date: 1/16/2021 3:41:08 PM
vehicle
- T Author: Jerome Carman Date: 1/16/2021 3:38:58 PM
zero emission
- T Author: Jerome Carman Date: 1/16/2021 3:40:49 PM
- T Author: Jerome Carman Date: 1/16/2021 3:40:55 PM
- T Author: Jerome Carman Date: 1/16/2021 3:40:01 PM
vehicle
- T Author: Jerome Carman Date: 1/16/2021 3:39:09 PM
zero emission
- T Author: Jerome Carman Date: 1/16/2021 3:42:33 PM
zero emission
- T Author: Jerome Carman Date: 1/16/2021 3:43:09 PM
- T Author: jerome Subject: Insert Text Date: 1/22/2021 8:12:57 AM
are zero emission
- T Author: Jerome Carman Date: 1/16/2021 3:44:24 PM
- T Author: jerome Subject: Insert Text Date: 1/22/2021 8:13:07 AM
are zero emission

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- T Author: Jerome Carman Date: 1/16/2021 3:47:00 PM
- T Author: jerome Subject: Insert Text Date: 1/22/2021 8:14:52 AM
are zero emission

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- A Author: Jerome Carman Date: 1/22/2021 8:15:40 AM
My guess would be that the number of transit trips needed to meet this target may exceed the transit trips goal in the mode shift measure. Align transit trips target with this target. I apologize but I don't have initial thoughts on how to align these.

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- T Author: jerome Subject: Replace Text Date: 1/22/2021 8:22:57 AM
20

Recommend employer size of 20+. My back-of-envelop estimate is
 - 100+ employer size will capture less than 20% of employees
 - 20+ employer size will capture ~60% of employees

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2/2/21	GHG	<p>From: Elaine Astrue Date: Tue, Feb 2, 2021 at 11:02 PM Subject: Re: Regional Transportation Plan (RTP) Draft: climate/GHG targets To: Oona Smith</p> <p>A lot of good work here...</p> <p>Good to see that we plan to build from Caltrans' work on measuring VMT. After surveying the RTPs of Sonoma, Butte, Monterey, and SLO counties, this seemed like the best approach. When we get to this point, it would be worthwhile to consult with SLOCOG on their algorithm for assessing how local projects might impact VMT. Maybe it can be adapted for Humboldt.</p> <p>I still believe that local transportation-related fuel sales is unreliable as a measure of VMT. In our first Ad Hoc meeting, we talked about how this metric really captures vehicle fuel efficiency and vehicle electrification trends. We might still want to look at fuel sales for a non-VMT reason, like GHG emissions from motorized vehicles. But then I think it should go in a different category. Here's what's behind my thinking.</p> <p>Recently Next 10 released the 2020 Green Innovation Index, which reports California GHG actuals vs. targets for 2018 (the latest year available). The key finding on transportation-related fuel consumption:</p> <p>While the amount of transportation fuel consumed in 2018 was similar to levels from ten and fifteen years prior, emissions from transportation fuel in 2018 were 3.3 percent lower and 8.3 percent lower than 2008 and 2003, respectively. This is the result of policies promoting cleaner vehicle fuels and advanced clean vehicle standards.</p> <p>In other words, across CA transportation fuel sales held steady (flat) for 15 years while associated GHG emissions fell as Californians switched over to electric vehicles (the Nissan Leaf and Tesla Model S) or cleaner fossil fuel vehicles (the Toyota Prius). While the lower GHG emissions are a step in the right direction, the overall picture is not a good one for VMT. That's because the only way that total fuel sales can be flat while efficiency increases is if there are more and more vehicles of all kinds on the road. So overall VMT has gone up. It might be hard to quantify how much, but a good guess would be our collective VMT has gone up +8.3% from 2003 to 2018.</p> <p>The RTP has 20-year time horizon, so let's look at what will happen to the graph over time. As the shift toward vehicle electrification accelerates our fuel sales line will start tilting downward year over year. With population growth, as the number of vehicles on the road (and their VMT) continue to climb, the fuel sales graph will look like we're making great progress! Over time, as more EVs are sold, fuel sales will actually diverge from VMT. It will become less accurate than it is today.</p> <p>More cars on the road driving more miles is a serious limiting factor for mode shift. It makes roads much more hazardous for bikes and peds, and we have seen big upticks in serious/fatal crashes during this time period. Do we really need mode shift as much as we need EVs? Yes. (see attached slide).</p> <p>It's not simple, measuring VMT, and we're all new at it. I think we should cast a wide net early on, looking for metrics that reflect real progress in our collective behavior. Some examples:</p>

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		<ul style="list-style-type: none"> • Tire-related chemicals in stream runoff - Humboldt Baykeeper is starting to measure them, I think. • A ratio between the number of light vehicles registered to residents of Humboldt County vs. the number of households, or the number of licensed drivers we have. This data is available from the DMV. • <your ideas here> <p>Thanks for listening! Elaine Astrue</p>
2/2/21	GHG target monitoring	<p>Caltrans District 1 From: Tucker, Kevin A@DOT Date: Fri, Feb 12, 2021 at 8:50 AM Subject: RE: Regional Transportation Plan (RTP) Draft: climate/GHG targets To: Oona Smith</p> <p>Some thoughts from Alexis. It will be good to coordinate with Caltrans when gathering data.</p> <ul style="list-style-type: none"> • With regards to destination data, we've had trouble with this in the CAT Plans. People for Bikes use Open Street Map for destination types except jobs. I recently looked at what is available through Open Street Map, and a lot of data are missing. Destinations have been something the TAG is very keen on using, so I think it is worth pursuing, but at this time I'm not aware of a data source that captures everything of interest. • I'm not sure how bike/ped collisions will be tracked for underserved communities other than the demographics of the location of the collision. As far as I know (could be wrong), race and income are not collected on SWITRS reports. <p>Kevin Tucker Planning North Chief, District 1, Eureka California Department of Transportation (Caltrans)</p>
3/4/21 TAC meeting comments	GM goal	<p><u>Mike Foget, City of Blue Lake</u>: This is a question: will "rail" in the Goods Movement goal still be applicable (with NCRA mission changing to trails and dissolving)? <u>Netra Khatri, City of Arcata</u>: We don't know what will happen in the future, so we should not omit it.</p>
	TT goal	<p><u>Leslie Sanders, Trinidad Rancheria</u>: The Tribal Transpn goal refers to NCTTC's mission, and doesn't reflect HCAOG actions like the other goals. HCAOG does support NCTTC in its goals, so the language in the goal could reflect that ("HCAOG supports the NCTTC mission to...").</p>
	obj	<p><u>Hank Seeman, County of Hum</u>: Re Economic Vitality objective – Ask local E.D. practitioners to suggest specific econ development objectives that are currently relevant for transportation.</p>
	GCC	<p>Questions the usefulness of "crisis" in GCC title. Suggests that the goal include adaptation and mitigation. <i>[Oona Smith asked if adapting and mitigating could be objectives and not goals in and of themselves.]</i> New wording could say something to the effect that the goal is that transportation supports reducing GHG emissions.</p>
	GCC	<p><u>Jesse Robertson, Caltrans D1</u>: Could replace "crisis" with "threat."</p>
	overall goal	<p><u>Colin Fisk</u>: Goal is agnostic regarding modes; supports all modes equally, to let people make their own choices. Goal should be explicit that we want to support, prioritize</p>
	GM	

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	equity projects	active transportation and deprioritize single-occupancy vehicles, especially to achieve climate targets. -- include intra-county goods movement. -- Glad equity was mentioned; put explicitly in goals. -- RTP should reflect thinking at every step how projects in RTP correlate with goals.
3/4/21	GCC	From: Colin Fiske Date: Thu, Mar 4, 2021 at 3:11 PM Subject: Crisis To: oona smith I forgot to say this in my TAC comment, but please keep the word "crisis" in the Global Climate Crisis element title. I know you recognize this, but it IS a crisis, and not calling it that won't make it any less so.
3/16/21	GCC	From: Colin, CRTP Date: Tue, Mar 16, 2021 Subject: Action Alert: Support Strong Climate & Transportation Goals To: oona smith@hcaog

**Action Alert:
We Need Ambitious Reductions in
Greenhouse Gases and Miles Driven**

Dear Oona,

Every four years, the Humboldt County Association of Governments (HCAOG) updates the county's Regional Transportation Plan. The Plan is a 20-year vision for the county's transportation system, and it carries a lot of weight - most projects aren't eligible for funding if they're not included.

In preparation for the Plan update later this year, an HCAOG committee has been meeting to develop specific goals for mode shift and greenhouse gas reduction. CRTP and other advocates and community members have participated in this process, and the result is a proposed set of ambitious but achievable targets for reducing vehicle miles traveled and climate-harming emissions, increasing active transportation and transit, electrifying vehicles, improving land use practices, and increasing safety.

This Thursday at 4 p.m., the entire HCAOG Board of Directors will weigh in on the targets for the first time. It's critical for them to know that the public supports the inclusion of these strong targets in the Plan. You can call into the meeting [following the instructions here](#). The Agenda Item is 7.b. Tell the Board:

- We are facing a climate crisis and a transportation safety crisis.
- Strong targets are needed to meet the challenges we face, and the committee has done a good job of developing those targets.
- Goals are useless if we don't try to meet them. The Plan update should only include projects that help us meet these targets.
- Climate, safety and equity should be the organizing principles of the Regional Transportation Plan.

If you can't make it to Thursday's meeting, you can submit comments anytime before the meeting by email. [Just click here and make your comments in your own words.](#)

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		<p>Thanks for taking action. Stay safe and healthy! -Colin & the CRTP Team <i>Copyright © 2021 Coalition for Responsible Transportation Priorities, All rights reserved.</i></p>
<p>3/16/21 [3.18 board mtg]</p>	<p>GHG targets</p>	<p>Humboldt Baykeeper From: Jennifer Kalt Date: Tue, Mar 16, 2021 Subject: Comment on 3/18/21 Board Agenda Item 7.b</p> <p>Greetings,</p> <p>I am writing on behalf of Humboldt Baykeeper in support of setting strong targets for reducing vehicle miles travelled and greenhouse gas emissions in the Regional Transportation Plan.</p> <p>Our region is facing twice the rate of sea level rise as the rest of the state, and it is critical that we do our part to slow the rate of climate change and sea level rise.</p> <p>The proposed targets and performance measures will further these goals, and will increase active transportation, public safety, and promote projects that benefit the entire community and the environment.</p> <p>Climate, safety and equity should be the organizing principles of the Regional Transportation Plan.</p> <p>Thank you,</p> <p>Jennifer Kalt, Director Humboldt Baykeeper Office: Arcata</p>
<p>3/16/21 [3.18 board mtg]</p>	<p>GHG targets</p>	<p>From: Carol Mone Date: Tue, Mar 16, 2021 Subject: Comment on Board Agenda Item 7b</p> <p>The Regional Transportation plan appears to have well-articulated strong performance measures and targets. But we also need realistic ways to meet these targets. The plan update could be narrowed to include only projects that move us toward meeting the targets. My personal concerns, as a walker, are primarily about safety. I walk for health and to decrease my carbon footprint. The plan update cannot overlook the climate crisis or the alarming increase in pedestrian deaths and injuries, particularly in Eureka. I am very excited about a better bicycle and pedestrian network. I am also very excited about reducing vehicle miles traveled by car and truck, but alternatives that take into consideration the comfort and convenience of travelers, have not been forthcoming. In order for people to actually use public transportation, it needs to be regularly scheduled at convenient times, including evenings. It is neither comfortable nor convenient to find that one has to stay overnight in Eureka because the last bus just left and it is not even dark yet. It is extremely important for the rural populace to have transportation alternatives to cars and trucks, gasoline-powered, hybrid or electric. More consistent and regular bus service could also decrease incidences of folks driving under the influence of substances or cell phones.</p> <p>Carol Moné Trinidad resident [for 35 years]</p>
<p>3/16/21</p>	<p>GHG targets</p>	<p>From: Robin Baker Date: Tue, Mar 16, 2021 at 1:23 PM Subject: Comment on 3/18/21 Board Agenda Item 7.b</p>

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[3.18 board mtg]		<p>Dear HCAOG,</p> <p>I am writing to express my support for the bold targets laid out in the Regional Transportation Plan update referenced in Agenda Item 7.b.</p> <p>We can all agree that we are facing a climate crisis that requires immediate collective action. The strong targets set in the RTP are essential for meeting our climate challenges and the committee has done a great job developing these targets.</p> <p>It is essential that we strive to meet these goals and that we hold climate, safety and equity as the core principles of all projects moving forward.</p> <p>These targets will not only improve bicycle and pedestrian safety and contribute to solving the climate crisis, they will also have near-term health benefits. By increasing active transportation, we can reduce rates of obesity and health impacts related to obesity such as diabetes, hypertension and cardiovascular disease. Through this work, we will add to quality of life and extend the life expectancy of Humboldt County residents.</p> <p>Thank you for your time and attention to this urgent matter.</p> <p>With thanks, Robin Baker Medical Social Worker Certified in Climate Change and Health, Yale School of Public Health</p>
5/7/21		<p>From: Colin Fiske Date: Fri, May 7, 2021 at 12:38 PM Subject: RTP Input To: Oona Smith</p> <p>Hi Oona,</p> <p>After giving it more thought, I have some ideas/suggestions for the RTP update. I apologize for the length of this. I hope it's helpful and not overwhelming!</p> <p>The first thing has to do with the structure of the elements. As they are currently structured, it's hard to connect each of the GHG/VMT targets with the policies that support it, and then to connect the policies with the projects meant to implement them. The project lists in particular seem very disconnected from the rest of the document. It's also somewhat difficult to see how the VMT/GHG targets fit in with the "Goals/Objectives/Policies" framework.</p> <p>My suggestion would be something like this: break the elements into sections, each organized around one of the identified objectives. Within each objective, identify all the relevant GHG/VMT targets, then the policies that support that target, then the projects which implement those policies. I think this would create a much more intuitive planning flow, and make it easier to see when objectives, targets, policies and/or projects are out of alignment.</p> <p>I'd also like to suggest some additional policies to implement some of the VMT/GHG targets. These are not set in stone by any means, just ideas for you to consider. My hope is that the RTP will provide clear direction to HCAOG to ensure progress toward the VMT/GHG targets.</p> <ul style="list-style-type: none"> • Invest in Complete Streets target area

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		<ul style="list-style-type: none"> ○ Proposed policy: In 2022, HCAOG will adopt a schedule of regional discretionary funding apportionment for the years 2023-2028 that ensures increasing proportional investment in active transportation. ○ Proposed policy: HCAOG will work with member jurisdictions to develop proposals for new local and/or regional funding sources for active transportation and transit. HCAOG will assist jurisdictions in the process of securing such funding, including seeking approval from voters if required. ● Active Transportation Education target area <ul style="list-style-type: none"> ○ Proposed policy: HCAOG will develop a program for larger employers and landlords that provides best practices and leverages economies of scale to promote and incentivize multimodal travel among employees and tenants. ● Percent Mode Shift/Reduce VMT target areas <ul style="list-style-type: none"> ○ Proposed policy: Following completion of the low-traffic-stress and connectivity analysis of the bike and pedestrian network, HCAOG will work with Caltrans and member jurisdictions to create prioritized plans and identify funding sources to eliminate obstacles and close network gaps. These plans will be incorporated into future RTP updates. ○ Proposed policy: HCAOG will work with HTA and AMRTS to identify routing, scheduling, ticketing, or other changes which would maximize ridership while preserving mobility for transit-dependent populations, and help identify and secure funding sources for these changes. ● Percent of Zero-Emission School Buses & Public Fleet Vehicles target area <ul style="list-style-type: none"> ○ Proposed policy: HCAOG will request annual data on zero emission vehicle fleet conversion from member jurisdictions and other regional agencies. HCAOG will offer guidance to agencies which are not making progress toward adopted fleet conversion targets. ● Zero-Emission Vehicle Infrastructure target area <ul style="list-style-type: none"> ○ Proposed policy: HCAOG will partner with the Redwood Coast Energy Authority and member jurisdictions to identify ideal EV charging station locations for meeting the adopted target. ○ Proposed policy: HCAOG will develop a regional plan for funding and installing EV charging stations to meet the adopted target. This plan will be incorporated into future RTP updates. ● Efficiency & Practicality in Locating New Housing/Convenient Access to Destinations target areas <ul style="list-style-type: none"> ○ Proposed policy: HCAOG will work with member jurisdictions to identify any General Plan and zoning code amendments which could support efforts to meet adopted greenhouse gas, VMT, mode shift, traffic safety, and zero emission vehicle targets. ○ Proposed policy: HCAOG will review proposed development projects in member jurisdictions and provide feedback on the projects' impacts on regional efforts to meet adopted greenhouse gas, VMT, mode shift, traffic safety, and zero emission vehicle targets. ● Vision Zero target area <ul style="list-style-type: none"> ○ Proposed policy: HCAOG will work with Caltrans and member jurisdictions to identify locations and road segments with high concentrations of fatal and serious injury collisions, as well as areas at high risk of future serious collisions, and develop recommended safety interventions. To the extent feasible, these interventions will utilize techniques which allow for rapid implementation to prevent additional deaths.

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date received	issue/element	comment
		<p>Thanks for considering all this. I'd be happy to discuss any time.</p> <p>--</p> <p>Colin Fiske (he/him) Executive Director Coalition for Responsible Transportation Priorities</p>
5/27/21	public transit	<p>CALTRANS District 1 From: ROBERTSON, JESSE GRAHAM@DOT Date: Thu, May 27, 2021 at 11:10 AM Subject: 2021 RTP Update - Public Transportation Element To: oona.smith @ hcaog</p> <p>Caltrans has the following input on the Public Transportation Element:</p> <ol style="list-style-type: none"> 1. Greyhound bus schedule is not integrated into the local transit system, which limits opportunities to make transfers. For example, Greyhound buses leave Oakland at 9 pm and arrive in Arcata at 3:45 am. Local transfers using public transportation are not available at this arrival time. 2. Downtown Eureka is a major transit origin/destination for the Redwood Transit System (RTS), Southern Humboldt Intercity (SHI), Eureka Transit System (ETS), Greyhound and Amtrak buses. Transit service is constrained here due to the absence of a transit hub. Major transit destinations in the region need to be identified, and dedicated transfer facilities constructed for seamless transfers (in all weather), ticketing and information dissemination to travelers. 3. KTNeT transit service for Willow Creek and communities north along HWY 96 has not been operational due to financial and logistical reasons. 4. Greater coordination between tribal transit systems and transit agencies in Humboldt County would be helpful to ensure these transit systems better complement each other. 5. We emphasize the need to undertake origin/destination analyses, rider surveys, first last mile analyses, audit the transit infrastructure (missing bus stops, bus shelters, transit centers, information booths etc.). 6. The bicycle and pedestrian network on local streets should be improved to complement the transit network. Bike racks on buses, bike parking at transit stops, links to transit stops and centers (bike lanes, sidewalks, trails and widened shoulders) all help to make transit more accessible and convenient to riders and potential riders. 7. Since the number of riders who use transit decreases with distance to the bus stop, we recommend making a commitment to increasing transit coverage across Humboldt County using Mobility on Demand, Micro transit and other innovative means to widen the potential ridership. 8. Clearly identify and understand the areas of the County with transit dependent populations, based on income, vehicle ownership, the elderly, the disabled, etc. 9. In addition to fixed routes, explore options for demand responsive transit services that fulfill a community's need for medical, grocery, school, recreational and other travel needs. Providing charter buses for events, festivals, etc., in Humboldt County may substantially improve the quality of life.

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date received	issue/element	comment
		<p>10. We recommend that the feasibility of vanpools or commuter express buses be considered within the McKinleyville/Fortuna/ Eureka corridor in conjunction with employer incentives (bus passes) to ride these buses.</p> <p>11. We suggest setting a target to increase transit ridership for areas in close proximity (within a 1/4 mile walk or a 3 mile bike ride) to bus stops as a performance measure.</p> <p>We are still working on the Complete Streets project table, the Complete Streets Element, and we may have some additional comments for the Commuter Trails Element. If you have the time for a conversation today or tomorrow, I can let you know what the issues are that we are trying to resolve and possibly provide an early idea of the comments that we are likely to make. Otherwise, we will work to get the remainder of our comments to you in time for the TAC meeting.</p> <p>Jesse Robertson Transportation Planning Caltrans District 1</p>
6/2/21	trails, complete streets, SST table, public transit	<p>CALTRANS District 1 From: ROBERTSON, JESSE GRAHAM@DOT Date: Wed, Jun 2, 2021 at 5:53 PM Subject: Caltrans Comments on Administrative Draft Elements of the 2021 HCAOG RTP Update To: Oona Smith <oona.smith@hcaog> Cc: Jackman, Rex A@DOT, Ahlstrand, Tatiana L@DOT, Rymer-Burnett, Saskia@DOT</p> <p>Oona,</p> <p>Caltrans' initial comments on the HCAOG Administrative Draft 2021 RTP Update are attached. Unfortunately I do not have the requested update of the project list from the 2017 RTP update. We will continue to work on that. Feel free to contact us for further assistance with the project list.</p> <p>Also attached is the adopted alignment of US Bike Route 95 with the County of Humboldt's jurisdiction, which was passed by a resolution of the Board of Supervisors in March of this year. This series of maps is not recommended for public viewing/displays, but it can be prepared into a county-wide map for the purpose of comparing alignments with the Pacific Coast Bike Route.</p> <p>Feel free to follow up with questions or for further assistance.</p> <p>Jesse Robertson Transportation Planning Caltrans District 1</p> <p><i>(Attached letter is reproduced below)</i></p>

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Jesse Robertson, Caltrans District 1 letter, page 1 of 4

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 1
P.O. BOX 3700 | EUREKA, CA 95502-3700
(707) 445-6600 | FAX (707) 441-6314 TTY 711
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June 2, 2021

HCAOG 2021 RTP Update
Administrative Draft
Complete Streets Element

Ms. Oona Smith
Senior Planner
Humboldt County Association of Governments (HCAOG)
611 I Street, Suite B,
Eureka, CA 95501

Dear Ms. Smith:

Thank you for giving Caltrans the opportunity to review and comment on the Complete Streets Element of the 2021 Regional Transportation Plan (RTP) Update. The following Caltrans comments should not be considered to be comprehensive so much as responsive to the current draft of the RTP. We look forward to ongoing engagement and dialog with HCAOG to make the region's streets safer and more sustainable.

In terms of the organization of the various elements and their accessibility to the general public and grant fund administrators, there appears to be a significant amount of overlap between elements and their policies. For example, the Commuter Trails Element includes policies labeled "Complete Streets". Some of these policies may be found in other elements, including Complete Streets and Public Transportation. For the sake of clarity, we suggest considering ways to re-organize policies, discussions, and elements to minimize redundancy. One recommendation would be to focus each element according to travel mode with a discussion included for the various contexts for which specialized planning is needed.

Commuter Trails Element

The Commuter Trails Element describes commuter trails as travel corridors with a mixture of separated multi-use paths, rural roads, designated bike lanes, bike routes, and shoulders. The Commuter Trails Element also notes that the "Complete Streets Element" covers sidewalks, bike lanes (Class II), and bike routes (Class III). Our respectful suggestion would be to identify each regional trail facility after discussions for both pedestrian and bicycle elements, recognizing that these facilities blur the lines of more classical urban facility-type definitions.

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The Pacific Coast Bike Route discussion may benefit from a discussion about US Bike Route 95, which parallels the US (Highway) Route 101 in Humboldt County. As an interregional and interstate bike route, it makes sense to unite these two routes over time into a single West Coast bike route. More information about the US Bike Route network and US Bike Route 95 can be found online at the following web sites: <<https://www.adventurecycling.org/members/news/five-new-u-s-bicycle-routes-to-celebrate-in-the-new-year/>>; and, <<https://www.adventurecycling.org/routes-and-maps/adventure-cycling-route-network/pacific-coast/>>.

The Eureka/Arcata Corridor Project had intended to use a parcel for wetland mitigation which was also planned to mitigate for the 2.26 acres of wetland creation needed for Bay Trail North. The parcel originally intended for mitigation was not able to provide the wetland credit that was anticipated. The mitigation team was able to develop a mitigation plan to maintain the 2.26 acres of wetland mitigation for Bay Trail North via a combination of mitigation at the Samoa Parcels as well as Spartina Eradication at Indian Island. Both mitigation efforts are still in process.

Table Trails-1, Regional Commuter Trail Projects, includes a statement encouraging Caltrans to design improvements for pedestrians and bicycles on the bridges crossing the Eel River and Mattole River. Please note that there are no State highway crossings over the Mattole River.

Complete Streets Element

We are still working to update the Complete Streets Project Table for the Caltrans portion of the administrative draft RTP.

Complete Streets Performance Measures

The Complete Streets Project Table includes fields for reporting the applicability and extent of progress towards regional targets for projects listed in the 2017 RTP. Caltrans is unable at this time to indicate any applicability to past projects or progress toward meeting HCAOG's 2021 RTP goals. We invite HCAOG staff to call on Caltrans for any needed information or to work through disparities in practices.

Vision Zero goals:

With respect to meeting the Vision Zero goals, we assumed there to be a typo for the following Regional Target: there are two measures labeled with a Roman numeral two (II). We assume that the performance measure to "decrease by 25% each year the number of people seriously injured in bicycle and pedestrian collisions in the cities and unincorporated county" should be indicated using the Roman numeral three (III).

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Caltrans has recently begun using Collision Reduction Factors on a statewide basis as a way to quantify and/or estimate potential safety gains to be realized using proven safety countermeasures. This methodology does not neatly coincide with the identified Regional Target methodologies to assess progress towards road and highway safety goals. The State's methods provide utility when trying to allocate limited funds on an equitable basis across the State in a diversity of geographic and demographic contexts. If HCAOG would like to measure local progress toward safety improvements using Vision Zero goals, we recommend working with us to reach an agreement on the preferred approach or methodology as a way to prevent public misunderstandings.

Safe & Sustainable Transportation Performance Measures and Targets Matrix

We recommend that fields be added to this matrix for identifying partner/responsible agencies for implementation. Some of the responsible agencies are seldom involved with regional transportation planning and are likely to include local land use agencies, public schools, and the North Coast Unified Air Quality Management District, among others.

Public Transportation Element

The following observations for transit service in Humboldt County is offered for HCAOG's (and Humboldt Transit Authority's) consideration:

Greyhound bus schedule is not integrated into the local transit system, which limits opportunities to make transfers. For example, Greyhound buses leave Oakland at 9 pm and arrive in Arcata at 3:45 am. Local transfers using public transportation are not available at this arrival time.

Downtown Eureka is a major transit origin/destination for the Redwood Transit System (RTS), Southern Humboldt Intercity (SHI), Eureka Transit System (ETS), Greyhound and Amtrak buses. Transit service is constrained here due to the absence of a transit hub. Major transit destinations in the region need to be identified, and dedicated transfer facilities constructed for seamless transfers (in all weather), ticketing and information dissemination to travelers.

KTNeT transit service for Willow Creek and communities north along HWY 96 has not been operational due to financial and logistical reasons.

Greater coordination between tribal transit systems and transit agencies in Humboldt County would be helpful to ensure these transit systems better complement each other.

We emphasize the need to undertake origin/destination analyses, rider surveys, first last mile analyses, audit the transit infrastructure (missing bus stops, bus shelters, transit centers, information booths etc.).

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The bicycle and pedestrian network on local streets should be improved to complement the transit network. Bike racks on buses, bike parking at transit stops, links to transit stops and centers (bike lanes, sidewalks, trails and widened shoulders) all help to make transit more accessible and convenient to riders and potential riders.

Since the number of riders who use transit decreases with distance to the bus stop, we recommend making a commitment to increasing transit coverage across Humboldt County using Mobility on Demand, Micro-transit, and other innovative means to widen the potential ridership.

Clearly identify and understand the areas of the County with transit dependent populations, based on income, vehicle ownership, the elderly, the disabled, etc.

In addition to fixed routes, explore options for demand responsive transit services that fulfill a community's need for medical, grocery, school, recreational and other travel needs. Providing charter buses for events, festivals, etc., in Humboldt County may substantially improve the quality of life.

We recommend that the feasibility of vanpools or commuter express buses be considered within the McKinleyville/Fortuna/Eureka corridor in conjunction with employer incentives (bus passes) to ride these buses.

We suggest setting a target to increase transit ridership for areas in close proximity (within a 1/4-mile walk or a 3-mile bike ride) to bus stops as a performance measure.

We look forward to partnering with HCAOG to cooperatively tackle the new challenges and rise to meet the many new goals established in the 2021 RTP Update. Please contact me with questions or for further assistance at the number below regarding the above comments.

Sincerely,

Jesse Robertson

JESSE ROBERTSON
Transportation Planning
Caltrans District 1
(707) 684-6879 (mobile)

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date received	issue/element	comment
6/28/21	car emissions (GCC)	<p>From: Cathy ChandlerKlein Date: Mon, Jun 28, 2021 at 6:32 PM Subject: idling cars To: oona.smith@hcaog.net</p> <p>I am emailing you about idling cars. I really noticed it on my way home today because there is a lot of road construction from Grants Pass to 20 miles south of Crescent City. I was probably stopped about 10 times for varying lengths. There were long long lines of cars waiting indeterminate times (some up to 45 minutes). Many many left their engines idling the whole time. Drove me crazy.</p> <p>The idea I wondered about was if CalTrans could post an electronic board with estimated wait times and the request to turn off your car. My son mentioned that when he takes the ferry to Seattle, they do that at the car loading ramp. They do not request but tell people to not leave their cars idling.</p> <p><i>[forwarded to Caltrans 8/3/21]</i></p>
7/13/21	street ROWs, EV infrastructure, telecommute	<p>RCEA Community Advisory Committee (Redwood Coast Energy Authority)</p> <ul style="list-style-type: none"> ◆ Jerome C. – Could the RTP work towards repurposing current right-of-ways to promote multi-modal use, for instance when jurisdictions are reviewing or implementing development projects or changing zoning? ◆ Larry G. – An effective way to decrease GHG emissions (from work commutes) is to promote telecommuting. The plan should promote telecommuting and countywide broadband access. Monitoring... ◆ Colin F. – Be cautious with telecommuting because another trend is that people move farther away, like to rural countryside, and their other daily trips can result in overall more VMT. ◆ Pam H. – Is this too much to do all at once? ◆ Dennis – We need more EV workforce development...for more jobs repairing EV cars, working on electrical grid, charging stations, etc. ◆ Luna – The eastern county has much less EV infrastructure and need it to support long trips, especially along Highway 96 between Willow Creek and Yreka. <p>Draft Minutes from RCEA: The group discussed whether the plan could impact how existing streets can be repurposed to promote multi-modal transportation when jurisdictions undertake development projects or change zoning. The group discussed which agency should encourage telecommuting, whether telecommuting reduces VMT and the issue’s connection to economic and regional broadband development. Members expressed the need for EV workforce development, mobile battery charger roadside service, and additional EV infrastructure in Eastern Humboldt, especially along Highway 96 between Willow Creek and Yreka. Staff described RCEA’s EV workforce development efforts and the five existing EV charging stations along Highway 96.</p>
7/20/21		<p>From: Colin Fiske Date: Tue, Jul 20, 2021 at 11:41 AM Subject: Re: RTP Input Questions To: oona.smith@hcaog.net</p> <p>It sounds like I should perhaps limit my comments at this juncture to high-level input, since details are likely to change before the final public draft. A lot of what I had to</p>

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say is in my email dated 5/7, so I won't repeat any of that. (Basically, I'd like to see some more specific/detailed policies to support some of the targets. I think there's been significant progress on that, even since I sent that email, so thanks!) Taking a look at the current drafts, here are a few more general CRTP comments to consider, in no particular order:

- We strongly support structuring the RTP around the new GHG/VMT/safety targets. Thanks for the strong start on that!
- CRTP believes that all the jurisdictions should assess their projects against the GHG/VMT/safety targets, and those that do not contribute substantially to meeting them should not be prioritized for funding. Moreover, projects which have the potential to make it more difficult to meet targets should be removed from the plan altogether.
- The Harbor District, the County and Caltrans should assess their freight projects against the GHG/VMT/safety reduction targets as well.
- The performance measures for each element don't always align with the new GHG/VMT/safety targets and performance measures. I think it would make sense to remove the old performance measures and replace them with the new ones associated with the new targets, as relevant to each element.
- We strongly support the inclusion of the new Equity element, and encourage HCAOG to center equity in all of its work, particularly as it transitions to focus on the new VMT/GHG/safety targets.
- We strongly support the inclusion of the new Transportation & Land Use element and encourage HCAOG to continue to engage more actively in local land use planning.
- In some places in the current draft elements, the GHG/VMT/safety targets are listed in their complete, quantitative form. In other places, they are described only in qualitative terms. For consistency and clarity, we would recommend including the quantitative targets wherever they are mentioned.
- Since on-demand services are being highlighted in the Transit element for the first time, it would be good to specify that such services should be publicly operated or contracted so that they can be designed to complement fixed-route transit and reduce VMT/GHGs as much as possible.

Thanks, Oona!
Colin

9/1/21 aviation

From: William Wickman
Date: Wed, Sep 1, 2021 at 9:00 AM
Subject: Aviation System element review
To: Oona Smith <oona.smith@hcaog

Hi Oona,

I've further reviewed the Aviation System Element as we had discussed. My conclusions remain the same. This document would far better serve its purpose without the inclusion of most of the "tables" of data pertaining to the airports in Humboldt County. The "data" is deeply flawed information. Continued dissemination of this information contributes to the continuation of the problems at our airports. I'll provide some examples.

Page 6-7, "Table Aviation 1. Public Use Airports in Humboldt County"

FOT Rohnerville airport is shown as having 3 aircraft based and average operations of 68 per day. As of actual count last Saturday there were 29 aircraft based at FOT. The best estimate from users is that 15 operations per day would

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be maximum. The table on page 6-13-14. Table Aviation-4, Aviation Forecast for Based Aircraft, 2010-2025 also contradicts this information showing 38-41 aircraft based at FOT.

Also on page 6-13, "Table Aviation-3. "Forecast Airport Activity for Humboldt County 2017-2039" shows FOT with 27,500 annual operations for an average of 75 daily.

"Table Aviation-5. Aviation Forecast for Annual Operations 2010-2025 page 6-14-15 again contradicts this information showing between 29,370 and 34,600 annual operations. All this is pure speculation.

The title "Facility Needs" beginning on page 6-22 comes from the Airport land Use Compatibility Plan for ACV. This is another case of somebody filling in the blanks. Some of these things are needed, some things have been completed and some....etc, etc. Garberville's runway was resurfaced two years ago as an example.

On page 6-25 "Table Aviation-6. Airport Enhancement Needs to Upgrade to Minimum Standards" from CalTrans is ridiculous. I site as one example the first listing which is runway 32-14 at ACV. Caltrans lists the minimum "acceptable" length as 7000'. Over the years this runway has been "acceptable" for United Airlines, PSA, AirWest, Alaska Airlines, American Airlines, Avelo airlines and others. As an example Orange County John Wayne Airport handles about 17 million passengers a year from about seven major airlines flying to destinations across this nation from a single runway that's 300' shorter with more obstructions and noise problems than the runway at ACV. The estimate that it would cost only 1.1 million dollars to extend the runway 1000' is laughable, even if that in itself would not cause a lot of operational problems. There are many, many other inconsistencies and errors in this table.

As one final example in the "Action Plan: Proposed Projects" , "Table Aviation-7. Regional Airport Capitol Improvement Plan (CIP) and Planning Projects" the references to constructing the ARFF building at ACV. These were completed a year ago. I could go on but again much of this is pure speculation based on out dated, incomplete and incorrect information.

My suggestion is that these tables of "data" not be included in this document. To include them would be to prolong and further institutionalize the problem. Misinformation is far worse than no information.

If you're interested in "opinions" pertaining to the problems of our airports I'd be happy to chat anytime. Below I'll attach my aviation resume that's on file with the county.

Thank you Oona,
Bill Wickman

9/2/21	Introduction, planning assumptions	From: Rymer-Burnett, Saskia@DOT Date: Thu, Sep 2, 2021 at 7:34 AM Subject: Caltrans comments on 2021 RTP Update Intro/Administrative chapter draft Hello,
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Please see attached a copy of our comments for the 2021 RTP Update draft Intro/Administrative chapter that was attached to the 9/2/21 HCAOG TAC packet. We have some questions, and recommendations for revisions to include in the chapter, particularly relating to some of the planning assumptions. For a vote, we would approve moving forward with the chapter subject to including the recommended revisions.

Thank you,
Saskia Rymer Burnett
Transportation Planning
Caltrans District 1 – Eureka

Draft 2021 RTP Intro-Administrative Chapter Comments for HCAOG:

Where will the 2017 Vroom Humboldt County Profile narrative be in this document?

Page 1-1:

- Climate Change. In discussing the shift to renewables, it could be better to refer to zero emission vehicles, ZE, as well as electric vehicles (EVs) as the technology evolves.
- Safety and Health. In addition to bike/ped fatalities discussion, this section could identify other relevant safety issues, (emergency evacuation planning, other?).

Pages 1-2, 1-3:

- Safe & Sustainable Transportation Targets. Reformat the bulleted list to improve legibility.
 - Under Planning Assumptions: Planning assumptions should include a broader range of planning topics to strengthen this section.
 - Travel Mode. This section should identify more transportation mode options, particularly air and marine (river, lake, coastal). Innovations to make these modes zero or reduced emission could change travel patterns. **In this sentence, the qualifier “stubbornly” seems unnecessary and is effective as, “Car trips remain the predominant mode of transportation...”** Why this is so could be useful to identify (large rural county, dispersed communities). Include more on pedestrian facilities/trails/walkable communities to balance the emphasis on bike facilities.
 - Planning Requirements. We are not clear what is meant by this planning requirements section - planning/ transportation legislation? **Are there additional “requirements” other than climate considerations, GHG reduction strategies, and VMT reduction targets?**
 - Energy & Fuel Sources. Include the term zero emission as well as electric for vehicles and charging infrastructure. Hydrogen could become increasingly common, especially for transit. Delete the gas powered (ICE) vehicle comment.
 - Technology. Expand the scope of this technology discussion. **The sentence, “people with mobile devices will enjoy greater transportation options and conveniences than people without mobile devices” cuts short and limits the technology and transportation discussion.** Other technology areas include Transportation Management Systems (ITS, changeable message signs, traffic monitoring stations to assist with emergency response times, etc.), solar-powered callboxes in remote areas, *broadband*, touchless pedestrian pushbuttons, bike/ped data systems (modeling, GIS), sustainable and other freight options (autonomous vehicles, drones), ZE charging infrastructure, transit innovations (route planning, payment systems), etc.
 - Extreme Weather. Include increasing temperature/heat, and future infrastructure planning needs, as well as repair and maintenance, to round out the discussion.
 - Page 1-6:
 - Under Goals, Equitable & Sustainable Use of Resources: add “access” here.
 - Related Plans: include references to Caltrans state Active Transportation Plan (ATP). The draft ATPs for District 1 counties (Humboldt) are to be adopted this year.
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- The vision for VROOM is to reduce pollution, promote housing in walkable neighborhoods near transit, and build out a complete network of bike and pedestrian paths for a healthy lifestyle. Identify how the vision addresses residents' needs and could be implemented in smaller rural communities, such as Shelter Cove, Petrolia, Weitchpec, and goals or policies (Area/other Plans), ie, for trails and bike/pedestrian connectivity within the community to shops, destinations, hubs etc.

9/13/21	transit (Amtrak, HFC in Redding); McKinleyville bike/ped and transit; Humboldt Bay Tram	<p>From: Dwight Winegar Date: Mon, Sep 13, 2021 at 8:43 PM Subject: Questions / Comments today for HCAOG (2021-09-13M) To: <oona.smith@hcaog</p> <p>1) On “Regional Transit” - Will we see a system (protocols) like the Oregon POINT (interagency and partner carriers sharing one vehicle in collaboration) to replace the current AMTRAK Thruway system (protocols = MUST connect with a train to use regardless distance) for the North Coast? Would HCAOG have a say in changing this current system to allow such Motorcoaches for the public to say .. get on at the new HSU AMTRAK stop and ride to ... Garberville? - or an Arcata rider to get off at something like Laytonville or Willits and collaborate with Greyhound so that it’s a joint effort and shared revenues (as POINT does)?</p> <p>2) With the latest news of HTA potentially getting more powerful Fuel Cell busses and 12 in order to have a Hydrogen Fuel Cell Facility will Shasta COG / RTPA also be looking into such an arrangement in Redding, and then working together for a JTPA to operate a straight-through bus over 299? We know they were talking about Electric Busses over there but have not heard any news since the pandemic. Of course those electric busses were mainly aimed at I-5 to Sacramento since the legislators would not consider a North State Train (like the Capital Corridor, or San Joaquins). But that plan also included a hub for Thruway connections from Redding in each direction.</p> <p>3) Group Presentations, Discussion and Input: Would HCAOG be interested in working with LeAnn S. (AMRTS) and Gregg Pratt (HTA) to do a roundtable with all the drivers / staff for observations, input and learning more about HCAOG. See what the “front-liners” have as input to share.</p> <p>4) Another Group that I belong to that might be interested in our local Granges, starting with Dows Prairie Grange / Humboldt (Hill) “501” Grange as the lead. Same person Kathy Moley has the Zoom equipment for both, and has been a civic leader connecting with McKinleyville Chamber as well. Dows Prairie expressed interest in the past about RTS service for Does Prairie Residents offering to help get a shelter and pull-out at Grange Road.</p> <p>5) Speaking of McKinleyville ... Collin with the Transportation Coalition helped get word out about the Zoom Meeting tonight and we’ve had concerns about McKinleyville including the bicycle / pedestrian interface from Valley West area to at least McKinleyville Civic Center. We hope to hear continued follow up about the safety and awareness of the connection from Wymore Drive to Central Ave. (and maybe even for Equestrians in that picture across the Mad River). Then there is Transit in McKinleyville ...</p> <p>The layout of Transportation in McKinleyville had been a challenge ever since it became developed and continues. “Big Bus” Transit has never seemed like a satisfactory solution, except as a “Mainline” connection, and even then the route was “bent” as best as possible to serve the greatest coverage area by a through 40-footer. But what keeps coming up over and over for at least the last 2 decades or more has been something smaller on an on-demand basis. Today we now have</p>
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vehicles like the Ford Transit vans. It would seem like Ford may be soon producing those as electric ZEV's too. Something small that's going to be a ZEV and can take residential streets on something of a circular route but flexes from being completely "Fixed" route and covers a general route on-demand. At peak hours this might even include going over to Fieldbrook to bring people over to connect.

Such a concept using McKinleyville as the pilot project might also hold potential for other rural areas such as SoHum, or even the Trinity Valley (East County). I noticed Supervisor Steve Madrone on the Zoom conference tonight and I know he's interested in this too.

6) Has anyone brought up in a while my idea for the "Humboldt Bay Tram"? That goes back a ways to when there was discussion about what to do with the NCRA trackage and the discussion of a passenger train, excursion train, or even Light Rail. The last term gets close, but up until now that has always meant overhead wiring or else heavy rail vehicles like SMART went with. I think the day is here NOW for us to look at the idea of a passenger traction system that Europe calls a "Tram" that would be essential busses on rail that are NOW ZEV electric and even the Fuel Cell idea hold potential. I had started talking with Dr. Tom Jackson about this before the pandemic when the idea of Cal Poly was first coming up. The potential of ideas and ways to make this now a study concept are becoming more practical and realistic, including plans of the Biden Administration, and the obvious massive work that will be entailed creating the North State Trail and the full Bay Trail plan. I have a lot to say about this which was to be a white paper, but my time has been consumed with work (employment) and have not had a chance to get back to it. Where? Aldergrove to Alton essentially and hits key locations on this whole urban corridor we have. I also point out in my comments as they get written how this also links with Economic Development and evolving planning trends on transit corridors rather than focused on freeways.

Thanks.
- Dwight Winegar

9/26/21

From: Dwight Winegar
Date: Sun, Sep 26, 2021 at 1:04 PM
Subject: Re: Questions / Comments today for HCAOG (2021-09-13M)
To: Oona Smith <hcaog

There's something else that came up here this week too, and it seems like certain groups may have cohesion amongst themselves but not necessarily getting involved with anything outside their group - and that would be the topic of EQUESTRIANS.

Being a Grange member, living here long enough when the slogan in McKinleyville "Where Horses have the Right of Way" meant something, and still living where there are horses nearby... I was at the feed store this week buying grain for the chickens and the talk on the deck was about horses, including where the various stables are nearby. My mind started picturing where the various stables and all the horses are relative to where they go for exercise and exploration.

Key Question: "Is there an EQUESTRIAN ELEMENT" in the RTP - or some section on Planning that is focused on Equestrian travel and Safety?"

When I think of the stables down on Wymore Road just north of Valley West there's not much place to go without risks of "safety". Ideally it might be to the Mad River IF there were ever to be built a river trail (which I've seen somewhere over the years

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on an LRTP) linking up with the Hammond Trail. One "could" cross with their house over that controversial Mello Bicyclist Trail Bridge (off the northbound shoulder) for bikes and pedestrians to safely cross the Mad River, but even so where to from there? Up the high speed Central Ave. on the shoulder which narrows to minimal space going over Azalea Hill to join the hodge-podge Central Ave. sidewalk trail?

Then there are the horses surrounding Mad River Hospital, or some up Heindon Road (again if there were river access up there at the north end ...) AND a number of them quietly tucked back down the length of 27th Ave. in Arcata off of Alliance. Where do the girls who own these horses go with them? Surprisingly they have sometimes been seen walking them in a complete loop over Janes / Heindon Roads to West End Road, - possibly to the Arcata Forest Trail there, or continuing around on Spear Ave. and back to those boarding locations. I know there is almost daily equestrian use of the Arcata Community Forest Trail from the West End trailhead, often with trailers being driven there, but some are still coming from the neighborhood once and a while, and coming down Spear from Alliance or Janes Road would still be safer than coming from the Valley West area.

What I've mentioned is just ONE portion of the County and there are plenty of others, but just here alone there are plenty of concerns I just mentioned over Safety and Equitable Access that it paints a picture for the larger scope of elsewhere in the county as well.

- Dwight

VROOM 2022-2042 – Formal public comment period: Oct. 22 to Nov. 21, 2021
Comments on Full Public Draft
 (listed chronologically)

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	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 Arcata, CA</p>
11/3	rail-banking, multi-modal trails; excursion rails	<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> <p>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</p>

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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 <oona.smith@hcaog.net>

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.

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

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		<p>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		<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>
11/5/21	SST	<p>Letter from Coalition for Responsible Transportation Priorities, Humboldt Baykeeper, Environmental Protection Information Center, Northcoast Environmental Center</p> <p><i>(see reproduced letter below this table)</i></p>
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. 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.

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		<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>
11/8/21	climate change, vision zero, align projects + performance measures with SST	<p>From: Robin Baker Date: Mon, Nov 8, 2021 at 2:36 PM Subject: Comments on 2021 RTP Update To: <oona.smith @ hcaog</p> <p>Dear Ms. Burks and Mr. Johnson:</p> <p>Thank you for the opportunity to comment on the draft 2021 update of the Regional Transportation Plan (RTP). This plan is essential to preparing our region for the impacts of climate change and for mitigating those impacts. Additionally, it is imperative that we make our community one in which no pedestrians or cyclists are killed by cars.</p> <p>With this in mind, I would like to encourage HCAOG to consider the recommendations submitted by CRTP, NEC, EPIC and Humboldt Baykeeper which I have reiterated below.</p> <p>Thank you for your attention to this important process.</p> <p>With gratitude, Robin Baker McKinleyville Resident</p> <p>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.</p> <p>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</p>

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		<p>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.</p>
11/8/21	Trinidad Area Access Improvement Project	<p>Letter from J. Bryce Kenny on behalf of Humboldt Alliance for Responsible Planning (HARP) <i>(see reproduced letter below this table)</i></p>
11/9/21	SST, evaluate projects	<p>From: Holly Quinn Date: Tue, Nov 9, 2021 at 12:36 PM Subject: Comments on 2021 RTP Update To: oona.smith @ hcaog</p> <p>Dear HCAOG,</p> <p>I appreciate the work you have done for the Safe and Sustainable targets.</p> <p>Please evaluate all of the projects in the plan to make sure all they will actually meet those targets.</p> <p>Please make sure that projects that could encourage more driving or make streets more dangerous are not included.</p> <p>Regards, Holly Quinn</p>
11/14/21	targets; evaluate projects	<p>From: Cathy ChandlerKlein Date: Sun, Nov 14, 2021 at 7:01 PM Subject: Comments on 2021 RTP Update To: oona.smith@hcaog</p> <p>As part of 350Humboldt, I want to thank HCOAG for the Safe and Sustainable Transportation Plan. It is excellent. We are writing to encourage HCOAG to evaluate projects as they unfold to make sure they meet the targets. Thank you again for HCOAG's work in this important arena.</p>
11/14/21	targets; evaluate projects	<p>From: Emily Siegel LCSW</p>

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		<p>Date: Sun, Nov 14, 2021 at 7:19 PM Subject: Comments on 2021 RTP Update To: <oona.smith @ hcaog</p> <p>Thank you very much for putting together the Safe and Sustainable Transportation Targets. I am impressed with the critical targets that have been included especially big increases in transit trips and electric vehicle charging stations and ensuring new housing is walkable and transit-oriented.</p> <p>I'm writing to encourage you to evaluate all of the projects in the plan to make sure they will actually meet the targets in the plan. Please make sure that projects that encourage more driving or make streets more dangerous are not included. It is so very important to me that these new targets are met. — Emily Siegel LCSW</p>
11/14/21	targets; evaluate projects	<p>From: Daniel Chandler Date: Sun, Nov 14, 2021 at 7:58 PM Subject: Comments on 2021 RTP Update To: <oona.smith@hcaog</p> <p>Thank you very much for adopting these transportation targets:</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 all new projects to make sure they fit in with achieving these goals.</p> <p>Thanks, Dan Chandler 350 Humboldt Steering Committee</p>
11/14/21	various	<p>Humboldt Trails Council <i>(see reproduced letter below this table)</i></p>
11/15/21	trees, landscaping	<p>From: Michele McKeegan Date: Mon, Nov 15, 2021 at 11:12 AM Subject: HCAOG Regional Transportation Plan - 2021 Update To: <debbie.egger@hcaog> Cc: Beth Burks</p> <p>As the co-founder and continuing member of Keep Eureka Beautiful, I would like to submit the following comments on the HCAOG Regional Transportation Plan - 2021 Update on behalf of Keep Eureka Beautiful.</p> <p>After reading the entirety of the Plan I am concerned about the omission of landscaping and trees as a critical element of any transportation plan. Here are the areas where they are most conspicuously absent:</p> <ul style="list-style-type: none"> • pg 2-3 shows a diagram of a tree-lined street to demonstrate how speed changes drivers' perception of the road but makes no allusion to trees.

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- pg 2-6 summarizes public concerns about roads and services and doesn't even mention beautification or the lack of landscaping and trees, which have always been a major concern that I've heard voiced in public forums.
- Section 3, Global Climate Crisis has no mention of trees and greenery, essential elements of dealing with climate change.
- Section 7, Complete Streets and Connected Communities has a diagram on pg 7-4 showing a "complete street" with a green belt on each side and there is a passing mention of landscaping later as part of an ideal Main Street. But the only place that beautification is mentioned is in a listing of current Eureka street projects. No mention of trees, despite the fact that the report uses a tree symbol to indicate "safe and sustainable " objectives, none of which are tree planting.

There is considerable discussion throughout the report about motivating more pedestrian and bicycle activity but no mention of greenery as one of the things that walkers and bicyclers want.

I am very discouraged about the near-total lack of attention to trees and landscaping in a document laying out a plan for our county's roads and hope there will be some revisions to this document.

Toward a greener world,
Michele McKeegan

11/17/21	project and equity criteria	Elaine Astrue <i>(see reproduced letter below this table)</i>
11/19/21	Trinidad Area Access Improvement Project	Bruce Kenny <i>(see reproduced letter below this table)</i>
11/20/21	port, rail	From: John Hoeflich Date: Sat, Nov 20, 2021 at 10:43 AM Subject: Humboldt Regional Transportation Plan Update To: beth.burks@hcaog
		Ms. Beth Burks HCAOG Executive Director
		Dear Ms. Burke:
		Thank you for the copies of the RTPs.
		<p>I don't agree with the conclusions of the Port of Eureka Study that states it is too small for container ships. Humboldt Bay has more room than Ports of San Diego, California and Montreal, Quebec. The main impediment is the bridge from Eureka. Is it high enough?</p> <p>Regarding the rail section of the RTP; private investment should be permitted to repair the railroad and work in conjunction with Port Development. When the North Coast Railroad was privately owned, \$millions was spent to keep it in a state of good repair and operating.</p>

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Best Regards,
John Hoeflich

Comments received after November 21, 2021

11/23/21 various, health and climate action

From: Wendy Ring
Date: Tue, Nov 23, 2021 at 6:53 PM
Subject: Comment on RTP
To: beth.burks@hcaog, mjohnson@ci.fortuna
Cc: oona.smith@hcaog, stephen.luther@hcaog

Comment on Regional Transportation Plan Update draft

Thank you for the opportunity to comment on the 2021 Regional Transportation Plan Update.

As a health professional, I applaud the high priority given to health and climate action and strongly support the Safe and Sustainable Transportation Targets. The public input described in Chapter 2, with active transportation infrastructure ranking higher than fixing our county's rundown roads and bridges, makes it clear that the public places a high priority on reducing greenhouse gas emissions from transportation by investing in transit and safe walking and biking.

With transportation being Humboldt's biggest source of greenhouse gas emissions, HCAOG has a major role to play in our current climate crisis. While this draft really moves the needle in terms of ambition, there is a troubling disconnect between stated goals and actual plans. The inconsistency is understandable. That's the way it's always been done. Jurisdictions don't have the resources to have sustainable transportation experts on staff. Civil engineers are historically not that enthused about public input. However, we are in the biggest war that humanity has ever fought and we can't win with each town mounting its own independent army.

It's way too late for a laissez faire approach to cutting transportation emissions. We need a truly regional approach with HCAOG becoming a centralized source of expertise, resources, and advocacy for the region, which also steers to keep action in line with strategy. Gearing up for this task should be an important element of the RTP because without it, VROOM will just be spinning its wheels. Not investing resources here will just lead to more wasted funds and opportunities.

Chapter 6 Land Use Transportation

I strongly support the policies in this section but they are so important that the plan should be more specific about what HCAOG will actually do to integrate transportation into land use decisions.

Chapter 7 Complete Streets

HCAOG will not be able to meet its goals unless it sets priorities and allocates resources accordingly. While the plan sets forth a rubric for Mode Shift, VMT, Access and Vision Zero, it is troubling that Humboldt County, Eureka, Rio Dell and Fortuna all left it blank. All projects must be evaluated impartially and ranked by HCAOG staff with a numeric scoring system that allocates points instead of check boxes, for how well or poorly each project would contribute to achieving the RTP's goals. Only projects consistent with the goals and objectives should be listed in the plan.

The metrics in the Safe and Sustainable Transportation Targets should be used for performance measures. LOS has been replaced by VMT as the appropriate metric for vehicle travel in CA. Delay and congestion should be removed.

Chapter 8 Trails

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Not all trails are commuter trails, as the title of this chapter suggests. Given the climate crisis and the strong public preference for climate action and getting places, trails that should take priority are those which enable people to safely walk and bike **on trips where they would otherwise drive. "Commuter" also implies trips to work,** but the majority of trips in the county are not to workplaces.

A better distinction is between transportation and recreation. Trails used for transportation connect residential areas with schools, commercial centers, parks, and other residential areas. Trails used for recreation, which are often reached by car, do nothing to reduce VMT or help people get where they need to go. The RTP should lay out a strategy for promoting trails which reduce VMT. Are they intra town trails that increase active short trips for more people, or inter town trails that decrease longer car commutes for fewer people? If we don't know, how do we find out?

Chapter 9 Public Transportation

In addition to decreasing headway and increasing bus stops, eliminating fares is a proven method of increasing ridership. Elimination of fares is more effective than targeted vouchers and has been shown to save time and money while increasing ridership as much as 60-70%. The head of Sonoma County's transit agency told me that public response to limited fare-free days was not a good predictor of what happened when many towns in the county went fare-free every day.

Eliminating fares is one of the most powerful things HCAOG can do to promote transportation equity. It removes cost as a barrier to accessing employment, education, and services; and increases the money low income households can spend on other necessities. Investing in free transit is particularly important for young people because it can create lifetime transit riders.

The 10% farebox requirement does not have to be a deal breaker. Communities have voted to tax themselves for free and improved transit. Corvallis OR added a surcharge to utility bills, Olympia WA voted to increase local taxes, Sebastopol used General Funds. HCAOG should also join with other counties in advocating for bills in the legislature that promote free transit.

One big barrier to EV adoption is the paucity of fast DC charging for long distance trips. This is especially true in rural Northern CA. EV owners driving out of Humboldt are reliant on a small number of chargers for which there will be increasing competition. I recently had to turn back from an EV trip to Santa Rosa when my phone app said the chargers at Benbow were out of service. The RTP should include expansion and improvement of long range transit from Humboldt to major cities to the north and south as an alternative to driving and air travel. This would also provide a way for the expanded number HSU students to come without bringing their cars.

Chapter 10 Aviation

While air access is important, its contribution to climate change cannot be ignored. Other than the future impact of sea level rise at Murray Field, VROOM gives this topic short shrift. The supply of carbon neutral aviation fuel over the next 2 decades will not be sufficient for air travel to continue at its current volume without burning fossil fuel. The decreased cost and more frequent flights celebrated in this chapter mean increased greenhouse gas emissions, not only for flights originating from our airport, but from the connecting flights as well, since it is very unlikely that one would fly to an air hub and then transfer to a long range bus or train. We must accept that business as usual cannot continue and that increased air travel is not an appropriate goal.

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80% of plane trips are taken for leisure purposes and the bulk of aviation emissions belong to a small percentage of wealthy individuals. The very least we can do is charge an airport use-fee that could be applied to fund projects to reduce local greenhouse gas emissions elsewhere in the community. I also question whether Humboldt County should spend \$22 million of public money on small airports which are only used by a very small number of pilots and businesses. Does this use of funds promote equity? The plan should include an evaluation of the need for each airport and how spending public money advances the RTP's priority objectives and Safe and Sustainable Transportation Targets.

Chapter 12 Funding

Fees from parking, from large employers for transportation demand management and funds from the federal infrastructure bill should all be included. Even though it is not required, I would very much like to see a sub-section on health savings and other local economic benefits included in this chapter, since their magnitude is not generally appreciated and can help to sell the community and policymakers on investing more in transit and bike/ped infrastructure. CDPH has an online tool called ITHIM for modeling the health impacts of regional and county transportation policies. Humboldt is not included in the model, but I have used Napa County as a surrogate in the past since it has similar population size and mode split. It is possible to load Humboldt data into the model but that is beyond my abilities.

Thanks for the chance to share my thoughts. I hope you find them helpful.

Sincerely,
Wendy Ring MD, MPH

11/29/21 sustainability targets

Environmental Indicator Accounting Services

PO Box 540, Arcata, CA 95518 | 707-273-3955 | jerome@eiaservices.net

To: Humboldt County Association of Governments
 From: Katy Gurin, Senior Analyst, Jerome Qiriaz, Principal Analyst,
 CC: Michael Richardson, Connor McGuigan, Aisha Cissna,
 Subject: Feedback on the 2021 Draft Regional Transportation Plan (RTP) Update Safe and Sustainable Transportation Targets

Environmental Indicator Accounting Services (EIAS) applauds HCAOG for developing Safe and Sustainable Transportation Targets in the 2021 draft RTP update. We are very supportive of efforts by HCAOG to reduce greenhouse gas emissions from transportation; as you know, transportation, particularly the passenger vehicle sector, is the leading source of GHG emissions in the County.

In support of the draft Humboldt County Regional Climate Action Plan, EIAS has performed modeling to show how Humboldt County can achieve a 40% GHG reduction below 1990 levels by 2030 per California's SB 32 Global Warming Solutions Act. We include insights from this modeling to suggest the scale of efforts needed. We support targets that exceed our modeling results whenever possible.

Comments related to all targets

We overwhelmingly support all measures and targets. Our comments in the following sections are focused on specific measures and targets for which we hope to provide additional insights, context, and/or suggestions for improvement.

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There are numerous targets that specify percentage reductions. However, it isn't clear what baseline these percent reductions are referring to. We recommend referencing specific baselines that can be used to assess the success of percentage-based targets.

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Reduce GHG Emissions in Air District, Target I: Reduce onroad transportation-related fossil fuel consumption in Humboldt County

We suggest establishing numerical targets for this objective if feasible. We recommend targets that are at least as high as those presented in the following table . Our recommended targets consider state modeling results and currently available zero emission vehicle technology for both on-road and off-road sectors. Note we have not suggested a diesel reduction target in 2040 as zero emission technology options for medium and heavy duty on-road as well as offroad vehicles are still quite limited.

	Estimated 2015 gallons consumed	Percent reduction from 2015 by 2030	Percent reduction from 2015 by 2040
Gasoline	51,190,783	30%	80%
Diesel	36,957,782	3%	TBD

Percent Mode Shift, Target II: Double transit trips by 2025, and again by 2030, and again by 2040

According to the Humboldt County General Plan EIR, the transit mode share in Humboldt County for 2010-2014 was approximately 1%, with the largest transit mode share occurring in Eureka (2%). According to the current Humboldt County Transit Development Plan the transit mode share for work commuting was 1.7% with the largest percentage occurring in the Redway / Sheltercove region (7.9%). Assuming that these numbers are still representative of current travel patterns, this target translates into a 1% - 4% transit mode share by 2025, 2% - 8% by 2030, and 4% - 16% by 2040, for all trips and work trips respectively.

To achieve SB32 targets, our modeling assumes 10% of the population will use a transit pass for work commuting, with an assumed 20% offset in annual commute VMT per pass for one-way commute distances of 24 miles or less (we focus on VMT rather than trips because VMT is more easily translated into GHG emissions) resulting in an estimated 1% reduction in total annual VMT.

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We estimate that this translates into 0.4% - 2% of trips converted to transit mode share by 2030, for all trips and work trips¹ respectively. Therefore, we believe this target exceeds our modeling recommendations, which we fully support.

We want to point out that our modeling assumes transit passes are associated with fixed-route transit systems only. We believe that public transit agencies will begin to operate other mobility options for the general public beyond fixed route, such as on-demand systems for all riders (rather than to just qualified riders such as the Dial-A-Ride service). Because the first target in the Percent Mode Shift measure distinguishes between micro-mobility and transit, we find the word "transit" in this target to be slightly ambiguous. We recommend clarifying if this target includes other modes of public transit.

Percent Mode Shift, Target III: Complete a Low-Traffic- Stress and connectivity analysis

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It is not clear to us why a countywide analysis is delayed to 2026. It is our assumption that constraining the geographic scope of this analysis would not significantly impact the cost and time needed to conduct the analysis. Please consider completing a countywide analysis by 2023/24. Another option could be to request a quote for both geographic areas in the RFP announced for this analysis, and choosing a countywide analysis if responses confirm this assumption.

Reduce Vehicle Miles Traveled (VMT) by Car, Target I: Reduce VMT per capita by at least 25% by 2030, and 40% by 2050 (VMT includes zero-emission trips)

Our modeling suggests that achieving VMT reductions at this scale will be challenging (albeit necessary). We predict a conservative² 12% reduction in VMT from 2015 levels by 2030 from the combined impact of 20 different actions (see attached table in appendix) spanning design of new development to expansion of multiple mode shift programs and associated infrastructure. As we developed our model, we struggled to find peer-reviewed methods that

1 Assuming 17% of all trips are associated with commuting to work.

2 We rely heavily on CAPCOA methodology. See Quantifying Greenhouse Gas Mitigation Measures at <http://www.capcoa.org/documents/> page 3

allowed for relatively large shifts in VMT from land-use planning and integrated transportation measures relevant to the County.³

In light of this, to help increase the success of achieving this target, we recommend that HCAOG form a technical advisory committee that focuses on developing regionally specific analyses and recommendations for actions that can be undertaken to achieve this VMT reduction target. We recommend that this committee be retained as a standing committee for the foreseeable future.

We also look forward to the results from additional modeling to be performed by HCAOG as part of the upcoming REAP grant, which we hope may yield more encouraging insights into strategies for achieving this important target.

Zero Emission Vehicle Infrastructure, Target III: EV Charging Infrastructure

We recommend changing the name of the Target to “ZEV Fueling Infrastructure” given that both electric and hydrogen targets have been aggregated under the same target. Or, we recommend creating two separate targets for the measure, one for EV charging and one for hydrogen fueling.

We suggest that goals for EV charging infrastructure be, at the very least, consistent with state on-road ZEV fleet deployment. Modeling by CARB, performed as part of the April 2021 draft of the mobile source strategy, predicts that 28% of California’s on-road fleet will be ZEV or PHEV by 2030. Electrification in CARB’s model is accelerated by EO N-79-20, which disallows ICE vehicle registrations past 2035. For comparison, for the County to achieve SB32 targets we estimate a 31% on-road ZEV adoption rate in Humboldt by 2030 (16,518 light duty vehicles, based on counts from the 2015 GHG inventory). The target in the RCEA’s RePower Humboldt Plan is higher still at 22,000 vehicles, or ~40% of on-road light duty vehicles in the County.

Furthermore, the use of parking spaces as a metric for EV charging infrastructure is understandable. However, we don’t believe the total quantity of parking spaces in the County can be directly correlated with the total

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date rec'd	issue/element	Comment on VROOM 2022-2042 Full Draft (released 10/22/21)
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3 For example, Tayarani et al., 2018 (<https://doi.org/10.1016/j.trd.2018.05.010>) indicate that a 40% reduction in GHGs by 2040 may be achievable through land use and transportation planning. However, this analysis relies heavily on infill strategies in very urbanized areas with projected 52% increase in population and 46% increase in employment which we do not feel is comparable to Humboldt County. Page 4 of 10

quantity of public chargers needed to efficiently support the adoption of electric vehicles. In discussions with colleagues, “back-of-the-envelope” estimates of the number of parking spaces that exist in Humboldt County suggest on the order of 10⁵. Therefore a 25% target would suggest at least 25,000 chargers, likely more, which we believe far exceeds actual requirements.

Therefore, we suggest that HCAOG adopt a target number of Electric Vehicle Charging Stations (EVCS)⁴ based on state modeling results. State model results estimate the number of plugs needed. Because one plug represents one parking space which aligns with the California Building Code definition of EVCS, state modeling results can be directly correlated with EVCSs. Furthermore, it may be possible to allow charging in the right of way for houses that rely on on-street parking⁵. For these reasons, we encourage a target number of EVCSs rather than parking spaces.

For the reasons discussed above, for light duty vehicle charging infrastructure targets, we recommend using the California Energy Commission’s AB2127 Commission Report⁶, Table C-10 to estimate a target number of EVCSs for 2025 (assuming ZEV adoption for the County will be consistent with state planning). For the 2050 target, we recommend changing this to a 2030 target given that detailed state modeling results at the county level currently do not project out to 2050. In addition, because the electric vehicle industry is still very nascent and changing quickly, thirty-year projections are likely to be extremely speculative. We recommend using Table C-15 in the Commission Report for the 2030 target.

It is important to note that the targets in the Commission Report referenced above are developed specifically for light duty EV adoption, and does not account for medium and heavy duty (MD/HD) EV charging infrastructure needs.

4 As defined by the California Building Code, an Electric Vehicle Charging Station (EVCS) consists of the Electric Vehicle Supply Equipment (EVSE) and the parking space served by the EVSE. Therefore, this definition is technology agnostic and directly correlates with both the number of parking spaces and state modeling results.

5 For example, Seattle offers a low-cost method for safe level 1 charging in the right of way: <https://www.atlasevhub.com/resource/electric-vehicle-charging-cord-guidance-for-crossing-the-public-right-of-way/>

6 <https://www.energy.ca.gov/programs-and-topics/programs/electric-vehicle-charging-infrastructure-assessment-ab-2127>

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Therefore, we recommend explicitly stating that the target number of EVCSs recommended above is for light duty vehicles.

We also recommend developing targets for EVCSs for MD/HD vehicle classes in addition to the hydrogen fueling target already included for MD/HD vehicle classes. Battery-electric transit buses, refuse trucks, city delivery trucks, and other types of heavy-duty BEVs are becoming economically favorable in certain applications. The Commission Report referenced above also

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		<p>estimates the charging infrastructure needed for MD/HD vehicle classes, but only provides results at the state level. Extrapolating statewide results from the Commission Report to Humboldt County, we estimate 70-250 chargers will be needed in Humboldt County by 2030 for MD/HD vehicle classes. This aligns with our internal modeling which suggests an MD/HD adoption rate of ~3,800 vehicles (~28%) requiring 268 plugs for MD/HD vehicle classes in order for the County to achieve SB32 targets. <u>Therefore, we recommend HCAOG adopt a separate additional target of 250 MD/HD EVCSs by 2030.</u></p>

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date issue/ element
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Appendix A: Example VMT Reduction Actions Quantified

Action	Metric	2030 countywide target	Notes	Method	% of 2015 VMT reduced by 2030
Increase Density and Mixed Use	# of new household units (cumulative between 2021 and 2030)	3,439	Total RHNA Allocation. Includes measures to encourage infill and mixed use	CAPCOA	Combined impact from all New Development actions: 1.8%
Improve Location and Accessibility of New Development	# of new household units (cumulative between 2021 and 2030)	3,439	Total RHNA allocation. Includes measures to encourage transit accessibility, traffic calming, etc.	CAPCOA	
Include Bicycle Accommodations in New Development	# of new household units (cumulative between 2021 and 2030)	3,439	Total RHNA allocation. Includes bike paths, location near bike trails, etc.	CAPCOA	
Expand Regional Trail and Bike Lane Network	1 mile of class I or class II bike trail (HCAOG bike plan target 94 miles for County)	96	Total miles from HCAOG bike plan	CAPCOA	1.0%
Traffic Calming	% of streets and intersections with improvements	25%		CAPCOA	0.25%

					2030
Pedestrian Streets	Improve pedestrian networks so that all destinations are accessible by walking (yes/no)	yes		CAPCOA	2%
Promote Purchasing of Electric Bicycles	1 e-bike purchase incentivized	2,209		EIAS (based on an assumed commute distance and a single passenger vehicle offset)	0.2%
Install Bike Parking Infrastructure at new and existing facilities	Implement Policy 1.4 recommendations in HCAOG Bike Plan for new construction and renovations, and also extend to existing infrastructure (yes/no)	Yes		CAPCOA	0.01%
Carpooling-workplace	Percent employees eligible for establishments employing over 25 (20%-100%)	35%		CAPCOA	0.01%

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Action	Metric	2030 countywide target	Notes	Method	% of 2015 VMT reduced by 2030
Telecommuting-workplace	Participation rate (1-25%)	14%		CAPCOA	0.01%
Promote Carpooling to School	Participation rate among families in jurisdiction (16-35%)	34%		CAPCOA	0.09%
Implement a carshare program	Number of participants	10,421		GreenTrip Connect	4.2%
Implement a Bike Share Program	Implement program	yes/no		CAPCOA	0.03%
Increase Transit Frequency / Speed	15% reduction in headway in ~50% of transit systems/routes	yes/no		CAPCOA	0.01%
Subsidize Transit Passes - Community Program	Per transit pass	8,905	Free fare. Assume 15% of residents will use passes	CAPCOA	Combined impact from all three transit pass

Action	Metric	2030 countywide target	Notes	Method	% of 2015 VMT reduced by 2030
Subsidize Transit Passes - Housing Developer Program	Number of transit passes subsidized for new transit oriented homes (max = # of new transit oriented homes in jurisdiction in 2030)	300		CAPCOA	subsidies: 2.2%
Subsidize Transit Passes - Employer Program	Number of passes	4,170		CAPCOA	
Increase number of transit stops	Per additional bus stop	45		CAPCOA	0.21%
Microtransit	Vehicles	26		McKinleyville transit study	0.07%
Parking Fees and Time Limits	Implement parking policy with a 25% or greater increase in parking price yes/no	Yes		CAPCOA	0.01%

12/21/21 various Brad Mettam, Deputy District Director, Planning and Local Assistance. Caltrans District 1
 (see reproduced letter below this table)

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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).

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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

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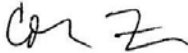
page 3 of 3

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

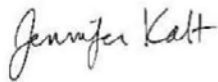
- We ask HCAOG to remove “reducing traffic congestion” from its transportation efficiency objective (p.2-11). Traffic congestion is not a major problem in Humboldt County, and a focus on reducing vehicle delays will only make it harder to meet the SSTs.
- We encourage HCAOG to add revenue from metered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

Thank you for your consideration of our comments.

Sincerely,



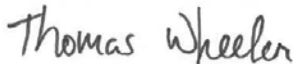
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J. Bryce Kenny
Attorney at Law
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Email: jbrycekenny@gmail.com

November 8, 2021

Humboldt County Association of Governments
611 I Street, Suite B
Eureka, CA 95501

www.hcaog.net

Attention: Ms. Beth Burks, Executive Director

Dear Ms. Burks:

Following are comments made by HARP (Humboldt Alliance for Responsible Planning) on the draft Regional Transportation Plan Update, circulated on Oct. 21, 2021.

HARP — the Humboldt Alliance for Responsible Planning — is a grassroots group of local residents formed to help foster and facilitate citizen and community involvement in the design and review of major land development proposals that may have substantial effect on community quality of life, environmental values and infrastructure, and to help ensure transparency in the development design and review process in Humboldt County.

Current HARP activities are focused on coastal Humboldt County north of Little River (Clam Beach).

HARP is concerned with one portion of the Tribal Transportation Element included in the Plan: the **U.S. 101 Trinidad Area Access Improvements Project** proposed by the Trinidad Rancheria. We do not feel that this project, as written, is an appropriate use of public funds for the following reasons:

The main “need” for the new interchange, as stated at page 4 of the Project Study Report-Project Development Support (PSR-PDS) approved by Caltrans on December 14, 2017, is that “The only access to Trinidad Rancheria lands from US



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J. B. Kenny page 2

101, Scenic Drive west of the Trinidad Rancheria, is not safe or sustainable.” (Exhibit 1 hereto) This is a patently false statement, as can be verified by any member of the Association by simply driving between Trinidad and the Rancheria on Scenic Drive. The road, while narrow and winding, has one area that had to be repaired after the opening of the casino because of minor shifting and settling. It is stable and comparable to most of the other roads in the Trinidad area.

The road south of the Rancheria is in bad shape, and has been for decades, because of the undercutting effect of the ocean waves on the bluffs below the road, which translates into slumping of the roadbed. But almost no one uses that part of the road for access to the Rancheria. It is much easier and quicker to simply take the freeway to Trinidad and drive south on Scenic Drive. The bad stretch to the south of the Rancheria is used mostly by the residents who live along that road, sight seers who wish to enjoy the spectacular views of the rocky coastline for which “Scenic Drive” is named, or to access one of the beaches along the road.

The PSR-PDS also notes that Scenic Drive is not a pedestrian/bicycle friendly route, and that is true, even for the north portion between Trinidad and the Rancheria. However, it would seem much more cost effective and less impactful to the physical environment to simply widen the road in the most critical places to improve that aspect of it--to the extent that it needs improvement. Most local residents know the road is rough and that they may encounter pedestrians or bicycles on it, and drive slowly and carefully for that reason. And the sight seers do the same because they want to relish the scenery, not speed through it as fast as possible.

The PSR-PDS also notes that the Main Street/Patrick’s Point/Scenic Drive intersection will be “inadequate to accommodate projected increases in traffic due to planned future development.” This is a reference to the Rancheria’s desire to build a 5.5 story 100-room Hyatt hotel onto its existing casino. That project will probably never be built, at least at the scale originally proposed. It is way behind schedule, and it is very questionable whether the new economy that is developing because of the current worldwide pandemic will justify such a hotel. Accordingly, it seems likely that that intersection can be improved by the installation of, for example, a roundabout. Those are becoming more prolific, and drivers are becoming more adept at negotiating them.

The last justification for the project is that “the construction of US 101 severed tribal lands.” Of course, that was true for all properties that were in the path of the freeway when it was built in 1962. As Exhibit 2, an excerpt from a letter from the

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Rancheria to the California Coastal Commission of May 13, 2019, shows, a nine-acre portion of the 60-acre Rancheria ended up on the east side of the freeway with the balance being on the west side. It was eventually disposed of by the Bureau of Indian Affairs (BIA) because it was land locked and an adjacent property owner refused to grant an easement over their property for access to the 9-acre parcel.

That is an example of the BIA not fulfilling its fiduciary duty to tribes, and could have been remedied by the BIA simply condemning an easement across the neighbor's property to ensure access to the 9 acres. Or the BIA could have—and still could—acquire additional property to be added to the Rancheria to make up for the property it lost because of the freeway. The Westhaven/Trinidad community and the public at large should not have to bear the burden of the BIA's malfeasance by losing the scenic corridor that currently exists along US 101 between Westhaven and Trinidad, and dealing with all the other impacts of the planned new interchange.

In 1994, the Rancheria acquired other property on the east side of the freeway on which four residences were constructed and one existing one rehabilitated. It is to connect these five houses to the main portion of the Rancheria that is offered as partial justification for the new freeway interchange.

HARP believes that the reasons given for the new interchange are a mere pretext for the Rancheria's true motive and goal. As set forth in Exhibit 3 hereto, excerpts from the Rancheria's Comprehensive Community Based Plan, show that in 2007, they engaged a consultant who determined that by building a hotel onto their casino, they could increase their gross gaming revenue by 11 million dollars annually, or a 33% increase over what they were making at the time. The local casino market was saturated and Blue Lake and Bear River were substantially cutting into what the Rancheria previously made.

It is obvious that the freeway interchange is designed to get gamblers off US 101 quickly and directly to the casino. Exhibit 3 supports such a finding.

It is not appropriate to spend tens of millions of dollars of public funds to benefit a small number of people, or to inject an agency like Caltrans into an intertribal battle for market share. Nor is it within HCAOG's purview to engage in social engineering for the purpose of setting things right relative to the wrongs that were done to Indigenous People since the arrival of Europeans to North America.

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The Trinidad Rancheria held a public "Design Fair" about a decade ago. At that time, spokespersons said the Rancheria would be content with a simple overpass to connect the two portions. How did that morph into the freeway interchange proposed by this project?

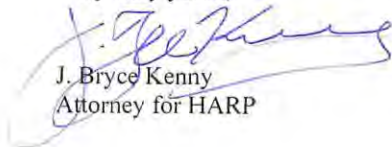
The properties of a great many people, who are completely unaffiliated with the Trinidad Rancheria, some living as far as three miles away, are in danger of being condemned to fulfill the demands for space that this interchange would require. This includes the proposed widening of the entirety of Westhaven Drive, which would involve taking or severe property loss for nearly every parcel along its three-mile length. Whose idea was that? What county official approved it? The County of Humboldt is NOT part of the Trinidad Rancheria Sovereign Nation, nor does the Nation pay taxes to the County.

Further, the proposal violates Caltrans standards, because the state agency does not allow interchanges closer than two miles apart in rural areas, and that section of US 101 already has two interchanges within a three-mile span. Caltrans had to grant a special design exception to allow the preliminary project documents to move forward.

Despite efforts to characterize things differently, the underlying issue appears to be an inter-tribal economic competition for the limited gambling market in the Humboldt Bay area. When the Trinidad Rancheria operated the only casino in this area, it did not complain of limited access.

Please put your support behind eliminating the 101 Trinidad Area Access Improvements Project from the Regional Transportation Plan Update.

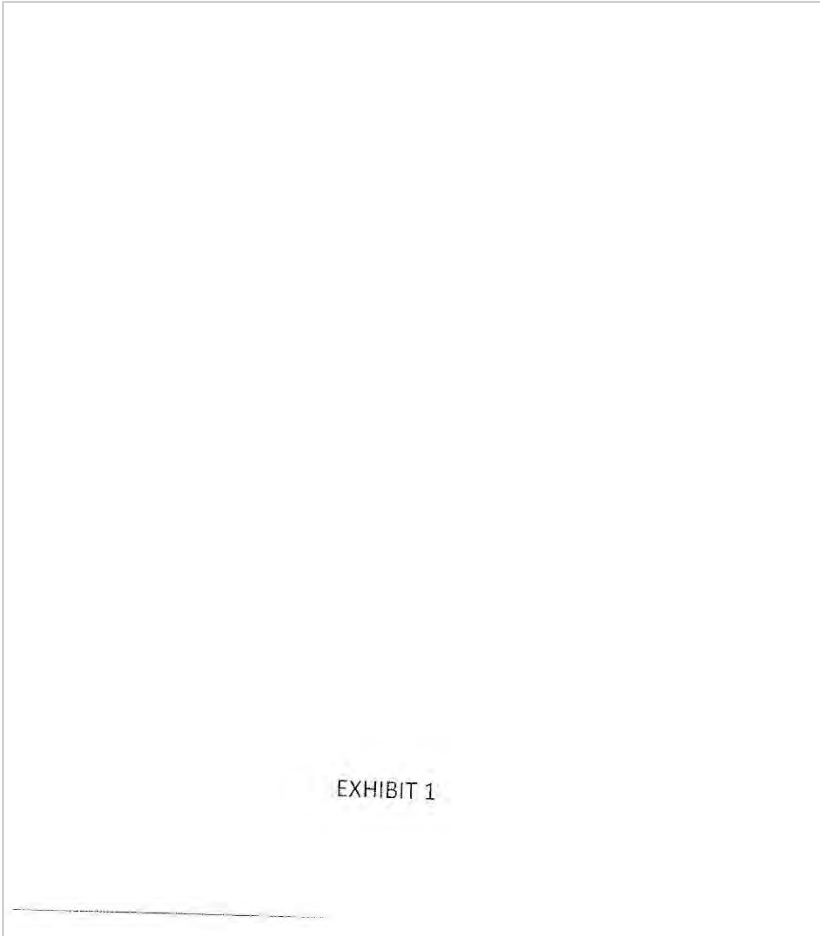
Very truly yours,




J. Bryce Kenny
Attorney for HARP

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US 101/TRINIDAD AREA ACCESS IMPROVEMENTS




Project Study Report-Project Development Support

01 HUM-101
PM 98.4/100.7
XXXXXXXXXX
PPND XXXX
01.0002.D301
01-48040K






PROJECT LOCATION
In Humboldt County,
near Trinidad from
Westhaven Drive
Undercrossing to 0.4
Mile North of Trinidad
Road Undercrossing



"This Project Study Report-Project Development Support has been prepared under the direction of the following registered civil engineer. The registered civil engineer attests to the qualification of any technical specialists providing engineering data upon which recommendations, conclusions and decisions are based."



Russ Wenham
Russ Wenham, P.E. 12/13/2017
Date

Approval Recommended:

Jacqueline Heather Carman 12/13/17
Date
Jacqueline Heather Carman
Chief Executive Officer

Kim Seyel 12/14/17
Date
Kim Floyd, P.E.
Project Manager, District 1

Brad Mettan 12/14/17
Date
Brad Mettan
Deputy District Director

Approved By:

Richard Muler 12/14/17
Date
FOR Matt Brady
District Director, District 1

CALIFORNIA DEPARTMENT OF TRANSPORTATION | DISTRICT 1

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US 101 / Trinidad Area Access Improvements
PSR-PDS, December, 2017

HUM-101 PM 98.4/100.7
EA: 01-48040K; EFIS: 0100020301

Since 2012, a Project Development Team (PDT) has met to guide the project through the project development process. This PDT team has been instrumental to date in developing the purpose and need for the project, and preparing the project to reach this stage. The PDT team will continue to play a key role in guiding the project through to completion.

3. PURPOSE AND NEED

Purpose:
The purpose of the project is to:

1. Provide safe and sustainable access to and from US 101, for all modes of transportation, to the Trinidad Rancheria and the surrounding communities located along Scenic Drive, Westhaven Drive, and in the City of Trinidad.
2. Relieve projected traffic congestion associated with planned future development.
3. Reconnect tribal lands.

Need:
The proposed project is needed because:

1. The only access to Trinidad Rancheria lands from US 101, Scenic Drive west of the Trinidad Rancheria, is not safe or sustainable:
 - a. It is geologically unstable; slides and slip-outs commonly cause partial or complete road closures, particularly during the winter months.
 - b. It is not a pedestrian/bicycle friendly route, due to the lack of sidewalks and minimal or no paved shoulders.
2. The current capacity at several intersections would be inadequate to accommodate projected increases in traffic due to planned future development.
3. The construction of US 101 severed tribal lands.

4. TRAFFIC ENGINEERING PERFORMANCE ASSESSMENT

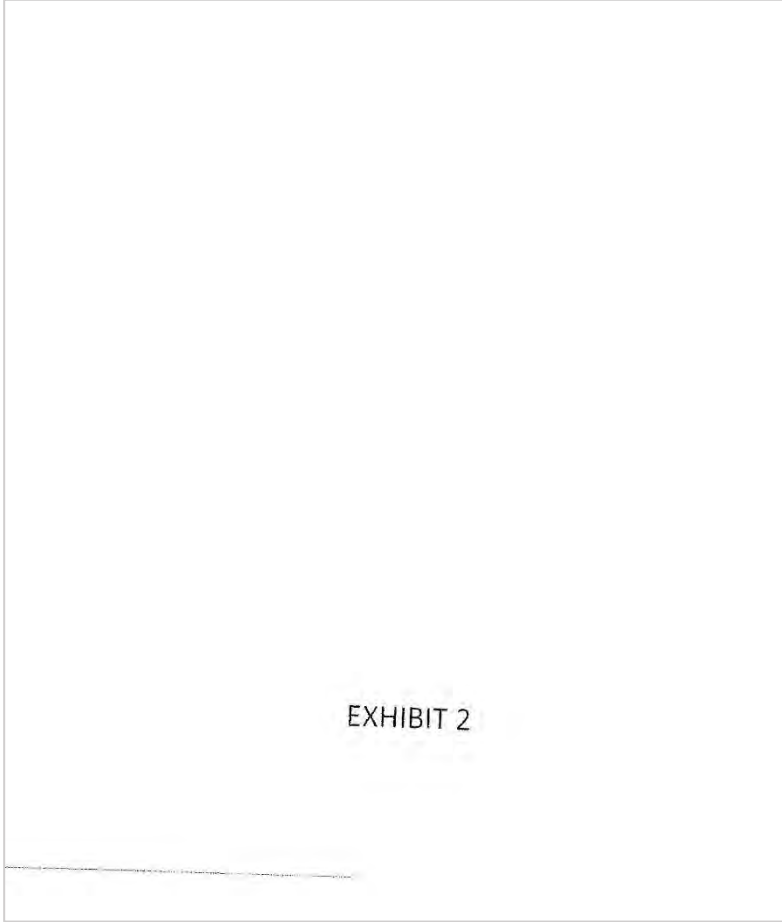
Traffic Operations:
The Trinidad Area Freeway Master Plan Study (Traffic Study), prepared by Omni-Means, Ltd., was approved by District 1 Traffic Operations in February 2014. The Traffic Study analyzed US 101, from the Sixth Street I/C to the Trinidad-Main Street I/C, as well as Main Street, Scenic Drive, Westhaven Drive, the Sixth Street I/C and the Trinidad-Main Street I/C. The Traffic Study analyzed existing performance, and future performance of these facilities based on anticipated growth. The Traffic Study projected traffic growth for this area of Humboldt County, including the City of Trinidad and the Trinidad Rancheria. The development envisioned in the Cher-Ae Heights Indian Community of the Trinidad Rancheria, December 2011, was included in the traffic projections as well. The Traffic Study projected traffic volumes to the year 2040 conditions.

While additional alternatives are presented for consideration in this PSR-PDS, the Traffic Study analyzed three alternatives:

- o No Project.
- o Alternative 1A. Reconstruct Trinidad-Main Street I/C to accommodate year 2040 traffic
- o Alternative 3A. New freeway I/C at Cher-Ae Lane to accommodate year 2040 traffic.

At the time the Traffic Study was prepared, some of the current alternatives had not been brought about yet, including the Baker Ranch Road interchange or the One-Mile Spacing Interchange. While the Traffic

RI721PSR003.docx



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Cher-Ae Heights Indian Community of the Trinidad Rancheria

May 13, 2019

Honorable Members of the Board of Commissioners
 John Weber, Energy, Ocean, Resources and Federal Consistency Division
 California Coastal Commission
 45 Fremont Street, #2000
 San Francisco, CA 94105

Re: Consistency Determination No. CD-0001-19

Dear Commissioners and Mr. Weber:

The Cher-Ae Heights Indian Community of the Trinidad Rancheria ("Tribe")¹ has reviewed the California Coastal Commission ("Commission") staff report for Consistency Determination No. CD-0001-19 ("Staff Report"), and I am providing the Tribe's response and comments. The proposed federal actions addressed in the consistency determination are the approval of an Indian Loan Guarantee by the Bureau of Indian Affairs (BIA), Office of Indian Energy and Economic Development; Division of Capital Investment and a lease of a portion of the Trinidad Rancheria to from the Tribe to the Trinidad Rancheria Economic Development Corporation (TREDC), a corporation federally chartered pursuant to Section 17 of the Indian Reorganization Act (25 U.S.C. § 5124) for the construction and operation of a hotel to be located on the leased premises. As set forth in the Staff Report, the BIA submitted a consistency determination, dated February 11, 2019, to the Commission, which stated the BIA's determination that the proposed federal action and related project is consistent to the maximum extent practicable with the California Coastal Management Program (CCMP).

The Staff Report recommends that the Commission object to the BIA's consistency determination because of a lack of information regarding certain matters and because of concerns about the visual compatibility of the proposed project with the surrounding area. The Tribe understands the Commission's need for additional information, and enclosed with this letter we provide substantial supplemental information to address the areas identified in the Staff Report as needing additional information. Further, although the Commission staff report does not request additional information regarding the visual compatibility concern, we have identified the need for clarification, and we are confident that with this new information, the Tribe, BIA, and Commission staff will be able to identify feasible mitigation measures that will resolve the concern. The Tribe, TREDC and our consultants look forward to working with the Commission staff over the next several weeks to review the new material enclosed with this letter and to discuss mitigation measures.

¹ For clarity, please note that in this letter we refer to our Tribe as "Tribe", our land base as the "Trinidad Rancheria," and our tribal members as the Cher-Ae Heights Indian Community.

Consistency Determination No. CD-0001-19
 Comments of Cher-Ae Heights Indian Community of the Trinidad Rancheria
 Page 3

we can advance this project and our Community development in a manner that is consistent with the Coastal Act and the Commission's mission.

Background of the Cher-Ae Heights Indian Community of the Trinidad Rancheria

The Cher-Ae Heights Indian Community of the Trinidad Rancheria is a federally recognized Indian tribe. Tribe has ancestral ties to the Yurok, Wiyot, Tolowa, Chetco, Karuk and Hupa peoples, but our members are primarily of Yurok descent and our Tribe has been recognized by Congress and the State as a Tribe of historic Yurok origin. Pursuant to a 1906 act of Congress (34 Stat. 333), the Secretary of the Interior, in 1908, acquired 60 acres of land on the coastal bluffs and shore of Trinidad Bay near the village of Tsurai, for the use of what the Department of the Interior referred to as the Trinidad Band.² In 1917 the Secretary of the Interior approved Federal recognition of the Tribe and formally established the Trinidad Rancheria to provide a homeland for our Tribe.³ The mission of our Tribal government, as stated in our Comprehensive Community-Based Plan, is to "preserve and promote our culture and traditional beliefs; improve quality of life and self-sufficiency; uphold tribal sovereignty; create positive partnerships; and protect the environment in order to provide a healthy community, honor our elders and guide our youth."

In 1962, to accommodate the current layout of Highway 101, the United States permitted the new highway alignment to bisect the Trinidad Rancheria, which left a nine-acre portion of the north eastern corner of the Rancheria on the eastern side of Highway 101. The BIA subsequently disposed of the north eastern portion of the Rancheria because it was landlocked by the highway and an adjacent land owner who refused to give the Tribe right-of-way to access that portion of our Rancheria. Due to the construction of Highway 101, the Trinidad Rancheria was reduced by almost 25 percent (from 60 acres to 46.5 acres). The remaining portion of the Trinidad Rancheria, a large portion of which is undevelopable, must provide for the tribal government, tribal housing, and our tribal economy.⁴

In 2013, Trinidad Rancheria conducted a Community Economic Development Survey (CEDS) through our work with the U.S. Department of Health and Human Services. This study revealed that Tribal Members were living at a poverty level of income, over 60% were unemployed, and

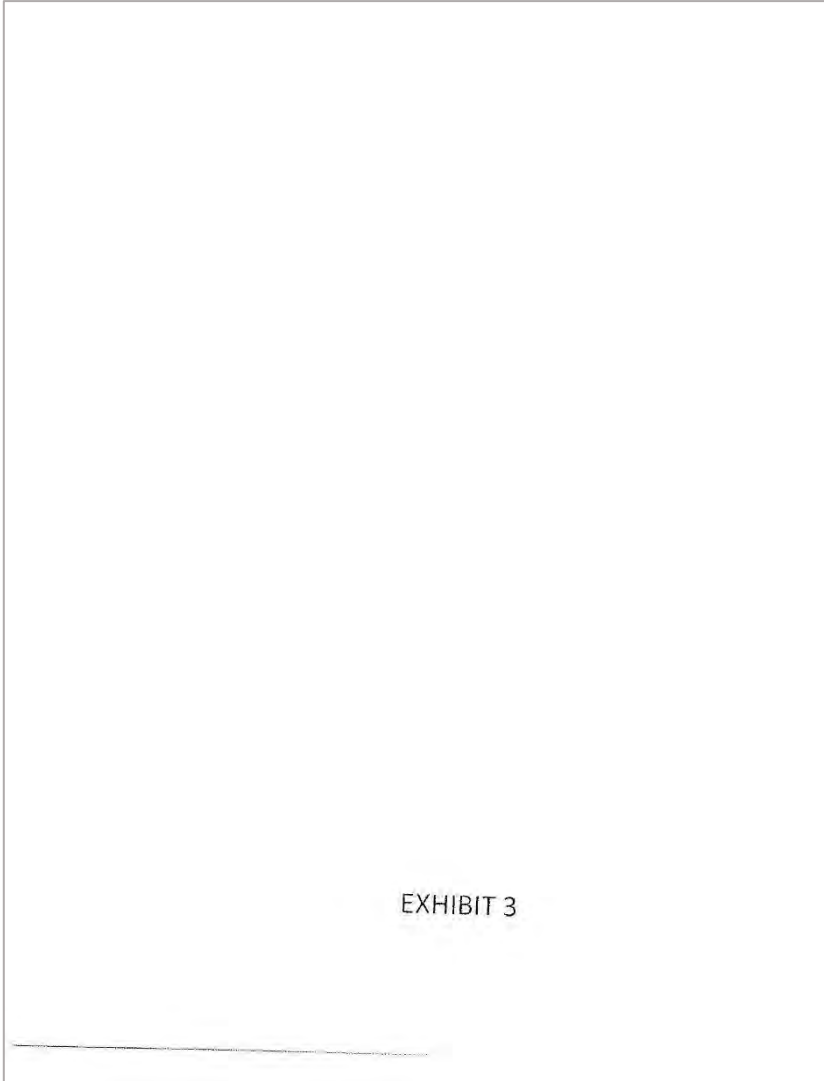
² Department of the Interior Report of the Commissioner of Indian Affairs to the Secretary of the Interior for the fiscal year ended June 30, 1915. (Washington: Government Printing Office 1915). See p. 30 http://images.library.wisc.edu/History/IFaas/CommRep/AnnRep/1517/reference-history/annrep1517_0001.pdf. With regard to the Trinidad Rancheria, Table 30 of this report indicates that 60 acres were purchased in Humboldt County for the Trinidad Band.

³ See Coastal Zone Information Center, U.S. Department of Commerce, Federal and State Indian Reservations and Indian Trust Areas 159 (1974) ("Report of Indian Reservations and Trust Areas"). Although this report also indicates that the Rancheria was in the process of being terminated under the Rancheria Act (P.L. 85-671), the Trinidad Rancheria did not accept the proposed termination, and the Trinidad Rancheria was never terminated.

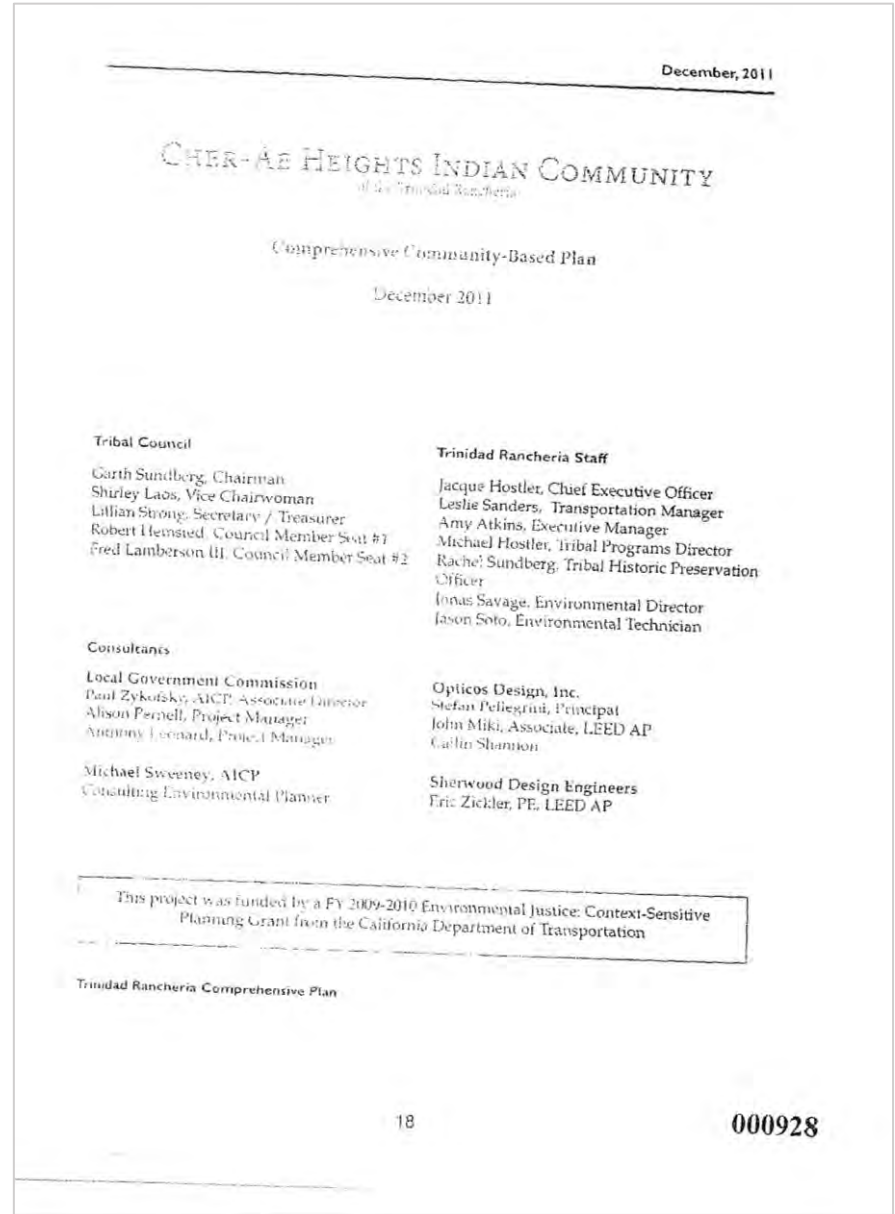
⁴ Through economic development and self-sufficiency, the Tribe was able to purchase additional land for tribal housing, located in Westhaven and McKinleyville, but these parcels are for residential use.

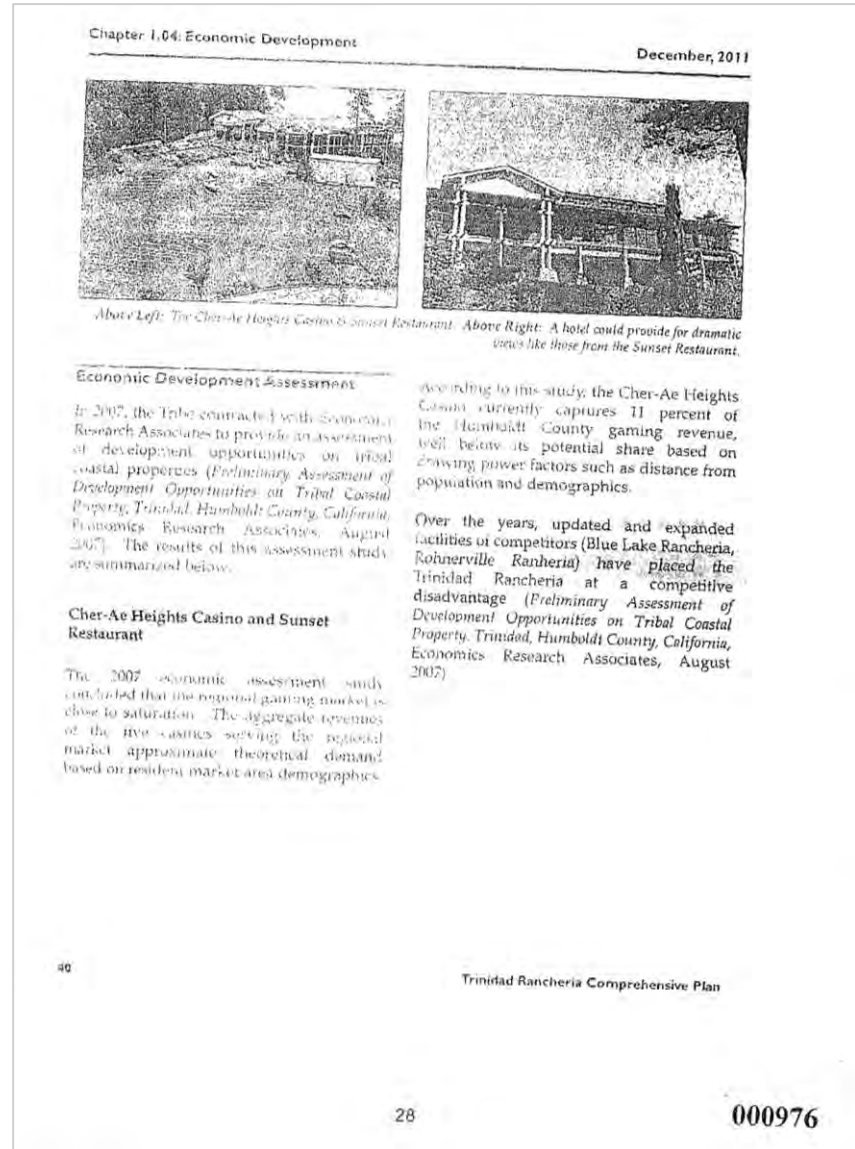
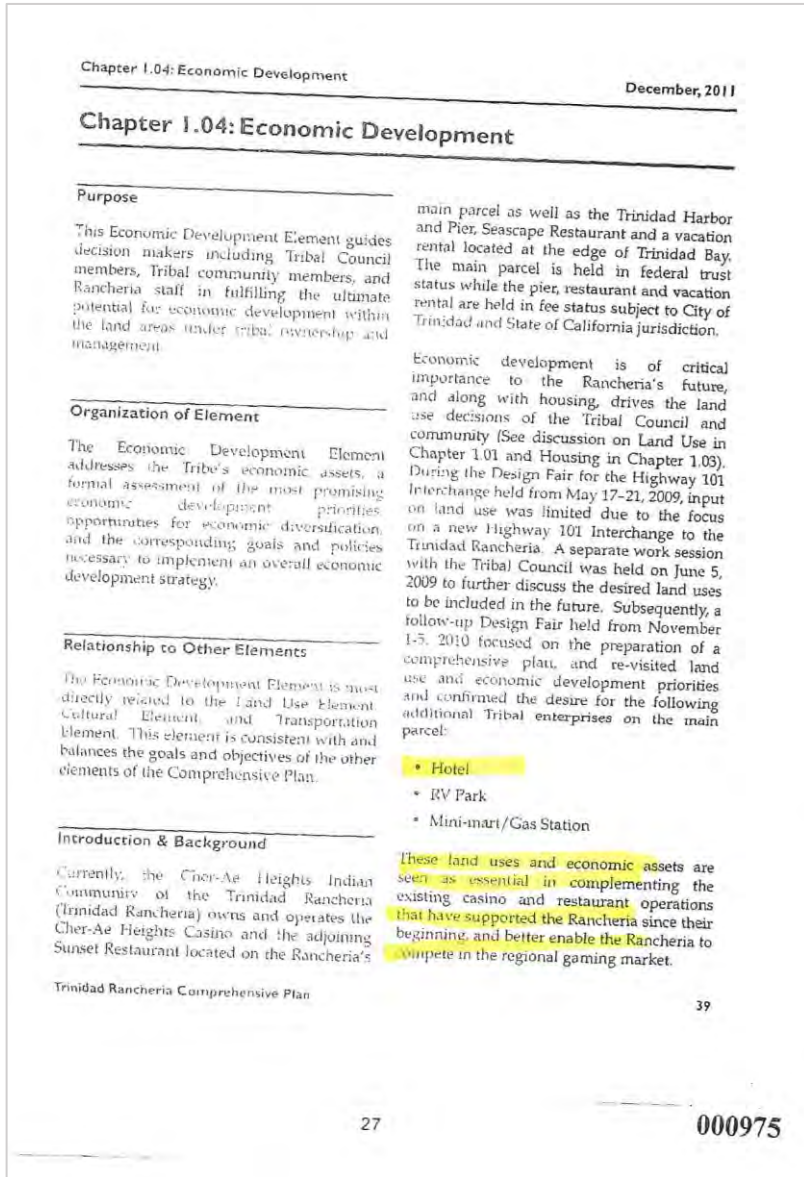
Appendix D. Public & Agency Written Comments

J. B. Kenny pages 9 & 10



J. B. Kenny pages 11 & 12





Appendix D. Public & Agency Written Comments

pages 15 & 16

Chapter 1.04: Economic Development December, 2011

Casino Hotel

The study suggested that increasing competitiveness, mostly through facility improvement, could generate about \$11 million in gross gaming revenue from the regional day trip market, an increase of about 33 percent over current levels. Additionally, the opportunity exists to augment the market through capturing overnight visitors with a casino hotel.

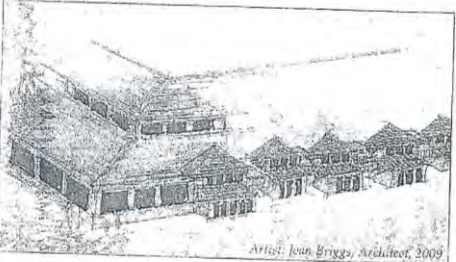
Due to the differences in guest experience, the overnight market does not merely siphon revenue away from the day trip market but adds to the day trip market (Economics Research Associates, August 2007).

The study further concluded that a 130-room casino hotel positioned as a 3.5 star property ranks highest among the uses and capital projects evaluated and promises a strong economic performance based on two factors: 1) the hotel would produce substantial incremental gaming revenue; and 2) the existing casino would somewhat reduce the building requirements of the hotel as the Sunset Restaurant already exists. The casino hotel would incorporate about 50 rooms for resort-oriented guests (Economics Research Associates, August 2007).

The study also looked at a smaller "boutique" hotel of 50-75 rooms, though the economics of a traditional resort-hotel are marginal. The economics could be improved by marketing the hotel units as condominiums. Another alternative involves broadening the casino hotel concept to a position as a resort-casino hotel, whereby the market for the boutique hotel can at least be partially captured (Economics Research Associates, August 2007).

Conference Center

Other facilities that the study determined to be viable include a conference center serving primarily smaller groups of fewer than 100 attendees that could be developed in conjunction with overnight lodging facilities. Potentially, the casino's 800-seat bingo hall/event center could be utilized and/or modified in order to meet the needs of such conferences (Economics Research Associates, August 2007). At this time, there is not a lot of specific community interest in a conference facility alone, though ideas related to a community or cultural center could certainly incorporate abilities to hold conferences relatively small in scale.



Left: An artist's sketch illustrates a new hotel built on top of the existing casino & bingo hall with expansive westerly views of the Pacific Ocean and coastline
Artist: Juan Briggs, Architect, 2009

Trinidad Rancheria Comprehensive Plan 41

29 000977

Chapter 1.04: Economic Development December, 2011

RV Park

The economic study also examined the feasibility of a high-quality recreational vehicle (RV) resort and noted that a premium RV park would feature approximately 15 sites per acre (Economics Research Associates, August 2007).

Retail Adjacent to Highway 101 Interchange

Construction of a new interchange on Highway 101 would benefit the casino and at the same time improve the marketability of the Tribe's land on the frontage areas of the highway. The study did not specifically address the economic potential of a gas station and mini-mart, but both of these uses would benefit from their proximity to the new interchange as well as the existing casino, and restaurant and future Casino Hotel and RV Park.

Tourism Development

Currently, the Trinidad Rancheria has no formal tourism development strategy in place. In 2000, the Rancheria purchased the Trinidad Pier, Seascape Restaurant, and the nearby vacation rental. These facilities provide basic assets related to tourism, especially boating access to Trinidad Harbor and Bay, breathtaking ocean views, surfing, hiking, and sea kayaking among other outdoor activities.

This property includes the main entrance and access point to the Trinidad Head, which hosts walking trails, and cultural and historical points of interest.

Trinidad Bay was designated as an Area of Special Biological Significance (ASBS) in the 1970s in order to protect marine mammal life through the prohibition of waste discharges within this area. Recently, the area was redesignated as a State Water Quality Protection Area and encompasses 1.8 miles and 297 acres of marine waters. Similarly, the California Ocean Plan requires the protection of the kelp beds, considered biologically significant for both the food and shelter provided to fish and invertebrates. Trinidad Bay is also designated as a Critical Coastal Area by the California Coastal Commission (Request for Proposal: Trinidad Pier and Harbor Planning Study, Cher-Ae Heights Indian Community of the Trinidad Rancheria, 2008).

The Tribe is currently in the process of designing and constructing a new pier facility, because the existing facility has structural deficiencies as well as toxic creosote on its pilings which have been determined to be a toxic pollutant in ocean waters. A new wastewater treatment facility that serves a new restroom facility and the restaurant has been completed (Trinidad Pier and Harbor Planning Study, 2008).

The Trinidad Harbor and Pier lands are currently not held as federal trust lands and are considered harbor fee lands for tax and local and state government jurisdiction purposes.

The November 2010 Comprehensive Plan Design Fair focused on economic development opportunities of the Trinidad Harbor and Pier. Many tribal members engaged during the Design Fair process saw ample opportunities to build on the natural and cultural assets of the region. The "gateway" location of the Rancheria to the area's scenic coastline, nearby Redwood National & State Parks, and the public's interest in Native American culture provide opportunities to diversify by becoming more

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Trinidad Rancheria Comprehensive Plan

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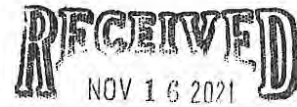
Appendix D. Public & Agency Written Comments

Humboldt Trails Council page 1 of 2



Humboldt Trails Council
Post Office Box 7164
Eureka, CA 95502
humtrails.org

November 14, 2021



HUMBOLDT COUNTY
ASSOCIATION OF GOVERNMENTS

Oona Smith, Senior Regional Planner
Humboldt County Association of Governments
6111 I Street, Suite B Eureka, CA 95501

RE: Comments on Draft Regional Transportation Plan – 2021 Update

Dear Ms. Smith,

On behalf of the Humboldt Trails Council, I am writing to thank you for this opportunity to make comments on the Humboldt County Association of Government's (HCAOG) Regional Transportation Plan (RTP) – 2021 Update.

The mission of the Humboldt Trails Council is to serve as a unified voice to support development, maintenance, connection to, and use of trails for recreation and transportation throughout Humboldt County. This plan is in line with our mission and vision, which takes into account the county's active transportation systems to promote the community's well-being.

The RTP gives focus to prioritizing and building critical transportation projects. We like that VROOM 2022-2042 'addresses transportation's interconnected challenges of climate change, land use, safety, and equity in a way that is both tailored to Humboldt County and consistent with the bold targets set at the state and federal levels.' Your outreach to the community in this updating was extensive and appreciated. We applaud your plans to reduce vehicle pollution, to promote the development of housing and jobs in walkable neighborhoods near transit, meet the needs of all trail users, and to build out a complete network of bike and pedestrian trails so that all users can safely engage in a healthy lifestyle.

What we strongly support in the plan:

- The shift to zero-emission vehicles (ZEVs), and we like that it can be achieved by a substantial mode shift to more walking, biking, and transit trips.
- Regional multi-modal travel on major routes that connect major population centers and destinations.
- The goal of a seamless network of pedestrian and bicycle routes in more densely populated areas.

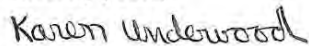
Appendix D. Public & Agency Written Comments

Humbolt Trails Council page 2 of 2

- The land-use transportation objective of expanding healthy community development by designing neighborhoods around safe, attractive, walkable, and bikeable streetscapes designed for people and for social, cultural, economic, recreational, and residential activities.
- Expanding partnerships with community-based organizations in marginalized communities to ensure active transportation investments reflect community needs and priorities.
- Expanding active transportation funding specifically for marginalized communities and centering communities in the planning and decision-making process.
- The revision of permitting and standards to support local and regional agencies in implementing active transportation projects on state-owned right-of-ways.
- Expanding funding for active transportation projects at the local, regional, and state level.
- Prioritizing projects that include Complete Streets elements such as protected bicycle lanes, expanded sidewalks, ADA accessible infrastructure, and those that provide first-last mile transit access.
- Requiring multi-modal project components and Complete Streets upgrades during maintenance, preservation, and rehabilitation activities "where feasible.
- Expanding statewide campaigns to encourage active transportation and educate both active transportation users and drivers about safety.

The Humboldt Trails Council recognizes trails as an integral part of our regional transportation system and we are happy to see trails embedded so strongly in this updated plan. This is a plan that the council will strongly support. Thank you for your time and effort.

Sincerely yours,



Karen Underwood

Appendix D. Public & Agency Written Comments

Elain Astrue page 1 of 2



Elaine Astrue

650-215-8490 eastrue@gmail.com 1337 Stagecoach Road, Trinidad CA 95570

November 17, 2021

Mike Johnson
Board Chair, Humboldt County Association of Governments
cc: Beth Burks, Oona Smith

Chair Johnson & HCAOG Board Members:

This letter is regarding recent discussions on project and equity criteria in the Regional Transportation Plan.

As a citizen advocate, I have sunk many hours into deciphering current policy as well as the new RTP draft. I served on the Ad Hoc Committee for GHG Targets and contributed to the update in other ways as well. .

While the November 4, 2021 TAC Meeting Record is not yet posted, I understand there was a strong backlash from the committee when staff proposed using project criteria (mode shift, lowers VMT, access, vision zero) to align with the RTP's main objectives. This step would be evolution, not revolution, which rarely leads to controversy. As for the status quo, I've been meaning to ask – why do we currently allow projects in the RTP that are inconsistent with our stated goals and priorities? As I see it, they undermine the credibility of that document.

And it was even more surprising that a technical committee would step outside its charter and attempt to influence process and policy. I'm shaking my head that a group of people who believe that our transportation system is primarily for cars could be in a position to shape our collective future. The TAC members seem pretty confident they know the right direction for all of us. I'm hoping the HCAOG board takes this opportunity to clarify organizational boundaries and committee roles.

If there ever was a time for hard internal conversations, it is now. The new RTP will have ripple effects in our community for decades. Nearly every resident of Humboldt County will feel its impact. As we face converging crises of climate change, traffic safety, and equity, how will we respond? Will our plan double down on a broken status quo? Or will it lead us toward a more sustainable, safe, and just future?

One thing is clear: ongoing community engagement will be essential. When deciding whether to get involved and lend my voice in the RTP process, I was wary. I knew that community stakeholders are often marginalized. Citizens are "included" only to discover later that our viewpoints and values were never translated into action. Friends and colleagues predicted I would be wasting my time. Ultimately I decided this is a crucial moment, an inflection point, and I could not stand on the sidelines.

Appendix D. Public & Agency Written Comments

Elaine Astrue page 2 of 2

Right now, it looks like a committee that operates mostly out of public view and whose members are not accountable can sabotage these efforts and force us back to the status quo. Personally I'm angry with myself for believing change was possible. There are probably others who feel the same. Why would anyone engage with local or regional governments, when vested interests always win?

We deserve a functional transport network. We deserve process and organization that brings positive results. We demand real community engagement, not the checkbox kind.

Words can be meaningful or they can be empty - it's up to us.

Thank you for this opportunity to comment.

Regards,

Elaine Astrue

Appendix D. Public & Agency Written Comments

J. Bryce Kenny/HARP letter dated November 19, 2021

page 1 of 2

J. Bryce Kenny
Attorney at Law
P.O. Box 361
Trinidad, California 95570
Telephone: (707) 677-2504
Email: jbrycekenny@gmail.com

November 19, 2021

Humboldt County Association of Governments
611 I Street, Ste. B
Eureka, CA 95501

Attention: Ms. Beth Burke, Executive Director

Re: Comment letter of November 8, 2021

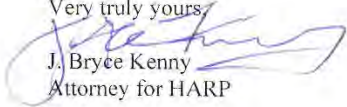
Dear Ms. Burke:

This is a follow up to my letter of November 8, 2021, commenting on the Trinidad Area Access Improvements Project relative to the Regional Transportation Plan Update.

In my prior letter, among other things, reference was made to excerpts from a letter dated May 13, 2019, from the Trinidad Rancheria to the Coastal Commission that asserted that a "nine acre" portion of the Rancheria ended up on the east side of the freeway when it was constructed in 1962, and was subsequently abandoned by the Bureau of Indian Affairs.

Information has now surfaced suggesting that the amount of land the Rancheria lost was much closer to one acre, not nine as they told the Coastal Commission and other agencies. Please see the attached map that shows the small triangle shaped parcel on the east side of the freeway. This issue should be further investigated and clarified, since one justification for a new interchange was that the Tribe lost nine acres of land when the freeway was built.

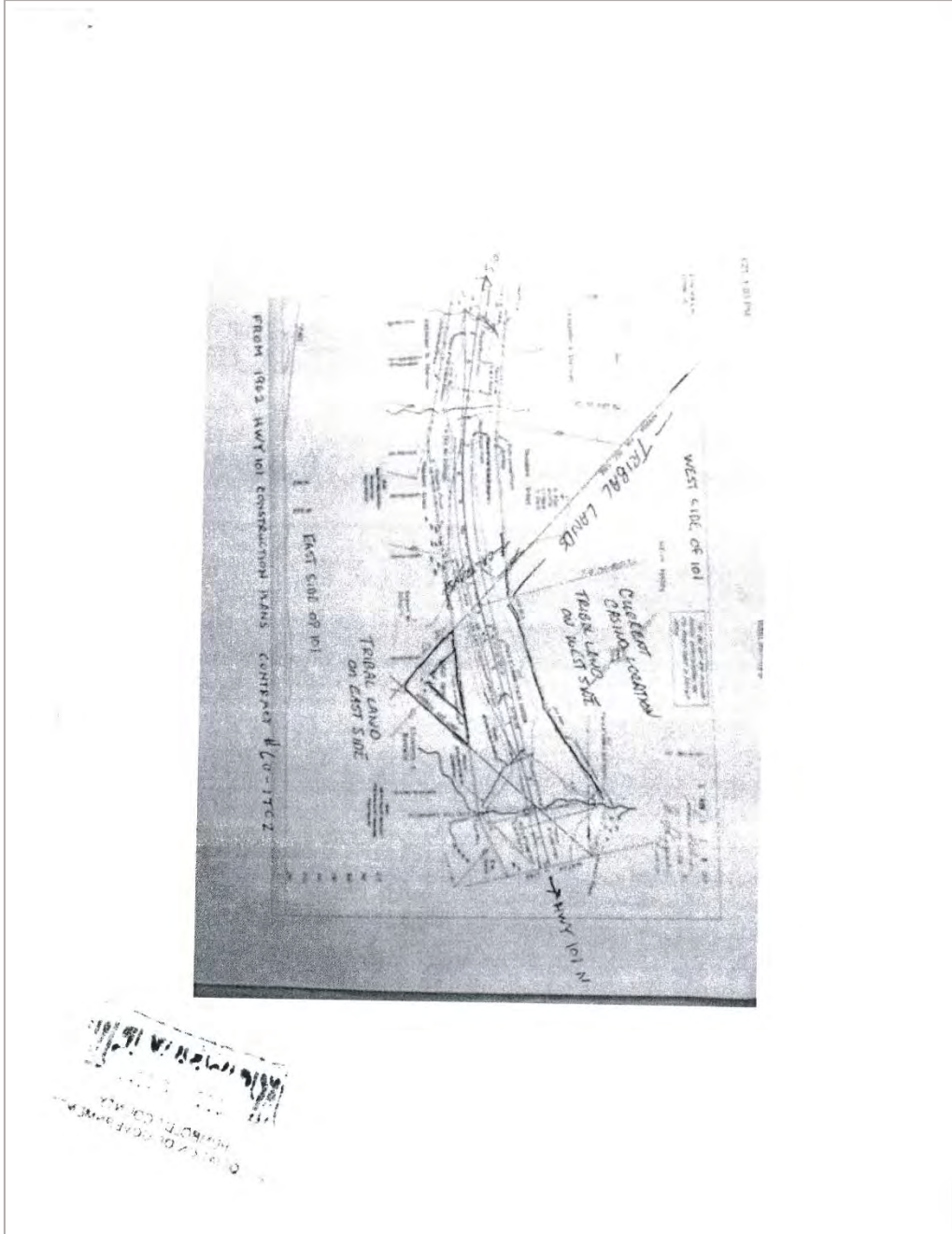
Very truly yours,


J. Bryce Kenny
Attorney for HARP

Appendix D. Public & Agency Written Comments

J. Bryce Kenny/HARP letter dated November 19, 2021

page 2 of 2





Appendix D. Public & Agency Written Comments

Brad Mettam, Deputy District Director, Planning and Local Assistance. Caltrans District 1
Dec 21, 2021

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 1
P.O. BOX 3700 | EUREKA, CA 95502-3700
(707) 445-6413 | FAX (707) 441-6314 TTY 711
www.dot.ca.gov/dist1

December 21, 2021

Ms. Elizabeth Burks
Executive Director
Humboldt County Association of Governments
611 "I" Street, Suite B
Eureka, CA 95501

Dear Ms. Burks:

Thank you for the opportunity to comment on the draft 2022-2042 Humboldt County Regional Transportation Plan (also known as, Variety in Rural Options of Mobility, or VROOM). The Regional Transportation Plan (RTP) is an important policy document that is based on the unique needs and characteristics of Humboldt County. It helps shape the region's economy, environment, social future, and communicates the region's vision to the state and federal government.

We appreciate the opportunity to have worked with the Humboldt County Association of Governments (HCAOG) on the review and development of this draft during the past year. We commend HCAOG for developing sections of the RTP in further detail, especially relating to public outreach/community engagement, equity, climate, and complete streets. We also thank HCAOG for your work with the Native American Tribal Governments in your region.

We have the following comments for HCAOG's consideration prior to adopting the Regional Transportation Plan:

Introduction

- HCAOG's Public Participation Plan is in the process of being finalized and is expected to be completed in early 2020. We recommend including information on what additions and/or changes were included as a part of that update (consistent with Section 3 of the RTP Checklist).
- The Related Plans section (1-6, pages 15-17) provides a good review of Caltrans Plans, however, references to Caltrans Corridor Plans could be added here. Caltrans District 1 completed oversight for the *Eureka Broadway Multimodal Corridor Plan*. Priority routes for new Comprehensive Multimodal Corridor Plans

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Appendix D. Public & Agency Written Comments

Ms. Elizabeth Burks, Executive Director
December 21, 2021
Page 2

(CMCPs) in Humboldt County include State Routes 200, 255 and 36. We look forward to working with HCAOG on these plans.

- We recommend including a list of the Federal Land Management, State, and local agency representatives, including those from environmental and economic communities, airport, transit, and freight, as well as the private sector, who were consulted during preparation of the Draft RTP.

Renewing Our Communities

- Under the section titled "Renew How: Plan Goal & Objective" (2-11, page 28), the third bullet in the Efficient & Viable Transportation System objective discussion refers to the "Greater Eureka Area Travel Demand Model". We suggest updating this example with the more recent Humboldt County Travel Demand Model.
- Page 2-21 (page 38) has good equity policy discussion (Policy5). In future updates, more detail could be added about on how projects would be prioritized and what measures could be used to improve transportation investments to disadvantaged communities.

Tribal Transportation

- The Tribal Transportation Element would be enhanced with a map showing locations of Native American Reservations and Rancherias and identification of transit service and connectivity to Tribal areas (if available).

Public Transportation

- The Public Transportation Element would be enhanced by providing an overview of Humboldt Transit Authority (HTA) that includes a description of the fleet, and a transit map of current routes, transit centers and regional connectivity. A brief history of ridership over the years identifying popular routes, trends and travel patterns would be informative.
- It would be helpful if the Public Transportation Element had a discussion of first/last mile connectivity and the opportunity for future studies to examine how Intelligent Transportation System (ITS) elements, strategic placement of park and ride lots, transit education, and initiatives such as Mobility on Demand and Micro-transit could help increase ridership in Humboldt County.

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Appendix D. Public & Agency Written Comments

Ms. Elizabeth Burks, Executive Director
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Aviation System

- The narrative in the introductory page of the Aviation System Element (9-16, page 146) could be enhanced by including language regarding airport usage for regional emergencies, disaster planning and recovery.

Goods Movement

- In the Goods Movement Element, under subsection Major Truck Routes (11-3, page 174), there is a small sidebar titled "Transition to Zero-Emission Technology Target" which contains information from the 2016 CA Sustainable Freight Action Plan. In the future, this section could be enhanced with information regarding zero-emission (ZE) trucks, infrastructure, and truck parking issues that are specific to Humboldt County. For future updates we hope to work together to identify key goods movement issues.
- Goal, Objectives & Policies section (11-10, page 180). In the Goods Movement Table, Economic Vitality Objective, the Policy GM-6 (Rail Right of Way) narrative discusses rail right-of-way uses and preservation until freight/passenger service can be restored. Consider including language to allow the use of rail right of way for active transportation, including language consistent with legislature to develop the Great Redwood Trail along (or on) the North Coast Railroad Authority right of way.

Financial Element

- While projects either include a funding source or are listed as unfunded, it would be beneficial to include a column to identify whether projects listed are constrained or unconstrained. Caltrans also recommends that HCAOG identify regionally significant projects.
- Please include a statement that addresses the consistency between the projects in the RTP and the projects in HCAOG's Regional Transportation Improvement Program (RTIP).
- Consider including a brief description about unanticipated funding sources that affect HCAOG and your partner agencies, including the Coronavirus Response and Relief Supplemental Appropriations Act (CRSSA), the Clean California program, and the Infrastructure Investment and Jobs Act (IIJA).

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Appendix D. Public & Agency Written Comments

Ms. Elizabeth Burks, Executive Director
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Page 4

Appendix C - Environmental

- When HCAOG has completed their EIR Addendum environmental review, which is identified in Appendix C as pending (TOC page v, page 6), Caltrans would like to review the Addendum to the Final EIR for the RTP 2013-14 Update, including the mitigation activities identified in the RTP Checklist as “pending review of Addendum”.

Caltrans Projects

- The project list shared with HCAOG in August 2021 has been updated with the approval of the SHOPP Ten-Year Project Book. Updates to the projects in these lists were provided to HCAOG on December 17, 2021.
- For the next RTP update, we recommend putting the Caltrans project list in an appendix.

General Caltrans Comments

Broadband does not appear to be referenced in the RTP. Please provide information specific to Humboldt County regarding broadband internet service, underserved areas, and how improved connectivity supports climate goals, equity, economic, and transportation. In addition, please include a reference to the following state level documents: Recommended Strategic Broadband Corridors (2019) which identifies US 101 in Humboldt County as a strategic priority route for broadband; and the California Broadband Action Plan (2020). If appropriate, please include policies that support broadband activities.

Caltrans reviewers have noted that HCAOG is ahead of many agencies in addressing critical elements to improve active transportation, health, and equity. The RTP provides comprehensive elements with detailed policies and action plans to advance State and local climate, zero emission and other transportation planning goals and targets.

Future RTP updates could also consider mapping the short- and long-range projects to provide an effective visual of projects within the county. Additionally, the RTP could include a map of communities considered as highway main streets, as well as a map identifying the disadvantaged communities throughout Humboldt County.

“Provide a safe and reliable transportation network that serves all people and respects the environment”

Appendix D. Public & Agency Written Comments

Ms. Elizabeth Burks, Executive Director
December 21, 2021
Page 5

We look forward to working with HCAOG on this Regional Transportation Plan. If you have questions regarding the comments in this letter, please contact Saskia Burnett at (707) 684-6889 or by email at saskia.rymer-burnett@dot.ca.gov.

Sincerely,



BRAD METTAM
Deputy District Director, Planning and Local Assistance

c: Kevin Mariant, Associate Transportation Planner, Office of Regional and Community Planning, Headquarters Department of Transportation
Jelani Young, Associate Transportation Planner, Office of Regional and Community Planning, Headquarters Department of Transportation

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Appendix D. Public & Agency Written Comments

VROOM 2022-2042 – Written comments received re Final Draft (Jan. 2022)

(listed chronologically)

date rec'd	issue/element	Comments on VROOM 2022-2042 FINAL DRAFT (Released for January 2022 TAC & Board meetings)
1/4, 1/5, 1/6	Trinidad Rancheria project	<p>Lucy Kostrzewa</p> <p>From: lucy k Date: Wed, Jan 5, 2022 at 10:34 AM Subject: Re: kostrzewa submittal for TAC meeting 1-6_22 To: Debbie Egger @ hcaog</p> <p>I offer one minor correction in my cover letter. please forward to any recipients of the letter..</p> <p>middle of the page: One acre was severed.....East side....1908.</p> <p>should correctly read One acre was severed.....East side....1962, with freeway construction.</p> <p>thank you lucy kostrzewa</p>

See reproduced letter at the end of this table.

Appendix D. Public & Agency Written Comments

Lucy Kostrzewa letter (1/4/22) and attachment (1/6/22):

January 4, 2022 (for presentation at Jan. 6 TAC meeting)

To: HCAOG Technical Advisory Committee

From Lucy Kostrzewa, P.E., co-chair Friends of Westhaven

Dear TAC members:

As a 43 year resident of Westhaven, I was appalled when without notice (and in violation of Gold Book standards required by Caltrans Co-op agreement with the Trinidad Rancheria), the Community of Westhaven was unwelcomely included in the Trinidad Access Improvement Project.

AS a former Caltrans Senior Transportation Engineer, now retired after 30 years in Caltrans District 1, I offered my experience to my concerned neighborhood in researching how and why Westhaven was included. While answering that question, have become aware of numerous red flags within the project documents, ranging from inconsistencies to false statements to omissions of relevant information. One of these concerns, regarding Purpose and need, is brought to your attention with this letter and the accompanying powerpoint (seven p.).

The Purpose and Need states: Reconnect tribal lands – severed by 101 construction, leaving tribal members who reside east of 101 without direct access. (paraphrased by author for succinctness)

Long term neighbors questioned this claim, as they recalled the tribe's purchase of land adjacent to their own homes in the late 1980's. A public records request was made to CT yielding information which is in direct conflict with projects stated purpose and need of reconnecting historical tribal lands.

Caltrans Records show:

One acre was severed and remained on the East side of the highway in 1908. (p.2 of powerpoint)

The one acre on the east was never used by the tribe, never developed, and was ultimately abandoned in 1966. (p.4,5/7 .ppt)

In the late 1980s the tribe bought approx. 8 acres on the east side of the freeway, non—contiguous to any original 1908 tribal lands. Tribal members living on the east side of 101 live on land purchased by the tribe 25 years after the freeway was constructed. (p.6,7/7 .ppt)

This information from Caltrans and Humboldt County Recorders Office stands in direct opposition to the project's claimed need to reconnect tribal lands severed by 101 freeway construction for tribal member access.

We are now entering the PA&ED / CEQA phase- tax funded. As alternatives in the PSR were ranked based on meeting Purpose and Need, I ask the TAC to accept my research documentation, draw an independent conclusion regarding the validity of the projects Purpose and Need, and potentially provide for modification of the projects alternatives.

Thank you for your time and consideration.

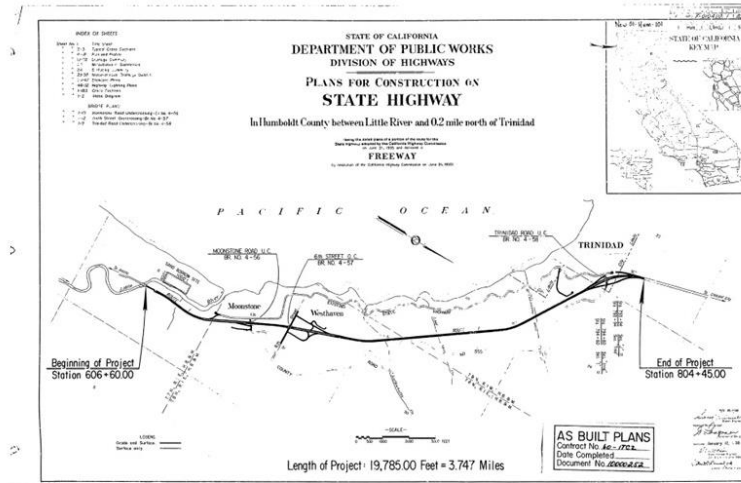
Respectfully,



Lucy A Kostrzewa, P.E.

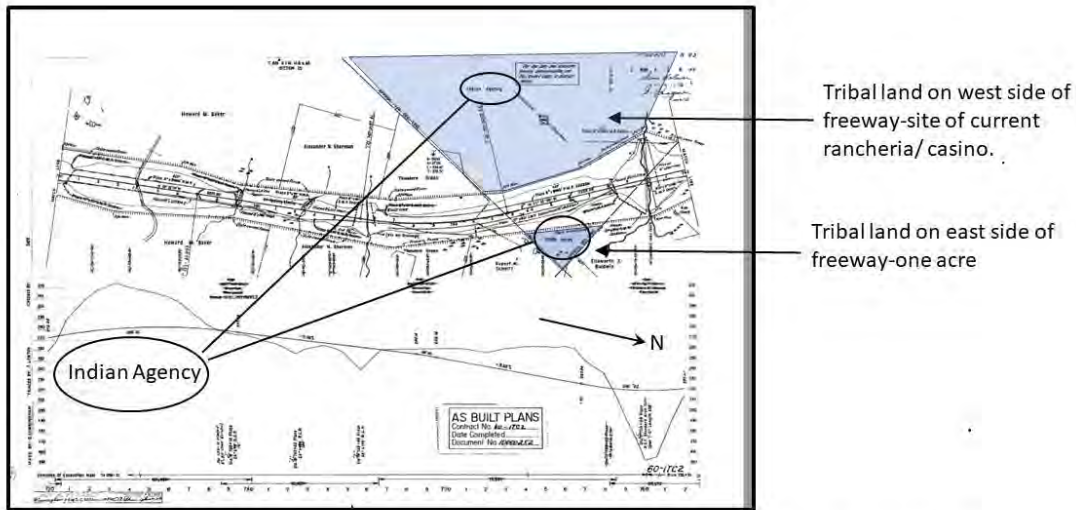
Co-chair, Friends of Westhaven

Appendix D. Public & Agency Written Comments



Public Records request to Caltrans produced as-built plans for 1962 freeway construction near trinidad

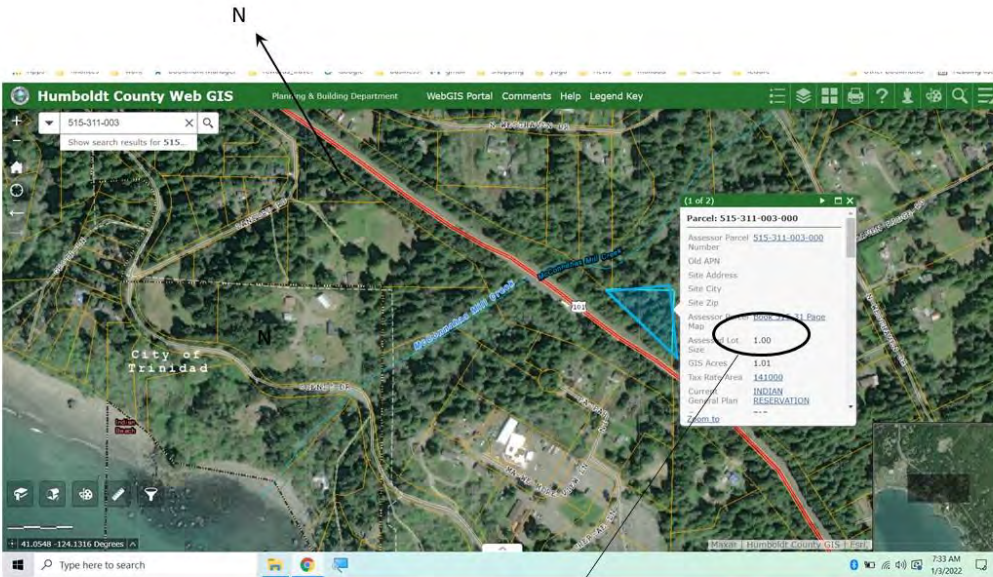
p.1/7



Adjacent land to new highway construction-one acre on east was severed from bulk of land on west (source: Caltrans 1962 freeway as-built plans)

p.2/7

Appendix D. Public & Agency Written Comments



Triangular piece on east side of freeway is one acre (source: humboldt county gis)

p.3/7



The triangular piece on the east side of the freeway was abandoned 1966. (source; Caltrans right of way maps)

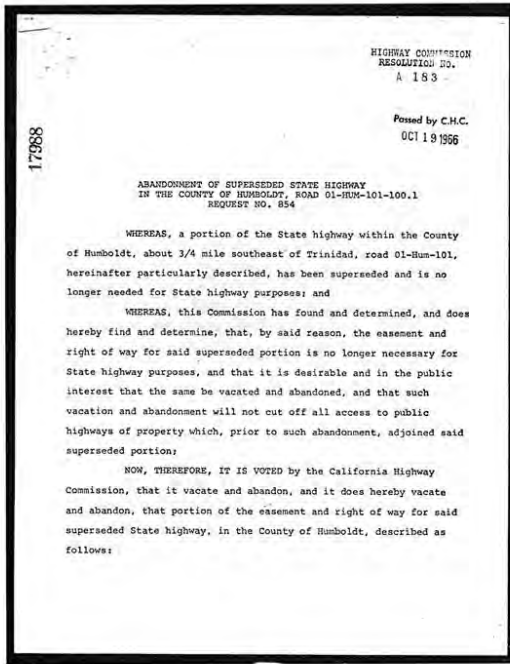
Schedule includes reference to recorded document in county recorders office

Note engineering stations match as-built plans exactly

CASE	GRANTOR	GRANTEE	INSTRUMENT	DATE	RECORD	REMARKS
244	Frank Langford et ux	State of California	Easement	6-7-27	Book 154 Deeds, Page 370	
3951	Theodore Green Sr. et ux	"	Grant Deed	8-23-57	487 O.R. - 46	6 access rights
3952	United States of America	"	Map	12-28-58	" 427 Planning 167 622	
3953	Rupert W. Schultz et ux	"	Grant Deed	9-4-57	" 477 O.R., Page 561	4 access rights
3954	William E. Baldwin et ux	"	Grant Deed	7-27-57	257 -	475
3955	A. W. Stach et ux	"	Grant Deed	9-19-57	468 -	57
3956	Axel Lindgren	"	Grant Deed	7-27-57	458 -	30 6 access rights
3957	Oliver Frank (2/3 interest)	"	Grant Deed	3-13-52	683 -	345 *
3958-396	Melissa Langford et al	"	Grant Deed	2-19-59	538 -	395
3959	David L. Larson et ux	"	Grant Deed	10-17-57	477 -	550 6 access rights
3960	Peter Fortner et ux	"	Grant Deed	10-17-57	470 -	156 *
3713	F. S. Meadows et ux	"	Grant Deed	2-29-58	483 -	127
3774	Harry & Hebert et al	"	Grant Deed	4-2-57	454 -	79
297	State of California	Peter Fortner et ux	Director's Deed	11-18-59	665 -	633
324-1	"	County of Humboldt	Relinquishment	12-14-60	619 -	200 Parcel 2 only
324	"	County of Humboldt	"	11-15-61	661 -	619 Parcel 4
325	"	"	"	11-15-61	661 -	623 Parcel 1
325	"	"	"	11-5-59	531 -	55
3051-A	Wardwood-Calf. Redwood Co.	State of California	Quitclaim Deed	12-13-61	667 -	367
374	State of California	Betty Hancock	Director's Deed	12-13-61	682 -	284
3957-A	Marjorie R. Thomas	State of California	Grant Deed	4-6-62	695 -	214 For 1/3 interest
445	State of California	Edward L. Gurley et al	Director's Deed	3-23-63	741 -	214
471	"	Axel Lindgren, Sr.	"	8-21-63	753 -	401
483	"	Howard M. Bahr	"	8-21-63	760 -	432
3957-B	Marjorie R. Thomas, Guardian	State of California	Grant Deed	12-28-62	751 -	55 Interest of Franks minors
515	"	"	Quitclaim	11-19-88	508 -	585
515	"	"	"	3-26-89	1000 0.01 297	566 FILE 2

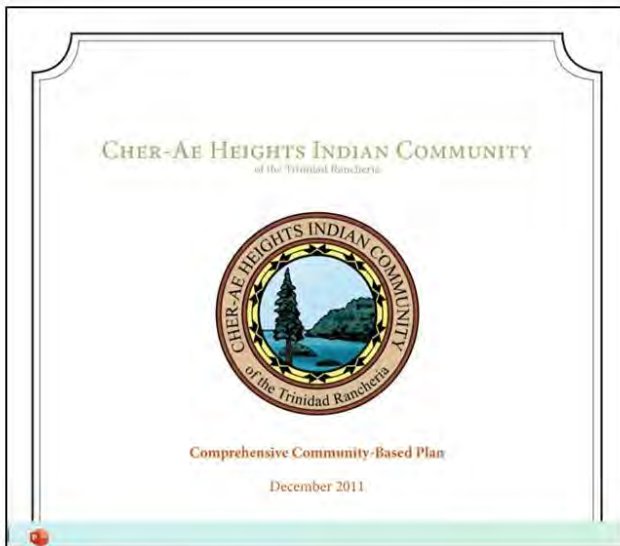
p.4/7

Appendix D. Public & Agency Written Comments



Abandonment document dated 10/19/1966 from Humboldt county recorders office (p.1/4)

p.5/7



From introduction (p.1)

The Trinidad Rancheria is now comprised of three separate parcels that total 82 acres. The largest parcel is located on the west side of Highway 101 along the Pacific Coast and is made up of 46.5 acres. This parcel accommodates Tribal Member Housing, Tribal Offices, a Tribal Library, the Cher-Ae Heights Casino and the Sunset Restaurant. **Approximately 8 acres were purchased in Westhaven, directly across Highway 101 in the late 1980s** and a third 27.5 acre parcel, located in the unincorporated community of McKinleyville, was purchased in the 1990s and now houses 12 residential properties.

2011 Community Plan states Westhaven acreage was purchased 25 years after freeway construction.

p.6/7

Appendix D. Public & Agency Written Comments



Original 1908 east side tribal lands
(abandoned 1966)
APN:515-311-003

Freeway constructed 1962

Source:
Humboldt County GIS,
Hum County Recorders Office
Caltrans as-built plans

Tribal lands presumably purchased ~1988
Current tribal residences
APNs:
515-041-074=1.73 acre
515-041-075=1.32 acre
515-041-067=4.25 acre
7.8 acre ~8 acre

p.7/7

DIRECT OUTREACH TO STATE/FEDERAL AGENCIES



HCAOG

*Regional Transportation
Planning Agency*

611 I Street, Suite B
Eureka, CA 95501
707.444.8208
Fax: 707.444.8319
www.hcaog.net

Members:

- City of Arcata*
- City of Blue Lake*
- City of Eureka*
- City of Ferndale*
- City of Fortuna*
- City of Rio Dell*
- City of Trinidad*
- County of Humboldt*

October 26, 2021

To: Federal and State Agencies:

- U.S. Forest Service**, Six Rivers National Forest
1330 Bayshore Way, Eureka, CA 95501
- Bureau of Land Management**, Northern California District, Arcata
Field Office
1659 Heindon Road, Arcata, CA 95521
BLM_CA_Web_AR@blm.gov
- California State Parks**, North Coast Redwoods District
P.O. Box 2006, Eureka, CA 95502-2006
- Redwood National Park**
111 Second Street, Crescent City, CA 95531
- U.S. Fish and Wildlife Service**
1655 Heindon Road, Arcata, CA 95521
- California Department of Fish and Wildlife**, Region 1
619 Second Street, Eureka, CA 95501
- California Coastal Commission**
1385 8th Street, Arcata, CA 95521
- California Coastal Conservancy**
Karyn.gear@scc.ca.gov

Dear Resource Agency:

The Humboldt County Association of Governments (HCAOG) has completed the Full Public Review Draft of the Regional Transportation Plan update. This document, Variety in Rural Options of Mobility 2022-2042 (VROOM) will be available for review and comment from October 22, 2021 through November 21, 2021.

VROOM is a long-range transportation planning document covering a 20-year planning horizon. VROOM begins to address the interconnected challenges of climate change, housing, safety, and equity in a way that is both tailored to Humboldt County and consistent with the bold targets set at the state and federal levels.

VROOM contains a number of objectives and policies to support the overall goal:

HCAOG's goal is for Humboldt County to have a carbon-neutral, multi-modal transportation system that is comprehensive, safe, sustainable, and equitable so that people in the region can travel and move goods by the modes that best suit the individual or business/ industry, and society at large.

Appendix D. Public & Agency Written Comments

Federal and State Agencies
October 27, 2021
Page 2

New to this update of VROOM are Safety and Sustainability Targets (starting on page 2-12). These targets outline performance measures, regional targets, metrics, and available data sources in the areas of; reducing regional vehicle miles travelled, increasing transit ridership, transitioning to zero-emission fleets, improving accessibility through better land use, achieving zero pedestrian and bicyclist fatalities, and increasing active transportation education.

VROOM also includes lists of anticipated regionally significant active transportation, road, and transit projects.

Staff is recommending that the HCAOG Board adopt an Addendum to the Final Environmental Impact Report prepared for the 2014 update to the Regional Transportation Plan. The draft addendum can be found at: <https://www.hcaog.net/ceqa-addendum-2>

As a resource agency, we would appreciate your comments on VROOM. The draft can be found at <http://www.hcaog.net/documents/regional-transportation-plan-2021-update>.

If it would be beneficial, I am available to meet with agencies to discuss VROOM and any comments or questions you may have. Written comments can be submitted via email to beth.burks@hcaog.net, alternately I can be reached by phone at 707-444-8208.

Regards,



Beth Burks, AICP
HCAOG Executive Director