

Dear Commissioners and Board,

Thank you for the opportunity to comment on the Circulation Element. We provide comments below on specific language in the chapter, but are concerned about the overall approach.

### **Background**

We have provided comments on other chapters of the General Plan Update, mostly to point out that balancing our transportation system will do much to achieve the goals set in many of these chapters. In many cases, balancing the transportation system will do much more than anything actually in those chapters, such as in the Energy, and Noise and Safety elements.

With regard to energy, transportation accounts for 45% of greenhouse gas emissions in Arcata, and likely a similar proportion in the rest of the county. Our electricity comes from a variety of sources, biomass, natural gas and solar, but our transportation system is almost entirely dependent on oil-based fuels. This will become a problem as oil prices continue to rapidly increase.

Motor vehicle collisions are the number one killer of Californians age 1-35. For a city of its size, Eureka nearly leads the state in per capita motor-vehicle related injuries and deaths (<http://eureka-reporter.com/node/90194>). This carnage can be reduced by reducing driving and shifting travel to safer modes, such as transit, which is 10 times safer per passenger mile.

We estimate that roughly 13% of Humboldt County's GDP is lost to imported fuel and vehicles. A combination of reducing transportation expenditures through smart land use and non-motorized infrastructure, and shifting to more transit use could substantially benefit the economy as such policies have in Portland, Oregon, where per capita vehicle miles traveled have successfully been reduced and the economy has benefited from reduced transportation expenditures (Dylan Rivera, 2007, Less driving is more cash for Portland. The Oregonian <http://www.oregonlive.com/news/oregonian/index.ssf?/base/news/1187576751202450.xml&coll=7>).

Because it works better with compact urban land use, balanced transportation dovetails well with the goals of preserving agricultural and timber working lands which provide for the long-term health of the economy. The resultant reduced urban footprint can help reduce flooding and polluted runoff as well.

### **Flawed Perspective**

If achieving balanced transportation will help us achieve many of our goals, does this Circulation Element strive to balance our transportation system? The first goal C-G1 has all the right buzz words: "...well coordinated, balanced, circulation system that is safe, efficient and provides good access..." but the element is suffused throughout with the presumption that this can be achieved while focusing primarily perpetuating automobile dependence throughout the county.

Most emblematic is the statement: "With existing and likely available future funding, it does not appear financially feasible to provide transit service that can compete with the automobile." This statement belies the inherent auto-centric viewpoint from which this Circulation Element was written.

Let's start with funding. Current limitations on transit funding have been caused by local decisions and priorities, not something outside our control. While Mendocino, Trinity and Del

Norte Counties spend all of their Transportation Development Act funds on transit operations with the exception of a small percentage going to bicycle and pedestrian improvements. Humboldt County does NOT spend all its TDA money on transit operations, and in fact annually puts about \$7-800,000 into county road maintenance which is struggling with a \$100 million maintenance backlog. Because we don't spend all of our TDA money on transit, in 2002 we were not eligible for additional transit assistance from Wesley Chesbro's SB 739 Rural Transit System Grant Program. We need a set of policies to unify our transit system and empower it to use all TDA funds available to operate transit.

Many of the improvements needed to make transit more competitive have more to do with capital improvements than with operating costs. These are expenditures that we have a great deal of local control over, for example STIP funding which is dispensed by HCAOG can be used to develop Bus Rapid Transit strategies along 101 in Eureka and along Central Avenue in McKinleyville, as well as to construct park-and-ride lots and other amenities where appropriate..

The second half of the statement relates to whether transit service can "compete with the automobile." The assumption is made that anyone riding transit has "no alternative means of transportation available." This is somewhat insulting to those who are economically struggling, because it implies we don't need to make transit more convenient for them. It was nice enough of us to even offer the charity. The suggestion that transit cannot compete is also incorrect. According the 2006 Transit Development Plan for Redwood Transit Service, only about 50% of riders are "ride dependent" and over 20% chose transit for its convenience or to avoid parking hassles.

In any case, the suggestion of people having "no other transportation available" is also a gross oversimplification. For some, affording a car (or the ability to drive one) might be out of the question. For others, there is a weighting of the costs and benefits of car ownership. Many people use a combination of transportation strategies including a combination of walking, biking and transit. Every household makes decisions about how many vehicles it needs, and having transportation options affects those decisions. Since our goal is to have a balanced transportation system, we ought to strive to provide those options.

Additionally, the suggestion that transit can't compete is incorrect on several levels. Transit captures a small share of trips. If it couldn't compete, it wouldn't capture any. That share is growing quickly as well. Arcata & Mad River Transit System has seen a 20% increase in ridership over the last three fiscal years measured, and about a 10% increase in the last year to date. Redwood Transit System ridership has grown 24% in three years leading up to this year (based on annual ridership). Growth is now accelerating, with about 30% growth on RTS the last year alone (Oct. '06 compared with Oct. '07). Willow Creek Bus ridership has grown 244% in four years. Redwood Coast Transit Route 20, providing service from Del Norte County through northern Humboldt County to Arcata, is on track to double its ridership since its inception in 2005. Meanwhile, vehicle miles traveled in Humboldt County only increased 3% between 2000 and 2006 (the last year for which there is data). While still a small proportion of total travel demand, transit use is competing effectively for a greater market share.

### **How to Proceed?**

We provide some general and specific comments below, but we believe the draft needs to essentially be rewritten. Because of the economic and environmental consequences of automobile dependence perpetuated by the current draft plan, we recommend hiring a consulting firm with extensive experience in multimodal transportation demand management to assist with

this, and the writing of urban land use goals, policies and implementation measures. While hiring a good consultant will add to the cost of the plan, the consequential costs of not getting this plan right are many times greater.

Respectfully submitted,



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Green Wheels – Executive Director

### ***Complete Picture***

Meeting the stated goal of creating a “well coordinated, balanced, circulation system that is safe, efficient and provides good access” will require a coordinated approach in the Land Use, Circulation and Community Design Elements. At this time, the Land Use Element lacks urban land use goals and policies, and therefore does little to move us toward a goal that it must play a key role in achieving. The Community Design Element has not been available for review yet at the time of this writing. The Circulation Element is currently unbalanced, in that it assumes continued emphasis on automobile dependence while accommodating minor improvements for bicyclists and pedestrians, and virtually no improvements for transit.

A successful balanced transportation strategy will require balancing the performance standards for all modes, creating safe bicycle connections between all communities, encouraging compact mixed use development, pedestrian-friendly streetscapes and market-based parking policies. So far, it is not clear to us that any of these components of the strategy are in place.

### ***Roadway Standards***

The set of standards classifying roads in a hierarchy as major and minor arterials, major and minor collectors and local roads is overly simplistic, and if adhered to too strictly, can result in a hierarchical road system with poor connectivity.

We suggest using the system adopted in Seattle ([http://www.seattle.gov/transportation/docs/TSPprintfinal102505\\_ch3.pdf](http://www.seattle.gov/transportation/docs/TSPprintfinal102505_ch3.pdf)). This system defines roads based on their importance for each mode. Then improvements to each road can bring the quality of service on each road into line with what is needed for each mode. A lay-person’s explanation of this system is available at:

<http://www.nrsrcaa.org/humpal/jeremynelsonpresentation.pdf> p.22-40

A more detailed explanation for how it works is available at:

[http://www.ci.glendale.ca.us/planning/pdf\\_files%5CMobilityPlan/GLENDALE\\_PerfMeasures\\_StreetsRPT.pdf](http://www.ci.glendale.ca.us/planning/pdf_files%5CMobilityPlan/GLENDALE_PerfMeasures_StreetsRPT.pdf)

### ***Level of Service***

The balanced approach above requires level-of-service (LOS) or quality of service (QOS) standards for all modes rather than just for private automobiles. LOS standards have been developed for transit (see previous link), and road segments for bicycling

(<http://ntl.bts.gov/DOCS/98095/index.html>) and pedestrians

(<http://www.dot.state.fl.us/Planning/systems/sm/los/pdfs/pedlos.pdf>, note: this standard is not as well developed), but have not been developed for intersections for bicyclists and pedestrians.

Transit LOS standards developed by Nelson / Nygaard go beyond measuring cost efficiency from the operator’s perspective, although this is still important. Transit LOS

standards measure quality of service for the rider: frequency, hours of service, reliability, loading, and travel speed. A primary transit route should meet the following standards:

- Frequency 15 minutes or better
- Hours of Service 6am to 10pm
- Reliability <10% probability of delay > 0.5 of headway
- Loading maximum of 86-100% capacity
- Travel Speed 0.3 of speed limit or better

There are less stringent standards for secondary transit routes. None of our transit routes come close to the primary transit standard, but we have an opportunity with a combination of land use, circulation and community design policies, to identify a primary route in the micropolitan core of our county and work towards meeting the standard over the next 20 years. Such a route would likely include McKinleyville's Central Avenue, Spruce Point and Field's Landing, as well as the three major cities and College of the Redwoods. This strategy would give the people of Humboldt County the option to live in an area well-served by transit. Imagine a series of healthy, pedestrian-friendly communities at the core of our string of urban areas, places designed primarily for people rather than primarily for the passage of automobiles. A primary transit route would help make this possible.

The Bicycle Compatibility Index created by the federal DOT has developed, and LOS standards for pedestrians from Florida's DOT are based on bicyclist and pedestrian perception of safety. They use traffic volumes, lane widths and buffers to ascertain how safe a roadway will appear to a bicyclist or pedestrian. These standards should be used to balance LOS for all modes in all road improvement projects.

We suggest using LOS standards that are available, and adopting more complete standards when they do become available either from the U.S. DOT or from Caltrans.

### ***Bicycle Infrastructure***

This section needs to be more inclusive of the long term goal of providing a network of Class I multi-use paths between all major population and employment centers in the Humboldt Bay Area: McKinleyville, Blue Lake, Arcata, Manila, Eureka, College of the Redwoods, Fortuna, Rio Dell and Scotia. This is ambitious, but we are supposed to be planning for twenty years out, and depending on what happens with the railroad, this is entirely within the realm of possibilities.

### ***Transit***

There are two basic goals to strive for with transit. One is to try to provide service to the transportation disadvantaged, which is essentially addressed with CIM-11. Service to the North and East has largely been accomplished, but service to southern Humboldt is needed.

The second goal is to capitalize on places where transit has shown itself to be effective, and support those hi-performing transit services so they can meet transit demand and encourage transit-oriented development. Opportunities for improving the bus ways on RTS between McKinleyville and Fortuna could provide an alternative solution (and in the long term a more effective one than what has been proposed) for traffic congestion in Eureka and on Central Avenue in McKinleyville, both of which continue to deteriorate.

The twenty year timeline of this plan makes it appropriate to plan for the option of developing RTS into a Bus Rapid Transit system with dedicated lanes and streets as well as queue jumps strategically located to provide speedy passage for buses through the most congested parts of Eureka and McKinleyville, with improvements in other sections to improve passenger amenities, speed travel and attract passengers. Identifying a primary transit route and

working towards meeting minimum performance standards outlined above could guide this process.

### ***Road Capacity and Land Use***

Studies have shown that building road capacity may relieve congestion in a location but it paradoxically generates additional traffic which can impact other locations (<http://www.vtpi.org/tdm/tdm96.htm>). A combination of transportation demand management (TDM) strategies can more effectively at reduce congestion over the long term than increased roadway capacity.

If substantial development is allowed or encouraged in areas where residents will have little option other than drive the narrow roads serving that area to get downtown for their employment and services, there will be substantial increases in congestion as a result. Even if the congestion is somehow mitigated in the outlying areas, congestion will increase in the areas where services and employment are concentrated, especially Eureka.

If development occurs in such a way as to provide citizens a choice of modes, the system will have more resilience when it comes to mitigating traffic congestion or contending with changing energy prices even if the vast majority of people continue to drive in the near term. Policies focused on developing walkable, transit-oriented communities seem to be missing entirely from the Land-use Element. These policies will need to address parking policy, encouraging mixed use development in commercial zones and nodes of higher density focused around transit hubs. The few toothless land-use policies in the Circulation Element will not suffice.

### ***Parking Policy***

The requirement of providing over-abundant parking in all new development drives up the price of housing, goods and services for everyone. Free on-street parking is a substantial government subsidy of \$240 to \$3600 annually per space depending on land values and whether they are included in the calculation (2003 Regional Parking Needs Study, [http://hcaog.net/docs/Regional\\_Parking.pdf](http://hcaog.net/docs/Regional_Parking.pdf)). Off-street parking requirements represent a subsidy of parking coming from higher prices we all pay for housing, goods and services (Donald Shoup, *The High Cost of Free Parking*). These subsidies create further incentive for people to use the already overemphasized mode that is responsible for so much congestion, emissions and threat to public safety. We will provide more detailed comments on moving towards a more market-based parking policy once we have reviewed the Community Design Element.

## **Comments on Specifics in the Plan**

### **8.2 Description of Transportation Facilities**

#### **Roadway Infrastructure**

The unstated goal of perpetuating automobile dependency is apparent in this section.

“...are among the eight (8) road segments already operating at above capacity<sup>1</sup>.” p.8-2

While we understand this is a technical description of a road with certain characteristics and traffic volumes, it reveals some of the absurdity of LOS for automobiles. How can a road operate above capacity? What does “at capacity” really mean if a road can continue to operate above it? If a road can operate “above capacity,” then perhaps capacity needs to be better defined than the somewhat arbitrary number attached to a given type of roadway.

“Roadway capacity is also affected by limited right-of way width and the need to provide for vehicle travel lanes and facilities for other transportation modes, including public transit, bicycles and walking.” p.8-2

This implies that public transit, bicycling and walking are not valid modes for adding capacity. It is possible to achieve higher passenger capacity per right-of-way width using Public transit and bicycling than using single occupancy vehicles.

“Simply put, areas with development potential need to be adequately served by roads with sufficient capacity to accommodate the new development.” p.8-3

This seems to imply that the county must expand roads wherever there is developable land. Another way to put it would be: “Simply put, areas do not have development potential if they are not adequately served by roads with sufficient capacity to accommodate new development.”

“...and the preferred alternative involves construction of an overpass at the intersection of Indianola Cutoff and U.S. Highway 101.” p.8-4

A “Least Environmentally Damaging Preferred Alternative” has not yet been selected for this project.

### **Public Transportation**

“The following fixed route systems serve the County’s public transit needs: Redwood Transit System, Eureka Transit System, **Southern Humboldt Rural Transit System**, Arcata & Mad River Transit System, Klamath/Trinity Non Emergency Transportation (K/T Net), and Blue Lake Rancheria.” p.8-4

Southern Humboldt Rural Transit System, more commonly known as the Quail, would be better described as paratransit, rather than “fixed-route,” since it is only available to seniors and the disabled, and not the rest of the general public.

“1 hour weekday interval or less as the appropriate level of service for the urban areas of Eureka and Arcata, and an interval of 1.5 hours for the U.S. Highway 101 corridor between Trinidad and Scotia. This Element carries forward those public transit goals, policies and implementation measures applicable to the unincorporated areas of the County.” p.8-5

This statement inserts inherent bias in the Circulation Element before goals and policies are discussed. While an LOS of F for road capacity (which might represent a delay on the order of 1 minute) is deemed non-satisfactory, and indicates the roadway is operating “above capacity,” a wait of 1 to 1.5 hours for the next bus is considered “appropriate.” Goals for transit service in and between urban areas need to be defined in a manner that is more comparable with LOS for other modes.

### **Non-motorized**

“Major new non-motorized facilities are possible along the Annie and Mary Rail Line from Arcata to Blue Lake, and along the Northwestern Pacific Railroad between Arcata and Eureka.” p.8-5

Re-write to read: “Major non-motorized transportation facilities are possible such as extending the existing Hammond Trail to Arcata, and trails *on all former Northwest Pacific*

*Railroad rights of way* depending on the near-term viability of the railroad. The most immediate projects include the Annie and Mary Rail Trail between Blue Lake and Arcata, and the Eureka Arcata Humboldt Bay Trail.” Otherwise the plan makes extremely limited statements of what is possible in the next 20 years.

### **8.3 Goals and Policies**

**“C-G1 Roadway Safety and Functionality.** To develop, operate and maintain a well coordinated, balanced, circulation system that is safe, efficient and provides good access to all cities, communities, neighborhoods, recreational facilities and adjoining regions [FRWK].” p.8-9

The Title of this goal should be changed to “Circulation System Safety and Functionality” especially if you wish to use the word “balanced” to describe the transportation system. Otherwise, the goal immediately implies that altering roads (i.e. expanding their capacity) is the only way to improve safety and functionality, when altering the way the roads are used (i.e. slowing speeds and balancing the mode-share) can also serve to improve safety and functionality.

It would also be helpful to define access. Does this mean human access, or is an automobile required to have good access?

Is the word “efficient” meant to be with regard to user cost, government cost, both or with regard to fuel consumption?

**“C-G2 Multi-Modal Transportation.** To provide a balanced multi-modal transportation system that accommodates motorized vehicles, public transit, bicycles, and pedestrians.” p.8-9

Does simply accommodating each mode qualify a transportation system as balanced? I don’t think most transportation planners would agree with this definition. It needs to be defined here so we know what the goal is. A balanced system could be defined as one in which roughly an equal number of trips are made by each mode, as is done in Fraiburg, Germany. This might be a good long term goal. In the shorter term you could use the Victoria Transportation Policy Institute definition: a transportation system in which consumers have a variety of transport options, and incentives to use each for what it does best.

**“C-G3 Interagency Cooperation.** To coordinate planning among state/county/city roadway system service providers and HCAOG for improved system design, development, operations and maintenance.” p. 8-9

Re-write to read: “To coordinate planning among state/county/city *transportation* system service providers, and HCAOG for improved system design, development, operations and maintenance.” Otherwise it is implied that transit providers are not included in coordination.

**“C-P2. Roadway Functional Classifications.** Adopt and apply consistent roadway functional classifications that reflect urban/rural/community distinctions and that maximize right-of-way use for multi-modal safety and functionality.” p.8-9

This policy falls short of the Seattle system mentioned in earlier comments. Distinctions in the priority each mode places on a roadway should be part of the classification system.

From C-P6:

“A. Using minor collector roads to provide access to higher density residential areas, local commercial facilities, neighborhood parks and schools.” p.8-10

This policy has the tendency to create major collectors and arterials that are unpleasant to walk on and have increased potential for crime if executed poorly. This is often due to privacy fences that wall the sidewalks along an arterial off from the development, and poor pedestrian connectivity. Here is our suggested rewrite: “Using minor collector roads to provide access to higher density residential areas, local commercial facilities, neighborhood parks and schools, while maintaining maximum bicycle and pedestrian connectivity and access. New fences and walls fronting any sidewalk or multi-use path shall be limited to 3 feet in height to provide a safe environment for pedestrians.”

From C-P20:

“C. Multi-family housing, public uses such as libraries, schools and community centers, and commercial uses should be encouraged in areas serviced by public transit where consistent with other sections of the plan. [FRWK]” p.8-12

Change “should” to “shall.” The opposite should also apply. That is: “Development and public uses shall be discouraged in areas not serviced by public transit.”

There should be a section on urban lands in the Land-use Element to draft a collection of policies like this, but for some reason there is no such section.

**“C-P21. Roadway Capacity Expansion and Non-Vehicle Modes.** Enhance the Level of Service for non-vehicle modes when expanding roadway capacity for vehicle circulation.” p.8-12

Change “non-vehicle” to “non-motorized” in heading and text. Apply to other alternatives as well. A bicycle is a vehicle and the intent of this Policy was surely to include bicycles.

**“C-P24. Right-of-Way Multi-Modal Level of Service Standards.** Right of Way Multimodal Level of Service (LOS) Standards should be used for maximizing the multi-modal suitability of County roads and intersections.” p.8-12

Replace “should be used” with “shall be adopted and used.” There is absolutely no justification for having standards only for automobiles in a balanced transportation system.

**“C-P37. Use of the NWP Railroad Right of Way for Bicycles and Pedestrians.** The County shall encourage of the NWP right of way between Arcata and Eureka as a Class 1 bike/pedestrian trail provided those uses do not compromise future use of the right of way for rail transportation.” p.8-13

Add: “Should railroad development become infeasible within the timeframe of the general plan, the county shall encourage a rail-banking strategy to create multi-use trails on all NWP rights of way creating intercity bicycle connectivity and preserving rights-of-way in case of changes that make rail transportation feasible in the distant future.

**“C-P41. Joint Use of the Greater Eureka Area Travel Model.** Integrate roadway maintenance and improvement data through use of the Greater Eureka Area Travel Model (GEATM). Support coordination with other agencies to resolve discrepancies in the list of road segments with capacity problems between the GEATM model and estimates made by HCOAG based on CalTrans data.” p.8-13 and 8-14

Before adoption of policy advocating the reliance on a specific travel model (the GEATM), the assumptions, inputs and methods associated with that model must be understood by the public and those who choose to adopt this policy. The information recently released on the GEATM and the Humboldt County Travel Demand Forecasting Model which it grew from indicates the following shortcomings of both models with regard to balanced transportation:

- Trip generation estimates appear to be based on square footage and type of development. The correlation between trip generation and square footage is weak to non-existent in many cases.
- The model measures auto trips only and assumes a set per-unit trip-rate based on whether it is multifamily or single family housing. This may be a useful simplification if the goal is to prioritize accommodation of the automobile, but does not make sense in the context of the stated Circulation Element goals.
- There is no mode-choice component of the model “given the purpose of the model and the limited transit use in the county.” Transit is only one of four mode choices, and if the purpose of the model is not consistent with the stated goals of the circulation element, its use should be qualified.
- It would appear that changes in route selection because of congestion are accounted for, but not changes in trip time, or trip reduction. As congestion worsens individuals will make decisions to combine trip purposes or travel at off-peak times. This in combination with competitive alternative modes and land use that places at least some services closer to residents, could act to mitigate congestion in a way the model would be incapable of estimating.

These travel demand models may be useful, but until they are developed in a way to serve the goals of the circulation element, they should be used with caution and “a grain of salt.”

The policy should have additional language to direct model developers to incorporate travel demand management and multimodal inputs into travel demand models so that these strategies can be effectively employed to help solve congestion problems.

**“C-P53. On-Street Parking.** On street parking shall be prohibited discouraged in commercial areas and shall be prohibited discouraged where bicycle routes are planned adjacent to public street’s travel lanes unless parking lanes are provided. (MCCP)” p.8-15

We will provide more complete suggestions on parking policy once the Community Design Element becomes available, but policies C-P53 and C-P68 needed to be addressed immediately.

This policy has two problems. First, it discourages on-street parking in commercial areas. This must be a mistake. In the absence of public parking lots, on-street parking is the only parking that enables motorists to park once and walk to various businesses to do their shopping in a commercial district. Thus it works in concert with making a downtown walkable while still allowing automobile access. If there is a concern with having adequate right-of-way width, it should be written as a separate policy allowing for acquisition of additional right-of-way as a condition of development or providing incentives to facilitate such an exchange.

It seems that the second purpose of this policy is to facilitate the creation of bike lanes in planned areas where they have not yet been built or designated. Perhaps wording stating that on-street parking is of secondary importance to providing bike lanes where they are consistent with the county bike plan might be clearer.

An additional issue brought up by this policy is that of car-dooring. Using existing design standards of a 7 foot parking lane and 5 foot bike lane renders most of a bike lane hazardous because of the potential of being car-doored. A 7 foot wide vehicle (not uncommon in our county) parked 18 inches from the curb leaves 3.5 feet of bike lane. Because the car-door zone extends 3 feet from the side of the vehicle, that leaves 6 inches of usable bike lane.

Here's a suggested rewrite: "On street parking is of secondary importance to providing bike lanes where they are consistent with the county bicycle plan. On street parking shall be prohibited in bike lanes. Designation of on street parking adjacent to bike lands should be discouraged except where bike lanes and on street parking can be accommodated with a minimum parking lane width of 8ft, and minimum bike lane width of 6ft."

**"C-P68. Off-Street Parking.** Off-street parking along local streets shall be encouraged in the design of new developments. Creative on-street parking arrangements such as parking pockets or bays on local service roads are encouraged when based on engineering principles." p.8-17

Encouraging off-street parking instead of on-street parking in both commercial and residential developments may increase development costs and decrease housing affordability without expected benefit tradeoffs. For example, adding a driveway for off-street parking at a residence takes away curb space from on-street parking which frequently is large enough to park another vehicle. Thus, in many circumstances adding off-street parking may simply lead to greater construction costs and more land paved over which could be dedicated to other uses, all while doing little or nothing to increase overall parking capacity.

"Creative solutions" should be further clarified and expanded on. Allowed solutions should include methods such as shared parking with other uses that have different peak travel demand hours, centralized off-site shared parking, and transportation demand management (TDM) or mobility management strategies. These strategies could include universal transit pass programs for residential neighborhoods or businesses, or designated spaces for subsidized car-sharing programs, for example.

The above-suggested mobility management strategies are most effective when they are complemented by parking "unbundling," so parking costs are not included in the costs of other goods and services. This is best achieved by allowing developers and businesses to decide how much parking to build rather than instituting minimum parking requirements. Since parking availability is important to make most business or residential developments viable, they will find it necessary to build parking, but since it is expensive to build, they will likely choose a fairer, market-driven approach to providing parking — charging residents or business tenants for parking separately from other occupancy fees. Businesses, in turn, to reduce their costs for parking, may offer employees a parking "cash-out" for not driving to work.

**"C-P70. Trails Implementation Plan** A Trails Implementation Plan shall be prepared..." p.8-18

This is an important policy. Writing it in the active voice will clarify who is responsible for making sure this gets done.

## Standards

**“C-S7 Multi-Modal Level of Service Standards.** Right of Way Multimodal Level of Service (LOS) Standards should be used for maximizing the multi-modal suitability of County roads and intersections. For bicycle facilities, LOS standards should be developed for the following types of facilities: ...” p.8-21

Change to active voice and change “should” to “shall.” LOS or “Quality of Service” (QOS) standards need to be adopted for pedestrians and transit as well. See our comments above on the Seattle system.

## Implementation Measures

**“C-IM6 Transit Infrastructure.** Work with regional transit providers (HTA) to situate transit stops and hubs at locations that are convenient for transit users, and promote increased transit usage through the provision of shelters, benches, and other amenities.” p.8-25

This implementation measure leaves out many transit providers and falls far short of the goal of creating a balanced transportation system. It should be rewritten:

“Work with regional transit providers (K-T Net, Blue Lake Rancheria Transit, HTA, A&MRTS and Redwood Coast Transit) to situate transit stops and hubs at locations that are convenient for transit users. Where feasible, develop Bus Rapid Transit strategies, such as signal prioritization, dedicated lanes and streets, queue jumps and bus stations with pre-board fare payment capabilities and next-bus arrival display on congested urban corridors to provide long-term congestion relief by providing a viable transit alternative”

A&MRTS should be included in the event that it begins to provide service outside Arcata city limits, such as to Jacoby Creek.

**“C-IM9 U.S. Highway 101 Safety Corridor Improvements.** Issuance of Coastal Development Permits and other discretionary permits by the County for the U.S. Highway 101 Safety Corridor Improvement project should support a strategy that treats all three main roads between Arcata and Eureka (U.S. Highway 101, State Route 255, and Old Arcata Road/Myrtle Avenue) as one system. The strategy would develop an overall improvement plan that phases improvements on a prioritized basis between the three roads. Potential impacts of the project on coastal resources, including those that were identified in the comments made to CalTrans by the Board of Supervisors September 18, 2007, should be minimized.” p.8-25

Change to read: “...support a *multimodal* strategy...”

## 8.4 Staff Analysis and Alternatives

“LOS D and worse are not generally appropriate design criteria in rural areas. This provides no room for future growth, and can easily lead to substantial deterioration in traffic operations which can decrease safety conditions.” p.8-32 and 8-33

Please provide a citation supporting the assertion that deterioration in traffic operations can decrease safety conditions. Safety and congestion are separate issues.

“Areas with development potential need to be adequately served by roads with sufficient capacity to accommodate the new development in order to avoid serious operation or economic consequences.” p. 8-35

This statement is backward. Given the counties struggle to maintain its road network, this would be a better way to think about it: “If an area is not served by roads with sufficient capacity, new automobile-dependent development may cause serious operation or economic consequences.”

Operator	Area	Service	
		Weekday	Saturday
Eureka Transit Service	City of Eureka	5 routes, 1 hr. headway, 6 a.m. – 7 p.m.	2 routes, 1 hr. headway, 10 a.m. – 5 p.m.
Arcata & Mad River Transit System	City of Arcata	2 routes, 1 hr. headway, 7 a.m. – 7 p.m.	2 routes, 2 hr. headway, 10 a.m.– 5 p.m.
Redwood Transit Service	U.S 101 from Scotia to Trinidad	1 route, 1 – 2 hour headways, 7 a.m. – 11 p.m.	1 route, 2 – 3 hour headways, 8 a.m. – 5 p.m.

Note: No scheduled transit service on Sunday. Times and frequencies are approximate.

Source: Regional Parking Needs Study Final Report, HCAOG, 2003

p. 8-38

The table above is out-dated. Eureka offers four routes (not five) on weekdays. Arcata offers three routes (not two) on weekdays while HSU is in session. Arcata’s express shuttle runs until 5pm and the red and gold routes run until 10pm, not 7pm.

Most importantly, Redwood Transit Service average weekday headway is 41 minutes, and headways are as short as 20 minutes during rush hour. The only weekday two hour headway is between the second to last and last buses in the evening.

“Public transit in Humboldt County primarily serves persons who have no alternative means of transportation available. With existing and likely available future funding, it does not appear financially feasible to provide transit service that can compete with the automobile. A competitive transit service would require at least a doubling of service from current levels, and greatly extended hours of operation. But transit operators are financially stretched to operate at their current levels.” p.8-38

This paragraph has a few inaccuracies. First-off, Humboldt State University attendees compromise a great deal of the ridership on both A&MRTS and RTS. Many of these riders have other means of transportation, but choose the bus in part because of a universal bus pass for students and in part due to parking fees that have doubled in the last three years, and will further increase to \$157.50 per semester in Fall of 2008. Unionized university staff and faculty currently pay less than \$60 per semester now, but their parking fees may come into line with student and non-unionized staff fees in the next several years, adding incentives for more potential transit riders.

With transit ridership and service growing, and \$100 million backlog on county road maintenance that gets worse every year, the county road system appears far less financially

feasible than transit growth. Competitive transit service is in part based on frequency of service (and RTS service frequency is roughly double what the draft element assumes). However, transit cannot compete as an alternative choice to the congestion on roadways if it is stuck in the same congestion that it acts to alleviate.

Bus Rapid Transit strategies such as signal prioritization, dedicated lanes or streets, queue jumps and bus stations are not funded through the sometimes tight operating budget of the transit agency, because they are a capital improvement. As such, they can be funded with State Transportation Improvement Project (STIP) dollars that are dispensed through HCAOG. So it is the discretion of our region, whether we wish to fund transit improvements, and less an issue of operating budgets.

The issue of transit operators being financially stretched was covered in earlier comments. There is more TDA money available to Humboldt County to improve and expand transit operations, but it is being spent on our financially infeasible county road system.

## **Rail**

“– especially since rail service was suspended in recent years.” p.8-41

Replace “recent years” with “1998.”

“Passenger rail service could support efforts to increase tourism and offer an alternative for visitors to the County to Highway 101... passenger rail service can be an important element of a comprehensive transportation system for the County.” p.8-41

Recent studies do not support this statement. The 2003 Bay District document, “The Long Term Financial and Economic Feasibility of the Northwestern Pacific Railroad” states: “Due to the relatively low population density and long travel times on the NWP corridor, intercity passenger service demand was not found to be sufficient to warrant further analysis” (S-9).

While there would be many benefits to the restoration of rail, it is unlikely to happen, and we need a “plan b” to ensure the preservation of these public rights-of-way. A network of multi-use trails is the obvious choice for rights-of-way in the vicinity of Blue Lake, Arcata, Manila, Samoa, Eureka, College of the Redwoods, Fortuna, Rio Dell and Scotia. Using a railbanking approach to build the trails would help preserve the right-of-way and allow for return of rail at some future date if market and political conditions change. Rail rights-of-way are already under threat or lost in the northern part of the county as landowners reclaim railroad easements on their land. Railbanking would act to preserve the rights-of-way and prevent this loss of a vital public asset.