



TRINITY COUNTY
DEPARTMENT OF TRANSPORTATION
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Via E-Mail

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research

**Subject: Comments on OPR's Preliminary Evaluation of Alternative Methods of
Transportation Analysis**

Dear Mr. Calfee:

Trinity County Department of Transportation continues to have concerns regarding the above-referenced document by the Governor's Office of Planning and Research. The document proposes fundamental changes in the way a project's impacts on transportation would be analyzed and mitigated under CEQA.

My agency has expressed opposition to previous attempts to eliminate the use of Level of Service to assess the traffic impacts of projects. Alternative policies are model with the expectation and assumption that if traffic gets too congested, more people will use alternative methods, such as transit, bicycling or walking. Eliminating LOS impacts from CEQA will remove an easy to identify impact factor for rural areas for both proposed projects, and preparation of the Regional Transportation Improvement Program. For rural areas, our primary focus is on intersections, not the links between areas. LOS is a primary tool that helps identify, and many times eliminate intersections that are problematic. Only in very select locations does the travel/capacity of roadway outside of an intersection warrant further consideration.

In rural areas like Trinity County, there are many urban oriented solutions that are not practical in a rural setting. Our development pattern consists of small communities widely separated by miles of largely unpopulated areas. There are no hub-style cities with steadily decreasing populations radiating outward from a dense core. Without this development pattern, most of the mitigation measures proposed in the document difficult or impractical to impose.

Further, we have a thriving transit system for a rural area, which included a large proportion of inter county travel from the coast to the valley. However, these transit trips between communities are very long, an hour or more one-way. Farebox recovery requirements support one or two of these long runs per day, requiring a rider to remain at their destinations for at least half a day. This limits the potential for increased ridership under these conditions.

There are positive proposals such as the concept of “infill opportunity zones” where LOS does not apply, especially in the more urbanized core of rural areas, but for this to be a practical matrix, it is requested that a rural development model, with widely dispersed communities of very low population, be considered in development of measures to mitigate traffic impacts and reduce greenhouse gas emissions. A “one size fits all” model is not appropriate if “OPR intends to investigate metrics and criteria that will apply statewide” as is stated in the document. This would provide a more successful approach to what we all are trying to set up for the State of California.

If you have any questions, please do not hesitate to contact me at (530) 623-1365, or by email at rtippett@trinitycounty.org.

Sincerely,

Richard Tippett, P.E.
Director
Trinity County Department of Transportation and Planning