197/199 Safe STAA Access Project

Volume III

Final Environmental Impact Report/ Environmental Assessment and Section 4(f) Evaluation

Responses to Comments

State Clearinghouse Number: 2008082128

SR 197 and US 199 in Del Norte County
Ruby 1, 01-DN-197 PM 4.5; Ruby 2, 01-DN-197 PM 3.2-4.0;
Patrick Creek Narrows, 01-DN-199 PM 20.5-20.9, PM 23.92-24.08, & PM 25.55-25.65;
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EA: 01-48110, 01-45490, 01-47940, 01-4500U

Prepared by the
State of California Department of Transportation

The environmental review, consultation, and any other action required in accordance with applicable Federal laws for this project is being, or has been, carried out by Caltrans under its assumption of responsibility pursuant to 23 U.S.C. 327.

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Chapter 1 Introduction and Background

Volume III of the Final Environmental Impact Report/Assessment for the 197/199 Safe STAA Access Project consists of California Department of Transportation (Department)-prepared responses to written comments from the public regarding the proposed project. Volume I consists of the main Final EIR/EA document. Volume II consists of the Appendices.

On July 13, 2010, the Department held a public meeting to provide the public an opportunity to review project information, the results from the Draft EIR/EA, ask questions, and submit comments. A Notice of Completion form and Draft EIR/EA copies were submitted to the State Clearinghouse on June 29, 2010 with a request to close circulation and comment period on August 23, 2010. The State Clearinghouse sent a letter back to the Department stating that the review period closed on August 12, 2010, but the Department did not consider that statement as being correct. Instead, the Department considered the close of the public comment period to be August 23, 2010, as noted in public notices, on the comment cards, and as stated at the public meeting.

The Department received a total of 91 public comments in the form of comment cards, letters, form letters, emails, and verbal comments from individuals that attended the July 13, 2010 public meeting, during the circulation of the Draft EIR/EA. Some individuals and organizations submitted more than one written comment letter.

The Department released a Partial Recirculated Draft Environmental Impact Report / Supplemental Environmental Assessment on September 18, 2012, and accepted comments until November 5, 2012. The Recirculation involved only Sections 2.3.1 Natural Communities and Section 2.3.3 Plants. The Recirculation was to address additional information on potential effects to large redwoods and another special status plant species. The Department received 398 public comments in the form of letters, form letters and emails.

1.1 Organization of Public Comments

Written comments from public agencies and governments, organizations, and individuals received regarding the Draft EIR/EA and the proposed project are included in this volume. Each public comment received was placed into one of five categories, as listed below, including the transcript of comments provided during the public meeting held on July 13, 2010.

1. Public Agencies and Governments
2. Organizations
3. Individuals
4. Public Meeting Transcript
5. Form Letter
6. Comments on Recirculated Environmental Document

1.2 Format of Responses to Public Comments

Each written comment has one or more numbers inserted in the margin. These numbers correspond to Department written responses that follow each comment. Note that in some cases responses to public comments refer the reader to a response to a different comment or to the grouped responses section, described below.

Chapter 2 Grouped Responses to Common Public Comments by Topic

Many of the written comments received from the public raised similar concerns regarding the proposed project. To avoid repetition of responses to similar comments, common issues raised in public comments were grouped together by topic and responses were prepared to address each topic in detail. The following Grouped Comments and Responses section precedes the actual copies of public comments. Each Grouped Comment and Response is assigned a number for reference.

- #1 Purpose and Need
- #2 Cost vs. Benefit
- #3 Visual Resources
- #4 Effects on Trees
- #5 Wild and Scenic River
- #6 Alternative Routes
- #7 Inadequate Range of Alternatives
- #8 Safety
- #9 Traffic Study
- #10 Geologic Stability

2.1 Grouped Comment #1: Purpose and Need

Many comments addressed the purpose and need of the project. Some comments questioned whether there was an actual need for STAA truck access, since a minimal number of businesses propose to use STAA trucks if the State Route 197/U.S. Highway 199 corridor (197/199 corridor) is reclassified for STAA access, minimal economic improvement is anticipated for Del Norte and Humboldt Counties, and there is an anticipated increase of only 17 trucks (or 8.25 new daily round trips) per day. Some comments stated that the road is adequate and usable in its current state for the smaller California-legal trucks, which have equal weight limits to STAA trucks and which are the trucks that most businesses surveyed said they would continue to use; therefore, they state that there is no need to reclassify SR 197 and US 199 to accommodate STAA trucks. The Department's response is presented below.

2.1.1 Grouped Response #1: Purpose and Need

The purpose of the proposed project is to improve spot locations on SR 197 and US 199 in Del Norte County to accommodate STAA truck travel, thereby removing the restriction for STAA vehicles, and improving goods movement. By making improvements to accommodate STAA

trucks, the prohibition for STAA vehicles would be removed, the SR 197/US 199 route would be consistent with federal and state legislation and regional programs, plans, and policies, and the safety and operation of US 199 and SR 197 would be enhanced. This would improve goods movement, and also enhance safety on the routes for automobiles, trucks, and other large vehicles such as motor-homes, buses, and vehicles pulling a trailer. The proposed project has logical termini (rational end points) as it addresses the curves that currently result in the STAA vehicle prohibition. The project has independent utility as no further improvements on the 197/199 corridor are required to lift the restriction on STAA Vehicles between US 101 at Crescent City and I-5 at Grants Pass, Oregon.

The need for the project is greater options for goods movement and potential economic benefits (see Section 2.1.2.2 of the DEIR/EA): As stated in Section 2.1.2.2, "an anticipated outcome of the project is that it will promote and encourage economic growth by providing a more efficient, less costly way to move goods and people into and out of the county." Also, "The use of non-STAA (shorter) trucks requires businesses to incur extra costs associated with transferring goods between non-STAA trucks and STAA trucks. In addition, many businesses must maintain higher inventories because of port access, erratic deliveries, and damage during transfers. The cost of trucking is an issue not only for manufacturing, but also for local residents in the way that it affects the cost of living. Some local residents view transportation costs as an additional tax on businesses and consumers. Local economic development planners estimate that Humboldt County businesses and residents pay about 10% to 15% more for goods as a result of poor truck access. (Note: Because Del Norte County has similar limitations on STAA truck access, transportation-related effects on prices for Del Norte County residents and businesses would be similar to those faced by Humboldt County residents and businesses. This issue is discussed in more detail under "Economic Impacts."). As discussed under "Potential to Influence Population and Economic Growth [Section 2.1.2.2]," the removal of STAA restrictions along the 197/199 corridor would foster economic and population growth but would not directly or indirectly encourage unplanned growth or greatly hasten planned growth.

Reclassification of the 197/199 corridor as STAA-accessible is based on the following legislation and local policy/guidance/actions (see bulleted list below and Chapters 1 and 2 in the DED).

- Regional Transportation Plan need (Section 2.1.5.1 in DEIR/EA): The 2002, 2007, and 2011 Regional Transportation Plans (RTP) also contribute to the need for the proposed project. The Del Norte Local Transportation Commission has long supported STAA access through this corridor. The 2007 RTP (accessed at http://dnltc.org/planningdocs/ on 2/27/13) defines the mobility conditions, needs, and actions necessary for a coordinated and balanced regional transportation system in Del Norte County. Objective 1 under Policy 5.D.3 states "Support planning for, and implementation of, improvements necessary to upgrade SR 197 and US 199 from "Red Route" to "STAA Route" status." See Section 2.1.5.1 in the DEIR/EA for further discussion. The Truck Policy in the 2011 RTP (accessed at http://www.dnltc.org/planningdocs/RTP_2011_Final_061611.pdf accessed on 1/26/12) further states "Encourage and partner with Caltrans to meet the needs of local shippers, and businesses moving freight by truck, when planning truck routes in and out of the County." Objective 1 under this Truck Policy states "Continue to implement roadway improvement projects along the US Highway 199 and Route 197 corridor that will achieve STAA Route

status and create a viable trade corridor." These local plans show that there is strong interest and support by the local government, contributing to the need of the project.

- Regional Transportation Improvement Program need (Section 2.1.1.2 in DEIR/EA): The 2008 Regional Transportation Improvement Program (RTIP), adopted by the Del Norte Local Transportation Commission (DNLTC), also contributes to the need for the proposed project. The RTIP states that "This project on US Highway 199…Realignment and Widening at Patrick Creek Narrows, has been selected as the #1 priority by the DNLTC" (see pg. 4 of the RTIP, accessed at http://www.dnltc.org/planningdocs/RTIP_2008.pdf on 1/26/12). The RTIP also stated that the DNLTC requested STAA access from DN to Interstate 5 be fully funded and requested advancing State Transportation Improvement Project (STIP) shares to fund the Realignment and Widening at Patrick Creek Narrows. The 2008 RTIP also states goals of planning to accommodate STAA trucks on US 199 and SR 197 and support development of a viable goods movement truck corridor on these roadways. This local guidance/action shows that there is strong interest and support by the local government, contributing to the need of the project.
- Federal need (Section 1.2.2 in DEIR/EA): The need for the proposed project is partly based on the Surface Transportation Assistance Act (STAA) of 1982. This is mentioned in the Need section in Chapter 1 of the DEIR/EA, which states "The Department continues to evaluate and open STAA access to existing state routes as improvements are made to allow safe access for STAA vehicles, in accordance with the Federal STAA of 1982" (section 1.2.2). Additional clarification was added to the Need section of the FEIR/EA after review of public comments to further explain the federal STAA and how the proposed project complies with the federal STAA.
- State need (Section 1.2.2 in DEIR/EA): The need for the proposed project is also based on Assembly Bill (AB) 866, passed in 1983, which implements provisions of the federal STAA.
- Route Concept Report needs (Section 1.2.2 in DEIR/EA): The Route Concept Reports for SR 197 and US 199 (1999) also contribute to the need for the proposed project. They concluded that the two routes should be widened and realigned to safely accommodate STAA trucks.
- Consistency with local policy: See "Environmental Consequences," under the Consistency with State, Regional, and Local Plans and Programs section, Section 2.1.1.2, in DEIR/EA for a discussion of consistency with the above plans. The Avoidance, Minimization, and/or Mitigation Measures portion of Section 2.1.1.2 states "Overall, the proposed project is consistent with all local and regional plans and policies, and no long-term measures are necessary. Implementation of the access- and circulation-related minimization measures in Sections 2.4.3, 2.4.4, and 2.4.5 [of the DEIR/EA] would minimize effects of the temporary closures of US 199 during construction." Furthermore, the No Build Alternative would fail to be consistent with the DNLTC RTIP's Highways, Streets and Roads Goal, since the No Build Alternative would not accommodate long (STAA) trucks on SR 197 and US 199 (see Section 2.1.1.2 in the FEIR/EA). The purpose and need for the project is consistent with local policy.

While achieving consistency with the federal STAA, State bill 866, RTIP, RTP, and Route Concept Reports, the Department has determined that there would be anticipated benefits if

proposed improvements were constructed and the 197/199 corridor was reclassified to allow STAA trucks. Anticipated benefits are discussed in Grouped Response #2.

Revisions were made to Sections 1.2.1 and 1.2.2 in the FEIR/EA for clarity.

2.2 Grouped Comment #2: Costs vs. Benefits of the Proposed Project

Several comments stated concern regarding the potential costs of the proposed project and questioned whether the costs would outweigh the anticipated benefits. Topics of particular concern that were mentioned include the following: costs of the projects, including monetary cost; temporary construction impacts; potential economic impacts to Crescent City; safety impacts; and potential environmental impacts. Comments suggested that the above costs outweigh the minimal benefits anticipated, including a minimal number of businesses that propose to use STAA trucks, minimal economic improvement anticipated for Del Norte and Humboldt Counties, and an anticipated increase of only 17 truck trips (i.e., approximately eight truck round trips) per day.

2.2.1 Grouped Response #2: Costs vs. Benefits of the Proposed Project

The Department appreciates the public's concern regarding costs versus benefits. In general, the concept of cost versus benefit is not a topic that is addressed in the environmental document, however the Department is providing the following information. Additionally, the purpose and need are based on striving to achieve consistency with the federal STAA and State Assembly Bill 866, plus the RTIP, RTP, and Route Concept Reports discussed above, that seek reasonable access to terminals for STAA trucks (see Grouped Response #1, above), so cost versus benefit is not a consideration for the Department regarding the project purpose and need. However, the Department would like to respond in the interest of maintaining good communication with the public. See Grouped Response #1, above, for a discussion of anticipated benefits associated with the purpose and need. Following are responses addressing concerns regarding costs versus benefits of the proposed project.

<u>Monetary cost of the project versus anticipated economic gain</u>: Some comments stated concern that the proposed project costs too much money to build compared to the minimal economic gain. There would be some economic benefit from lower transportation costs (see Section 2.1.2, Growth, and specifically, Section 2.1.2.3, Environmental Consequences, in the DEIR/EA). According to the Community Impact Assessment (Trott 2010, pages 4-73 through 4-80) prepared for the DEIR/EA, the proposed STAA truck access improvements along the 197/199 corridor would lower transportation costs by about 15% for an estimated 20% of the trucking firms and about 60% of the producers in the two-county [i.e., Del Norte and Humboldt Counties] study area, based on a survey of 37 trucking and producer firms. The Community Impact Assessment (pages 4-83 through 4-85) discusses economic effects of the project.

In terms of employment and personal income, the project is anticipated to generate small economic benefits to the region. As discussed on page 2.1-44 of the DEIR/EA, providing STAA

truck access on SR 197 and US 199 could result in the creation, in the near term, of 30 or more jobs in Del Norte County and 43 jobs in Humboldt County—a 0.3% increase in employment in Del Norte County and 0.1% increase in Humboldt County compared to existing employment levels. Annual personal income related to this expansion of economic activity could total an estimated $4 million ($1.4 million in Del Norte County and $2.6 million in Humboldt County). The number of jobs that could be indirectly generated in other business throughout the regional economy is not known. A full assessment of the potential adverse and beneficial economic effects of the project is provided in the Community Impact Assessment prepared for the DEIR/EA (Trott 2010), which is available for review at the Department's District 1 office at 1656 Union Street in Eureka and at the public library in Crescent City.

Temporary construction impacts versus anticipated long-term benefits: Proposed temporary impacts may be of concern to members of the public, particularly because of anticipated traffic delays over the proposed construction seasons, which may discourage tourists from visiting North Coast destinations and may affect access for emergency service vehicles. Discussion on temporary construction impacts is provided in DEIR/EA Section 2.4, and see pages 2.4-20, -21, -25, -27, and -28 for Measures to Reduce Temporary Access and Circulation Impacts regarding measures for both emergency vehicles and tourism. Section 2.1.1.2 also discusses assurance of emergency vehicle access through the work zone. See Section 2.5.3.2 in the Draft and Final EIR/EA regarding considerations for potential cumulative effects by resource topic, particularly traffic delays in the Community Impacts section. The construction schedule is discussed in Section 2.4.3 of the Draft EIR/EA and Final EIR/EA; currently, construction of project improvements is anticipated to begin in 2014 and to be completed by late 2017. This timeframe is refined in the Final EIR/EA so that construction would begin in 2013 and occur through 2015, since the Retaining Wall Alternative for Washington Curve was not selected as the preferred alternative and was the reason that construction might extend to 2016 (see Tables 1-2 and 1-3 in the Draft and Final EIR/EA).

The anticipated schedule includes summer and early fall periods, when tourism levels are generally high. The Department determined that the potential temporary and permanent impacts from proposed construction would not be significant or cumulatively significant because impacts would be temporary and would leave no long-lasting effects. The proposed project was designed so that it would meet the purpose and need while minimizing temporary impacts and avoiding or minimizing environmental impacts. The Traffic Management Plan for each project location provides restrictions to avoid lane closures and traffic delays on busy travel days, including Friday afternoons (after 3 p.m.), Saturdays, Sundays, designated legal holidays, the day before designated legal holidays, and special event days. There will be advanced public notice of closures. Additionally, except for staged construction, the full width of the traveled way would be open for use by public traffic from the preceding Friday to the following Monday for special events that could be affected by project construction, such as the annual "Jamming on the Jed" festival. These measures and the access and circulation–related measures described in the Avoidance, Minimization, and/or Mitigation Measures portion of Section 2.4.3 of the Draft and Final EIR/EA would help reduce impacts on tourists and motorists during the construction periods for each location.

For the proposed improvements at the Ruby 1 and 2 sites on SR 197, delays for motorists are not anticipated to be long, with one lane of SR 197 through the construction zones anticipated to be

open at all times. Additionally, both lanes would be open during weekends. According to the Traffic Management Plans for these sites, the maximum delay during construction is estimated to be 15 minutes. Therefore, impacts on delays of tourist traffic on SR 197 are anticipated to be minor.

Potential impacts on tourist travelers on US 199 from construction of improvements at Patrick Creek Narrows Locations 1 to 3 and the Narrows and Washington Curve sites range in level of severity. During much of the construction seasons, one lane of US 199 would be open at all times, with maximum delays anticipated to range from 15 to 30 minutes at individual project locations. If construction were to occur at the same time at all seven locations in the 197/199, the Department determined after circulation of the DEIR/EA and further study of the selected preferred alternatives that cumulative delays in the 197/199 corridor will not be allowed to exceed 90 minutes during daytime construction (see FEIR/EA in Section 2.4.3), which would be inconvenient for travelers but not likely to deter many tourists from traveling to destinations in Del Norte and Humboldt Counties. At night, however, delays could be substantially longer as all lanes are periodically closed for construction operations. Delays of up to 4 hours over 50 to 150 nights, spread over two construction seasons, could occur at the Washington Curve site.

Potential safety impacts versus benefits: Some comments stated concern for an increase in truck traffic and how that would affect road users. Related to traffic operations, the potential increase in truck traffic has a minimal impact. As stated in the purpose and need, providing the proposed safety improvements will be a benefit to all users of the corridor, not just trucks. See the response to Center for Biological Diversity's Comment 6 (see Chapter 2 of response to comments volume of the Final EIR/EA) for a discussion of safety and how collisions are addressed. See Grouped Response #8, below, for a discussion of how speed zones are determined, safety, and how the anticipated increase in truck traffic would affect local communities and road users. See response to Transcribed Comment 6-1 for a discussion of assessing school bus access. See the response to Vern Powers' Comment 1 for a discussion of hazardous material spills. In summary, the proposed improvements are intended to enhance safety on SR 197 and US 199 for all road users, and the anticipated increase in truck traffic would be minimal enough that it is unlikely that local residents would notice the additional truck traffic after construction or under future conditions.

Potential costs of environmental impacts: Some comments questioned the need for STAA truck access and whether or not the project is worth the potential impacts to trees and wildlife. Regarding potential permanent environmental impacts, there would not be substantial adverse impacts to sensitive environmental resources due to implementation of the preferred alternatives of the proposed project (see Section 3.2 of the Draft and Final EIR/EA). See Section 1.3.7 in the FEIR/EA for a discussion of selected preferred alternatives and Section 3.2.3 in the FEIR/EA for a discussion of unavoidable significant environmental effects. Measures would be implemented to avoid and/or minimize environmental impacts to all other environmental resources at all seven locations so that no sensitive resources would experience significant impacts (see Section 3.2 and Volume II, Appendix E in the FEIR/EA). The 197/199 corridor would not change dramatically due to the proposed project, since road improvements are proposed at only seven locations; most improvements involve minimal road/shoulder widening; the slope cuts would have a similar appearance to the existing slope cuts (i.e., rock with some lightly vegetated soils); the proposed new structures (i.e., retaining walls at the Patrick Creek Narrows locations plus the new arch

bridge at Patrick Creek Narrows Location 2) would have aesthetic treatments that match the existing treatments along US 199; the new bridge would be an arch bridge, just like the existing bridge; vistas would not be substantially different than existing; and posted speed limits would not change. Since widening would be minimal at the seven locations, drivers would not likely be able to perceive the additional width as being wide enough to speed up in those areas; even if drivers did speed up in those seven spot locations, the 197/199 corridor would remain winding, leading to drivers maintaining slower speeds along the majority of the corridor.

The bridge replacement at Patrick Creek Narrows Location 2 would have the highest potential for impacts to sensitive environmental resources due to work over the Middle Fork Smith River and the greatest number of special status plants in areas of proposed ground disturbance; however, avoidance and minimization measures have been included in the proposed project's design, in consultation with environmental resource agencies, to offset potential environmental impacts (See Volume II, Appendix E). No work would be conducted in the wetted channel. If the bridge was not replaced under this project, it would be needed in the near future, considering that the existing bridge is nearing the end of its design life.

Enhanced safety (see Section 1.2 of the DEIR/EA): Proposed roadway improvements, such as roadway widening and improved sight distances, would enhance safety on SR 197 and US 199 for all users.

Decreased travel times (see Section 2.1.3.1 of the DEIR/EA, and Figure 4 and pages 7-10 in the Traffic Analysis Report (Fehr and Peers 2010)): The opening of an STAA-accessible route along US 199 and SR 197 would substantially decrease STAA-truck travel times for trucks traveling to/from Interstate 5 in Oregon and US 101 in California.

Improved access to public services and enhanced safety (see Section 2.1.4.2 of the DEIR/EA): The proposed project would improve access to public services in the study area, including law enforcement, fire, and emergency services. Existing emergency service provider routes would be enhanced by project improvements, including roadway widening and improved sight distances in places along SR 197 and US 199. In addition, the proposed improvements would enhance roadway safety along the 197/199 corridor, which could reduce traffic accidents and related calls for emergency services.

No revisions to the Draft EIR/EA are necessary.

2.3 Grouped Comment #3: Visual Resources

Several public comments stated concern that the inherent beauty of Highways 197 and 199 would be modified due to the proposed project. They do not feel this is acceptable when so few people are likely to benefit from the proposed project.

2.3.1 Grouped Response #3: Visual Resources

The Department provided a Visual Assessment study to analyze potential impacts to aesthetics along this corridor. Results from the study were included in the DEIR/EA (see DEIR/EA Table S-1, sections 2.1.6 and 2.4.6, and Chapter 3). Along US 199, none of the proposed improvements would substantially alter views which are observed by the traveler, nor would the improvements substantially alter views as viewed from residences or recreationists. Changes to the roadway conditions on US 199 would slightly increase the length of viewing time of vistas. There would be little effect on fore, mid, and background views. However, installing retaining structures, lengthening cut slopes in certain locations, and relocating a bridge near its existing location would remove and/or degrade existing visual resources such as trees, rocks, vegetated slopes, and a 1925 bridge structure. Although potential impacts were identified in the DEIR/EA, none of the proposed impacts to visual resources were determined to be significant or substantially adverse (see DEIR/EA Section 2.1.6.3 for a discussion of proposed impacts to visual resources and Section 3.2.1 in the CEQA Chapter for inclusion of Visual/Aesthetics in the category of Less-than-Significant Effects of the Proposed Project).

Avoidance, minimization, and/or mitigation measures as described in Section 2.1.6.4 in the DEIR/EA and FEIR/EA will serve to lessen or avoid impacts on visual resources. The Department has committed to maintaining corridor consistency in aesthetic treatment of the retaining walls, concrete safety barriers (Type-80 railing with aesthetic treatment) and the proposed bridge replacement along Route 199. The retaining walls and portions of the bridge proposed for this project will have identical or nearly identical aesthetic treatment (rock facing) compared to what has already been constructed in recent years in the replacement of Hardscrabble Creek Bridge and at the retaining walls at Idlewild curves.

Based on the selected preferred design option for bridge type at Patrick Creek Narrows Location 2 (see Section 1.3.7 in the FEIR/EA), the bridge would be replaced with an arch bridge with aesthetic treatment (e.g., color and texture treatments of the concrete that would simulate or aesthetically match the surrounding natural environment) that would be the same or similar to other recent aesthetic treatments constructed along US 199, such as at Hardscrabble Creek Bridge. The aesthetic treatment would be developed in coordination with the U.S. Forest Service, and would be identical or similar to that of Hardscrabble Creek Bridge and the retaining walls at Idlewild curves, to ensure that Wild and Scenic River and Department of Transportation Act Section 4(f) concerns are addressed.

Rock-retaining curtains, also called cable mesh draperies, would be almost identical to the curtain (drapery) shown in the photo in the document (see Photo 15 in the DEIR/EA, Figure 2.1.6-3h), and also where it is newly placed along US 199 from post mile R18.3 to R18.6. Regarding concerns about visual impacts from cable mesh drapery, the drapery would be a brown or black color which visually blends into the natural landscape better than lighter colors such as grey or metallic. The travelers' view of the drapery is of short duration, and if on a curve, it will be less noticeable. For these reasons, this drapery may cause only a minimal visual impact. There are no cumulative impacts regarding cable mesh drapery, as drapery is not expected to be the usual manner of rock-fall control along US 199.

No revisions to the Draft EIR/EA are necessary.

2.4 Grouped Comment #4: Effects on Trees

Some comments stated concern that the proposed project would have impacts to root and canopy structures of large redwoods. Several comments expressed concern about large redwoods both as a cultural/visual resource and as a biological/ecological resource at the Ruby 1 and Ruby 2 sites. There are several large Douglas-firs at the Patrick Creek Narrows Location 2 that have similar resource value. However, these mature Douglas-fir trees are within hundreds of acres of similar forest community in this area. Nonetheless, the department has designed the project to minimize impacts to this forest community. Comments stated concern for trees within the project footprint which would be removed, and trees near the project footprint which could have root impacts and/or other indirect effects.

2.4.1 Grouped Response #4: Effects on Trees

After circulation of the DEIR/EA, the Department conducted an additional study (Forester/Arborist Report 2012) and recirculated a portion of the DEIR/EA with updated information about potential impacts to these resources. It should be noted that the Ruby 1 location and the Ruby 2: Two Foot Widening in Spot Locations were both designed to avoid impacts to large redwoods (greater than 36 inch dbh), and the Ruby 2: Two Foot Widening in Spot Locations was selected as the Preferred Alternative at this location because it avoided significant impacts to large redwoods.

The Forester/Arborist Report assessed potential impacts to each tree on an individual basis and as a forest stand. Trees were assessed based on the project activities around each tree including: amount of ground disturbance such as cut or fill, removal of adjacent trees and canopy effects, potential construction impacts and proportion of the Root Health Zone (5x dbh) which would be affected (cut, filled or compacted). The study demonstrates that no large redwoods would be substantially affected by the preferred alternatives for the proposed project. The study methods and results are discussed in Section 2.3.1 of the Recirculated DEIR/EA and the Final EIR/EA.

Ruby 1 and the preferred alternative for Ruby 2 will not have substantial negative effects on the large redwoods adjacent to the project because of the limited extent and nature of the proposed project. Trees can remain healthy and vigorous after impacts on up to 30% of their root zones, and none of the large redwoods near the project will have this level of effect.

The large redwoods and surrounding forest at the Ruby 1 and Ruby 2 sites are not high quality contiguous old-growth redwood forest, but are small fragments of the older forest. While many definitions exist for old growth forest the consensus is stand characteristics of: mixed age stands, complex crown structure (dead tops, cavities, large branches), multistage canopy and standing dead trees (Forester/Arborist Report 2012). Most of the surrounding lands have been developed for residential and industrial uses. While some of the individual trees are very impressive, large, old remnants of the old-growth forest, the area does not represent ecologically significant old-growth forest.

At Ruby 1 the forest is a thin strip of trees on either side of the highway, with a rock quarry to the east. To the west is the Smith River and the across the river are residences lining the river.

The surrounding forest landscape is second and third-growth forests under active forest management for production (see DEIR/EA Figure 2.1.1-1). The rock quarry to the east has been active and enlarged over the past decade.

At Ruby 2 the forest directly east is a second or third-growth industrial forest, which will likely have future harvest operations at some date. To the west are a few remaining large redwoods, residences maintaining lawns and homes along the river. The open residential lawns are as wide or wider than the forested strip west of SR 197, which highlights that the major landscape features being maintained in this area are developed residential and not mature forest resources. Again, across the river are more residences and industrial forests.

The major ecological forest resources in this area are the industrial timberlands which support a bulk of the wildlife in the redwood region and the park lands to the south which support true old-growth redwood ecological resources. These areas have contiguous forest habitats that can support wildlife populations and rare species which are dependent on the mature redwood forests. Marbled murrelets prefer larger stands of mature forest for nesting and the current highway and residential activities would likely preclude nesting in the large redwoods adjacent to the project site. Similarly, northern spotted owls require hundreds of acres of forest habitat within their home range and are not likely to be nesting in single trees adjacent to the highway, but rather in a 100-acres grove of mature redwoods. Given the fragmented nature of the forest habitat it is not likely to provide habitat for either northern spotted owls or marbled murrelets. The Biological Assessment and Biological Opinion from USFWS concur with the finding that the project may affect, but is not likely to adversely affect spotted owls or marbled murrelets at Ruby 1, Ruby 2, Washington Curve, Patrick's Creek Narrows 1 and Patrick's Creek Narrows 3. The small loss of habitat at Patrick's Creek Narrows 2 and potential for disturbance at Patrick's Creek Narrows 2 and The Narrows were determined to be adverse effects, but not likely to result in jeopardy to the spotted owl.

For other forest species using the project area, such as songbirds and small mammals, the risks of edge effects (higher predation rates) are greater. Risks associated with residential areas are higher densities of domestic cats and corvids, which can prey on wildlife populations, and increased mortality due to vehicles. Many roadside and residential areas may function as population sinks for some wildlife species.

The Ruby 1 and Ruby 2 projects together will permanently remove approximately 0.14 acres of redwood forest habitat. This habitat is already degraded by the residential areas, rock quarry and existing road. For perspective, there are approximately 2.29 acres of redwood habitat within the Right of Way adjacent to the Ruby 2 site. Of this, 0.14 acres (6%) would be removed by the preferred alternative of this project. For comparison, the rock quarry is approximately 4-6 acres of cleared forest land, the residential lawns adjacent to Ruby 2 are greater than 3 acres (likely more depending on how they are defined), and the nearby golf course represents over 60 acres of former redwood forest. Overall, the loss of 0.14 acres of non-pristine, roadside redwood habitat is not a significant impact to redwood ecology locally, regionally or even on the project site.

Nevertheless, these forested strips do provide a great aesthetic, visual and cultural value to the residents, tourists, and through travelers on SR 197, as is evidenced by the number of comments the Department received concerned about the large redwoods. With the selection of the Ruby 2:

Two-foot Widening in Spot Locations, these resources will not be negatively impacted by minor widening of the roadway, especially in this case where the large trees will be retained. The existing large trees will not be removed or indirectly affected by the project, thus the aesthetic, visual and cultural value of the trees will not be affected by the project.

Various avoidance and minimization measures are planned to reduce any effects to these large redwoods (RDEIR/EA and FEIR/EA Section 2.3.1.3). These include: minimizing excavation, cut, fill and compaction within the Root Health Zone wherever feasible, using an Air-Spade or similar pneumatic excavation tool within the Root Health Zone to avoid inadvertently severing roots greater than 2 inches, and reduced overall footprint of the project.

Some revisions have been made to the FEIR/EA Section 2.3.1 to clarify this information.

2.5 Grouped Comment #5: Wild and Scenic River

Some comments stated concern that the proposed project would have impacts to the Wild and Scenic River corridor and the Smith River.

2.5.1 Grouped Response #5: Wild and Scenic River

Designated recreational river segments allow for transportation facilities, such as SR 197 and US 199 (DEIR/EA Section 2.1.1.3). Highway improvements on US 199 were provided for in the Smith River National Recreation Area (NRA) when it was established, and the river was designated with these existing transportation facilities. Potential impacts on Wild and Scenic Rivers is discussed in the Draft and Final EIR/EA in Section 2.1.1.3, the DEIR/EA Appendix B, Section B.8.3, and in the FEIR/EA Appendix B, Sections B.4 and B.8.

See Section 2.1.1.3 in the FEIR/EA for a discussion regarding coordination with the National Park Service (NPS) for work at Ruby 1 and 2, near the Smith River. This section also discusses coordination with the Forest Service for work at the five proposed locations on US 199 near the Middle Fork Smith River. The concurrence letter from NPS was included in Chapter 4 of the DEIR/EA. The concurrence letter from the Forest Service, sent in April 2012, is included in Chapter 4 of the FEIR/EA. In summary, the NPS and the Forest Service concurred with the Department's preliminary findings that the proposed project would not have a permanent adverse effect on the free-flowing characteristics of the Smith River and Middle Fork Smith River or the values for which the river was designated, and project implementation would not alter the ability of the river to meet the Recreational designation it now holds.

Section 2.4.2.2 of the DEIR/EA and FEIR/EA describes the temporary effects of the proposed project on the Middle Fork Smith River due to proposed work at Patrick Creek Narrows Location 2. No permanent structures would be placed within the river channel that would alter the free-flowing nature of the river or recreational use of the river.

In addition, implementation of measures included in the Draft EIR/EA, Section 2.3.4.4 would avoid and minimize potential impacts on the salmonids and their Critical Habitat and Essential

Fish Habitat to the greatest extent practicable during project construction. Additional measures included in the Draft EIR/EA, Section 2.1.6.4 and Section 2.3.3.4 would reduce and minimize potential impacts on the visual setting and plant species, respectively.

No revisions to the Draft EIR/EA are necessary regarding this grouped comment; however, updates were made in the FEIR/EA Section 4.3 to reflect that coordination with the Forest Service is complete.

2.6 Grouped Comment #6: Alternative Route Linking US 101 to US 199

Several comments recommended an alternative trucking route. One alternative route was suggested to be constructed as a four-lane road parallel to the existing SR 197; this alternative will be referred to as the SR 197 Bypass. Another proposed alternative route was a four-lane bypass "…parallel with US 199 through the park," and a similar statement for "four lanes all the way to I-5 and four lanes through the park," which will be referred to as the US 199/Toll Road Bypass. Another proposed alternative was a four-lane highway from O'Brien in Oregon to Rowdy Creek in California; this will be referred to as the Rowdy Creek Bypass. The last proposed alternative route was suggested as a "straight line from I-5 to Crescent City, high-speed, four lanes, 55 miles an hour," which will be referred to as the Crescent City to I-5 Bypass.

2.6.1 Grouped Response #6: Alternative Route Linking US 101 to US 199

The Department appreciates suggestions for alternative truck routes. These alternative truck routes have been considered but eliminated from further consideration in the FEIR/EA. The anticipated environmental impacts would be too great to consider any of the proposed alternatives as viable. All of the proposed alternative routes would lead to the following anticipated environmental impacts:

- Water quality impacts, partly due to many acres of new impervious surface
- Erosion and sedimentation into creeks and rivers, due in part to new road cuts in many steep areas, some of which are likely geologically unstable with potential for landslides and rock fall
- Visual impacts
- Potential cultural impacts
- Potential wetland impacts
- Cutting of many trees, some of which may be large redwoods or Douglas-fir
- Habitat impacts to, and potential take of, special status and federal/state listed animal and plant species, including likely take of federally listed northern spotted owl and possibly marbled murrelet due to harassment and/or take of their critical habitat

- Potential impacts to Wild & Scenic River(s), particularly the upper forks of the Smith River tributaries that are considered wild
- Temporary and/or permanent impacts to 4(f) resources, such as public parks/recreation areas, through noise and visual impacts, right-of-way acquisition, and potential proximity impacts

Following is a discussion of potential environmental impacts for each proposed alternative. The quantity and magnitude of the potential environmental impacts leads the Department to consider but reject them.

The SR 197 Bypass would bypass properties on SR 197. It would require creation of a four-lane highway over approximately seven miles of currently unpaved ground. It would likely require creating bridges across six major creeks plus installation of culverts in at least three unnamed tributaries to the Smith River. It would also include construction through Jedediah Smith State Park (a Section 4(f) resource) and the Del Norte Golf Course.

The intent of the US 199/Toll Road Bypass may have been to provide a four-lane, less winding road that would be used by trucks and that would bypass SR 197. The proposed route, as described, appears to originate near Crescent City and parallel US 199 up to approximately Gasquet, at which point the new highway could connect to the Gasquet Flat Road to Gasquet Toll Road, then to Shelly Creek Road, and up to Oregon in the Cave Junction/O'Brien area. This alternative would require at least 30 miles of temporary and permanent impacts in northern California, not including the miles of impacts in Oregon. There is no existing road where the toll road ends that parallels US 199. This alternative would cross at least 20 major creeks and at least 21 unnamed tributary creeks on the existing toll road and Shelly Creek Road. Also, there would likely be approximately 10 miles of widening through old growth redwood forest in Jedediah Smith State Park, with new bridges or culverts on at least six major creeks and at least three unnamed tributary creeks to the Smith River before encountering US 101 near Crescent City.

The Rowdy Creek bypass would require routing traffic on Rowdy Creek Road from US 101 near the town of Smith River in Del Norte County (north of Crescent City), then to Low Divide Road, then north on Wimer Road, towards O'Brien in Oregon. It would require at least 30 miles of widening by at least two traffic lanes through Six Rivers National Forest in northern California with additional work in Oregon. It would also require culvert work and/or bridge work for at least 16 major creeks and at least 21 unnamed tributaries.

The Crescent City to I-5 bypass would route traffic as a straight line from Crescent City to I-5 in Oregon, which would be infeasible due to the rugged topography of the area that would be crossed, plus the large number of environmental impacts (e.g., many rivers, creeks, and tributaries, several mountains within the Klamath Ranges where numerous special status plant species would likely be encountered and affected; northern spotted owl and possibly marbled murrelet and their habitat would likely be affected; other special status species would likely be affected; and there would be impacts to water quality and Section 4(f), cultural, and visual resources, etc.).

No revisions to the Draft EIR/EA are necessary.

2.7 Grouped Comment #7: Inadequate Range of Alternatives, and Other Alternatives Proposed

Several comments state that the range of alternatives is inadequate, or other alternatives were not proposed. Some comments also requested that scoping comments be acknowledged in the record.

2.7.1 Grouped Response #7: Inadequate Range of Alternatives, and Other Alternatives Proposed

NEPA requires an agency to study, develop, and describe appropriate alternatives to recommended courses of action, and include in an EA a brief discussion of reasonable alternatives. The CEQA statutes require a reasonable range of alternatives. Section 15126.6 of the CEQA Guidelines states:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

In summary, the lead agency must select a reasonable range of potentially feasible alternatives that would feasibly achieve most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and that would allow informed decision making and public participation.

For the proposed project locations where only one build alternative was proposed, those being Ruby 1, Patrick Creek Narrows Locations 1 and 3, and The Narrows, there was no other feasible alternative that would attain the project purpose and need of the project (see Chapter 1 in the DEIR/EA and FEIR/EA) while avoiding or substantially lessening potential significant effects of the project. Please refer to Section 1.3.7, Alternatives Considered but Eliminated from Further Discussion, in the DEIR/EA for a discussion regarding the Department's reasons for eliminating from consideration those alternatives for the above locations.

Among the locations that had more than one build alternative (Ruby 2, Patrick Creek Narrows Location 2, and Washington Curve), the Department considered all feasible alternatives that would feasibly achieve the purpose and need of the project while avoiding or substantially lessening potential significant effects. The only potential significant effects for the project would have occurred under the Ruby 2 Two-Foot Widening and Four-Foot Widening Alternatives, with proposed cutting of large redwood trees over 36 inches dbh. However, the Department considered but did not select these alternatives as the preferred alternative after circulation of the DEIR/EA due to their potential to affect large redwood trees; see Section 1.3.7. There were no

potential significant impacts anticipated or proposed for Patrick Creek Narrows Location 2 or Washington Curve.

No public comments suggested alternatives that would accommodate safe STAA access and avoid or substantially lessen potential significant effects of the project. Several public comments, including transcripts from the public hearing during the public comment period, suggested considering construction of a new truck route. Please see the Grouped Response #6 for a response regarding proposed new truck route(s). Some public comments suggested a safety-only alternative, in which the project would be built as proposed but reclassification of the route to allow STAA access would be avoided. Another proposed alternative suggested implementing options that avoided construction and STAA access, such as reduced speed limits, signage, improved lighting, and enhanced enforcement, to address this safety concern. Another proposed alternative was to consider a legislative exemption from STAA restrictions similar to that currently provided for moving vans; this is not considered safe due to STAA vehicles off-tracking into the oncoming lane. Some comments proposed alternative shipping technologies, but those technologies are speculative and not a reasonably foreseeable alternative to this project. The traffic analysis is based on current shipping methods and needs of shippers and producers in the region. Also, alternative shipping would not meet the purpose and need of the project. In total, the above proposed alternatives would not meet the purpose and need of the project, so they cannot be considered as viable alternatives.

The scoping comments were retained and are available for review upon request, through a California Public Records Act Request.

No revisions to the Draft EIR/EA are necessary.

2.8 Grouped Comment #8: Safety

Some comments stated concern that the 197/199 corridor would remain narrow and winding and unsafe for STAA truck travel, even after proposed improvements are made. Some comments stated concern that the increase in number of trucks anticipated after construction and under the future build condition would cause a significant increase in truck traffic and significant decrease in safety, particularly for the local communities. Some comments stated safety concerns associated with speed limits and collisions.

2.8.1 Grouped Response #8: Safety

It is true that the 197/199 corridor would remain narrow and winding, even after proposed improvements are made. As noted in Section 1.2.2 of the DEIR/EA, safety-enhancing improvements, including wider lanes, wider shoulders, longer-radius curves, and enhanced sight distances, are needed at the seven proposed project locations to provide a roadway that is easier for STAA trucks to traverse; these improvements would benefit all users. These improvements would allow STAA trucks and other large vehicles to negotiate the 197/199 corridor without offtracking into the oncoming traffic lane at the seven proposed locations. Offtracking is the tendency for rear tires to follow a shorter (i.e., different) path than the front tires when turning

and is the primary concern with longer vehicles because rear tires may clip trees, knock down signs, encroach onto shoulders, or cross into the opposing/adjacent lane of traffic (see DEIR/EA Section 1.2.2). For a typical passenger car, the path followed by the rear wheels is almost the same as the front wheels. Offtracking of large vehicles, particularly STAA trucks, was the focus of investigations by the Department to ensure safe STAA truck travel.

To address the purpose and need of the project, truck offtracking into the oncoming traffic lane was considered to determine where the roadway geometrics would need to be improved along the 197/199 corridor to allow safe access by STAA trucks. As stated in Section 1.2.2 of the DEIR/EA, STAA truck tracking trials[1] and computer modeling software (i.e., software called AutoTURN, using the Caltrans "STAA-Long" vehicle type; this software is used by engineers worldwide) helped the Department conclude that STAA-length vehicles offtrack into the oncoming traffic lane at seven identified pinch-point locations based on roadway geometries. The truck tracking trials identified potential locations to consider, and AutoTURN was the method used by the Department to make final determinations as to which of the locations identified in the truck tracking trials actually showed STAA trucks offtracking into the oncoming traffic lane, based on consistent, quantifiable conditions that were entered into the computer model. These seven offtracking locations are where widening improvements are proposed. All other locations that were identified in the truck tracking trials and preliminary reports, including the Hiouchi-to-Gasquet section of US 199, were removed from further consideration for this project because they did not show offtracking by STAA trucks into the oncoming traffic lane, and therefore they did not address the project purpose and need. The proposed project would improve seven locations on SR 197 and US 199 by widening, improving tight radius curves, and providing wider shoulders, allowing drivers additional room for recovery and for negotiating tight curves with opposing traffic, or when bicycles or pedestrians are present. The computer model helped determine the amount of widening or realignment required at the seven locations. If the proposed improvements are made, STAA and other long vehicles should not offtrack into the oncoming traffic lane because there would be sufficient width for these vehicles to turn within their lane. The 197/199 corridor would remain narrow and winding, but offtracking into the oncoming traffic lane should be eliminated in the vicinity of the seven proposed project locations, which are the only locations identified by Department's investigations as being places where an STAA truck would offtrack, and that is what the Department considers necessary in order to allow safe STAA access.

Regarding the concern that the increase in number of trucks anticipated after construction and under the future build condition would cause a significant increase in truck traffic and significant decrease in safety, particularly for the local communities, the DEIR/EA acknowledges (pages 2.1-56 to 2.1-57) that the existing average daily traffic acts as a barrier that separates parts of the communities adjacent to the highway within the 197/199 corridor, but it states that the increase in truck traffic through these communities resulting from the project's removal of STAA trucking restrictions would be minor. The assessment of the project's impacts on these

[1] A number of reports and studies have identified the lack of access for STAA trucks on SR 197 and US 199. A key study was the set of STAA truck tracking trials by Caltrans District 1 Traffic Operations/Permits on SR 197 and US 199 in August 2003 and October 2005 (*DN-197/199 Corridor Extra-Legal Load and STAA Vehicle Accessibility Study* (March 2006)). Additional reports identifying improvement strategies needed to upgrade the corridor to accommodate STAA vehicles are listed in Section 3.1 of the draft Project Report for the 197/199 Safe STAA Access project (June 2010).

communities was based on how heavy-truck traffic would increase under with-project conditions. The additional trucks per day is considered minor because the proportion of total traffic consisting of heavy trucks is anticipated to increase from 10.0% to 10.3% along the segment of US 199 between SR 197 and Gasquet, including Hiouchi. Under future (2030) with-project conditions, the increase in percentage of total average daily trips attributable to heavy-truck traffic would increase slightly from 10.0% to 11.4% along US 199 between SR 197 and Gasquet. The projected increase in truck traffic by 2030 is considered insignificant because the estimated 92-truck increase per day by 2030 equates to about 10 trucks per hour in the peak period or one additional truck every six minutes. Per the Caltrans Guide for the Preparation of Traffic Impact Studies, the minimum threshold for "significant impact" is between 50-100 trips per hour. The proposed peak hourly increase of 10 trucks per hour (or 92 trucks per day) in 2030 falls well below the "significant impact" criteria. It is very unlikely that this very small increase in truck traffic will even be noticeable by the traveling public or residents living or working within the corridor in the Year 2030. In summary, the traffic analysis conducted for the Draft EIR/EA indicates no substantial adverse impacts on the roadway, transit, bicycle, or pedestrian systems or their operation within the study area. Additionally, the projected 92-truck per day increase by 2030 assumes consistent economic growth each year for the entire 20-year period. In the event of economic down times, such as what is being experienced currently by the region, state, and nation, the projected truck increase could be much lower than what was estimated by Fehr and Peers in the Traffic Study.

Speed Limits

Some comments suggested reducing speeds on highways 197 and 199 to prevent accidents. The Department also is concerned over the problem of excessive speeds and traffic safety. The process for reducing speed limits below the state maximum is complex. Reduced speed zones must be justified by an engineering and traffic survey (E&TS), which is a specific method defined in Section 627 of the California Vehicle Code. The implementation of speed zoning law is found in the California Manual on Uniform Traffic Control Devices (California MUTCD). Once an E&TS is completed, with concurrence by the California Highway Patrol, the report and any associated orders are filed with California Superior Court; they generally have a term of seven years.

The District 1 Traffic Safety office has conducted two detailed engineering and traffic surveys (E&TSs) in both Gasquet and Hiouchi since June 1998. As required by the vehicle code, these surveys were based on field-measured 85th-percentile speeds, collision history, and highway, traffic and roadside conditions not readily apparent to drivers (also called hidden conditions). Field-assessed residential and commercial density conditions and pedestrian and bicyclist safety were also considered when selecting the appropriate speed limit for these two communities.

The most current E&TS for State Route 199 through Gasquet reflects an analysis from postmile R11.95 at Mary Adams Peacock Bridge to postmile 14.50 at the north end of the existing 50 mph speed zone. This engineering and traffic survey was completed in October 2009 and is due for renewal in October 2016. As required by the vehicle code, the survey was based on prevailing speeds (85th-percentile speeds); collision history; and highway, traffic, and roadside conditions not readily apparent to drivers. Since at least 2004, the collision rates in Gasquet for both fatal+injury and total collisions have consistently been well below statewide averages for similar

roadway facilities, and there are no hidden highway, traffic, and roadside conditions. Residential density and pedestrian and bicyclist safety were also considered in the study. There has actually been a small reduction in prevailing speeds in Gasquet over the period of February 2008 to October 2009. Concerted and persistent efforts by the Department to calm traffic speeds in Gasquet by providing more cues to drivers that they are driving through a community where people live, work, and play have perhaps had a beneficial effect.

In the last few years, the Department has implemented several safety improvements and additional studies in the vicinity of Gasquet, including the following:

- an E&TS extension which included traffic, speed, and collision studies in March 2008
- an overlay and restriping to a two-way left-turn lane with northbound and southbound bicycle lanes in August 2008
- additional traffic, speed, and collision studies (extending to just south of Gasquet Flat Road) in September 2008
- installation of "share the road" bicycle signs, new speed zone and "your speed" radar feedback signs in January and June 2009
- installation of "begin center lane—left turns only—do not pass" signs in December 2009

Average 85th- and 50th-percentile speeds were measured through the reduced speed zone at 56 and 52 mph, 57 and 52 mph, and 55 and 51 mph, for February 2008, September 2008, and October 2009, respectively. The vehicle code and California MUTCD guidance requires that the Department set the speed limit at the nearest 5-mph increment to the measured 85th-percentile speed. The Department can then reduce that speed by 5 mph (and no more) if there are site-specific considerations such as conditions not readily apparent to drivers, a high collision rate, dense roadside development, or pedestrian and bicyclist safety issues. In the case of Gasquet, this 5-mph reduction was applied because of the presence of pedestrians and bicyclists along the highway.

The Hiouchi E&TS which sets the speed limit at 50 mph was renewed in February 2008 and is due for renewal in February 2015. The field-measured average 85th-percentile speed was 54 mph. Both the frequency and severity (total and fatal + injury) of collisions in the speed zone were below statewide averages, although not as far below as that of Gasquet and the segments just to the north and south. Also similar to Gasquet, a 5-mph reduction was applied because of the presence of pedestrians and bicyclists along the highway.

There are many reasons for setting the speed limit close to the 85th-percentile on any given segment of highway. Setting a speed zone far below prevailing speeds encourages disrespect for the law and makes a large number of drivers "violators," when in fact they are operating their vehicles in a reasonable manner. Also, an artificially low speed limit sets up a radar-unenforceable "speed trap," which is contrary to vehicle code requirements.

Further, the basic intent of a speed zone is to influence as many drivers as possible to operate at or near the same speed, thus reducing conflicts created by wide differences in operating speeds. The goal is to ensure the safe and orderly movement of traffic as much as possible. A speed

limit set much below the 85th-percentile defeats this purpose because while some drivers are "rule followers" and will always observe the posted limit, most drivers will "drive the road" at the speed they believe is reasonable and safe. For more information about the requirements of the California Vehicle Code and how speed zoning is conducted, the booklet "Realistic Speed Zoning" is a useful resource, available online at http://www.dot.ca.gov/dist05/traffic/Realistic-Speed-Zoning.PDF.

The Department will follow the law and established policy in setting speed zones that ensure the safe and orderly movement of traffic on state highways. This includes continuing to work in consultation with local agency and community transportation groups and in concurrence with the California Highway Patrol.

Collisions

On the subject of how Caltrans typically responds to collisions, design and traffic standards have evolved over a period of many years; consequently, many existing roads do not fully conform to current standards. It is not economically feasible to upgrade all roads to current standards, and in many cases the environmental impacts would be so great that the Department must weigh potential impacts versus potential safety concerns, where the environmental impacts may make it infeasible to bring the facility to current standards. Therefore, Design Exceptions are considered and granted where appropriate. See Response to Environmental Protection Information Center's Comments 8, 14, and 16 for further discussions on design exceptions.

The Caltrans Highway Safety Improvement Program (HSIP) was developed to identify and prioritize locations where it is economically feasible and practical to upgrade existing roads where concentrations of collisions have occurred. The program provides a system that ensures that the limited funds available for upgrading existing roads will be spent at locations where it will result in the greatest safety benefit to the highway user.

The purpose of this program is to reduce the number and severity of fatal and injury traffic collisions. The California Highway Patrol (CHP) provides the Department with collision information for each reported collision on the state highways. The locations and details of the reported collisions that occur on the state highways are processed by the Traffic Accident Surveillance and Analysis System (TASAS).

Using TASAS, a quarterly report, the Department identifies locations that have a statistically high concentration of collisions. The Department's Traffic Safety Office then receives the list of these locations and performs an investigation. Each investigation reviews the history of the collisions and the specific characteristics of the roadway at that location, and if deemed necessary, recommends an improvement. Each investigation and the recommended improvement(s) are then reviewed by one more Traffic Safety Investigator and the Chief of Traffic Safety. If an improvement is recommended, the work is done by either Department maintenance forces or by initiating a project.

Some comments request clarification regarding a statement in the DEIR/EA that says that safety improvements can be considered when accident rates reach 1.5 times the national average for similar road conditions, particularly requesting clarification for "similar road conditions" and

what the Department compared SR 197/US 199 to for National Average ratings. An important clarification is that collision rates are not compared to the "National Average", rather they are compared to the Statewide Average Collision Rates for Similar Facilities. The term "Similar Facilities" means that the characteristics of the highway are comparable. In order to make this comparison, every state highway segment, ramp and intersection is classified by a rate group. For example, Highway 197 is classified as highway rate group H03 (intersection rate groups are separate), which is described as "conventional, 2 lanes or less", "rolling terrain", "rural", and with a design speed of 55mph or less. Highway 199 is described by many highway segment rate groups (intersection and ramp rate groups are separate) because the characteristics of the highway vary from location to location along the length of the highway (Table 1).

Table 1. Highway 199 Rate Groups (Highway only) and Characteristic Descriptions

Rate Group	Highway Type	Terrain	Design Speed	Area
H05	Conventional 2 Lanes or Less	Mountainous	Less than or Equal to 55 mph	Rural
H12	Conventional 3 Lanes			Rural
H34	Divided 4 Lanes	Rolling/Mountainous		Rural
H04	Conventional 2 Lanes or Less	Rolling	Greater than 55 mph	Rural
H03	Conventional 2 Lanes or Less	Rolling	Less than or Equal to 55 mph	Rural
H17	Expressway 3 Lanes or Less	Mountainous		Rural
H45	Divided Expressway 4 Lanes or More		Less than or Equal to 65 mph	Rural
H22	Undivided 4 Lanes	Rolling/Mountainous		Rural
H06	Conventional 2 Lanes or Less	Mountainous	Greater than 55 mph	Rural

A collision report was run on the highway segment and intersections in Gasquet for PM 13.0 to 14.27 for the most current 5-year period of 10/1/2004 – 9/30/2009. For the 1.27-mile segment, the actual collision rate was 0.53 collisions per million vehicle miles (COL/MVM), which is 2.1 times less than the statewide average rate of 1.12 COL/MVM for similar roadways.

For the intersection at Gasquet Flat Rd, the actual collision rate was 0.16 collisions per million vehicles (COL/MV), which is approximately 1.3 times less than the statewide average rate of 0.20 COL/MV for similar intersections. Firehouse Road had an actual collision rate of 0.00 COL/MV. Middle Fork Gasquet Road had an actual collision rate of 0.32 COL/MV, which is 1.6 times greater than the statewide average rate of 0.20 COL/MV for similar intersections. This rate is not considered significantly elevated. Also, all three intersections had fatal+injury (F+I) collision rates of 0.00 COL/MV compared to the statewide average F+I rate of 0.08 COL/MV for similar intersections.

Consideration of Safety Improvements is not as simple as comparing the collision rate at a particular location to the statewide average collision rate for similar facilities. If deemed necessary, safety improvements are recommended after an investigation is performed. There are multiple ways an investigation is initiated as follows:

1. Monitoring Programs to identify collision concentration locations
2. Other notices such as letters, emails, phone calls etc. that direct the engineer's attention to the suggested problem location

3. Internal Correspondence

Increased Truck Traffic

Many comments were concerned that the increase in truck traffic associated with this project would cause an increase in safety concerns. The Department does not anticipate an increase in collisions, and offers a similar project as an example.

The "Big Lagoon STAA Project" (EA 01-46470) was completed in March of 2008. This project served the same purpose as this proposed project; to safely convey STAA trucks and improve the facility for all users. The Big Lagoon STAA Project location is similar to these proposed project locations, along the rural Big Lagoon coastline of Highway 101 in Humboldt County from PM 111.7 to PM 112.1.

To determine the effects of the Big Lagoon STAA Project on safety, we have retrieved collision information for the same length of time both before and after project construction. Construction on the Big Lagoon STAA Project started on 10/29/2007 and was completed on 2/29/2008. The most recent collision information available is through 3/31/2011 (37 months total). To compare to before construction, we retrieved 37 months of collision information from 9/30/2004 to 10/29/2007.

Before construction there were a total of 10 collisions (2 injury, 0 fatal) within the project limits, and after there were a total of 7 collisions (1 injury, 0 fatal). Before construction there were 2 truck and trailer collisions, after there was 1 truck and trailer collision.

Using this before-and-after comparison we can say that since the STAA improvements were constructed at Big Lagoon, the injury and truck collisions have decreased by 50%. Therefore, we expect no increase in collisions related to the 197/199 Safe STAA Access Project improvements. The Big Lagoon STAA Project has had a positive effect on safety, by reducing the number of total, injury, and truck collisions. Similar results are expected on this proposed project.

Please see Chapter 1, Section 2.1.3 (Community Impacts), Section 2.1.5 (Traffic and Transportation/Pedestrian and Bicycle Facilities), Section 2.5 (Cumulative Impacts), Section 3.2.1 (Less-than-Significant Effects of the Proposed Project), and Section 3.2.2 (Significant Effects of the Proposed Project) of the Draft and Final EIR/EA for more information.

No revisions to the Draft EIR/EA are necessary.

2.9 Grouped Comment #9: DEIR/EA Traffic Study Makes Erroneous and Misleading Calculations

Several comments stated that the traffic study prepared for the DEIR/EA made erroneous and misleading calculations. The comments addressed questions about the analysis methodology and the survey results.

2.9.1 Grouped Response #9: DEIR/EA Traffic Study Makes Erroneous and Misleading Calculations

The project team followed standardized, accepted methods in determining the number of additional daily trucks, including the potential for latent and induced demand (see Section 2.1.5.2 in the DEIR/EA and starting on printed page 5 in the Traffic Analysis Report, Fehr and Peers 2010). The estimated additional daily trucks were calculated from the data derived from the detailed surveys (latent demand), induced growth, background growth, and induced travel. The data is based on detailed surveys, historical growth, and research. For clarification, the estimated additional daily truck traffic from the traffic analysis is 8.25 round-trips or, in other words, 17 trucks per day (see DEIR/EA Section 2.2.4.3 and printed page 10 in the Traffic Analysis Report, Fehr and Peers 2010). The purpose of the traffic analysis was to determine the traffic operation impacts due to the potential increase in truck traffic. Standard transportation analysis practice is to determine traffic conditions under the "worst typical case" so that potentially significant impacts are not overlooked merely because of daily fluctuations in traffic. In this case, the additional wood-products truck was added because on a busy day, the analysis indicated that an additional wood product truck could be on the road, which could have potential traffic impacts. On many days this truck would not be present and would not lead to any traffic impacts.

In response to the claim of inflated numbers, the purpose of the traffic analysis was to address the "worst case" traffic conditions to adequately ensure that potential traffic impacts from the project were identified. The estimation of latent demand was based on survey data and assumptions based on the survey data that was received. While the estimated increase in trucks is conservative, they are not unsupported – they are based on survey data and conservative assumptions based on retailers/general shippers not responding to survey requests, not being able to provide further information, or not being able to quantify how often they shipped.

The results of the traffic impact analysis are presented in Section 2.1.5.3 of the Draft EIR/EA, starting on page 2.1-71. A more detailed description of the methodology is in the Traffic Analysis Report (Fehr & Peers 2010); however, the results and conclusions are summarized in the Draft EIR/EA.

No revisions to the Draft EIR/EA are necessary.

2.10 Grouped Comment #10: Proposed Cut Slopes and Geologic Stability

Several comments express concern that cut slopes proposed for the project would be geologically unstable or worsen geologic instability. Comments also requested data on rockslides and the proposed cut slope areas.

2.10.1 Grouped Response #10: Proposed Cut Slopes and Geological Stability

The quantity of material to be excavated at each cut slope area is stated in section 1.3.2, Project Alternatives section of the DEIR/EA. Type of rock/material to be excavated, along with other geologic background information, is presented in section 2.2.3.2 of the DEIR/EA. Preliminary geotechnical reports prepared for the project are listed on page 2.2-17 of the Draft EIR/EA and are available for review at the Department's District 1 office located at 1656 Union Street, Eureka, CA and at the public library in Crescent City. For the proposed cut slopes at the Narrows, Patrick Creek Narrows Location 2, and Washington Curve, Geotechnical staff conducted site reviews, as discussed in the preliminary geotechnical reports prepared for the project. Staff reviewed existing conditions at and near the proposed cut slopes at the three locations and determined that any potential increase in rock fall would be mitigated with cable mesh drape or other rock fall mitigation (to be determined during the design phase of the proposed project), or that the proposed engineered cut slopes are not anticipated to result in increased landslides or rock fall due to the slope material and/or the engineering design of the proposed slope cuts. In summary, Geotechnical staff do not anticipate an increase in landslides or rock fall due to the proposed project, based on knowledge of existing conditions and proposed engineering of the cut slopes and rock fall mitigation. Potential geologic impacts were found to be less than significant and not substantially adverse.

During the design phase of the project, the Department Office of Geotechnical Design North will perform further detailed field investigations and analyses of the existing and proposed cuts. A systematic approach for evaluating the potential for rockfall associated with proposed cuts, the Rockfall Hazard Rating System, will be utilized in order to reduce the risks associated with rockfall. This level of field investigation does not typically happen until after the environmental document is finalized and signed because alternatives need to be analyzed and circulated for public comment, and the public must be afforded the opportunity to suggest additional alternatives.

The comments also suggest that rock fall from slope cuts cannot be mitigated using rock nets and that the Department needs to provide data to support the proposal that rock nets would mitigate rock fall. Cable drapes act like blankets that hold rock against the slope, to reduce the number of rocks that are susceptible to falling, and slow the pace of falling rock. Since the existing cut slopes already exhibit rock fall, and rock fall is a safety concern of the Department and the public, it is responsible to design rock fall mitigation measures, if needed, for new cut slopes. A discussion of methods to reduce the potential for rock fall is included in section 2.2.3.3 in the DEIR/EA, under Potential for Erosion, Landslide, and Rock Fall on page 2.2-22.

The three cut slope areas that had the greatest potential for geologic instability and rock fall if excavation was conducted, including the cut slopes at Patrick Creek Narrows Locations 1 and 3 and a portion of the slope at Patrick Creek Narrows Location 2 that would have been part of the cut slope excavation for the Upstream Bridge Replacement Alternative and the Bridge Preservation Alternative, were recommended to be avoided by the Department's Geotechnical Engineers prior to development of designs in the DEIR/EA to avoid exacerbating geologic instability in these specific areas (see Preliminary Geotechnical Report, Patrick Creek Narrows, dated April 2009). Recommended avoidance of these slopes resulted in the Department's Design Engineers developing plans that would avoid excavation in these areas. For Patrick Creek

Narrows Locations 1 and 3, excavation of the cut slopes was avoided by widening towards the river with retaining walls (see DEIR/EA Sections 1.3.2.3 and 1.3.2.5). For Patrick Creek Narrows Location 2, the unstable portion of the cut slope was avoided by selecting the Downstream Bridge Replacement Alternative as the selected preferred alternative, after circulation of the DEIR/EA, review of public comments, and agency coordination. This was the only alternative in the DEIR/EA for this location that avoided excavating the unstable portion of the cut slope because this alternative required less of a slope cut, including avoidance of the unstable area that is close to the existing bridge, to achieve an alignment that is downstream of the existing bridge (see DEIR/EA Section 1.3.2.4).

Requests for data regarding rockslides do not specifically address the DEIR/EA. Specific requests for data in specific locations may be requested through a California Public Records Act Request by contacting the Department's District 1 office at 707-445-6600.

No revisions to the Draft EIR/EA are necessary.

Chapter 3 Specific Responses to Public Comments on the Draft Environmental Impact Report/ Assessment

This chapter is organized as follows:

- 3.1 Public Agencies and Governments
- 3.2 Organizations
- 3.3 Individuals
- 3.4 Public Meeting Transcript
- 3.5 Form Letter

3.1 Public Agencies and Governments

Six public/government agencies submitted comments in response to the Draft EIR/EA. The index to these agencies, their comments, and responses are below.

- California Department of Fish and Wildlife
- California Regional Water Quality Control Board, North Coast
- California State Lands Commission
- Del Norte Local Transportation Commission
- National Marine Fisheries Service - National Oceanic and Atmospheric Association
- North Coast Unified Air Quality Management District

California Department of Fish and Wildlife

State of California
Department of Fish and Game

Flex your POWER

Memorandum

Date: August 13, 2010

To: Ms. Kim Hayler, Associate Environmental Planner
California Department of Transportation – District 1
Post Office Box 3700
Eureka, CA 95502-3700

Late Clear 08/12/10 e

RECEIVED
AUG 18 2010
STATE CLEARING HOUSE

From: NEIL MANJI
Regional Manager
Department of Fish and Game
601 Locust Street
Redding, CA 96001

Subject: **Draft Environmental Impact Report (SCH #2008082128) for the 197/199 Safe STAA Access Project, Del Norte County**

On July 1, 2010, the Department of Fish and Game (DFG) received from the California Department of Transportation (Caltrans) a draft environmental impact report/environmental assessment (DEIR) for the proposed 197/199 Surface Transportation Assistance Act project (project). The project would provide safety improvements to State Route 197 (SR 197) and US Route 199 (US 199) in Del Norte County.

The project combines five projects previously identified and proposed separately that share the same general improvement purpose. The five projects are known as Ruby 1, Ruby 2, Patrick Creek, The Narrows, and Washington Curve. The project locations, listed by highway post miles, are: Ruby 1 on SR 197 at Post Mile (PM) 4.5; Ruby 2 on SR 197 at PM 3.2-4.0; Patrick Creek Narrows on US 199 at three locations between PM 20.5-20.9, PM 23.92-24.08, and PM 25.55-25.65; The Narrows on US 199 at PM 22.7-23.0; and Washington Curve on US 199 at PM 26.3-26.5. Post miles for US 199 start at the intersection with US 101. Post miles for SR 197 starts at the intersection with US 199. Improvements at the Patrick Creek Narrows site include bridge replacement over the Middle Fork of the Smith River.

As a trustee for the State's fish and wildlife resources, DFG has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and the habitat necessary to sustain their populations. As a responsible agency, DFG administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code (FGC) that conserve the State's fish and wildlife public trust resources. DFG offers the following comments and recommendations on this project in our role as a trustee and responsible agency under the California Environmental Quality Act (California Public Resource Code §21000 *et seq.*).

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Smith River and Patrick Creek

The Smith River is a State- and federally-designated Wild and Scenic River and is of regional and national significance because of its relatively pristine condition and un-dammed status. The Smith River is habitat for Chinook salmon (Oncorhynchus tshawytscha), steelhead (O. mykiss), and the State- and federally-listed coho salmon (O. kisutch), as well as a number of Species of Special Concern (SSC). Problems facing anadromous salmonids in the Smith River include amount of available habitat, degraded condition of riparian vegetation, poor large woody debris (LWD) recruitment, altered estuarine environment, excess sediment, compacted stream gravels, and fish passage barriers.

Take of Coho Salmon

The DEIR is contradictory in its assessment of impacts to coho salmon. DEIR page 2.3-67, states that coho salmon "may be inadvertently killed by construction activity" and the project is "likely to adversely affect coho salmon." However, DEIR Table S.1 indicates that the Patrick Creek Narrows Location 2 bridge replacement will have "no adverse impacts" on threatened and endangered species. DFG recommends, Table S-1 in the final EIR be corrected to indicate the project's adverse affects to coho salmon. 1

The Patrick Creek Narrows Location 2 site proposes bridge replacement across the Middle Fork Smith River on US 199. The DEIR describes a number of potential scenarios to construct a new bridge and demolish the existing bridge. DFG and National Marine Fisheries Service (NMFS), in partnership with Caltrans, continue to evaluate and analyze which bridge construction and demolition strategies are least likely to impact the Smith River and most likely to minimize the take of listed species such as coho salmon. However, in all construction scenarios evaluated thus far, DFG, the NMFS, and Caltrans have agreed that this project will result in the take of coho salmon due to instream channel work. 2

DFG agrees with the DEIR that Caltrans should request a consistency determination from DFG pursuant to FGC §2080.1 for the take of coho salmon. Caltrans should continue to work closely with DFG and NMFS staffs to insure the federal biological opinion and incidental take statement are consistent with the requirements of CESA.

Pursuant to FGC §2081(b), the impacts of authorized take shall be minimized and fully mitigated. One potential means to fully mitigate for take of coho salmon is to improve fish passage at upstream tributaries to the Middle Fork Smith River or to provide other habitat restoration and enhancements. DFG recommends that Caltrans continue to work closely with DFG and NOAA to identify suitable project sites to fully mitigate for the take of coho salmon.

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Biological Study Area 3

Numerous DEIR sections and tables refer to the projects' Biological Study Area (BSA). However, the DEIR does not appear to map or otherwise describe the BSA location. DFG recommends the final EIR include a map or description of the BSA.

Ruby 2 Build Alternatives and Removal of Old-growth Redwoods 4

The DEIR presents three build alternatives for widening a section of SR 197 at the Ruby 2 site. DFG supports the build alternative that includes two-foot shoulders in spot locations because this alternative would preserve old-growth trees by avoiding removal of redwood trees with diameters at breast height greater than 36 inches.

Salvage of Large Woody Debris 5

This project has the potential to remove a number of large conifer trees and old-growth redwood stumps during construction. These tree boles (especially if root wads are left attached) and stumps could provide LWD to be used for placement in DFG fish habitat restoration projects. DFG recommends Caltrans consult with DFG before construction begins to assess salvage options for large stumps and tree trunks to be used for ongoing and future stream restoration projects in Del Norte County.

Impacts to Sensitive Plant Species 6

The DEIR describes likely project impacts to a number of non-listed sensitive plant species. Transplantation and seed collection and reseeding, are discussed in the DEIR as an experimental mitigation measure to assist in the reintroduction of these species into project sites disturbed by construction activities. As discussed in the DEIR, sensitive plant transplantation efforts are documented as having a low success rate. Despite its experimental nature and likelihood for success, DFG finds efforts to collect and reestablish, soil, seed, and other plant propagules at areas impacted by the project is appropriate given that the project will primarily result in construction-related disturbance to sensitive plant habitats as opposed to the loss and conversion of these habitats.

DEIR Section 2.3 page 44 appears to have an important discrepancy regarding the magnitude of impacts to the sensitive plant *Cardamine nuttallii* var. *gemmata* (yellow-tubered toothwort) at the Patrick Creek Narrows Location 2 site. *Cardamine nuttallii* var. *gemmata* has a State ranking of "S2.2" and a California Native Plant Society ranking of "1.B", meaning that it is considered very rare in California and throughout its global range. The DEIR states that the population at this site consists of 1,000-2,000 plants. 7

Through meetings with Caltrans staff and from information elsewhere in the DEIR, DFG understands that approximately 5-10% of the population in the project area will be impacted by the project. However, two build alternatives described on DEIR page 44, Section 2.3, estimate that less than 90-95% of these plants would be removed.

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This statement indicates that up to 90-95% of the *Cardamine nuttallii* var. *gemmata* plants at this site will be impacted or taken. DFG believes that this section should indicate that that up to 5-10% of the plants at this site will be impacted or taken. 7 cont.

If DFG is correct in this interpretation, the final DEIR should consistently indicate this lower amount of impact to this species. If DEIR Section 2.3 page 44 is accurate, and up to 90-95% of the plants at this site would be removed, then DFG recommend that Caltrans re-consult with DFG to develop additional mitigations for impacts to this species.

Invasive Plant Species

The DEIR proposes implementing a three-year invasive weed control program as another means to mitigate for impacts to sensitive plant species. DFG supports the use of invasive species management and eradication plans as a means to mitigate for impacts to sensitive plants and natural communities. 8

Acacia dealbata (silver wattle) stands occur within or adjacent to the project area near Hiouchi and elsewhere on US 299. This plant is not targeted as an invasive species to be managed or eradicated, or included in Table 2.3.6-1 Invasive Plant Species Observed in BSA. It appears *Acacia dealbata* is not documented within the project BSA.

The California Invasive Plant Council (Cal-IPC) has created the California Invasive Plant Inventory (Inventory) to categorize non-native invasive plants that threaten the state's wildlands. Categorization is based on an assessment of the ecological impacts of each plant. The Inventory represents the best available knowledge of invasive plant experts in the state. The Cal-IPC inventory threat category for *Acacia dealbata* is "Moderate." Species with this designation have "substantial and apparent—but generally not severe—ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance."

DFG recommends Caltrans assess the occurrence of *Acacia dealbata* within its SR 197 and US 199 right-of-ways and include this species in its area invasive weed control program.

Bats

Populations of many bat species in California, North America, and globally are declining and currently approximately 25% of the global bat fauna are listed as threatened by the International Union for Conservation of Nature. In California, 12 of 25 bat species are either SSC, USDA Forest Service Sensitive, or Federally Endangered. California Natural Diversity Database records show an occurrence of silver-haired bat (*Lasionycteris noctovagens*) near the Patrick Creek project site. Colonies of other species of bats may also occur in the project area. The DEIR states that bat surveys were conducted in the BSA for this project and no bats of any species were detected. Since bat colonies can change roosting and natal sites from 9

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year to year. DFG recommends that bat surveys be conducted in May of each year prior to commencement of work at the Middle Fork Smith River Bridge and at other natural features providing habitat for bats. Mitigation measures should be developed in consultation with DFG if a bat colony is identified within the project impact area. 9 cont.

Although the present Middle Fork Smith River Bridge does not currently support a bat colony, this bridge provides a good bat roosting or natal site because of its location in a large riparian corridor surrounded by extensive conifer forests. According to the 1999 report initiated by the Federal Highway Administration (FHA), *Bats in American Bridges*, "only one percent of American bridges have ideal conditions for day roosting, but at little or no extra cost a much larger percentage could provide habitat for bats in the future." According to this report, bat species preferably roost on concrete bridges with sealed crevices that are 10 feet or more above the ground or water. The new bridge proposed for this site will be constructed of concrete and will have a height well over 10 feet above the ground and river. Thus, pursuant to the 2004 Caltrans report, *California Bat Mitigation Techniques, Solutions, and Effectiveness*, and the above-mentioned FHA report, DFG recommends the new bridge proposed at this site be designed and maintained to provide for bat roosting habitat. 10

If you have any questions or comments regarding this matter, please contact Staff Environmental Scientist Gordon Leppig at 619 Second Street, Eureka, California 95501 or telephone (707) 441-2062

ec: Ms. Kim Hayler
California Department of Transportation
kimberly_hayler@dot.ca.gov

Mr. Arthur Reeve
County of Del Norte, Community Development Department
areeve@co.del-norte.ca.us

Messrs. William Condon, Gordon Leppig, Michael van Hattem, and Craig Martz
Ms. Laurie Harnsberger, Jane Arnold, and Gayle Garman
Department of Fish and Game
wcondon@dfg.ca.gov, gleppig@dfg.ca.gov, mvanhattem@dfg.ca.gov, cmartz@dfg.ca.gov, lharnsberger@dfg.ca.gov, jarnold@dfg.ca.gov, ggarman@dfg.ca.gov

State Clearinghouse
Governor's Office of Planning and Research
state.clearinghouse@opr.ca.gov

Responses to California Department of Fish and Wildlife (CDFW)

Response to Comment 1

This comment states that the EIR/EA should be clarified to make the Summary table consistent with the text with regard to the anticipated impacts to coho salmon stated in Chapter 2.3 of the DEIR/EA. The Department selected the Downstream Bridge Replacement as the preferred alternative for Patrick Creek Narrows Location 2, with the concrete arch bridge being the preferred design option, after reviewing public comments and coordinating with resource agencies (see Section 1.3.7.3 in the FEIR/EA). After circulation of the DEIR/EA, the Department determined that the proposed bridge replacement, with a concrete arch bridge, at Patrick Creek Narrows Location 2 could be constructed so that no heavy equipment and minimal temporary foot traffic would occur within the wetted channel, and there would be no water diversion, further reducing the effects of this alternative. Since there would be no work in the wetted channel under the selected preferred alternative and bridge design option, there will be no lethal take of coho salmon. CDFW staff concurred with this assessment during a Level 1/Level 2 meeting held in January 2012 and stated that there was no need for a consistency determination since there would be no lethal take of coho salmon during construction (see FEIR/EA Section 4.3.2.2).

Revisions to the Draft EIR/EA Section 2.3.5.3 were made to reflect that no work will be conducted in the wetted channel and that there will be no lethal take of coho salmon at Patrick Creek Narrows Location 2.

Response to Comment 2

This comment correctly states that the Department, CDFW, and NMFS agreed, prior to circulation of the DEIR/EA, that the proposed instream work (i.e., work in the wetted channel) to replace the bridge at Patrick Creek Narrows Location 2 would result in take of coho salmon. See Response to CDFW Comment 1 for a discussion of how the Department came to conclude that there would be no lethal take of Coho salmon; also see that response regarding CDFW's statement that there was no need for a consistency determination.

Avoidance and minimization measures for coho salmon were included in Section 2.3.5.4 of the DEIR/EA and were updated in the FEIR/EA to reflect that the Department has now committed to no diversions or heavy equipment work in the wetted channel of the Middle Fork Smith River at Patrick Creek Narrows Location 2.

Revisions to the Draft EIR/EA Section 2.3.5.3 were made to reflect that no work will be conducted in the wetted channel and that there will be no lethal take of coho salmon at Patrick Creek Narrows Location 2.

Response to Comment 3

In section 2.3.3.1 Affected Environment, the Biological Study Area (BSA) is defined and the "area of direct impact" is also defined. The BSA includes the entire Smith River Watershed, since coho salmon, marbled murrelet, northern spotted owl, and other special status resources are known to move within this area. The Smith River Watershed is within and/or adjacent to the project locations; it is used as a migration corridor, and provides habitat for special status animal species. The proposed area of direct impact (hereafter referred to as area of direct impact) is

defined as the area within each of the seven proposed project locations, including Ruby 1, Ruby 2, The Narrows, Patrick Creek Narrows Locations 1, 2, and 3, and Washington Curve in Del Norte County, California, where construction activities are anticipated to affect the surrounding physical environment, generally through disturbance to vegetation and/or the ground/soil surface.

Response to Comment 4

This comment expresses support the Two-Foot Widening at Spot Locations alternative for Ruby 2 in order to preserve more old growth trees. This comment has been noted and no changes to the Draft EIR/EA are necessary.

Response to Comment 5

This comment suggests that the Department consult with CDFW prior to construction activities regarding the use of removed large tree stumps as fish habitat in Del Norte stream restoration projects. The Department recognizes the importance of continuing consultation with the CDFW. This comment has been noted and no changes to the DEIR/EA are necessary.

Response to Comment 6

This comment reiterates a portion of the DEIR/EA that describes impacts to non-listed sensitive plant species as well as experimental mitigation involving transplanting. Although this method has been documented with a low success rate, CDFW believes that these efforts are appropriate. This comment has been noted and no changes to the DEIR/EA are necessary.

Response to Comment 7

This comment suggests that the text in Section 2.3 (i.e., Section 2.3.3.3, page 2.3-44) of the DEIR/EA has two possible interpretations regarding the number of yellow-tubered toothwort plants that would be affected by construction at Patrick Creek Narrows Location 2 for the Downstream Bridge Replacement Alternative and Bridge Preservation with Upslope Retaining Wall Alternative. Text in the DEIR/EA states that approximately 10% and 5% of the yellow-tubered toothwort plants occurring at the site would be affected by the Downstream Bridge Replacement and Bridge Preservation Alternatives, respectively. Further in the respective paragraphs, the text states that less than 90% and 95% of these plants would be removed. The Department agrees that the text in these paragraphs was confusing and made corrections to clarify the potential effects to this sensitive species. The text on page 2.3-43 of the Recirculated DEIR/EA maintains that the Downstream Bridge Replacement Alternative, which is the selected preferred alternative, would affect approximately 10% of the yellow-tubered toothwort population, and the Bridge Preservation Alternative would affect approximately 5% of the plants. The text clarifies that approximately 100-200 of the plants would be removed under the Downstream Bridge Replacement Alternative, and no more than 5% of the 1,000-2,000 plants would be removed by the Bridge Preservation Alternative.

Response to Comment 8

This comment recommends that the Department assess the occurrence of *Acacia dealbata* (silver wattle), an invasive plant species, within the Department's right of way on SR 197 and US 199 and include this species in the proposed invasive weed control program. No occurrences of this species were observed during botanical surveys for the seven proposed project locations. The Department will conduct invasive plant removal.

Response to Comment 9

Since bat colonies can change roosting and natal sites from year to year, bat surveys will be conducted in May of each year prior to commencement of work at the Middle Fork Smith River Bridge and at other natural features providing habitat for bats. Mitigation measures will be developed in consultation with CDFW if a bat colony is identified within the project impact area. Changes were made in the FEIR in section 2.3.4.4 to reflect this.

Response to Comment 10

The Department agrees with the CDFW on the importance of providing bat habitat when possible. The new bridge proposed at this site will be designed and maintained to provide for bat roosting habitat. Revisions to bat roosting habitat were made in the Final ED in sections 2.3.4.2 (Affected Environment) and 2.3.4.3(Environmental Consequences). The following paragraphs are included in the FIER/EA Section 2.3.4.4:

Conduct Pre-Construction Surveys for Bats

Measures will be implemented to minimize impacts on bats that may be present in the work area. Bat surveys will be conducted in May of each year of work at the Middle Fork Smith River Bridge and at other natural features providing habitat for bats, a qualified biologist will survey for bats in the area. If a bat colony is identified within the project impact area, mitigation measures should be developed in consultation with CDFW.

Provide Roosting Habitat for Bats

Surveys determined there was evidence of night-roosting bats at the Middle Fork Smith River Bridge. The new bridge will provide equivalent habitat. In addition, bat roosts will be installed on the bridge in appropriate locations to provide additional bat roosting habitat.

California Regional Water Quality Control Board

California Regional Water Quality Control Board
North Coast Region
Geoffrey M. Hales, Chairman

www.waterboards.ca.gov/northcoast
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
Phone: (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

August 23, 2010

Ms. Kim Hayler
State of California
Department of Transportation
P.O. Box 3700
Eureka, CA 95502

Dear Ms. Hayler:

Subject: Comments on the Proposed Environmental Impact Report for the 197/199 Safe STAA Access Project, SCH 2008082128

Thank you for the opportunity to comment on the Environmental Impact Report for the 197/199 Safe STAA Access Project. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of such waters.

The proposed project consists of the construction of seven spot improvements on State Route 197 and U.S. Route 199. The Ruby 1 and Ruby 2 spot improvements would lengthen highway shoulders from 0 to 1 foot in size, and extend the existing culverts and add drain inlets Ruby 1 project area. The Patrick Creek Narrows Project 1 would consist of highway widening and improvements as well as a six foot retaining wall on the Patrick Creek side of the project. The Patrick Creek Narrows Project 2 would consist of upstream and downstream bridge replacement as well as road widening and permanent rock fall mitigation. The Patrick Creek Narrows Project 3 would increase shoulder width of highway by four feet, add a 135 foot wall on the river side, and lengthen existing culverts. The Narrows Project would widen the existing lanes to 12 feet with a 2 foot shoulder. Widening would be accomplished by excavating into cut slope. This project would also include a 1 foot wide drainage ditch and the addition of a longer culvert. The Washington Curve Project would consist of excavating a new slope on the cut slope side of the roadway and a shoulder widening of 2 to 6 feet.

The proposed 197/199 STAA Access project includes grading and tree removal that may disturb sediment and remove riparian vegetation impacting the surrounding watershed. The Regional Water Board wants to ensure that impacts to water quality 1

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California Regional Water Quality Control Board

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from the project are avoided, minimized, and mitigated as needed. Our comments outline general water quality issues that need to be addressed in any forthcoming environmental review documents. Please consider these recommendations as guidelines for preparing a California Environmental Quality Act (CEQA) document that properly addresses water quality concerns. 1 cont.

The federal antidegradation policy requires that state water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution No. 68-16. Resolution No. 68-16 incorporates the federal antidegradation policy where the federal policy applies under federal law. Resolution No. 68-16 requires that existing quality of waters be maintained unless degradation is justified based on specific findings. The Regional Water Board's Basin Plan implements, and incorporates by reference, both the State and federal antidegradation policies. Therefore, the proposed project must provide adequate treatment to all increases in impervious surfaces and adequate mitigation for all temporary and permanent impacts to waters of the State. Some examples of waters of the State are: rivers; creeks (seasonal and intermittent); headwater creeks; wetlands (seasonal, marshes and tidal); estuaries; isolated wetlands; vernal pools; ponds; lakes; springs; grassy swales (creek tributaries); and some drainage ditches.

Surface Waters

Individual stream and wetland systems are part of complete aquatic ecosystems through interaction of surface and subsurface hydrologic connections, healthy systems perform functions that protect and enhance watershed-wide water quality. In addition, surface waters provide habitat that supports a variety of plant and animal life for rare and endemic species. Riparian areas between streams and wetlands and their adjoining environments play critical roles in protecting and enhancing water quality. An important tool for reducing and avoiding impacts to surface waters is the implementation of a buffer area of native and riparian vegetation between any construction activities or structures and surface waters. If permanent impacts to wetlands and streams are part of the proposed project then mitigation will be required. 2

The type, location and timing of mitigation to be implemented will greatly influence the ratio required. Bank credits and mitigation sites established prior to initiation of the project will require much lower ratios than plans that propose off-site or post-construction mitigation; in kind mitigation is preferred and usually required. In addition, projects that have temporary impacts to resources for an entire construction season or longer may be required to mitigate at a higher ratio for the temporal loss of functions and values. Revegetation plans should present at a minimum the site locations, types of seeds and plants to be used, and methods of implementation. Mitigation plans should at least specify locations (on-site, off-site, bank credits, etc.), area/amount of mitigation, methodology, and timeframe. Also, site specific implementation details,

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success criteria, and adequate monitoring and reporting are essential for approvable plans. 2 cont.

The Regional Water Board and the United States Environmental Protection Agency (EPA) recommend a *minimum* setback of 100 feet from the top of bank of a stream, watercourse or the edge of a wetland. The project should delineate buffer zones of at least 100 feet for all perennial and seasonal surface waters. Setbacks should be vegetated and undisturbed or enhanced with native plants. Please be aware that disturbance to waters of the State require permitting from this agency. Permanent and temporary impacts to riparian areas will require appropriate mitigation. Riparian vegetation provides numerous functions to improve water quality and its beneficial uses, including but not limited to shade and sediment retention. In general the mitigation, as related to water quality, should be designed to mitigate the loss of those specific functions lost.

Storm Water

3

The 197/199 Safe STAA Access should identify Best Management Practices (BMPs) to prevent storm water runoff from carrying pollutants from the site offsite or to waters of the state. The Regional Water Board requires the use of Low Impact Development (LID) and BMPs that treat and retain (infiltrate, capture and store) storm water runoff on the project site. We have included a list of LID resources for your reference.

LID is a development site design strategy with a goal of maintaining or reproducing the pre-development hydrologic system through the use of design techniques to create a functionally equivalent hydrologic setting. LID emphasizes conservation and the use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely reflect pre-development hydrologic functions. Hydrologic functions of storage, infiltration, and ground water recharge, as well as the volume and frequency of discharges, are maintained through the use of integrated and distributed storm water retention and detention areas, reduction of impervious surfaces, and the lengthening of flow paths and runoff time. LID seeks to mimic the pre-development site hydrology through infiltration, interception, reuse, and evapotranspiration. LID requires that the storm water runoff volume from small storms be retained onsite.

Other LID strategies include the preservation and protection of environmentally sensitive site features such as riparian buffers, wetlands, steep slopes, valuable trees, flood plains, woodlands, native vegetation and permeable soils. Natural vegetation and soil filters storm water runoff and reduces the volume and pollutant loads of storm water runoff. Other benefits from LID implementation include reducing global warming impacts from new development (preserving carbon sequestering in native soils and retaining native vegetation), increasing water supply (by encouraging ground water recharge) and reducing energy consumption.

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LID requires the use of landscape-based BMPs that filter storm water runoff using vegetation and amended soil prior to infiltration. Examples of these types of BMPs are rain gardens and vegetated swales. LID BMPs need to be sized to treat the storm water runoff from all impervious surfaces (e.g. roads, roofs, walkways, patios) using the following sizing criteria: 3 cont.

1. The volume of runoff produced from the 85th percentile of 24-hour rainfall event, as determined from the local historical rainfall record; or

2. The volume of runoff produced by the 85th percentile 24-hour rainfall event, determined using the maximized capture storm water volume for the area, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, p. 170-178 (1998); or

3. The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in California Storm Water Best Management Practices Handbook-Industrial/Commercial (1993).

BMPs to prevent erosion and the release of sediment or hazardous materials during land disturbing activities should be included in the Final Environmental Impact Report to prevent sediment and other pollutants reaching surface waters or leaving the site in storm water runoff. These can include scheduling grading to take place during the dry season, identifying staging areas for work vehicles that are separated from sensitive areas, training employees in procedures for cleaning up spills of hazardous materials, and erosion and sediment control techniques.

Waste Disposal

Pursuant to California Water Code 13260 and California Code of Regulations Title 27, which regulate land disposal activities, the Regional Water Board requires proof that placing non-hazardous waste or inert materials (which may include discarded product or recycled materials) will not result in degradation of water quality, human health or the environment. Degradation of water quality can be defined in terms of beneficial uses and/or in terms of numerical or narrative limits adopted to protect those uses. Therefore, in order for each agency to perform their respective duties efficiently, the Regional Water Board will allow Caltrans to conduct some leach testing to evaluate materials for on-site reuse as a cost-saving measure to the State. 4

General Requirements for the Reuse of Low Level Contaminated Solids

- Potentially contaminated material shall be properly characterized for potential on-site and/or off-site disposal;

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- Material determined to be non-hazardous solid waste or inert will be placed at an elevation at least five feet above seasonally high groundwater elevations and be underlain by the least permeable material available at the site. An impermeable membrane will be used if low permeable material is not available; 4 cont.
- Material will be placed under a cap (i.e. asphalt ,concrete, soil with vegetation) that will act as a low permeability surface;
- Material will not be placed in drainage ways or wetlands;
- Caltrans shall comply with local grading ordinances;
- Material is not transported or exposed during wet weather conditions
- Materials shall be protected utilizing BMPs; and
- Caltrans shall document the location of the placed materials.

If laboratory analytical reports indicate that the material is non-hazardous and is compliant with applicable water quality objectives, then Caltrans may proceed with an on-site disposal option and prepare a reuse plan for Executive Officer review, consideration, and concurrence.

The following permits may be required for this project:

Construction General Storm Water Permit: Land disturbances on projects of one acre or more require coverage under the construction general storm water permit. If the land disturbance will be one acre or more, the owner of the property will need to apply for coverage under this permit prior to the commencement of activities on-site. This permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that identifies BMPs to implement and maintain to minimize pollutant discharges from a construction site. The permit also requires a risk level analysis for the project based on erosion risk and sensitivity of the receiving waters, inspections of construction sites before and after storm events, and every 24 hours during extended storm events, storm event monitoring, and electronic document and data submittal. The permit requires the use of Low Impact Development to treat post-construction storm water runoff from impervious surfaces. Applicants may find the permit at http://www.waterboards.ca.gov/water_issues/programs/storm water/construction.shtml. 5

Waste Discharge Requirements (WDRs) or a Conditional Waiver of WDRs: Under authority of the California Water Code, the Regional Water Board may issue WDRs for any project which discharges or threatens to discharge waste to waters of the state. Projects that impact waters of the state (including discharges of post-construction storm water runoff, and any grading activities within stream courses or wetlands) require permitting by the Regional Water Board. The Regional Water Board may also require permits for on-site septic systems accepting 1,500 gallons or more per day. An application may be printed from the State Water Resource Control Board website at: www.swrcb.ca.gov/sbforms/.

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Water Quality Certification (401 Certification): Permit issued for activities resulting in dredge or fill within waters of the United States. All projects must be evaluated for the presence of jurisdictional wetlands and other waters of the state. Destruction of or impacts to these waters should be avoided. Under the Clean Water Act Sections 401 and 404, disturbing wetlands requires a permit from the United States Army Corps of Engineers (ACOE) and a state 401 permit. To determine whether wetlands may be present on any proposed construction site, please contact Jane Hicks of ACOE at (415) 503-6771. If wetlands are present, please contact Mark Neely from our office at (707) 576-2689 for a 401 Permit. 5 cont.

In order to expedite permit issuance, a complete and accurate project description needs to be submitted. Common problems identified by Regional Water Board staff include inconsistent description of impact volume and/or area, lack of suitable mitigation or revegetation plans, lack of detailed storm water treatment information (most commonly post-construction), excessive hardscape, and the lack of any alternatives analysis (project, mitigation and storm water treatment alternatives).

If you have any questions or comments, please contact me at (707) 576-2835 or jpuget@waterboards.ca.gov.

Sincerely,

Jeremiah Puget
Environmental Specialist

100823_TMC_197/199STAA_EIR

cc: Scott Morgan, State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812
Re: SCH 2008082128

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Low Impact Development Resources

Santa Rosa's Storm Water Program and LID Technical Manual (in development with the North Coast Regional Water Board):
http://ci.santa-rosa.ca.us/departments/utilities/stormwatercreeks/swpermit/Pages/SWPERMITCOMPLIANCE.aspx
http://ci.santa-rosa.ca.us/departments/utilities/stormwatercreeks/swpermit/Pages/swLIDtechManual.aspx

Low Impact Development Center:
http://www.lowimpactdevelopment.org/

Puget Sound LID manual:
http://www.psp.wa.gov/downloads/LID/LID_manual2005.pdf

Green Infrastructure Municipal Handbooks:
http://cfpub2.epa.gov/npdes/greeninfrastructure/munichandbook.cfm

Oregon Rain Garden Guide, landscaping for clean water and healthy streams:
http://seagrant.oregonstate.edu/sgpubs/onlinepubs/h10001.pdf

Marin County's LID manual:
http://www.mcstoppp.org/acrobat/GuidanceforApplicantsv_2-5-08.pdf

San Diego County's LID manual – LID for roads:
http://www.sdcounty.ca.gov/dplu/docs/LID-Handbook.pdf

Low Impact Development – Sustainable Storm Water Management:
http://www.waterboards.ca.gov/water_issues/programs/low_impact_development/

EPA Green Infrastructure Basic Information:
http://cfpub.epa.gov/npdes/greeninfrastructure/information.cfm

Managing Wet Weather with Green Infrastructure:
http://cfpub.epa.gov/npdes/home.cfm?program_id=298

Contra Costa Manual and Guidance to Municipalities:
http://www.cccleanwater.org/new-developmentc3/stormwater-c3-guidebook/

Contra Costa approach powerpoint to implement LID:
http://www.cccleanwater.org/Publications/StormCon-5-06/5-ContraCostaApproach-I-Dalziel-Cloak.ppt

City of Portland's Sustainable Storm Water Management Program – LID for streets:
http://www.portlandonline.com/bes/index.cfm?c=34598

Streetscape improvements and water quality design:
http://www.lowimpactdevelopment.org/nhb/lid.htm

LID Urban Design tools – design software for different BMPs:
http://www.lid-stormwater.net/homedesign.htm

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LID design fact sheet:
http://www.coastal.ca.gov/nps/lid-factsheet.pdf

Storm Water Runoff Calculator:
http://www.stormulator.com

Storm Water Management and LID at EPA headquarters – BMP choice and design:
http://www.epa.gov/owow/nps/lid/stormwater_hq/

State Water Board Resolution on LID and Sustainable Water Resources Management:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2008/rs2008_0030.pdf

Resolution of the California Ocean Protection Council Regarding Low Impact Development:
http://www.resources.ca.gov/copc/05-15-08_meeting/05_LID/0805COPC05_%20LID%20Res%20amended.pdf

Storm Water Resources:

North Coast Regional Water Board Municipal Storm Water Program:
http://www.waterboards.ca.gov/northcoast/water_issues/hot_topics/santa_rosa_ms4_npdes_stormwater_permit/

State Water Board Storm Water Program:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/

California Stormwater Quality Association:
http://www.casqa.org/

EPA Storm Water Program:
http://cfpub.epa.gov/npdes/home.cfm?program_id=6

Erase the Waste Campaign – California Storm Water Toolbox (outreach materials for permittees and non-profits):
http://www.waterboards.ca.gov/water_issues/programs/outreach/erase_waste/

The San Francisco Regional Water Board Storm Water Resources Website:
http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/avail_docs.shtml

State Water Board Storm Water Grant Program:
http://www.waterboards.ca.gov/water_issues/programs/grants_loans/prop84/index.shtml

Federal Funding Sources for Watershed Protection:
http://cfpub.epa.gov/fedfund/

Stormwater Manager's Resource Center:
http://www.stormwatercenter.net/

For more information, please contact Jeremiah Puget at jpuget@waterboards.ca.gov

California Environmental Protection Agency

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Responses to California Regional Water Quality Control Board (Board)

Response to Comment 1

This comment refers to potential watershed impacts as a result of project implementation and offers recommendations for addressing water quality issues in future environmental documents under CEQA. The Department appreciates the guidelines presented by the Board and is committed to ensuring that impacts are avoided, minimized and/or mitigated. The Department will ensure that the proposed project will be in compliance with the latest edition of all applicable State and Federal permits and regulations.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

The Department is aware of the importance of surface waters and their contribution to overall health of the watershed. Although the Draft EIR/EA determined that there will be no significant impacts to wetlands and streams, Avoidance, Minimization, and/or Mitigation Measures, such as the short-term requirements contained in the Department's Construction Site BMP manual and an active SWPPP program that provides for BMP inspection and sampling, will reduce any temporary construction impacts of surface waters. The Department often cannot accommodate the recommended minimum 100-ft buffers for streams, watercourses, and wetlands since culvert or other work is often conducted within 100 feet of these waters. Where feasible and determined to be necessary, the Department specifies installation of Environmentally Sensitive Area (ESA) fencing in the bid package for the Contractor, to discourage foot traffic and serve as a visual reminder to avoid impacts to this sensitive area. No ESA fencing is proposed at streams, watercourses, and wetlands for this project since some form of culvert repair/replacement is planned for all culverts within limits of ground disturbance at each project location. The Department will ensure the proposed projects will be in compliance with the latest edition of all applicable State and Federal permits and regulations.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

As described in Section 2.2.2.4 of the Draft and Final EIR/EA, standard specifications, special provisions, and permit requirements will be implemented by the Department and reduce short-term impacts as a result of stormwater runoff from the construction site. Also, the Department's Construction Site BMP manual and an active SWPPP program will reduce any potential temporary construction impacts to water quality. The Department is planning to implement Low Impact Development into the design with the proposed use of a biostrip (i.e., a narrow biofiltration swale) at Patrick Creek Narrows Location 2. Biofiltration swales were included in the DEIR/EA as one potential option that would be considered for treating storm water runoff (see Section 2.3.2.4 and 2.4.13). The proposed biostrip would be placed northwest of the old bridge, in the vicinity of the abandoned northwest bridge abutment and existing unpaved, compacted road shoulder. The biostrip would collect storm water runoff, promote infiltration, trap sediment, and provide for pollutant removal. The Department will ensure the proposed projects will be in compliance with the latest edition of all applicable State and Federal permits and regulations.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment refers to potential hazardous materials impacts as a result of project implementation and cites California Code for addressing waste disposal. The comment also describes the General Requirements for the Reuse of Low Level Contaminated Solids as the Board will allow The Department to conduct some leach testing to evaluate materials for onsite reuse. Where the Department or the Contractor intends to reuse materials on-site as a cost-saving measure to the State, the Department is committed to characterizing the material in accordance with Title 27 CCR, or as directed by the Board, prior to using recycled materials on the project. As the comment states, the Department would prepare a reuse plan, if the material is indicated as suitable after testing, and submit this for review, consideration, and concurrence by the Board. Alternatively, the Department/Contractor may choose to avoid reusing materials and instead would properly dispose of materials at an appropriately licensed solid waste disposal and/or re-use facility.

In addition, the Department's Construction Site BMP manual and an active SWPPP program will reduce any temporary construction impacts to water quality. The Department will ensure the proposed projects will be in compliance with the latest edition of all applicable State and Federal permits and regulations.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 5

This comment discusses three different permits that might be required for the project. These permits are comprised of a Construction General Storm Water Permit, Waste Discharge Requirements or a Conditional Waiver of WDRs, and a 401 Water Quality Certification Permit. The Department will ensure the proposed project will be in compliance with the latest edition of all applicable State and Federal permits and regulations. The Department acknowledges that permits and regulations change over time, so the permits that were suggested as potentially being required in this comment may change by the time permit applications are submitted. In addition, the Department acknowledges that it will apply, as necessary, for coverage under the Construction General Storm Water Permit. A risk level analysis would also be prepared, as required, and strategic use of Low Impact Development, as feasible, would be incorporated. A 401 Water Quality Certification would be applied for wherever dredge or fill is planned within waters of the United States. In order to expedite permit issuance, the Department would provide, to the best of its ability, a complete and accurate project description with consistent description of impact volume and/or area, suitable mitigation/revegetation plan(s), detailed storm water information, and provide an alternatives analysis for the project.

No revisions to the Draft EIR/EA are necessary.

California State Lands Commission

STATE OF CALIFORNIA — ARNOLD SCHWARZENEGGER, Governor

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

PAUL D. THAYER, *Executive Officer*
(916) 574-1800 FAX (916) 574-1810
California Relay Service From TDD Phone 1-800-735-2929
from Voice Phone 1-800-735-2922

Contact Phone: **(916) 574-1880**
Contact FAX: **(916) 574-1885**

July 21, 2010

File Ref: SCH# 2008082128

State of California Department of Transportation
Attn: Kim Hayler
P.O. Box 3700
Eureka, CA 95502

Subject: 197/199 Safe STAA (Surface Transportation Assistance Act) Access Project Draft Environmental Impact Report/Environmental Assessment (EIR/EA) and Resources Evaluated Relative to the Requirements of Section 4(f).

Dear Ms. Hayler:

Staff of the California State Lands Commission (CSLC) has received the above referenced Draft EIR/EA for the 197/199 Safe STAA Access Project. Under the California Environmental Quality Act (CEQA), the CSLC is a Responsible and/or Trustee Agency for any and all projects that could directly or indirectly affect sovereign lands, their accompanying Public Trust resources or uses, and the public easement in navigable waters. 1

The State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the State for statewide Public Trust purposes, which include waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation and open space. The boundaries of these State-owned lands generally are based upon the last naturally occurring location of the ordinary high or low water marks prior to artificial influences. On tidal waterways, the State's sovereign fee ownership extends landward to the Ordinary High Water Mark as it last naturally existed. On navigable non-tidal waterways, the State holds fee ownership of the bed landward to the ordinary low water mark and a Public Trust easement landward to the ordinary high water mark, as they last naturally existed. Such boundaries may not be readily apparent from present day site inspections. The State's sovereign interests are under the jurisdiction of the CSLC.

CSLC staff has determined that the main branch of the Smith River adjacent to Routes 197 and 199 at this location is State sovereign lands under the Commission's jurisdiction. If any portion of the project at the Ruby 1 and Ruby 2 sites is located below the ordinary low water mark in the bed of the Smith River, a lease will be required.

At this time, the extent of the State's sovereign interest on the Middle Fork and South Fork of the Smith River is undetermined and a lease for any portion of work over or in the bed of these forks will not be required. This conclusion is without prejudice to any future assertion

California State Lands Commission

Kim Hayler Page 2 July 21, 2010

of State ownership or public rights, should circumstances change, or should additional information come to our attention. 1 cont.

As a responsible agency, the CSLC will need to rely on this CEQA document for the issuance of a lease and, therefore, please consider our comments below and implement our recommendations prior to adoption of a Final EIR/EA. 2

Greenhouse gas (GHG) emissions information consistent with the California Global Warming Solutions Act (AB 32) should be included in the Draft EIR/EA. This would include a determination of the GHGs that will be emitted as a result of construction of all facets of the proposed project, an evaluation of the cumulative effects resulting from generation of GHG emissions, a determination of the significance of these construction-related and cumulative impacts, and the identification of mitigation measures to reduce any impacts found to be significant.

Staff recommends mitigating the recognized air quality impacts identified from a recognized analysis program (URBEMIS, SacRCEM, or OFFROAD) used to evaluate construction-related air quality discharges. These discharges identified in the body of the text and cumulative impacts will need to be mitigated. Based on the amounts of GHGs created by this project, as part of its lease application process, the CSLC staff will need to review the mitigation measures needed to address the total 4,473.01 metric ton equivalents of carbon dioxide (CO2e).

Any modification to any General Plan as a result of the levee improvement project must have the appropriate GHG impacts reflected to include all aspects of the proposed project. Please include any applicable changes in the land use, circulation, safety, and conservation elements effecting GHGs by the modification of these elements to the General Plan. Please also include a Climate Action Plan which discusses inventory of jurisdictional emissions and projected emissions, an evaluation of the project within the region, reduction goals related to AB 32, and any specific policies or programs aimed to reduce GHGs as a result of this project. 3

For questions and comments related to the environmental review, please contact Christopher Hultt at (916) 574-1938 or by e-mail at hulttc@slc.ca.gov. Please contact Mary Hays, Public Land Manager, at 916-574-1812 or by email at haysm@slc.ca.gov for information about our leasing requirements.

Sincerely,

Cy R. Oggins, Chief
Division of Environmental Planning and Management

cc: Office of Planning and Research
M. Hays, CSLC
C. Hultt, CSLC

Responses to California State Lands Commission

Response to Comment 1

Project boundaries for Ruby 1 and Ruby 2 (including alternatives), are located beyond the banks of the Smith River and therefore, would not include construction activities within the ordinary low water mark in the bed of the Smith River. According to Comment 1, a lease would not be required for this scenario. Since Comment 1 also says that the extent of the State's Sovereign interest on the Middle Fork Smith River is undetermined, a lease for work over or in the bed of this fork (i.e., work at locations on US 199) would not be required, unless circumstances change or new information is brought to the Commission's attention.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment states that the California State Lands Commission (CSLC) will need to rely on this CEQA document for issuance of a lease; however, as stated in Response to Comment 1, above, no lease should be required for work at any of the locations. This comment also states that a greenhouse gas (GHG) emissions determination should be made as a result of the project, an evaluation of cumulative effects resulting from GHG emissions, determination of significance of construction-related and cumulative effects, and identification of mitigation measures to reduce impacts found to be significant. It also includes suggestions for analysis programs and states that the CSLC would need to review the mitigation measures as part of the lease application process, although a lease would not be required according to Comment 1.

The Department does not anticipate needing to apply for a lease from the CSLC, based on Comment 1; however, to clarify, the Department updated the conclusion regarding climate change in the FEIR/EA Section 3.2.4.4 to be consistent with the most current knowledge and requirements of the Department for climate change. This updated conclusion states that "both the future with project and future no build show increases in CO2 emissions over the existing levels; the future build CO2 emissions are higher than the future no build emissions. In addition, as discussed above, there are also limitations with EMFAC [emissions model] and with assessing what a given CO2 emissions increase means for climate change. Therefore, it is Caltrans determination that in the absence of further regulatory or scientific information related to greenhouse gas emissions and CEQA significance, it is too speculative to make a determination regarding significance of the project's direct impact and its contribution on the cumulative scale to climate change. However, Caltrans is firmly committed to implementing measures to help reduce the potential effects of the project. These measures are outlined in" the Greenhouse Gas Reduction Strategies portion of Section 3.2.4.4 of the FEIR/EA.

No revisions to the Draft EIR/EA are necessary to address this comment; however, revisions were made in Section 3.2.4 to update the document to provide the most current knowledge and requirements of the Department for climate change.

Response to Comment 3

This comment does not provide a comment on the Draft EIR/EA. The comment refers to a levee improvement project and modification to a General Plan, therefore it does not appear to be applicable to the proposed project.

No revisions to the Draft EIR/EA are necessary.

Del Norte Local Transportation Commission

1225 Marshall Street, Suite 6
Crescent City California 95531
www.dnltc.org

Del Norte Local Transportation Commission

Tamera Leighton, Executive Director
tamera.leighton@gmail.com
Desk (707) 560-5878
Cell (707) 218-6824

August 23, 2010

Kim Hayler
California Department of Transportation
North Region Environmental, Unit E1
P.O. Box 3700
Eureka, Ca 95502

Re: 197/199 Safe STAA Access Project Draft EIR/EA

Dear Ms. Hayler

Please consider this letter comment on the 197/199 Safe STAA Access Project Draft EIR/EA. The Del Norte Local Transportation Commission fully supports this project, which has been a top community and regional priority for well over a decade. 1

We agree with the conclusion in the Community Impact Assessment that overall impacts of the projects on employment and income are likely to be positive for Del Norte County. It's important for the State to keep in mind that we are not seeking special economic advantage but are seeking to eliminate a disadvantage resulting from a decades old STAA transportation standard that we have yet to meet.

Additionally, we agree that the effects on businesses, employment, and income are anticipated to be beneficial, especially in the long term. Del Norte County hosts the Six Rivers National Forest, Redwood State and National Parks, Wild and Scenic Rivers and we have some of the highest indicators of poverty, low literacy and poor health. We have had the lowest or second-lowest per capita income in California since 2001 and the corresponding high rates of reported abuse and neglect. The cumulative economic impacts may be impossible to know, but coming from a community that is so far behind, the anticipated positive benefits mean a lot. Seventy-three jobs and $3.95 million in Del Norte and Humboldt counties are significant to us.

Del Norte Local Transportation Commission

It is also important to consider the economic impacts to Curry County, Oregon, our northern neighbor, who is equally dependant on this corridor. Just 20 miles away, Brookings, Oregon is as much of a sister community as are the communities in Humboldt County, California. For our community's overall health and well-being, many have actively worked to advance this regional priority including: 1 cont.

- California State Senator, Sam Aanestad
- Alexandre EcoDairy Farm
- Brookings-Harbor Chamber of Commerce
- California Redwood Company
- California State Assemblymember, Patty Berg
- California Trucking Association
- Caltrans District 1
- City of Crescent City
- County of Del Norte
- Crescent City/Del Norte Chamber of Commerce
- Curry County Economic and Community Development Department
- Del Norte County Unified School District
- Elk Valley Rancheria
- Green Diamond Resource Company
- Hambro Forest Products
- Home Depot
- Lily Growers Association
- Mendocino Council of Governments
- Shasta County Regional Transportation Planning Agency
- Smith River Rancheria
- Tri-Agency Economic Development Corporation
- United States Congressman, Mike Thompson
- Yurok Tribe

Direct STAA access to Interstate 5 on the 197/199 corridor has been a top priority in our region for over 10 years. If our goods movement costs became normal and tourists were not afraid to drive this route, we would have a healthier, more vibrant economy. Frankly, we aren't concerned about our asphalt highway. We are concerned about our people and providing safe access to our region and our vast natural resources.

Thank you for your diligence in preparing the EIR/EA for this essential project and for considering our comments.

Sincerely,

Tamera Leighton, Executive Director

Response to Del Norte Local Transportation Commission

Response to Comment 1

This comment does not provide specific comments on the Draft EIR/EA. The comment indicates agreement with economic conclusions in the Community Impact Assessment technical report prepared for the Draft EIR/EA. This comment also lists others who support the proposed project.

No revisions to the Draft EIR/EA are necessary.

National Marine Fisheries Service/National Oceanic and Atmospheric Association

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/28/2010 08:26 AM -----

Kasey Sirkin <Kasey.Sirkin@noaa.gov>

09/28/2010 06:53 AM

To kimberly_hayler@dot.ca.gov

cc

Subject

Good morning Kim – Attached are my comments on the STAA project. Again, I am sorry for the delay in getting these to you. I thought I had sent them off a while ago but apparently that was not the case. I hope this did not cause you delay in the project. Please let me know if there are any questions about my comments or if there is anything else you need from me in the near future.

Sincerely,

L. Kasey Sirkin
Fisheries Biologist
NMFS - Northern California Office
707-825-1620, kasey.sirkin@noaa.gov

National Marine Fisheries Service/National Oceanic and Atmospheric Association

Dear Mrs. Hayler,

Given the lengthy extent of the proposed project and the draft environmental document, I focused my evaluation on the aspects of the project that concern species and habitats listed under the ESA under NOAA jurisdiction. Therefore, my comments are mainly regarding aspects of the project related to the Patrick Creek Location 2, where the Middle Smith River Bridge is proposed for replacement or realignment. However, I am including comments regarding the project in its entirety and therefore have included comments regarding proposed mitigation and minimization measures in all areas where listed species may be located, or instream habitat may be affected. 1

After attending the site visit to all the project sites it is apparent to me that either the no-build or downstream alternatives would be best suited for the replacement of the Middle Fork Smith River bridge at the Patrick Creek Location 2 site. Selection of the no-build (no replacement) alternative would be preferable as the least environmentally damaging alternative, it seems that replacement would still be necessary in the near future, and that would then still create the potential effects as seen in the current proposal. Additionally, after attending the site visit, it became apparent that construction constraints occur with the upstream alternative, and so we support the downstream replacement alternative. This seems to be the best build alternative and would allow the lifespan of the bridge to be extended in one project rather then two.

However, I would like to see more information and detail about the bridge replacement to better understand the effects that this part of the STAA project will have on critical habitat and listed species. I would like to have more information on the following items to do a proper assessment when the time comes 2

1. if there will be any piles in the water?
2. if proposed RSP and viaduct building will be done below the Ordinary High Water Line?
3. How do you propose to make a diversion in this area? There seems to be very little room to work with and nowhere to divert the water to. I read about the potential to push the water to one side but more information would be helpful.
4. Also, if any of the RSP that is to be placed at culvert outlets falls under the OHWL, I would like to see the amount minimized as much as possible. The less armoring the better
5. What are your potential mitigation sites for this project? Have these begun to be examined yet ?
6. I thought at one point a Caltrans engineer or someone mentioned they could do a single span across – is that still possible?

Thank you for giving me the chance to comment on this project proposal and I apologize for the delay in responding. I look forward to working with you further on this project and hope my comments are useful for future consideration. Please let me know if you have any other questions for me or I can do anything else to provide assistance.

Sincererly,

L. Kasey Sirkin
Fisheries Biologist
NMFS – NCO office
Arcata, CA
707-825-1620
Kasey.sirkin@noaa.gov

Responses to National Marine Fisheries Service/National Oceanic and Atmospheric Association

Response to Comment 1

The commenter's main focus includes concerns specific to the ESA and NOAA jurisdiction and the bridge replacement for Patrick Creek Narrows Location 2. In addition, the commenter favors the no-build or downstream bridge replacement alternative. The Patrick Creek Narrows Location 2: Downstream Bridge Replacement Alternative was selected as the preferred alternative.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment requests more information about the proposed bridge replacement. In response: The proposed bridge would be a concrete arch bridge that spans the Middle Fork Smith River, above the ordinary high water mark. There will be no permanent piles below the ordinary high water (OHW) mark. There will be no rock slope protection (RSP) or construction for the viaduct below the OHW mark. A diversion is no longer proposed with selection of the Downstream Bridge Replacement Alternative as the preferred alternative and the current proposed construction techniques. There will be no new culvert outfalls below the OHW. There are no mitigation sites proposed because there are no permanent significant impacts to sensitive fish species.

Revisions to the Draft EIR/EA Section 2.3.5.3 were made to reflect that no work will be conducted in the wetted channel and that there will be no lethal take of coho salmon at Patrick Creek Narrows Location 2.

North Coast Unified Air Quality Management District

Al Steer
<alsteer@ncuaqmd.org>
07/20/2010 03:09 PM
Please respond to
alsteer@ncuaqmd.org

To gary_bonigan@dot.ca.gov, kimberly_hayter@dot.ca.gov
cc
bcc
Subject Asbestos regulations

History This message has been forwarded.

Kimberly and Gary

Attached please find the two State ATCMs for Naturally Occurring Asbestos (NOA), and the Federal; National Emission Standard for Hazardous Air Pollutants (NESHAPs) for Asbestos. 1

These are the three regulations we have have been delegated to enforce in the North Coast Air District,
(Humboldt, Del Norte and Trinity Counties).

Please do not hesitate to call this office with any questions you may have.
Your first point of contact should be Inspector Eric Bruckner.
"Eric Bruckner" <ebruckner@ncuaqmd.org>

Al Steer
Compliance & Enforcement Manager
North Coast Unified AQMD
2300 Myrtle Avenue
Eureka, CA 95501-3327
(707) 443-3093
alsteer@ncuaqmd.org
http://www.ncuaqmd.org

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Please consider your environmental responsibility before printing this e-mail.

ATCM 93105 final.pdf

ATCM 93106 Final.pdf 40 CFR61 NESHAPS ASBESTOS.pdf

North Coast Unified Air Quality Management District

Al Steer
<alsteer@ncuaqmd.org>
07/21/2010 08:50 AM
Please respond to
alsteer@ncuaqmd.org

To kimberly_hayler@dot.ca.gov, gary_berrigan@dot.ca.gov
cc
bcc
Subject Sorry, I should have included this in the first email

GEOLOGIC OCCURRENCE OF ASBESTOS IN CALIFORNIA

1 cont.

NOA is most commonly found in and immediately adjacent to ultramafic rock formations, which are composed of 90 percent or more of dark-colored, iron-magnesium-silicate minerals. California's official state rock, serpentine, occurs commonly throughout the state, and NOA is often associated with serpentenite. NOA may also be present in other geological settings, such as fault shear zones, metamorphic contacts, mélanges, alluvial deposits, and in surfacing or fill materials derived from mafic and ultramafic rocks. In the Salinas Valley, soils containing elevated levels of NOA have been transported 20 to 30 miles downstream by river sediments. Similarly in Coalinga, an alluvial fan deposit with elevated levels of NOA was found to have been derived from sediments transported approximately 15 miles downstream of the Atlas Mine Superfund Site.

Al Steer
Compliance & Enforcement Manager
North Coast Unified AQMD
2300 Myrtle Avenue
Eureka, CA 95501-3327
(707) 443-3093
alsteer@ncuaqmd.org
http://www.ncuaqmd.org

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Please consider your environmental responsibility before printing this e-mail.

North Coast Unified Air Quality Management District

Gary Berrigan/D01/Caltrans/CAGov
09/08/2010 09:04 AM

To Kimberly Hayler/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Asbestos regulations

----- Forwarded by Gary Berrigan/D01/Caltrans/CAGov on 09/08/2010 09:04 AM -----

Al Steer <asteer@ncuaqmd.org>
07/21/2010 08:56 AM
Please respond to alsteer@ncuaqmd.org

To Gary Berrigan <gary_berrigan@dot.ca.gov>
cc
Subject Re: Asbestos regulations

Gary

You are absolutely correct.
The confidentiality statement is a standard part of my emails and should have been removed on the email to you and Kimberly.
The attachments to the email are promulgated regulations, and as such are part of the public domain.
Let me know if I should resend them without the confidentiality statement.
Sorry I didn't think of it first.

On Wed, Jul 21, 2010 at 8:49 AM, Gary Berrigan <gary_berrigan@dot.ca.gov> wrote:

Good morning, Al...thank you for sending the items below after our recent conversation regarding the Del Norte STAA Project Draft EIR/EA. The result of our discussion was that you would send your comments so we could have our specialist review and respond for inclusion in the Final EIR.

I'm sure it was unintended on your part, but your email signature includes a confidentiality statement. We are involved in a public review process where comments and information are intended to be part of the public record, available to all and incorporated into the Final EIR. My understanding was that your comments were intended to be part of the public review. It would be helpful if you could clarify this.

Thank you.

Gary Berrigan, E-1 Branch Chief
North Region Environmental Management

Response to North Coast Unified Air Quality Management District

Response to Comment 1

The comment is regarding the geologic occurrence of naturally-occurring asbestos and associated regulations. Section 2.4.9 of the Draft EIR/EA details avoidance and minimization measures (e.g. Standard Special Provisions) the Department will implement during construction that will reduce the potential impacts relating to naturally-occurring asbestos.

No revisions to the Draft EIR/EA are necessary.

3.2 Organizations

Following is the index to written comments submitted by the following organizations:

- Center for Biological Diversity
- Environmental Protection Information Center
- Friends of Del Norte – attachments
- Sullivan, Mike, Del Norte County Board of Supervisors – comment card

The letter from Friends of Del Norte included two Department reports, portions of which were highlighted. The highlighted text and attachment title pages are included after the letter.

Center for Biological Diversity

CENTER *for* BIOLOGICAL DIVERSITY

August 23, 2010

Via e-mail: *kimberly_hayler@dot.ca.gov*

Kimberly Hayler
California Department of Transportation
North Region Environmental, Unit E1
P.O. Box 3700
Eureka, CA 95502

Re: 197/199 Safe STAA Access Project:
Draft Environmental Impact Report/ Environmental Assessment and Resources Evaluated Relative to the Requirements of Section 4(f)
(State Clearinghouse Number: 2008082128)

Dear Ms. Hayler:

These comments are submitted on behalf of the Center for Biological Diversity, and its staff and members, concerning Caltrans' proposal to widen and realign portions of Highways 197 and 199 along the wild and scenic Smith River in Del Norte County (the "Project"). The Center for Biological Diversity is a non-profit, public-interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has worked for the past 20 years to protect endangered species and their habitats. The organization has more than 250,000 members and online activists, many of whom reside in, travel to, recreate in, or otherwise use the irreplaceable natural resources found in the area affected by this Project. Because climate change poses such a serious threat to biodiversity, the Center also is greatly interested in efforts to understand, account for, and reduce greenhouse gas emissions associated with both public and private projects. 1

We understand that a number of public agencies, organizations, and individuals have submitted or will submit comments on the Draft Environmental Impact Report/Environmental Assessment ("DEIR/EA") for the Project. We concur with the conclusions expressed in many of those comments that the DEIR/EA fails to meet the procedural and substantive requirements of both the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321 *et seq.*, and the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 *et seq.* Specific deficiencies in the document are addressed below.

Arizona • California • Nevada • New Mexico • Alaska • Oregon • Montana • Illinois • Minnesota • Vermont • Washington, DC

Kevin P. Bundy • Senior Attorney • 351 California St., Suite 600 • San Francisco, CA 94104
Phone: 415-436-9682 x313 • Fax: 415-436-9683 • kbundy@biologicaldiversity.org

Center for Biological Diversity

Ms. Kimberly Hayler
Re: 197/199 Safe STAA Access Project DEIR/EA
August 23, 2010

I. Legal Standards

A. NEPA

Pursuant to congressional delegation of authority and a Memorandum of Understanding between Caltrans and the Federal Highway Administration, Caltrans has assumed all legal responsibility for compliance with NEPA and other applicable federal environmental laws with respect to this Project. *See* 23 U.S.C. § 327; Memorandum of Understanding Between the Federal Highway Administration and the California Department of Transportation Concerning the State of California's Participation in the Surface Transportation Project Delivery Pilot Program (June 29, 2007). Caltrans thus acts as a "federal agency" for purposes of NEPA compliance here. 2

NEPA is the "basic charter for protection of the environment." 40 C.F.R. § 1500.1(a). In NEPA, Congress declared a national policy of "creat[ing] and maintain[ing] conditions under which man and nature can exist in productive harmony." *Or. Natural Desert Ass'n v. Bureau of Land Mgmt.*, 531 F.3d 1114, 1120 (9th Cir. 2008) (quoting 42 U.S.C. § 4331(a)). This policy is realized "not through substantive mandates but through the creation of a democratic decisionmaking structure" that is "strictly procedural." *Id.* By mandating this decisionmaking structure, NEPA is intended to "ensure that [federal agencies] ... will have detailed information concerning significant environmental impacts" and "guarantee[] that the relevant information will be made available to the larger [public] audience." *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998); *see also, e.g., Inland Empire Public Lands v. U.S. Forest Serv.*, 88 F.3d 754, 758 (9th Cir. 1996); *Klamath Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt.*, 2004 U.S. Dist. LEXIS 10977 (D. Or. Jan. 12, 2004). NEPA's policy goals are thus "realized through a set of action forcing procedures that require that agencies take a hard look at environmental consequences, and that provide for broad dissemination of relevant environmental information." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989) (citations and internal quotations omitted).

Under NEPA, before an agency takes a "'major [f]ederal action[] significantly affecting the quality' of the environment," the agency must prepare an environmental impact statement ("EIS"). *Kern v. U.S. Bureau of Land Mgmt.*, 284 F.3d 1062, 1067 (9th Cir. 2002) (quoting 42 U.S.C. § 4332(2)(C)). "An EIS is a thorough analysis of the potential environmental impact that 'provide[s] full and fair discussion of significant environmental impacts and . . . inform[s] decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.'" *Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt.*, 387 F.3d 989, 993 (9th Cir. 2004) (citing 40 C.F.R. § 1502.1). An EIS is NEPA's "chief tool" and is "designed as an 'action-forcing device to [e]nsure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government.'" *Or. Natural Desert Ass'n*, 531 F.3d at 1121 (quoting 40 C.F.R. § 1502.1).

2

Center for Biological Diversity

Ms. Kimberly Hayler
Re: 197/199 Safe STAA Access Project DEIR/EA
August 23, 2010

Certain actions categorically require the preparation of an EIS, while others first allow the agency to prepare an EA in order to make a preliminary determination as to whether the proposed action will "significantly affect" the environment. 40 C.F.R. § 1501.4; *Metcalf v. Daley*, 214 F.3d 1135, 1142 (9th Cir. 2000). NEPA regulations define an EA as "a concise public document" that serves to "[b]riefly provide sufficient evidence and analysis for determining whether to prepare an [EIS] or a finding of no significant impact." 40 C.F.R. § 1508.9. An EA "[s]hall include brief discussions of the need for the proposal, of alternatives as required by [42 U.S.C. § 4332(E)], of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted." *Id.* 2 cont.

In preparing an EA to assess whether a project will have significant impacts on the environment, Caltrans must evaluate both the "context" and the "intensity" of those impacts. 40 C.F.R. § 1508.27(a), (b). Among other things, Caltrans must consider: whether a significant impact exists even though the agency may consider the Project to be beneficial; the unique characteristics of the geographic area; whether the possible effects of the Project are uncertain or involve unique or unknown risks; whether the action is related to other actions with individually insignificant but cumulatively significant impacts; and whether the action threatens a violation of Federal, State or local law or requirements imposed for the protection of the environment. 40 C.F.R. § 1508.27(b)(1), (3), (5), (7), (10). The EA must contain "sufficient evidence and analysis" to determine whether any of the Project's impacts are significant. *See* 36 C.F.R. § 220.7(b)(3)(i).

If the EA reveals that the proposed action will significantly affect the environment, then Caltrans must prepare an EIS. 40 C.F.R. §§ 1501.4, 1508.9. If the agency determines, based on the EA, not to prepare an EIS, the agency must adequately explain its decision not to do so by supplying a convincing statement of reasons in the why the action's effects are insignificant. *Blue Mountains Biodiversity Project*, 161 F.3d at 1212. The statement of reasons is crucial to determining whether the agency took a hard look at the potential environmental impacts of the project. *Id.*; *see also Marble Mountain Audubon Soc'y v. Rice*, 914 F.2d 179, 182 (9th Cir. 1990) ("An agency must set forth a reasoned explanation for its decision and cannot simply assert that its decision will have an insignificant effect on the environment."). Conclusions that are reached without any study or supporting documentation are insufficient to satisfy an agency's NEPA obligations. *Id.* Moreover, if an EA raises "substantial questions" as to whether a project "may cause a significant degradation of some human environmental factor," the agency must prepare an EIS. *Id.*; *see also Greenpeace Action v. Franklin*, 14 F.3d 1324, 1332 (9th Cir. 1992) (a "plaintiff need not show that significant effects *will in fact occur*, but if the plaintiff raises substantial questions whether a project may have a significant effect, an EIS *must* be prepared") (quotations omitted; emphasis in original).

B. CEQA

The Legislature enacted CEQA to "[e]nsure that the long-term protection of the environment shall be the guiding criterion in public decisions." *No Oil, Inc. v. City of Los Angeles*, 13 Cal. 3d 68, 74 (1974). The Supreme Court has repeatedly held that 3

3

Center for Biological Diversity

Ms. Kimberly Hayler
Re: 197/199 Safe STAA Access Project DEIR/EA
August 23, 2010

CEQA must be interpreted to "afford the fullest possible protection to the environment." *Wildlife Alive v. Chickering*, 18 Cal. 3d 190, 206 (1976) (quotation omitted). 3 cont.

An EIR is "the heart of CEQA." *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.*, 47 Cal. 3d 376, 392 (1988) ("*Laurel Heights I*") (quoting *County of Inyo v. Yorty*, 32 Cal. App. 3d 795, 810 (1973)); *see also* CEQA Guidelines § 15003(a). The EIR serves as an "environmental alarm bell" whose purpose is to alert decision-makers and the public to the environmental consequences of projects "before they have reached ecological points of no return." *Laurel Heights I* at 392 (internal quotations omitted). CEQA also serves "to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action." *Id.* If CEQA is "scrupulously followed," the public will know the basis for the agency's action and "being duly informed, can respond accordingly to action with which it disagrees." *Id.* Thus, CEQA "protects not only the environment but also informed self-government." *Id.*

Caltrans must make a good-faith effort in the EIR to disclose and analyze all that it reasonably can about the impacts of the Project. *See* CEQA Guidelines § 15144. The EIR must contain sufficient analysis to provide decision-makers and the public with enough information to make a decision that "intelligently takes account of environmental consequences." CEQA Guidelines § 15151. To this end, Caltrans must disclose and consider the environmental impacts of all phases of the Project, including both direct and indirect effects and any growth-inducing effects. CEQA Guidelines §§ 15126, 15126.2. Caltrans must propose specific, enforceable, and potentially feasible mitigation measures and alternatives that may avoid or lessen the significant impacts of the Project. CEQA Guidelines §§ 15126(e), (f), 15126.4, 15126.6. In addition, Caltrans must consider the cumulative impacts of the project in conjunction with other past, present, and reasonably foreseeable future projects. CEQA Guidelines § 15130.

II. The DEIR/EA for the Project Fails to Meet Applicable Legal Requirements. 4

As disclosed in the DEIR/EA, and as discussed in detail below, the Project's environmental effects as a whole must be considered significant for purposes of NEPA. The DEIR/EA also fails to provide a convincing statement of reasons why an EIS was not prepared for the Project. At the very least, the Project's impacts on endangered species and critical habitat in several important areas along the Smith River raise a substantial question as to whether the Project will have significant impacts. Accordingly, Caltrans must prepare an EIS for this Project.

The DEIR/EA also fails to satisfy the minimum legal requirements for an EIR under CEQA. Caltrans must correct these deficiencies, and must revise and recirculate the DEIR/EA, before moving forward with this Project.

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Center for Biological Diversity

Ms. Kimberly Hayler
Re: 197/199 Safe STAA Access Project DEIR/EA
August 23, 2010

A. The DEIR/EA Fails to Adequately Disclose and Analyze the Project's Growth-Inducing Impacts, Raising Questions About the Need for the Project. 5

The primary purpose of the Project is to facilitate goods movement by opening Highways 197 and 199 to STAA trucks. *See* DEIR at 1-2, 1-9. Caltrans anticipates that the Project "will promote and encourage economic growth" that "could lead to housing and population growth." *Id.* at 2.1-42, 2.1-43. Yet Caltrans concludes that the Project's growth-inducing impacts will be less than significant—indeed, almost negligible—due to the many other constraints on growth in Del Norte and Humboldt Counties. *See id.* at 2.1-45, 2.1-46.

This analysis suffers from at least two flaws. First, the DEIR appears to evaluate the significance of potential growth-inducing impacts against planned future growth rather than actual physical conditions, *id.* at 2.1-38, 2.1-43, 2.1-46, and thus employs the wrong "baseline" for CEQA analysis. *See generally Communities for a Better Env't v. S. Coast Air Quality Mgmt. Dist.*, 48 Cal. 4th 310 (2010), and cases cited therein. Second, the consideration of other unrelated constraints on growth is irrelevant to the analysis demanded by CEQA and NEPA. The relevant question is whether this Project will induce physical growth-related changes, not whether other factors will impede growth in general, thus making the impact of this project appear negligible.

If Caltrans is correct, despite these errors in analysis, that the Project will not deliver much of a benefit in terms of economic growth, the need for the Project is questionable. Put another way, if unrelated constraints on growth mean that this Project will not deliver much of a benefit to Del Norte and Humboldt counties, then the primary purpose of the project appears to be undermined.

Moreover, although safety considerations are purportedly a secondary purpose of the Project, DEIR at 1-9, the collision data do not indicate that *this* Project—widening and realigning highway sections so two STAA trucks can pass in opposite directions without off-tracking—will alleviate the safety concerns identified. Accidents at these locations, when they have occurred, are predominantly attributable to unsafe speeds, weather, and darkness. *See id.* at 1-7 to 1-9. None of the collision data indicate that large trucks off-tracking while attempting to pass in opposite directions have caused any accidents. 6

Other alternatives—such as reducing speed limits, improving signage, enhancing enforcement, or installing adequate lighting—would probably do a better job of achieving Caltrans' safety objectives than this Project, while avoiding its environmental impacts. Yet the DEIR/EA completely failed to analyze any such alternatives. *See id.* at 1-19 (discussing "non-build" alternatives). As a result, the DEIR/EA does not present sufficient information for Caltrans to make an informed decision as to either the impacts of or the need for the Project.

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B. The DEIR's Traffic Analysis Is Incomplete and Flawed. 7

The DEIR/EA fails to provide information adequate to substantiate its conclusion that the Project's traffic impacts will be less than significant. The document states that traffic is expected to increase by 92 trucks per day, but fails to clarify when and where this impact is likely to occur. Furthermore, the methodology used to determine latent traffic demand was apparently buried in a technical report, *see* DEIR/EA at 2.1-71 to 2.1-72, that has not been made readily available to the public. It is not clear from the DEIR/EA whether this methodology accounted for latent demand for an additional through route for STAA trucks (an alternative to I-5) resulting from a simultaneous highway project at Richardson Grove in Humboldt County. The cumulative impacts analysis also fails to address this issue clearly. DEIR/EA at 2.5-6 to 2.5-9.

The DEIR/EA also appears to use circular logic and a questionable metric in concluding that additional trucks will have no significant impact on traffic. Rather than evaluate impacts in terms of numbers of additional trucks on the road, the document discusses significance only in terms of the percentage of trucks relative to other traffic. *See id.* at 2.1-61. However, the latent demand forecast in the traffic analysis apparently proportionally distributed anticipated future truck traffic to each roadway segment based on the existing percentage of heavy truck traffic. *Id.* at 2.1-71. Based on this forecast, the DEIR/EA concludes that there will be no significant impact because the relative percentage of heavy trucks on the road will not change appreciably. *Id.* at 2.1-61. This seems to be circular; it is likely that future percentages do not appear to change very much because they were projected based on existing percentages. This analysis provides no basis for a determination of significance. It is also irrational to claim, as the DEIR/EA does, that any increase in truck traffic experienced in low-income communities along the route will be "minimal," *id.*, just because non-truck traffic is also anticipated to increase in the same basic proportion.

As a result of these omissions and analytical errors, the DEIR/EA fails to contain information adequate for the public or other agencies to comment meaningfully. Important information—such as the basis for the document's conclusion that traffic impacts will be less than significant—should not be buried in a technical report that the public cannot access, review, and address in comments on the Project. This is one of the key sources of public controversy surrounding this Project as well as the Richardson Grove project in Humboldt County. Caltrans' decision to bury information addressing this controversy in a technical report, rather than to disclose it openly in the DEIR/EA, is more than just short-sighted. It also renders informed public participation in this process impossible. As circulated, the DEIR/EA thus fails the fundamental purposes of CEQA and NEPA, and must be revised and recirculated before this Project can be approved.

C. The DEIR/EA Fails to Analyze, Disclose, and Identify Adequate Mitigation for Impacts to Old-Growth Redwoods. 8

The Project will have unacceptable, and undeniably significant, impacts on old-growth trees. At the Ruby 2 site, under the four-foot shoulders alternative, the Project

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calls for removal of either seven or 10 redwood trees between five and 12 feet in diameter. DEIR/EA at 2.3-2 (seven trees), 2.3-12 (10 trees). This discrepancy is not explained, leaving the public and decision-makers in the dark as to the Project's actual impacts. Furthermore, under all of the alternatives for the Patrick Creek 2 site, two old-growth Douglas-firs will be removed. DEIR/EA at 2.3-14 to 2.3-15. Yet the document claims that no adverse impacts to trees will occur. The DEIR/EA does not explain why impacts to old-growth redwoods may be significant and require mitigation, but impacts to old-growth Douglas-firs are not adverse and need not be mitigated. 8 cont.

Furthermore, the mitigation measures identified for impacts to old-growth redwoods are speculative and improperly deferred. Caltrans must make a concrete, enforceable commitment to mitigation, not just claim that "some options" for mitigation might "include" various general proposals. See DEIR/EA at 2.3-20 to 2.3-21. In any event, none of the mitigation "options" identified will actually replace the trees lost or do anything to ameliorate the immediate on-site impacts. Removing invasive vegetation somewhere else does nothing to replace lost old-growth trees. Accordingly, Caltrans must develop and choose a feasible alternative that avoids this impact.

Finally, the DEIR/EA contains virtually no analysis of potential impacts to the root systems of old-growth trees in the various project locations. This is odd, given the intense public controversy surrounding this aspect of the Richardson Grove project. A promise of certain construction methods is no substitute for the good-faith disclosure of potential impacts and analysis of significance that CEQA and NEPA require.

D. The DEIR/EA Fails to Analyze, Disclose, and Identify Adequate Mitigation for Impacts to Endangered Species. 9

The Project also will have unacceptable and significant impacts on threatened and endangered species, including the marbled murrelet, northern spotted owl, and coho salmon. The DEIR/EA fails to identify legally adequate mitigation measures sufficient to reduce these impacts to a less-than-significant level, as required under CEQA. Moreover, taken together with the Project's impacts on old-growth trees, these impacts raise at least a substantial question that the Project as a whole will have a significant, adverse effect on the environment; an EIS is therefore required under NEPA.

The Smith River is a migration corridor for marbled murrelets as well as important habitat for listed anadromous fish, including coho salmon. The DEIR/EA reveals that migrating murrelets may be disturbed by noise during construction. The document also reveals that anadromous fish passage may be blocked, and habitat destroyed, by instream construction. Furthermore, the DEIR/EA explains that the Project will result in removal of northern spotted owl habitat. Adverse effects on both coho and northern spotted owls are anticipated.

Any of these activities could cause a "take" of listed species in violation of the state and federal Endangered Species Acts. This must be considered a significant impact under both CEQA and NEPA. Unfortunately, the DEIR/EA does not set forth mitigation

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measures sufficient to reduce these potential impacts to a less-than-significant level. For example, the development of mitigation measures for coho salmon is impermissibly deferred. Rather than identify specific, enforceable measures to offset the potential take of coho salmon, the DEIR/EA states that the Department of Fish and Game may require unspecified habitat improvements at some unspecified location. DEIR/EA at 2.3-67, 2.3-71. Other mitigation measures identified for impacts to coho are facially inadequate. Although these measures indicate that in-stream construction will be avoided while adult coho are present, the document makes clear that juvenile coho are present year-round. *See* DEIR/EA at 2.3-65, 3-19 to 3-20. At the very least, Caltrans must develop and analyze an alternative that avoids impacts to coho throughout their life cycle. 9 cont.

E. The DEIR/EA Fails to Adequately Disclose and Analyze the Project's Contribution to Climate Change. 10

The DEIR/EA's analysis of the Project's greenhouse gas emissions and its resulting contribution to climate change is fatally flawed. "The impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct." *Center for Biological Diversity v. National Highway Traffic Safety Administration*, 538 F.3d 1172, 1217 (9th Cir. 2008). CEQA also requires agencies to exercise "careful judgment" in making a "good-faith effort" to determine whether a project's contribution to climate change is significant. CEQA Guidelines § 15064.4; see also CEQA Guidelines § 15126.4(c) (agencies must consider mitigation for significant greenhouse gas emissions).

The DEIR/EA discusses climate change, and even goes so far as to attempt to quantify the Project's emissions. Yet the document ultimately fails to determine whether those emissions are significant, labeling their effects too "speculative" for analysis. DEIR/EA at 3-12. This is insufficient under CEQA. *See Communities for a Better Env't v. City of Richmond*, 184 Cal. App. 4th 70, 90-91 (2010) (discussing agency's recognition of weakness of argument that significance of climate change impacts is too speculative to determine). The absence of an adopted statewide threshold of significance or methodology for determining significance does not relieve Caltrans of its responsibility to make a significance determination. *See Protect the Historic Amador Waterways v. Amador Water Agency*, 116 Cal.App.4th 1099 (2004). There are several proposed and adopted thresholds of significance that Caltrans could have consulted in making a determination.[1] *See* CEQA Guidelines § 15064.7(c) (lead agency may consider other agencies' thresholds of significance).

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[1] *See, e.g.*, Cal. Air Pollution Control Officers Ass'n, *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act* (Jan. 2008) at 42-57 (evaluating thresholds of zero, 900, 25,000, and 50,000 metric tons per year) (attached as Ex. 1); *see also* Cal. Air Res. Bd., Preliminary Draft Staff Proposal, *Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases Under the California Environmental Quality Act* (Oct. 24, 2008) (attached as Ex. 2); South Coast Air Quality Mgmt. Dist.,

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Finally, the DEIR/EA's quantification of emissions is faulty. The document once again appears to rely on the wrong CEQA "baseline" by comparing the Project's potential greenhouse gas emissions to hypothetical future planning scenarios rather than present physical conditions. All of these omissions and errors must be corrected, and the DEIR/EA recirculated, before the Project can be approved. 10 cont.

F. The DEIR/EA Fails to Analyze a Range of Reasonable Alternatives. 11

As previously discussed, the DEIR/EA fails to disclose and analyze a range of reasonable, potentially feasible alternatives that could avoid the Project's significant effects. In particular, given the potential lack of need for the Project on economic development and goods movement grounds, the DEIR/EA fails to consider "non-build" alternatives better suited to addressing Caltrans' safety concerns, including reduced speed limits, signage, improved lighting, and enhanced enforcement. The DEIR/EA also fails to consider whether, in light of the apparent low demand for STAA access, a legislative exemption from STAA restrictions similar to that currently provided for moving vans might be extended to additional categories of vehicles. Absent analysis of these alternatives, the DEIR/EA fails to meet the requirements of NEPA, CEQA, and Section 4(f) of the Department of Transportation Act.

III. Conclusion

For the foregoing reasons, and for the reasons identified by other commenters, the Center for Biological Diversity objects to the approval of the Project on the basis of the DEIR/EA. Please feel free to contact me at (415) 436-9682 x313, or by email at kbundy@biologicaldiversity.org, with any questions or concerns. 12

Sincerely,

Kevin P. Bundy
Senior Attorney

Attachments

Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (Oct. 2008) (attached as Ex. 3); Bay Area Air Quality Mgmt. Dist., *California Environmental Quality Act Guidelines Update: Proposed Thresholds of Significance* (Dec. 7, 2009) (attached as Ex. 4).

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Responses to Center for Biological Diversity

Response to Comment 1

The comment states that the Draft EIR/EA fails to meet the procedural and substantive requirements of NEPA and CEQA and serves as an introductory sentence to the remaining comments in the letter. The Department respectfully disagrees with this comment. Specific concerns regarding the proposed failures are addressed in the following responses to this letter.

No revisions to the DEIR/EA are necessary.

Response to Comment 2

This comment correctly states that the Department assumes the role of the lead federal agency for compliance with NEPA and other federal regulations through the congressional delegation of authority and a Memorandum of Understanding between Caltrans and FHWA. It further states that NEPA requires a hard look at environmental consequences and provides for the broad dissemination of environmental information. Most of this comment consists of the steps as part of the NEPA process including references to various case law involving NEPA cases. The comment asserts that an EA is insufficient under certain circumstances and that an EIS should then be prepared, and it also states what Caltrans must consider in preparing an EA. The comment does not specifically assert that an EIS should be prepared for the proposed project. Since the comment is informational and does not make assertions regarding whether Caltrans met or failed to meet the above-mentioned requirements, no further response is required.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment outlines the CEQA process and the development of an EIR. The comment also asserts that the Department must disclose environmental impacts and propose specific, enforceable, and potentially feasible mitigation measures and alternatives that would avoid or lessen significant impacts of the project. It also states that the Department must also consider cumulative impacts of the project. Since the comment is informational and does not make assertions regarding whether the Department met or failed to meet the above-mentioned requirements, no further response is required.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project, and that the DEIR/EA fails to provide a convincing statement of reasons why an EIS was not prepared. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and accordingly proceeded to prepare a Finding of No Significant Impact (FONSI). The Department believes the DEIR/EA does include a convincing statement of reasons about why the project will not have a significant impact.

The comment also states that the project will have significant impacts on endangered species and critical habitat. The DEIR/EA and FEIR/EA discusses why there are no significant impacts to state or federal listed species or critical habitat in Section 2.3.5.

The comment also states that the DEIR/EA does not meet the legal requirements for an EIR under CEQA. The Department believes that the DEIR/EA, PRDEIR/SEA, and FEIR/EA do meet the legal requirements under CEQA.

No revisions were made to the DEIR/EA to address the comment topic.

Response to Comment 5

The comment is incorrect in asserting that the Draft EIR/EA concluded that the Project's growth-inducing impacts "will be less than significant—indeed, almost negligible—due to the many other constraints on growth in Del Norte and Humboldt Counties." The conclusion that the project is not expected to result in substantially adverse effects as a result of growth induced in Del Norte County or Humboldt County was based primarily on the small amount of growth estimated to be generated by the project, not on "other constraints to growth." As discussed on page 2.1-45 of the Draft EIR/EA, the estimated upper-range population growth anticipated to result from potential near-term business expansion is 78 for Del Norte County and 101 for Humboldt County. For both counties, the population increase would be less than 0.3% of 2008 population levels, and across the two counties the increase would be about 0.1% of the 2008 population (Draft EIR/EA page 2.1-45). This growth estimate was based on results of the producer/exporter business survey conducted for the traffic analysis and not on a consideration of potential growth constraints. The discussion of other constraints to growth in the region on page 2.1-45 of the Draft EIR/EA was provided for contextual purposes and to provide additional information on why growth generated by the project is not anticipated to be substantial.

The comment is also incorrect is asserting that an incorrect, future baseline was used to evaluate the significance of potential growth-inducing impacts. As the discussion in the prior paragraph demonstrates, the estimated growth levels generated by the project were properly compared to an existing (2008) baseline to evaluate the relative magnitude of the project-generated population increase. On page 2.1-45 of the Draft EIR/EA, the growth anticipated to be generated by the project was also compared to projected future (2030) growth levels, but this was done to show that the anticipated growth was well within growth levels anticipated to occur within the two counties over the next 20 years. This comparison was also made to show that the growth induced by the proposed project is not expected to be large enough to influence or alter planned development patterns in the study area, and, as a result, no substantially adverse growth-related indirect effects would be expected. Thus, the growth anticipated to be generated by the project was compared to an existing (2008) baseline, as required by CEQA, and to 2030 population projections to demonstrate that the small amount of growth induced by the project would be unlikely to directly or indirectly encourage unplanned growth or greatly hasten planned growth.

See the Grouped Response #1: Purpose and Need for a discussion regarding adequacy of, and support for, the purpose and need, despite the few number of trucks or minimal economic growth anticipated.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 6

This comment states that collision data provided in the DEIR/EA do not indicate that the proposed project would alleviate safety concerns discussed on DEIR/EA page 1-9, even though the DEIR/EA page 1-9 states that safety is a secondary purpose of the project, and none of the collision data indicate that large trucks offtracking while passing in opposite directions have caused accidents. This project was not developed in response to historical collision data; rather, the project need involves achieving consistency with federal and state legislation and regional programs, plans, and policies that require and/or encourage STAA truck access (see Grouped Response #1). The DEIR/EA, page 1-9, states that the secondary purpose of the project is to enhance safety on SR 197–US 199 for automobiles, trucks, and other large vehicles at the proposed project locations, and "Safety-enhancing improvements, including wider lanes, wider shoulders, longer-radius curves, and improved sight distances, would provide a roadway that is easier to maneuver for all users…" This does not mention collision history data, and the improvements are not proposed due to collision history. Additionally, STAA trucks are typically not allowed on the 197/199 corridor, so there is not adequate data on STAA-truck collisions; however, the proposed improvements would enhance safety for all users. By making improvements to accommodate STAA trucks, the prohibition for STAA vehicles would be removed, the 197/199 corridor would be consistent with federal and state legislation and regional programs, plans, and policies, and the safety and operation of US 199 and SR 197 would be enhanced for all users. The commenter's proposed alternatives would not achieve consistency with the above legislation or regional programs, plans, and policies or the purpose and need of the project since they would not necessarily affect offtracking by STAA trucks.

In regard to how Caltrans typically responds to collisions see Group Response #8.
Please see revisions to the purpose and need in Section 1.2 of the Final EIR/EA for more information and Grouped Response #1 for further discussion on purpose and need.

No changes to the DEIR/EA are necessary.

Response to Comment 7

This comment states that the DEIR/EA failed to provide adequate information to substantiate the conclusion that the project's traffic impacts will be less than significant, and that the document failed to clarify when and where the increase of 92 trucks per day would occur. The increase of 92 trucks per day is a result of the product of short-term truck growth, short-term to long-term induced travel effect, and future background truck growth based on 20-year linear growth factors. For analysis purposes, the 92-truck increase per day is based on the year 2030 (as stated on pages 2.1-69 through 2.1-71 of the Draft EIR/EA and in Chapter 2 of the Traffic Analysis Report [Fehr & Peers 2010]). This increase in truck volumes is expected to occur on the 197/199 corridor by the year 2030, if the proposed project is constructed.

The projected 92 truck per day increase by 2030 assumes consistent economic growth each year for the entire 20-year period. In the event of economic down times, such as what is being experienced currently by the region, state, and nation, the projected truck increase could be much lower than what was estimated by the traffic study. The estimated 92-truck increase per day by 2030 equates to about 10 trucks per hour in the peak period or one additional truck every six minutes. It is very unlikely that this very small increase in truck traffic will even be noticeable by the traveling public or residents living or working within the corridor in the Year 2030. Per the

Department's Guide for the Preparation of Traffic Impact Studies (State of California Department of Transportation December 2002[1]), which was referenced in DEIR/EA Section 2.1.5.1, the minimum threshold for "significant impact" is between 50-100 trips per peak-hour. The proposed peak hourly increase of 10 trucks per hour (or 92 trucks per day) in 2030 falls well below the "significant impact" criteria. Regarding the assertion that there could be an increase in STAA trucks essentially using US 101 as an alternate interregional north-south corridor to Interstate 5 (with the simultaneous completion of the Richardson Grove Project), it would be economically infeasible for trucks to use this route for anything other than movement of goods to and from existing activities in the area, because this route would have more miles and drive time than the Interstate 5 route.

Traffic operational impacts of the additional trucks on the road were evaluated not only in terms of a percentage increase in trucks, but also by level of service, delay, and "percent time spent following" – which are directly related to the number of additional trucks, not percentage increase in trucks (see page 2.1-72 of the Draft EIR/EA and Chapters 3-7 of the traffic analysis report prepared for the project [Fehr & Peers 2010]). The thresholds for acceptable level of service established in the route concept reports for SR 197, US 199, and US 101 (California Department of Transportation 1999a, 1999b, 2002) were used in the Draft EIR/EA (see pages 2.1-72 and 2.5-12). Based on the level of service thresholds established, the traffic impacts as a result of the increase in trucks are not considered significant. Page 2.1-73 of the Draft EIR/EA states "all of the directional segments would operate at acceptable levels of service based on the thresholds established in the route concept reports for SR 197, US 199 and US 101" and "the results of the 2030 with-project analysis indicate that all roadway segments in the 2030 with-project scenario would operate at or better than their target LOS." "Therefore, the increase in truck traffic by 2030 due to the project would not result in an adverse effect on traffic operations."

The future background growth was indeed based on the existing number of trucks; however, induced travel, induced growth, and latent demand were also factors applied to the future truck traffic. Based on the analysis, the traffic impacts on the roadways that travel through the respective communities are expected to be minimal. Although not described in the traffic analysis report, the potential for shifts in traffic from the I-5 corridor to a continuous STAA corridor on US 101–SR 197–US 199 were considered in the analysis but dismissed as a likely source of additional truck traffic demand. A review of the Department's California Statewide Travel Model and travel websites indicate that it would take an extra 90 minutes, or more than 20 percent longer, to travel between the Bay Area and Grants Pass on US-101–US-199 compared to the I-80 to I-5 corridor. Therefore, it was concluded that the only STAA trucks traveling from the south via Richardson Grove would have already been on the route making local deliveries or pickups. This is a similar delivery pattern to what occurs under existing conditions using CA Legal trucks.

All technical documents supporting the Draft EIR/EA are made available for public review as stated on the second page of the Draft EIR/EA under "General Information about This Document," at the Department's District 1 office located at 1656 Union Street, Eureka, CA. The DEIR/EA and all technical documents were also made available for review at the public library

[1] accessed at http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf on 5/4/12

in Crescent City, CA, as noted in the public notice for the announcement of the public hearing and availability of project information during circulation of the DEIR/EA for this project.

See Grouped Response #9 for more information regarding the methodology of the traffic study.

No revisions to the DEIR/EA are necessary.

Response to Comment 8

This comment states that the DEIR/EA fails to analyze, disclose, and identify adequate mitigation for impacts to "old-growth redwoods." The Department has selected the Two-Foot Widening in Spot Locations Alternative as the preferred alternative, and no significant impacts are anticipated from this alternative since no large trees (> 36 inch dbh) will be cut. This is considered a feasible alternative that will incur the least amount of impacts to trees and under which no significant impacts, i.e. no cutting of large redwood trees, would occur. See Grouped Response #4 potential impacts to trees.

The Department does not consider removal of large Douglas-fir trees to constitute a substantial adverse impact or significant impact under NEPA or CEQA due to the larger range and greater number of Douglas-fir trees, including large Douglas-fir trees in California, Oregon, and Washington. Regarding the question about large Douglas-fir trees at Patrick Creek Narrows Location 2: large Douglas-firs historically have not been considered as much of a sensitive environmental resource as large redwoods by the Department or to many members of the public, as exhibited by the general lack of public comments regarding large Douglas-firs (as compared to comments on redwoods) in public comments for this and other projects circulated by the Department.

Regarding the lack of analysis of impacts to root systems of large trees, the Department did an additional study and Recirculated the information in the fall of 2012; refer to the Group Response #4 for further information.

Revisions to the DEIR/EA were made in Section 2.3.1 and Recirculated to analyze impacts to large redwood and Douglas-fir trees and to analyze potential root impacts.

Response to Comment 9

This comment states that the DEIR/EA failed to analyze, disclose, and identify adequate mitigation for impacts to endangered species, and that the project would have significant impacts to threatened and endangered species, including marbled murrelet, northern spotted owl, and coho salmon. See the DEIR/EA and FEIR/EA Section 2.3.5 and the Biological Assessment to USFWS and NMFS impacts to listed species. In summary, the Department determined after circulation of the DEIR/EA that proposed bridge replacement at Patrick Creek Narrows Location 2 could and would be constructed so that no heavy equipment and only minimal temporary foot traffic would occur within the live channel, and there would be no water diversion for bridge construction; therefore, there would be no lethal take of listed fish species. No critical habitat for listed species would be removed for any of the proposed locations, and there would be no lethal take of any listed species. The proposed work will not impact marbled murrelet (MAMU) or northern spotted owl (NSO) nesting habitat. Construction techniques and activities will be implemented to avoid or minimize impacts to MAMU or NSO. Any effects will be negligible

and temporary and will not jeopardize the continuation of these or any federally or state listed species. Since there will be no lethal take of listed species or take of critical habitat and no cutting of large redwood trees, the Department finds that there would be no significant, adverse effects on the environment, particularly with the Avoidance, Minimization, and/or Mitigation Measures listed in Sections 2.1, 2.2, 2.3, 2.4, 2.5, and Chapter 3, and there is no requirement to prepare an EIS under NEPA.

Since MAMU may have migration/dispersal corridors in the biological study area, construction activities within the Ruby 1 and Ruby 2 project areas will have restrictions. To avoid adverse noise impacts to migrating marbled murrelet between March 24 and September 15, there will be no construction activity (including blasting) in the morning for a three-hour period starting one hour before sunrise until two hours after sunrise, then in the evening no construction activity in the three-hour period starting two hours before sunset until one hour after sunset. Therefore, from July 1 - September 15 there can be night work starting one hour after sunset and ending one hour before sunrise. After September 15 (until March 1) there will be no restrictions on night work. No trees suitable for marbled murrelet nesting will be removed. These restrictions will not apply to the US 199 project sites due to the low likelihood of MAMU occurrence.

To avoid adverse effects to northern spotted owls during the critical breeding season (March 1–July 9), there will be no blasting or night work at PCN-2 or the Narrows during this period. If night work is required, the lighting will be directed toward the area of work. Additional lighting is not expected to substantially exceed the level of disturbance of the existing traffic headlights. No trees suitable for spotted owl nesting will be removed. The proposed work will involve no additional specific avoidance and minimization efforts for NSO.

Edits were made to the DEIR/EA Section 2.3.5 to clarify that there would be no lethal take of coho salmon, due to design refinements to the construction scenario for Patrick Creek Narrows Location 2. No other edits were made to the DEIR/EA regarding this comment.

Response to Comment 10

This comment states that the DEIR/EA failed to adequately disclose and analyze the project's contribution to climate change. The Draft EIR/EA has been modified to clarify the existing / baseline conditions for purposes of comparing the project impacts pursuant to CEQA. Sections updated include Traffic and Transportation, Air Quality, Noise and Vibration, and Climate Change.

CEQA requires a lead agency to make a good faith effort to identify impacts and gives the lead agency discretion on the approach to analyze impacts. Caltrans has used the best available modeling method (CT-EMFAC) to analyze greenhouse gas emissions related to implementation of the proposed project and has disclosed a projected increase in GHG emissions. Modeling shows that there is an expected increase in GHG emissions when compared to existing conditions, but it also shows that emissions are expected to increase under the no-build conditions as well.

While there is no scientific data available to link the impact of the proposed project to the global greenhouse gas effects on a cumulative scale to climate change, Caltrans is committed to reducing GHG emissions as outlined in Table 3-4 of the DEIR/EA .

No revisions to the Draft EIR/EA are necessary.

Response to Comment 11

The comment states that the Draft EIR/EA fails to analyze a range of reasonable alternatives, that the DEIR/EA fails to consider non-build alternatives to address safety concerns, and that the purpose and need of the project has not been established. Please see the revised purpose and need sections in Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification and support of the project purpose and need. Please refer to Grouped Response #7 for a discussion of adequate range of alternatives. Also, see Grouped Response #7 and Response to Comment 6 for Center for Biological Diversity regarding consideration of no-build options, as mentioned in this comment. Ultimately, the "no-build" options that the comment suggests, including consideration of implementing reduced speed limits, signage, improved lighting, enhanced enforcement, and a legislative exemption from STAA restrictions similar to that currently provided for moving vans to be extended to additional categories of vehicles, would not address the problem of large vehicles offtracking into the oncoming traffic lane and would not meet the purpose and need of the project, and they would not achieve consistency with the federal and state legislation or the regional programs, plans, or policies. Furthermore, the 197/199 corridor cannot safely accommodate STAA traffic as it currently exists, so a legislative exemption is not a feasible solution.

The comment also states that the DEIR/EA fails to meet requirements of NEPA, CEQA, and Section 4(f) of the Department of Transportation Act due to failing to analyze the above-proposed "no-build" alternatives. Since the above-proposed "no-build" alternatives would not meet the project purpose and need, consideration of those alternatives is not required.

The purpose and need statement in Chapter 1 of the Draft EIR/EA was modified, as noted in the Grouped Response #1: Purpose and Need. No further revisions to the Draft EIR/EA are necessary.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 12

This comment states that The Center for Biological Diversity objects to the proposed project but does not comment on the DEIR/EA.

No revisions to the Draft EIR/EA are necessary.

Environmental Protection Information Center

Environmental Protection Information Center
#122 600 F Street Ste 3
Arcata, CA
95521

August 23, 2010

Attn: Attention Kim Hayler, Environmental Coordinator

California Department of Transportation
District 1
P.O. Box 3700
Eureka, CA,
95502

Dear Kim Hayler,

Please accept the following comments on behalf of the staff, board and members of the Environmental Protection Information Center, the California Department of Transportation draft Environmental Impact Report (DEIR) and Environmental Assessment (EA) for the 197/199 Safe STAA Access Project.

The Safe STAA Access Project, which combined five separate projects in seven locations, is incomprehensible. The five projects that have been combined create a labyrinth of potential outcomes, all of which have significant environmental, economic and social impacts. Many of these impacts cannot be mitigated, like the removal of several old growth redwood trees along the route. 1

Please consider extending the comment deadline so that the public may have adequate time to review the myriad of alternatives presented to the many sensitive locations within the proposed project.

Because of this lack of analysis and the incomprehensible nature of this project proposal, the only alternative that EPIC and our members can identify is the no build alternative.

The Safe STAA Access Project is one of many projects Caltrans has proposed to lift restrictions for STAA trucks to travel through Del Norte and Humboldt Counties, located along the rugged northern California coastal region. This change could result in a reclassification of US Hwy 199 and 197 into STAA accessible routes, as part of the STAA truck route network. 2

While several, high priority road improvements along these routes may be necessary to improve safety along the harrowing corridor along the steep cliffs above the Wild and Scenic Smith River, no need exists to reclassify the Highways 199 and 197 for this purpose.

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The reclassifications of the routes to "STAA accessible" and for them to be considered a part of the "STAA truck route network" may open the doors for Caltrans to receive federal funds for additional construction projects. The public does not understand the relationship between additional truck access and Caltrans access to additional federal monies for otherwise regional projects. 2 cont.
Instead, Caltrans attempts to convince the public that STAA projects will offer great benefits to businesses.

Only a very few businesses will benefit from STAA truck access.

While significant environmental, economic and social impacts would occur from the proposal project, the vast majority of businesses in Del Norte and Humboldt will not use STAA trucks.

According to the Fehr and Peers Traffic Analysis Report, the business to receive the most benefit from the massive project will only use the added access for two months out of the year. And while, according to the Del Norte Goods Movement Action Plan asserts that retail giants Walmart and Home Depot are inhibited by the STAA restrictions into Del Norte County, no evidence presented in the independent study concludes that this is true.

In relationship to other projects, Caltrans has failed to identify or analyze the cumulative impacts these projects will have on the region as a whole. This piecemeal approach to transportation planning threatens to undermine traffic safety and the environment by introducing the larger trucks to roadways without proper analysis or adequate public review. 3

Nearly every year weather conditions, landslides, collisions and other events create road closures along US Hwy 199, throughout the project's seven spot locations. Instead of planning for more access for trucks deemed unnecessary by a majority of businesses served by these shipping routes, Caltrans might serve the region more responsibly by addressing the needed repairs for current and predictable conditions, instead of planning a costly and damaging project that could impact the region for time immemorial. 4

This proposal and the available technical studies used to prepare the data within the DEIR/EA fail to demonstrate an adequate need for STAA access, and could further degrade the unique character of the region. 5

The DEIR has failed to demonstrate need for the main purpose of these highway projects: the need to provide access for STAA vehicles. In fact, the DEIR traffic surveys have demonstrated a clear lack of substantive need. And the DEIR traffic study makes erroneous and misleading calculations about additional daily trucks.

The total project costs would be very great, especially if the DEIR scope, or range of the projects is found to be insufficient and additional tight spots, railings, and rockslides are found to need correction. A Comprehensive Study of Routes 197/199 dated June 6

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1998, Del Norte Local Transportation Commission, estimated costs at $29 million. A Report to Improve Mobility and Accommodate Large Vehicles on Routes 197 and 199 in Del Norte, dated March 2006, Cal Trans District 1, estimated the costs of projects in the DEIR to be about $34 million. The DEIR estimate, with a limited scope, is approximately $22 million. 6 cont.

To justify such a great expense, the DEIR should demonstrate a substantial need for STAA trucks. However, the DEIR Traffic Analysis Study by Fehr and Peers 2010 reveals quite the opposite. The Fehr and Peers traffic study conducted a detailed survey of businesses that use or provide trucks. Both producers and shippers were asked many questions about current truck use and potential use of STAA trucks. The results of this survey are astonishingly clear, the need for STAA trucks is limited and insubstantial.

Most potential users (probably 90% of overall highway truck volume) such as Home Depot, Reddaway Shipping, United Van Lines/Mayflower, Safeway, Unified Western Grocers, Rumiano, Green Diamond Resource Company, Custom Trucking, Joe Costa, etc, clearly stated that STAA access would not affect them, nor benefit them, and that they would not be putting STAA trucks on the road.

The only user exception that would have an apparent benefit is the local lily bulb industry. Fehr and Peers summary confirms this. Most potential users answered the survey questions with a resounding NO:

For most producers, when asked if a restriction of truck size in Del Norte is an impediment- they answered NO. As stated, this is because most shipments max out on weight, and the smaller California legal trucks are sufficient.

Most producers stated they are currently using CA legal trucks and would continue to do so after improvements are made. For most producers, when asked would STAA 199/197 improvements create expansion opportunity- they answered NO or doubtful.

Fehr/Peers traffic analysis estimates that a mere 8 STAA trucks per day under existing conditions would use the improved highway (page ES 2-4 Fehr and Peers, latent demand). But this is an inflated, inaccurate figure.
Home Depot stated that they use Reddaway, and Reddaway answered NO to underloaded trucks (they use all smaller CA legal trucks, because of weight max out); NO to combining loads opportunities; NO to changing routes; and doubtful change in number of trucks or demand with STAA improvements. The other shippers answered no as well: United Van Lines/Mayflower uses NO underweight trucks; will have NO combine loads opportunities and NO demand changes. Custom Trucking, a shipper of groceries, also maxes out on weight and would not combine or chain loads onto STAA type trucks.

Goselin Trucking stated no changes, and raises a new potential hazard concern: that many drivers out of the area (STAA drivers) aren't used to driving our narrow highway. Even if the spot fixes are done, Hwy199 will remain narrow and winding and inherently dangerous. Local drivers know this.

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The Producers answered NO: Safeway said NO to #2, is restriction of truck size in DN an impediment; and NO to #3, would STAA improvements create expansion opportunity; and so did Rumiano Cheese producer answer NO to all as well. 6 cont.

In addition, the scope of projects and range of alternatives are inadequate. Public scoping requests for alternatives are not addressed, and public controversy for STAA 199/197 improvements were ignored. 7

Significant impacts that cannot be mitigated include a significant public safety hazard resulting from mandatory exemptions; a significant increased public safety hazard of landslides and rock slides; significant scenic impacts, significant property right of way acquisitions of small privately developed residential parcels; disruption of several communities located within project areas; extended period of construction with significant disruption of traffic. 8

In addition, ecological impacts that cannot be mitigated include the removal of old growth redwoods and numerous other tree removals at spot locations throughout the seven identified areas. Tree Root impacts were not adequately identified, and impacts to roots may be extensive. These methods are experimental and have not been proven safe for long-term tree health. 9

Home Depot stated that they use Reddaway, and Reddaway answered NO to underloaded trucks (they use all smaller CA legal trucks, because of weight max out); NO to combining loads opportunities; NO to changing routes; and doubtful change in number of trucks or demand with STAA improvements. The other shippers answered no as well: United Van Lines/Mayflower uses NO underweight trucks; will have NO combine loads opportunities and NO demand changes. Custom Trucking, a shipper of groceries, also maxes out on weight and would not combine or chain loads onto STAA type trucks. 10

Goselin Trucking stated no changes, and raises a new potential hazard concern: that many drivers out of the area (STAA drivers) aren't used to driving our narrow highway. Even if the spot fixes are done, Hwy199 will remain narrow and winding and inherently dangerous. Local drivers know this.

The Producers answered NO: Safeway said NO to #2, is restriction of truck size in DN an impediment; and NO to #3, would STAA improvements create expansion opportunity ; and so did Rumiano Cheese producer answer NO to all as well.

An additional 2.5 STAA trucks per day for lily producers seems very inaccurate as well. Bulb producers have estimated a total 150 round trips for the entire year. They do this over a two month period. That makes 75 (75/30) or 2.5 trucks per day, but only during the two month shipping period. The rest of the months are not shipping months, and register 0. But Fehr and Peers incorrectly indicate 2.5 new trucks per day for lily bulbs, and then inaccurately project that figure out for long term yearly figures. This is no little 11

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mistake. 2.5 times 365 results in a yearly exaggeration of 600% more lily bulb trips than exists. Please explain, and more appropriately show what the additional yearly truck rate would be for the different categories, rather than the daily additional truck load. Then extrapolate long term. 11 cont.

A more accurate figure for daily average lily bulb trips is a mere 150/365= 0.41 additional daily trucks on average. Other additions or reductions from consolidation are not quantifiable, and may cancel each other out. It might be prudent to place the total increase at 1 additional average daily truck.

Looking towards the future, to predict how many STAA trucks will be on the road in the year 2030, Fehr and Peers uses an annual growth rate of between 1 and 2% per year, on average precisely 1.44, to determine future use of trucks. Their results are again inaccurate. They claim they use Department of Finance (DOF) figures. However, a call on Aug 15, 2010 to lead planner of Del Norte, DOF for the last several years has been running at .994% for Del Norte County. Please correct the inaccuracy.

The DEIR calculation of 8 new STAA trucks per day now, and 92 trucks by the year 2030 seems inaccurate and baseless.

If we are to believe the actual survey question results, only the lily bulb producers will be adding trucks to the new STAA highway. With few other limited exceptions, and the chance to consolidate current user loads, and thus cancel exceptional additions the only clearly addition is the lily bulb users. They would put 0.41 new trucks on hwy 199/197 daily on average now.

According to our calculations, there would be at most, 2 average daily additional trucks by 2030, due to STAA changes, using DOF .994% growth.

Fehr and Peers uses an inaccurate exaggerated growth rate from the Del Norte General Plan predictions, which have proved to be inflated, and outdated. A phone call to Del Norte County Planning Dept., on August 16, 2010, lead planner stated that by the year 2010, at 2% Del Norte General Plan predicts a population of 41,000. However, we only have a population of about 29,547. And that for the very most recent years, State Dept. of Finance figures, as of July 1, 2009, the countywide growth has been slightly under 1% or .994%. So shouldn't the DEIR predictions be recalculated at a realistic rate?

Is it really sane to spend $20 to $34 million dollars to accommodate .41 additional daily average STAA trucks now, and only about 2 additional daily trucks by the year 2030? What is the threshold of need for such an expensive project? How is this judged? 12

Long term predictions, about how fossil fuel will be used in the far off future seems very precarious and uncertain. Will remote, agricultural communities rely less on shipping and focus more on local self sufficiency, providing valuable food essentials, rather than long distance shipping of luxury goods? 13

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Couldn't the current needs of the lily bulb producers, 150 trucks per year, each traveling 160 miles out of their way, be met by a simpler solution than spending as much as $34 million to fix the highway? 13 cont.

Upon researching just why lily bulb producers need STAA trucks, it appears that lily bulbs require air circulation while packed, because bulbs generate heat. And it is important to have cool lily bulbs, and air circulation. So, the truck space is taken up by peat moss and air gaps in the boxes, as well as lily bulbs. If we could cleverly redesign lily bulb packaging to reduce this airspace/peat moss space, while retaining coolness and air circulation, then more bulbs would fit in a CA legal truck size, and ship more efficiently, weight wise. Wouldn't it be prudent to investigate this alternative? And is the easter lily bulb need so great as to necessitate changing the entire Hwy?

Scope of projects and range of alternatives inadequate: 14
Hwy improvements between Hiouchi and Gasquet are needed
limited project locations are insufficient to provide safe STAA access

Public scoping requests for alternatives are not addressed
Public controversy for STAA 199/197 improvements ignored
Mandatory exemptions for STAA improvements likely to result in unsafe STAA conditions

During scoping for the DEIR, Dori and David Bruce presented extensive detailed traffic accident history and analysis that clearly identified trouble spots between Hiouchi and Gasquet on hwy 199 that needed fixing. They raised concerns about extensive narrow segments without railing, and tight turns. We resubmit that information, and ask that the scoping comments be acknowledged in the record. As you can see from their diagrams and traffic records, some of the highest accident rates exist between Gasquet and Hiouchi. And yet no improvements are planned for this area. What is considered one of the most dangerous blind turns on the road exists at PM 6.2-.5, near Monument drive. The winding grade to the east of this blind turn is also treacherous. Recently 2008, a terrible diesel oil spill occurred here at PM 11.38, that put many gallons of fuel into our Wild and Scenic Smith River, also the source of our drinking water (please see attached news articles.) And yet no project alternatives are proposed within this area. Their concerns were completely ignored in the DEIR. There are no explanations of why these areas are not being addressed, and why the scope or range of projects is so limited, given the accident history and the physical characteristics that exist between Hiouch and Gasquet.

Eileen Cooper submitted brief comments asking for an alternative that focused on safety improvements without putting STAA trucks on hwy 199.

Many residents from the Hiouchi community on Hwy 199/197 and Gasquet on Hwy 199 voiced opposition at meetings. And yet the DEIR proceeded merrily along, ignoring the controversy, and actually proclaims:

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"No significant public controversy has been raised for a particular project location or alternative." 14 cont.

Why does the DEIR ignore these public concerns and requests for alternatives? Was the scope and range of the project alternatives predetermined, regardless of public inquiry?

We now submit previous past studies that were aimed at defining what needed to be done to fix highway 199/197. Somewhere between these past studies and the DEIR, fixing the area between Hiouchi and Gasquet was dropped for no apparent reason. Why is this? Please explain. 15

Let me describe the turn at the The Hiouchi Monument, approximately PM 6.5. The Monument turn is a 180 degree tight spot, with dangerous blind egress at monument drive and uphill. Solid rock walls tower straight above you with an inadequate shoulder buffer, and the river looms below on a straight drop downward. You can trace the truck scratches on the towering rocks. It is one of the more spectacular places in Del Norte, where views of the forks of the Smith River are breathtakingly beautiful, if only you could enjoy them, because you are litterally holding your breath around this turn. And now somehow, we are going to put two STAA trucks passing each other on this turn, without any improvements. Please explain?

The Comprehensive Study of Routes 197 and 199 by CALTrans District 1, June 1998, clearly identified (page 15 attached) improvement needs here at PM 6.2 to PM 12.87 costing $9 million. What happened to consideration of the improvement needs here?

Mandatory exemptions for STAA improvements likely to result in unsafe STAA conditions 16

Even within the proposed project alternatives, the goal of providing safe STAA access will not be met at two locations.

"A Mandatory design exception would be required."

DEIR page 1-17, Patricks Creek Narrows #3 location-
"does not meet Department standards for shoulder widths and clear recovery zones."

DEIR page 1-13, Patricks Creek Narrows #1 location-
"Does not meet Dept. standards for shoulder widths." The slopes consist of "unconsolidated cobbles and boulders."

The DEIR mandatory exemption reason is geologic instability, prohibiting cutting into the slopes for adequate widening of the road.

Significant impacts that cannot be mitigated:
significant public safety hazard of landslides and rock slides 17

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significant scenic impacts that cannot be mitigated 17 cont.

For Patricks Creek Narrows #2, DEIR page 1-15, The common element for all proposed construction alternatives will excavate 20,000 cubic yards from the rock cut slope, 100 feet above the highway, exposing 1 acre of newly excavated rock slope. Rock fall is expected after construction, and permanent rock-fall mitigation will be required.

The DEIR acknowledges that the upslopes along this river corridor have great geologic instability, and that is the reason given for mandatory exemptions, to reduce excavation. And yet, we are exacerbating this problem wherever extensive cut slopes are proposed.

DEIR Page 1-17 The Narrows, widening toward the river was considered too costly, so it was dropped. Widening will be by excavation into the cut slope- into "soft material," with heights of upto 15 feet on irregular rock slopes with vertical overhanging. Sliver cuts will be done. 18

Recent hwy improvement cuts have already resulted in severe rockslides, and permanent unattractive curtain retaining mechanisms are proposed as mitigation at various locations. The Smith is designated as a Wild and SCENIC River, and the beauty of the river corridor is important to us, and our largely tourist economy. We consider the suggested permanent rock retaining curtain walls to be a significant scenic detriment; and the increased falling rock hazards due to new extensive excavations to be a significant public health hazard that cannot be fully mitigated. The DEIR does not acknowledge these significant impacts that cannot be mitigated. As I write this, I think of one of my dearest friends, who almost lost her life, as a giant boulder fell on her car along Hwy 199, from a roadside cut slope, and the boulder almost pushed her into the river. Her car was totaled, but luckily she survived. 19

We ask for a comprehensive enumeration of all cut slope areas for each alternative, and the type of rock or material, and the quantity of material to be excavated at each of these sites/alternatives.

The DEIR asserts rockslide hazards from slope cuts can be mitigated using unattractive nets. We disagree. We have seen continual slides along our highway at various new places, due to road cuts. We ask for highway safety/patrol history data on rock slides along Hwy 199/197 throughout the last twenty years. And we ask for a history of slope cutting roadwork on 199/197, and preventative measures that were done in response during this period of time, to substantiate that hazards from slope cuts can be mitigated.

One statement by truck users and critics alike is that it would be a good thing to make the highway safer. And the public asked for an alternative that focused on highway safety alone, without consideration of accommodating STAA trucks. Many residents view putting large STAA trucks on our 199/197 road to be a significant road hazard. Such a safety only alternative would use a more gentle approach, with slight widening of shoulders in dangerous spots. Such a safety only alternative could significantly lessen the 20

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need for cut slopes on cobbled landslide prone hills. Such a safety only alternative would not require transforming an essentially back country road like 197 into a super truck hwy. It would leave the neighborhood along 197 in tact. Please consider the public's request. It may not be your choice, it may not be as easily fundable, even though it would be far less expensive, but it is the people's choice. 20 cont.

Responses to Environmental Protection Information Center

Response to Comment 1

The comment states that the project is incomprehensible, and that the labyrinth of outcomes in the combined four projects has significant environmental, economic, and social impacts. It also requests an extension of the comment deadline and recommends the no-build alternative.

The project consists of seven locations; four locations had only one build alternative. Three of the seven locations had more than one build alternative, and those were Ruby 2, Patrick Creek Narrows Location 2, and Washington Curve. Ruby 2 and Patrick Creek Narrows Location 2 each had three build alternatives, and Washington Curve had two build alternatives. The Department combined the separate locations into one project for review because they shared the same purpose and need, and CEQA does not allow piecemealing, or separate consideration of, projects with the same purpose and need. The Department considers the public review period for the DEIR/EA to have been adequate, being longer than the required minimum number of days allocated for a public review of an EIR. The comment deadline was not extended.

None of the proposed alternatives for any of the proposed project locations were anticipated to produce significant economic or social impacts, according to the DEIR/EA (see DEIR/EA Section 2.5 and Chapter 3 and Response to Comments 7, 8, and 9 for Center for Biological Diversity). Potential significant environmental impacts were proposed if the Two Foot Shoulders Alternative or Four Foot Shoulders Alternative was selected for Ruby 2 due to proposed removal of large redwoods; however, the Department has selected the Two-Foot Widening in Spot Locations Alternative as the preferred alternative, and no significant impacts are anticipated from this alternative since no large redwood trees will be cut. No other proposed project locations or alternatives had anticipated significant environmental impacts.

The no-build alternative would not meet the purpose and need. Furthermore, as stated in Grouped Response #1, the No Build Alternative would fail to be consistent with the DNLTC RTIP's Highways, Streets and Roads Goal, since the No Build Alternative would not accommodate long (STAA) trucks on SR 197 and US 199 (see Section 2.1.1.2 in the FEIR/EA). Please see Grouped Response #1 for more information on purpose and need.

No edits to the DEIR/EA are needed regarding this comment, although edits were made in Chapter 1 of the FEIR/EA to clarify the purpose and need.

Response to Comment 2

This comment states that this project is one of many projects that the Department has proposed to lift restrictions for STAA trucks to travel through Del Norte and Humboldt Counties, allowing SR 197 and US 199 to be reclassified to allow STAA trucks and become part of the STAA truck route network. It also states that road improvements are needed to improve safety, but no need exists to reclassify SR 197 and US 199. The US 101 Richardson Grove Improvement Project is the other proposed project that would make improvements to allow reclassification to allow STAA trucks; these trucks might travel between Del Norte and Humboldt Counties, particularly if the STAA restrictions were lifted for SR 197 and US 199. See Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification of the project need, and see Grouped Response #2

regarding benefits of the project. See Response to Comment 1 for Environmental Protection Information Center (EPIC) for a discussion of the No Build Alternative.

The comment also discusses confusion regarding funding. See Grouped Response #2 for a discussion of how funding for the proposed project was originated.

The comment also states that significant environmental, economic, and social impacts would occur, but most businesses in Del Norte County will not use STAA trucks, and that those that would use STAA trucks would only do so for a limited duration each year. See DEIR/EA, PRDEIR/EA and FEIR/EA Chapter 2 for full discussions of impact analysis. See Grouped Response #1 for a discussion that clarifies purpose and need.

The purpose and need statement in Chapter 1 of the DEIR/EA was modified, as noted in the Grouped Response #1. No further revisions to the DEIR/EA are necessary.

Response to Comment 3

This comment states that the Draft EIR/EA failed to identify cumulative impacts that the project will have on the region as a whole. Please refer to Section 2.5, Cumulative Impacts, for the cumulative impact analysis in the DEIR/EA. Additional projects have developed since circulation of the DEIR/EA, so revisions to Section 2.5 were made to address the new projects.

Response to Comment 4

This comment states that the Department should address needed repairs for current and predictable conditions instead of planning the proposed project. The primary purpose of the project includes Federal requirements that the Department must meet. Addressing current safety issues is one of several benefits of the project. There are several other projects being developed in this corridor to address maintenance, repair, and improvement needs. Please see Chapter 1 of the Final EIR/EA and Grouped Responses #1 and #2 for a clarification of the project need and additional benefits of the project.

No revisions to the DEIR/EA are necessary.

Response to Comment 5

Regarding the comment that the “proposal” and technical studies, including traffic surveys, fail to demonstrate an adequate need for STAA access, please see Grouped Response #1 and the revised purpose and need section of Chapter 1 in the final EIR/EA for clarification of the need. Regarding the statement “and could further degrade the unique character of the region,” it is unclear as to what “unique character” refers to. If “unique character” refers to visual resources, please see Grouped Response #3. If it refers to large redwood trees, please refer to Grouped Response #4. If it refers to the Smith River and/or Wild and Scenic River corridor, please refer to Grouped Response #5.

Please see Grouped Response #9 regarding the comment that the DEIR traffic study makes erroneous and misleading calculations about additional daily trucks.

No revisions to the DEIR/EA are necessary.

Response to Comment 6

This comment states that the project's monetary costs would be great and cites varying cost estimates. Cost estimates are anticipated to vary, depending on the project details and cost of materials at the time of the estimate, and knowing that costs of materials fluctuate annually. See Grouped Response #2 for a discussion of costs versus benefits. The Community Impact Assessment (Trott 2010) describes the economic benefits of the project and the Del Norte Local Transportation Commission Goods Movement Plan (DNLTC 2007) considers this project to be a high economic priority for the county.

The comment also states that the DEIR should demonstrate a substantial need to justify such a great expense, but that the traffic study indicates that there would be few trucking companies that would use STAA trucks. It also states that the estimated trucks per day figure is inflated. Please see Grouped Response #1 and the purpose and need section of Chapter 1 in the FEIR/EA regarding purpose and need concerns. Please see Grouped Response #9 regarding the comment that the DEIR traffic study makes erroneous and misleading calculations about additional daily trucks.

The comment also states that one trucking company raised the concern that STAA drivers out of the area aren't used to driving the narrow highway, and that local drivers know that the highway will remain narrow and winding and dangerous. The proposed project would improve safety on the highway for all users by increasing shoulder widths, increasing sight distance and improving the geometrics of the highway. See Grouped Response #8 for a discussion on safety.

No revisions to the DEIR/EA are necessary.

Response to Comment 7

This comment asserts that the scope and range of alternatives is inadequate and that public requests for alternatives were not addressed. Chapter 1 of the Draft EIR/EA discusses some alternatives to project locations. In regard to the "no-build" alternatives, while increased signage and law enforcement could potentially help increase safety, those measures would not address the primary need for the project. Please see the revised Need statement in Chapter 1 of the FEIR/EA and Grouped Response #1 for clarification of the project purpose and need. Please see the Grouped Responses, which address commonly mentioned concerns from public comments for circulation of the DEIR/EA, and many of which were also public concerns mentioned in the scoping comments received for the Notice of Preparation. Specifically, see Grouped Response #2 for a discussion of costs versus benefits of the proposed project. See Grouped Response #7 for a discussion of inadequate range of alternatives and no-build alternatives.

No revisions to the DEIR/EA are necessary.

Response to Comment 8

The comment states that significant safety impacts cannot be mitigated due, in part, to "mandatory exemptions". When a proposed project feature does not meet design standards outlined in the Highway Design Manual, an "Exception from Design Standards" is prepared to document the engineering decisions leading to the approval of each exception from a design standard. Due to oversight by multiple licensed Engineers throughout the Design Standard Exception process, the Department considers the resulting design exceptions to be safe for

implementing. In addition, the existing roadway at the project locations does not meet current design standards, so the proposed work will improve on the existing conditions. See Grouped Response #8 for more information regarding safety issues.

The comment states that significant safety impacts cannot be mitigated due, in part, to landslides and rockslides. Section 2.2.3 in the DEIR/EA discusses impacts regarding landslides and rockslides. See Grouped Response #10 for a discussion regarding proposed cut slopes and geological stability.

The comment states that significant impacts that cannot be mitigated include significant scenic impacts. Section 2.1.6 in Chapter 2.1 of the DEIR/EA evaluates the potential impacts to visual resources from implementation of the project. See Grouped Response #3 for further discussion regarding visual resources.

The comment states that significant impacts that cannot be mitigated include significant property right-of-way acquisitions. Permanent land use impacts, including right-of-way acquisitions, were evaluated in Section 2.1.1.1 in Chapter 2.1. Since the Two-Foot Widening in Spot Locations Alternative is the preferred alternative for Ruby 2, permanent right-of-way acquisitions for this alternative would involve fewer parcels on the west side of the roadway, and the total amount of land acquired for right-of-way would be smaller than for the other two alternatives in the DEIR/EA. The amount of proposed right-of-way acquisition is no more than 35 feet from the existing property boundary for properties along SR 197 that would be affected by the project. Regardless, mitigation proposed includes driveways that would be upgraded as part of the proposed project. Additionally, any mailboxes, fencing, signage, or landscaping (including ornamental trees) displaced by the proposed project on affected residential properties would be replaced in coordination with property owners. Property value effects resulting from the narrow strip acquisition of right-of-way from residential properties along SR 197 (North Bank Road) were not addressed in the DEIR/EA, although the size of the strip acquisitions and potential effects of the acquisitions on affected residential properties are evaluated in Section 2.1.1, “Land Use.” Homeowners would be compensated for the value of property acquired for right-of-way, which would offset the property value effects of the acquisitions on individual property owners. Loss of property tax revenue attributable to the acquisition of additional right-of-way for the project was addressed in the Community Impact Assessment prepared for the project. As discussed on pages 4-86 through 4-88 of that report, right-of-way acquisitions from private properties would result in the estimated annual loss of property tax revenue ranging from $7,120 to $10,940 annually, based on the countywide 1% property tax rate. On average, Del Norte County receives about 18% of the property tax revenues generated by the 1% tax levy on the value of properties within its jurisdiction. Therefore, property tax revenue losses to Del Norte County would range from an estimated $1,280 to $1,970, representing less than 0.1% of its total property tax revenues. This loss would not be substantially adverse.

The proposed approximate 35-foot right-of-way acquisition was developed to be consistent with the Department’s Highway Design Manual, but the reason this right-of-way acquisition is important to the Department and is being proposed is to provide access for future maintenance of the facility.

The comment states that significant impacts that cannot be mitigated include disruption of several communities within project areas. Community impacts were evaluated in Section 2.1.3 in Chapter 2.1 of the DEIR/EA. As discussed in that section, effects on community cohesion are not expected to be substantial under the proposed project because SR 197 and US 199 already separate existing neighborhoods on both sides of the highway, and the increase in truck traffic through these communities and concentrations of residences resulting from the project's removal of STAA trucking restrictions would be minor. As discussed in DEIR/EA Section 2.4.3, implementation of the proposed project would include impacts such as temporary access and circulation delays. Please also see Section 2.1.1.1, particularly the section on Development Trends (page 2.1-6), for discussion regarding how the Del Norte County General Plan provides numerous growth-management goals, objectives, and policies to guide future development in the county, including emphasizing growth within or adjacent to existing communities. As discussed in DEIR/EA Section 2.1.1.1, Policy 3.C.5 of the County General Plan states that future development in the county shall be orderly and contiguous with existing development and district boundaries, that is, future development will likely remain centered within and adjacent to the Crescent City urban services boundary and along the US 101 corridor. Rural, outlying areas of the county that are not served by public water or wastewater systems will likely continue to develop at lower densities per acre. No development would likely occur on state- or federally owned lands in the county. Also stated on page 2.1-17 of the DEIR/EA, no additional residential construction projects or subdivisions are currently planned in the vicinity of the proposed improvements, so the potential for future residential or commercial development near the project sites is considered very limited. See Grouped Response #8 for a discussion regarding the anticipated increase in truck traffic after construction and under future conditions, which is important to consider when addressing potential impacts and disruption to local communities that might occur as a result of the proposed project. In summary, the traffic analysis conducted for the DEIR/EA indicates no substantial adverse impacts on the roadway, transit, bicycle, or pedestrian systems or their operation within the study area based on the anticipated small increase in heavy-truck traffic through roadside communities, and, consequently, the community impacts analysis and DEIR/EA state that minimal changes are anticipated for the rural character of the area in the proposed project vicinity and for community cohesion. Stated another way, effects on community cohesion are not expected to be substantial under the proposed project because SR 197 and US 199 already separate existing neighborhoods on both sides of the highway, and the small increase in truck traffic under the proposed project would have little effect on changing the ability of residents to cross the highway.

The comment states that significant impacts that cannot be mitigated include an extended period of construction with significant disruption of traffic. See Grouped Response #2 for a discussion of temporary construction impacts.

No revisions to the DEIR/EA are necessary.

Response to Comment 9

This comment states that ecological impacts that cannot be mitigated include the removal of large redwood trees and numerous other tree removals in other locations. It also states that tree root impacts were not adequately identified, root impacts may be extensive, and "these methods are experimental and have not been proven safe for long-term tree health." See Grouped Response #4 for further discussion regarding potential impacts to trees.

Revisions in the FEIR/EA Section 1.3.7 were made to indicate the selected preferred alternatives, including the Two-Foot Widening in Spot Locations Alternative, which avoids cutting large redwood trees, and to clarify root impact analysis for large trees that would not be cut but would be near proposed construction activities. Section 2.3.1 of the DEIR/EA was updated with new information on tree impacts, based on the Forester/Arborist Report (Caltrans 2012), and was recirculated for public comment.

Response to Comment 10

This comment duplicates three paragraphs that were in Comment 6 from EPIC. See the response to EPIC's Comment 6, above.

No revisions to the DEIR/EA are necessary.

Response to Comment 11

This comment states that the traffic study inflated the number of trips per day for lily producers and requests a new analysis. A shared goal of California Environmental Quality Act and National Environmental Policy Act is to ensure that potential environmental impacts of a project are adequately disclosed; therefore a conservative approach is typically taken to ensure that potential impacts are not missed. The traffic analysis for the proposed project follows this conservative approach and analyzes the peak hour conditions of traffic on a spring/summer day when lily bulbs may be likely to be shipped. Recommended practice documents from the Transportation Research Board do not recommend, and the Department does not analyze, traffic on an Annual Average Daily Traffic (AADT) basis.

This comment states that the traffic study used an inaccurate growth rate and requests a correction of the inaccuracy. The growth rates used in the traffic analysis were based on growth rates provided by the Department and are consistent with the Employment Development Department and Department of Finance. The growth rates provided by the Department were derived from the following two sources: "California Motor Vehicle Stock Travel and Fuel Forecast" and "Traffic Volumes on the California State Highway System."

This comment also states that the traffic study estimate of new STAA trucks now and by the year 2030, and the exaggerated growth rate from Del Norte General Plan predictions, seems inaccurate. The estimation of short-term (17) and long-term (92) additional trucks is based on the application of survey data (i.e., latent demand), induced growth, background growth, and induced travel. The numbers in the analysis are based on the data that was provided/available at the time of the study. The analysis is conservative in nature to evaluate the impacts of additional trucks on the respective roadways. See Grouped Response #9 for more information regarding the methodology of the traffic study.

No revisions to the DEIR/EA are necessary.

Response to Comment 12

This comment questions the expenditure of the proposed project funding for the number of additional average daily STAA trucks that the commenter calculated and stated in the previous comment and questions what the threshold of need is for what the commenter considers an expensive project. See Grouped Response #1 and the revised purpose and need section of

Chapter 1 in the FEIR/EA for more information on purpose and need. See Grouped Response #2 for a discussion of costs versus benefits of the proposed project.

No revisions to the DEIR/EA are necessary.

Response to Comment 13

This comment questions whether remote communities will rely less on shipping and more on local self-sufficiency, and whether the needs of the lily bulb producers could be met by a simpler and cheaper solution, such as redesigning lily bulb packaging to accommodate preservation of the bulbs. Alternative shipping technologies are speculative and not a reasonably foreseeable alternative to this project. The traffic analysis is based on current shipping methods and needs of shippers and producers in the region. See Grouped Response #1 and the revised purpose and need section of Chapter 1 in the FEIR/EA for more information on purpose and need.

No revisions to the DEIR/EA are necessary.

Response to Comment 14

This comment states that public scoping requests for alternatives were not addressed, specifically that locations on US 199 needed fixing to address accidents; public controversy for STAA improvements on the 197/199 corridor were ignored, and mandatory exemptions for STAA improvements are likely to result in unsafe STAA conditions. It also mentions that another commenter requested an alternative for safety improvements without allowing STAA trucks on US 199.

Regarding the accidents on US 199 that were referenced, they were not related to STAA trucks, so they did not affect the Department's analysis when determining which locations needed improvements to allow STAA truck access while avoiding offtracking of the trucks into the oncoming traffic lane, which is an emphasis of the purpose and need. Typically, improvements are only included in a project if they address the purpose and need. See Grouped Response #1 and the revised purpose and need section of Chapter 1 in the final EIR/EA for more information on purpose and need. See Grouped Response #8 for a discussion regarding safety and for a discussion about how the project locations were determined. According to email documentation dated August 13, 2010, an investigation was conducted by Traffic Safety staff between Hiouchi and Gasquet on Route 199, between post miles 8.22/8.35 and 6.0/13.0, as requested by Eileen Cooper during phone communications with the Traffic Safety office in August 2010. On March 2, 2012, the Department initiated a formal Traffic Safety investigation on DN 199 from PM 6.0 to PM 12.0 for review of guardrail placement. The Department will be investigating this area to determine if any changes are necessary. As a result of these and other investigations within these segments, new projects have been initiated and are in varying stages of the project development process. In regard to curve locations, at PM 8.3 a major curve improvement project is scheduled and was recommended as a result of a previous Traffic Safety investigation. At PM 9.3, a project recently corrected the roadway subsidence in this area. At PM 9.8, a signing improvement was recommended as the result of a Traffic Safety investigation, and installed on February 26, 2009. These areas were determined by Design Engineer staff to not impede STAA vehicles, and therefore they are not being considered as part of necessary improvements for this proposed project, since the purpose and need of this project are centered on providing safe STAA access and being consistent with federal and state legislation and regional programs, plans, and policies.

See Response to Center for Biological Diversity Comment 6 for a discussion regarding how the Department addresses collisions and determines where, and whether, to propose improvements.

Regarding mandatory design exceptions and the concern regarding safety, Caltrans District 1 is very large geographically and includes the counties of Del Norte, Humboldt, Mendocino, and Lake. The terrain varies greatly and creates many engineering challenges because it is very steep and rugged in many areas along the District's highways. This is the case along most of the 197/199. When challenging conditions and constraints arise, the state engineering standards cannot be feasibly met, thus requiring design exceptions. Therefore, the Department strives to improve the highways, but within the constraints of the existing environment and attempting to avoid or minimize environmental effects. Many routes within District 1 are challenged to meet the state standard shoulder width of 8 feet because of the terrain and/or surrounding environment. Anywhere the Department can feasibly increase the shoulder width along these narrow highways is considered an improvement to the facilities and an enhancement to safety of the traveling public.

Regarding design exceptions for the shoulder widths at Patrick Creek Narrows Locations 1 and 3, these are necessary because of the constraints (i.e., geologic instability on the cut bank above the road, and a commitment to minimize negative effects to the river and riparian habitat on the opposite side of the road) that prevent widening to standard 8-foot shoulders. The state standard for 8-foot shoulders is not the same standard required for routes to be designated as federal STAA routes. STAA-approved highways are those that have broad enough curves and wide enough lanes and shoulders so that STAA trucks do not offtrack into the opposing travel lane. The amount of widening necessary to make the route STAA-approved was determined using a computer modeling software (AutoTURN) with an appropriately dimensioned truck model. Thus, based on the model results, the proposed increases in shoulder width would provide safe STAA access. Bringing the facility to current standards would provide many benefits, but it would have multiple, potentially substantial, environmental effects, and it is not necessary for safe STAA access. The Department is aware and mindful of the need to use a balanced approach in transportation projects and strives to provide the needed improvements while respecting and preserving our environment to the extent that is reasonable and feasible. At Patrick Creek Narrows Location 1, the existing shoulder width varies from 0 to 3 feet, and would increase to 4 feet (DEIR/EA page 1-13). At Patrick Creek Narrows Location 3, the existing 1-foot shoulders would increase to 4-foot shoulders (DEIR page 1-17). This would increase the shoulder width at both locations. From a safety perspective, any increase in shoulder width is an improvement to the existing highway facility. Increased shoulder width creates more recovery area for all vehicle types, increases sight distance, and provides more space for bicyclists and pedestrians. See Response to Environmental Protection Information Center's Comment 8 for more discussion on design exceptions and Grouped Response #8 for a discussion regarding safety.

Regarding an alternative for safety improvements without allowing STAA trucks on US 199, this would not meet the purpose and need. See Grouped Response #1 and the revised purpose and need section of Chapter 1 in the final EIR/EA for more information on purpose and need. See Grouped Response #7 for a discussion regarding range of alternatives and a safety-only alternative. See Grouped Response #8 for a discussion of safety. Also, see Grouped Response #1 for a discussion of how the No Build Alternative would fail to be consistent with the DNLTC RTIP's Highways, Streets and Roads Goal.

No revisions to the DEIR/EA are necessary.

Response to Comment 15

This comment asks why the area between Hiouchi and Gasquet was not included in the DEIR/EA and specifically mentions an area at PM 6.5 as being a narrow curve that the comment suggests seems like it would not accommodate STAA trucks. The Hiouchi-to-Gasquet section of US 199 was identified in preliminary studies (see DEIR/EA Section 1.2.2) used by the Department to identify potential locations that may need improvements to allow STAA access while avoiding STAA trucks offtracking into the opposite traffic lane. The Department made final selection of which locations would need improvements to allow STAA truck access while avoiding offtracking into the oncoming traffic lane by using computer modeling software (AutoTURN; see DEIR/EA Section 1.2.2 and Grouped Response #8). Only the two locations on SR 197 and five locations on US 199 that are included in the proposed project showed STAA trucks offtracking into the oncoming traffic lane using AutoTURN. All other locations that were identified in the above-mentioned reports, including the Hiouchi-to-Gasquet section of US 199, were removed from further consideration for this project because they did not show offtracking by STAA trucks into the oncoming traffic lane, and therefore they did not address the project purpose and need. See Grouped Response #8 for further discussion of how the Department's truck tracking trials and AutoTURN software were used to determine which locations needed to be addressed to allow safe STAA access. Also, see Response to Environmental Protection Information Center's Comment 14 for details on investigations by the Department's Traffic Safety unit and new projects that will address non-STAA safety concerns between Hiouchi and Gasquet.

No revisions to the DEIR/EA are necessary.

Response to Comment 16

This comment states that safe STAA access will not be met at Patrick Creek Narrows Locations 1 and 3 because mandatory design exceptions would be required. See Response to Environmental Protection Information Center's Comments 8 and 14 for a discussion regarding mandatory design exceptions and Grouped Response #8 for a discussion regarding safety. Also, the Department considers safe STAA access to be STAA truck travel that avoids offtracking of STAA trucks into the oncoming traffic lane; therefore, mandatory design exceptions do not relate to, and are not a measure of, the Department's consideration of safe STAA access.

No revisions to the DEIR/EA are necessary.

Response to Comment 17

This comment does not provide a comment on the DEIR/EA. The comment mentions text in the DEIR/EA regarding excavation of the slope at Patrick Creek Narrows Location 2, past geologic instability, anticipated rockfall, and mandatory design exceptions. See Response to Environmental Protection Information Center's Comments 8, 14, and 16 for more information regarding design exceptions, Grouped Response #8 regarding discussions on safety, and Grouped Response #10 and Response to Environmental Protection Information Center's Comment 19 regarding geologic instability.

The comment also includes a statement about significant scenic impacts that cannot be mitigated, but the comment does not state where or what the statement is specifically referring to. See Grouped Response #3 for discussions regarding visual resources and effects.

No revisions to the DEIR/EA are necessary.

Response to Comment 18

This comment does not provide a comment on the Draft EIR/EA. The comment repeats a portion of the Draft EIR/EA regarding the alternative of widening toward the river at The Narrows that was considered but eliminated from further discussion and mentions that sliver cuts will be done instead.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 19

This comment considers the threat of rockslides to be a significant public health hazard and the proposed permanent rock retaining curtain walls to be a significant scenic detriment. Please see Grouped Response #3 regarding a discussion of visual effects and Grouped Response #10 for a discussion about proposed cut slopes and geological stability.

The comment also asks for an enumeration of all cut slope areas for each alternative, type of rock or material, and the quantity of material to be excavated at each location. It also requests highway patrol data on rockslides on SR 197/US 199 throughout the last twenty years, a history of slope cutting work on this corridor, and preventative measures that were done in that time period. This portion of the comment does not address the DEIR/EA or purpose and need. Data or information, such as what is being requested, that does not pertain specifically to the project may be requested through the public records act request by contacting the Department’s District 1 Claims Officer, Kathy King.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 20

This comment recommends a “safety only” alternative. This comment does not provide a comment on the Draft EIR/EA. Please see Grouped Response #7 for a discussion of the "safety only" alternative.

No revisions to the Draft EIR/EA are necessary.

Friends of Del Norte

Friends of Del Norte

P. O. Box 229
Gasquet, California 95543
friendsdelnorte@yahoo.com

Protecting the WILDLANDS, WATERS and WILDLIFE of Del Norte County Since 1973.

Caltrans
Attn: Kim Hayler
Environmental Coordinator
PO Box 3700
Eureka, Ca. 95502

August 20, 2010

Comments for the Draft Environmental Impact Report/Environmental Assessment on the Hwy.199/197 Project to allow the passage of STAA Trucks.

Dear Ms. Hayler and Project Staff,

The members of the Friends of Del Norte deeply appreciate the professional approach and hard work demonstrated by Caltrans staff to fulfill the guidelines for the DEIR/EA for your project on Scenic Highways 199 and 197. Because these highways serve as the gateway to Del Norte County and Redwood National Park, it is imperative that we all give our best effort to do the right thing on this project.

The following pages contain our observations based on the information you have provided in the DEIR/EA. We hope that Caltrans staff will give serious consideration to our observations and concerns. Our foremost concern is the serious lacking of a demonstrated need by our local business and industry for this project. Your DEIR/EA shows that this project at best gives minimal benefits to our local economy. We are also disappointed to find that you have not addressed the fact that this project on Hwy.199/197 is directly tied the Humboldt County project in Richardson Grove as it creates an STAA Trucking loop from Richardson Grove to the Collier Tunnel that will have lasting impacts on local motorists. The following pages give detailed information for these and other concerns. 1

Don Gillespie Aug 20, 2010

The Friends of Del Norte is non-profit group advocating sound environmental policies for our region.

Friends of Del Norte

STAA 199/197 DEIR Comments and analysis

Contents:

Lack of Need for the purpose of the projects, STAA access

Scope of projects and range of alternatives inadequate:
Hwy improvements between Hiouchi and Gasquet are needed.
Project spot locations are insufficient to provide safe STAA access

Public scoping requests for alternatives are not addressed
Public controversy for STAA 199/197 improvements ignored

Mandatory exemptions for STAA improvements likely to result in unsafe STAA conditions

Significant impacts that cannot be mitigated:
Significant public safety hazard resulting from mandatory exemptions;
Significant increased public safety hazard of landslides and rock slides;
Significant scenic impacts

Significant property right of way acquisitions of small privately developed residential parcels; disruption of a community;
Extended period of construction with significant disruption of traffic;
Significant ecological impacts;
Tree Root impacts not adequately identified, impacts to roots extensive

Preferred DEIR alternatives have fewer impacts, as listed:
Ruby2, 2' spot location improvements
Patricks Creek Narrows #2: Down Stream bridge replacement with retaining wall/via duct
Washington Curve, retaining wall

Lack of Need demonstrated for the proposed projects: safe STAA access

The DEIR has failed to demonstrate need for the main purpose of these highway projects: the need to provide access for STAA vehicles. In fact, the DEIR traffic surveys have demonstrated a clear lack of substantive need. The DEIR traffic study makes erroneous and misleading calculations about additional daily trucks. 2

The total project costs would be very great, especially if the DEIR scope, or range of the projects

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is found to be insufficient and additional tight spots, railings, and rock slides are found to need correction. A Comprehensive Study of Routes 197/199 dated June 1998, Del Norte Local Transportation Commission, estimated costs at $29 million. A Report to Improve Mobility and Accommodate Large Vehicles on Routes 197 and 199 in Del Norte, dated March 2006, Cal Trans District 1, estimated the costs of projects in the DEIR to be about $34 million. The DEIR estimate, with a limited scope, is approximately $22 million. 2 cont.

To justify such a great expense, the DEIR should demonstrate a substantial need for STAA trucks. However, the DEIR Traffic Analysis Study by Fehr and Peers 2010 reveals quite the opposite. The Fehr and Peers traffic study conducted a detailed survey of businesses that use or provide trucks. Both producers and shippers were asked many questions about current truck use and potential use of STAA trucks. The results of this survey are astonishingly clear, the need for STAA trucks is limited and unsubstantiated.

Most potential users such as Home Depot, Reddaway Shipping, United Van Lines/Mayflower, Safeway, Unified Western Grocers, Rumiano, Green Diamond, Custom Trucking, Joe Costa, etc, clearly stated that STAA access would not affect them, nor benefit them, and that they would not be putting STAA trucks on the road.

The only user exception that would have an apparent benefit is the local lily bulb industry. Fehr and Peers summary confirms this.

Most potential users answered the survey questions with a resounding NO:

Home Depot indicated that they would not change the number of shipments or shipping patterns in the event of STAA improvements because shipping patterns to regional stores are already well established.

For most producers, when asked if a restriction of truck size in Del Norte is an impediment- they answered NO. As stated, this is because most shipments max out on weight, and the smaller California legal trucks are sufficient.

Most shippers stated they have no underweight trucks, are currently using CA legal trucks, and would continue to do so after improvements are made.

For most producers, when asked would STAA 199/197 improvements create expansion opportunity- they answered NO or doubtful.

Fehr/Peers traffic analysis estimates that a mere 8 STAA trucks per day under existing conditions, would use the improved highway (page ES 2-4 Fehr and Peers, latent demand). But this is an inflated, inaccurate figure, as shown by the following examination of the survey. 3

?On page 11, Fehr/Peers, why was one additional daily truck added for wood products? Wood chip, lumber, and grain shipper Joe Costa clearly stated that his trucks max out in weight so he would not change to STAA, and none of his trucks switch from STAA to CA legal now. Green Diamond lumber survey stated they are maxed out by weight, and they don't need or use larger trucks. Goselin Trucking stated no changes and they would not chain trucks. They ship lumber out and groceries in.

?South Coast Lumber is the exception, and they do 10 loads per week with anticipated 10% increase with STAA access. That comes to one more truck per week, or 1/7 additional daily average truck. Why did the DEIR add more than this? This increase may be offset by

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consolidation of loads by current users such as Hambros.

Hambros is a noted other exception for being enthusiastic. And Opie cars in Eureka is another noted exception. 3 cont.

From the survey answers the wood and lumber industry would not for the most part be making changes, as their California trucks are already maxed out in weight.

?On pages 10- 11, Fehr/Peers, inaccurately add daily trucks for retailers/general shippers, when the major retailers and shippers clearly stated that there would be no change in patterns or number of shipments, that there are no underweight trucks and no combining opportunities, and there is no impediment due to truck size. Please explain this unsupported addition for retailers/shippers. 4

Home Depot stated that they use Reddaway, and Reddaway answered NO to underloaded trucks (they use all smaller CA legal trucks, because of weight max out); NO to combining loads opportunities; NO to changing routes; and doubtful change in number of trucks or demand with STAA improvements. The other shippers answered no as well: United Van Lines/Mayflower uses NO underweight trucks; will have NO combine loads opportunities and NO demand changes. Custom Trucking, a shipper of groceries, also maxes out on weight and would not combine or chain loads onto STAA type trucks.

Goselin Trucking stated no changes, and substantiates a potential hazard concern that the Friends of Del Norte previously raised: that many drivers out of the area (STAA drivers) aren't used to driving our narrow highway. Even if the spot fixes are done, Hwy199 will remain narrow and winding and inherently dangerous. Local drivers know this.

The Producers answered NO: Safeway said NO to #2: Is restriction of truck size in DN an impediment? And they answered NO to #3: Would STAA improvements create expansion opportunity? And so did Rumiano Cheese producer answer NO to all as well.

An additional 2.5 STAA trucks per day for lily producers seems very inaccurate as well. Bulb producers have estimated a total 150 round trips for the entire year. They do this over a two month period. That makes 75 (75/30) or 2.5 trucks per day, but only during the two month shipping period. The rest of the months are not shipping months, and register 0. But Fehr and Peers incorrectly indicate 2.5 new trucks per day for lily bulbs, and then inaccurately project that figure out for long term yearly figures. This is no little mistake. 2.5 times 365 results in a yearly exaggeration of 600% more lily bulb trips than exists. Please explain, and more appropriately show what the additional yearly truck rate would be for the different categories, rather than the daily additional truck load. Then extrapolate long term. 5

A more accurate figure for daily average lily bulb trips is a mere 150/365= 0.41 additional daily trucks on average. Other additions or reductions from consolidation are not quantifiable, and may cancel each other out. it might be prudent to place the total increase at 1 additional average daily truck.

Looking towards the future, to predict how many STAA trucks will be on the road in the year 2030, Fehr and Peers uses an annual growth rate of between 1 and 2% per year, on average precisely 1.44, to determine future use of trucks. Their results are again inaccurate. They claim they use Department of Finance (DOF) figures. However, a call on Aug 15, 2010 to lead planner of Del Norte, DOF for the last several years has been running at .994% for Del Norte County. Please

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correct the inaccuracy.

The DEIR calculation of 8 new STAA trucks per day now, and 92 trucks by the year 2030 is inaccurate and baseless. 5 cont.

The actual survey question results indicate only the lily bulb producers will be adding a significant number of trucks to the new STAA highway during two months of the year. With few other limited exceptions, and the chance to consolidate current user loads, and thus cancel exceptional additions the only clear additions are the lily bulb users. They would put 0.41 new trucks on hwy 199/197 daily on average now.

According to our calculations, there would be at most, 2 average daily additional trucks by 2030, due to STAA changes, using DOF .994% growth.

Fehr and Peers uses an inaccurate exaggerated growth rate from the Del Norte General Plan predictions, which have proved to be inflated, and outdated. A phone call to Del Norte County Planning Dept., on August 16, 2010, lead planner stated that by the year 2010, at 2% Del Norte General Plan predicts a population of 41,000. However, we only have a population of about 29,547. And that for the very most recent years, State Dept. of Finance figures, as of July 1, 2009, the countywide growth has been slightly under 1% or .994%. So shouldn't the DEIR predictions be recalculated at a realistic rate? Please recalculate.

Is it reasonable and prudent to spend $20 to $34 million dollars to accommodate .41, or at most 1 additional daily average STAA truck now, and only about 2 additional daily trucks by the year 2030? What is the threshold of need for such an expensive project? How is this judged? The proposed actions do not seem reasonable or prudent. 6

Long term predictions, about how fossil fuel will be used in the far off future seems very precarious and uncertain. Will remote, agricultural communities rely less on shipping and focus more on local self sufficiency, providing valuable food essentials, rather than long distance shipping of luxury goods? 7

Couldn't the current needs of the lily bulb producers, 150 trucks per year, each traveling 160 miles out of their way, be met by a simpler solution than spending as much as $34 million to slightly increase the radius of some curves in the highway?

Upon researching just why lily bulb producers need STAA trucks, it appears that lily bulbs require air circulation while packed, because bulbs generate heat. And it is important to have cool lily bulbs, and air circulation. So, the truck space is taken up by peat moss and air gaps in the boxes, as well as lily bulbs. If we could cleverly redesign lily bulb packaging to reduce this airspace/peat moss space, while retaining coolness and air circulation, then more bulbs would fit in a CA legal truck size, and ship more efficiently, weight wise. Wouldn't it be prudent to investigate this alternative? And is the easter lily bulb need so great as to necessitate these expensive projects?

8

Scope of projects and range of alternatives inadequate:
Hwy improvements between Hiouchi and Gasquet are needed
Limited project locations are insufficient to provide safe STAA access

Public controversy for STAA 199/197 improvements was ignored.
The mandatory exemptions for STAA improvements will result in unsafe STAA conditions.

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During scoping for the DEIR, Dory and David Bruce presented extensive detailed traffic accident history and analysis that clearly identified trouble spots between Hiouchi and Gasquet on hwy 199 that needed fixing. They raised concerns about extensive narrow segments without railing, and tight turns. We resubmit that information, and ask that the scoping comments be acknowledged in the record. As you can see from their diagrams and traffic records, some of the highest accident rates exist between Gasquet and Hiouchi. And yet no improvements are planned for this area. What is considered one of the most dangerous blind turns on the road exists at PM 6.2-.5, near Monument drive. The winding grade to the east of this blind turn is also treacherous. Recently 2008, a terrible diesel oil spill occurred here at PM 11.38, that put many gallons of fuel into our Wild and Scenic Smith River, also the source of our drinking water (please see attached news articles.) And yet no project alternatives are proposed within this area. Their concerns were completely ignored in the DEIR. There are no explanations of why these areas are not being addressed, and why the scope or range of projects is so limited, given the accident history and the physical characteristics that exist between Hiouch and Gasquet. 8 cont.

Eileen Cooper submitted brief comments asking for an alternative that focused on safety improvements without putting STAA trucks on hwy 199.

Many residents from the Hiouchi community on Hwy 199/197 and Gasquet on Hwy 199 voiced opposition at meetings. And yet the DEIR proceeded merrily along, ignoring the controversy, and actually proclaims:
"No significant public controversy has been raised for a particular project location or alternative."

Why does the DEIR ignore these public concerns and requests for alternatives? Was the scope and range of the project alternatives predetermined, regardless of public inquiry?

We now submit past studies that were aimed at defining what needed to be done to fix highway 199/197. Somewhere between these past studies and the DEIR, improving the area between Hiouchi and Gasquet was dropped for no apparent reason. Why is this? Please explain. 9

The turn at the the USFS Monument, near Hiouchi, approximately PM 6.5, is almost a 180 degree tight spot, with dangerous blind egress at Monument Drive and uphill. Solid rock walls tower straight above you with an inadequate shoulder buffer, and the river looms below on a straight drop downward. You can trace the truck scratches on the towering rocks. It is one of the more spectacular places in Del Norte, where views of the forks of the Smith River are breathtakingly beautiful, if only you could enjoy them, because you are litterally holding your breath around this turn. And now somehow, we are going to put two STAA trucks passing each other on this turn, without any improvements. **Please explain?**

The Comprehensive Study of Routes 197 and 199 by CALTrans District 1, June 1998, clearly identified (page 15 attached) improvement needs here at PM 6.2 to PM 12.87 costing $9 million. What happened to consideration of the improvement needs here?

The DN 197/199 Corridor Extra Legal Load and STAA Vehicle Accessibility Study, March 2006, page 6, describes taped truck trials to determine dangerous turns, stating
"Although these trials were conducted under CHP escort and <u>at speeds lower than typical truck travel</u>, the tapings illustrate the offtracking trucks demonstrate through tight radius curves."

If you drive slower, you can take turns much tighter. Every driver knows this. So, isn't it possible that some dangerous spots might have been overlooked? Was there any compensation for the deviation due to slower speeds during the tests? What kind of compensation? Shouldn't questionable spots be retested at actual use speeds for realistic results and recommendations?

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Gmail - final staa 199/197 comments

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This document, page 7, also says:

"Input concerning all pertinent issues from public agencies, California Highway Patrol (CHP), transportation industry representatives and the public is essential before the change can be implemented." What were the recommendations of CHP? 9 cont.

The public also had some great advice, reduce speeds on Hwy 199/197 to prevent accidents. The DEIR states that safety improvements can be considered when accident rates reach 1.5 times the national average for similar road conditions. What exactly does similar road conditions mean, and what did you exactly compare hwy 199/197 to for National Average ratings ? We should know this information specifically to judge as to whether a fair comparison was made.

Some of the ratings given for various segments of 199 are much higher than the national average, but they are not quite above 1.5 times.

Please do not continue to ignore public input.

Mandatory exemptions for STAA improvements likely to result in unsafe STAA conditions 10

Even within the proposed project alternatives, the goal of providing safe STAA access will not be met at two locations.

"A Mandatory design exception would be required."

The DEIR mandatory exemption reason is geologic instability, prohibiting cutting into the slopes for adequate widening of the road.

DEIR page 1-17, Patricks Creek Narrows #3 location-
"does not meet Department standards for shoulder widths and clear recovery zones."

DEIR page 1-13, Patricks Creek Narrows #1 location-
"Does not meet Dept. standards for shoulder widths." The slopes consist of "unconsolidated cobbles and boulders."

Significant impacts that cannot be mitigated: 11
Significant public safety hazard of landslides and rock slides
Significant scenic impacts that cannot be mitigated

For Patricks Creek Narrows #2, DEIR page 1-15, The common element for all proposed construction alternatives will excavate 20,000 cubic yards from the existing rock cut slope, 100 feet above the highway, exposing 1 acre of newly excavated rock slope. Rock fall is expected after construction, and permanent rock-fall mitigation will be required.

DEIR Page 2.2-20/21- Patricks Creek Narrows #2, All alternatives require excavation from the existing cut slopes. The natural hillslope above the proposed retaining wall shows evidence of past instability.

The DEIR acknowledges that the upslopes along this river corridor have great geologic instability, and that is the reason given for mandatory exemptions, to reduce excavation. And yet, we are exacerbating this problem wherever extensive cut slopes are proposed.

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DEIR Page 1-17 The Narrows, widening toward the river was considered too costly, so it was dropped. Widening will be by excavation into the cut slope- into "soft material," with heights of up to 15 feet on irregular rock slopes with vertical overhanging. Sliver cuts will be done. 12

DEIR Page 2.2-18 The Narrows has moderately to intensely fractured existing cut slopes, and rock falls affect this road.

DEIR Page 2.2-21 "Excavation of sliver cuts may decrease slope stability resulting in increased potential for rock fall and landslides as well as increased erosion."

DEIR Page 2.2-20 Washington Curve- The cut slope alternative seems very dangerous. There is the potential for rock fall and "pop-outs" after construction is complete. Could you please describe a pop-out. The current design has 2 - 8.5 foot wide paved shoulder and approximately 3 foot wide unpaved ditch to provide a catchment for falling rock. 13

Past highway improvement cuts have already resulted in severe, continuous rockslides, and permanent unattractive curtain retaining mechanisms are proposed as mitigation at various locations. The Smith is designated as a Wild and SCENIC River, and the beauty of the river corridor is important to us, and our largely tourist economy. We consider the suggested permanent rock retaining curtain walls to be a significant scenic detriment; and the increased falling rock hazards due to new extensive excavations to be a significant public health hazard that cannot be fully mitigated. The DEIR does not acknowledge these significant impacts that cannot be mitigated. 14

We ask for a summary enumeration and total of all cut slope areas for each alternative, and the type of rock or material, and the quantity of material to be excavated at each of these sites/alternatives.

The DEIR asserts rockslide hazards from slope cuts can be mitigated using unattractive nets. We disagree, and ask for data about Hwy 199 to substantiate such claims. There are continual rock slides along our highway at various places, due to road cuts. We ask for highway safety/patrol history data on rock slides along Hwy 199/197 throughout the last twenty years or so. And we ask for a history of slope cutting roadwork on 199/197, and preventative measures that were done in response during this period of time, to substantiate that hazards from slope cuts can or cannot be mitigated satisfactorily with the kind of severely fragmented rock facings that exists on Hwy 199.

The cumulative hazard impacts from existing and newly planned slope cuts is a substantial hazard that cannot be mitigated adequately. 15

One statement by truck drivers and critics alike is that it would be a good thing to make the highway safer. And the public asked for an alternative that focused on highway safety alone, without consideration of accommodating STAA trucks. Many residents view putting large STAA trucks on our 199/197 road to be a significant road hazard. Such a safety only alternative would use a more gentle approach, with slight widening of shoulders in dangerous spots. Such a safety only alternative could significantly lessen the need for cut slopes on cobbled landslide prone hills. Such a safety only alternative would not require transforming an essentially back country road like 197 into a super truck hwy. It would leave the neighborhood along 197 in tact. Please consider the public's request. It may not be your choice, it may not be as easily fundable, even though it would be far less expensive, but it is many people's choice.

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Extended period of construction with significant disruption of traffic 16

The DEIR page 2.4-23, confirms that there will be significant impacts of disruption of traffic. Washington Curve retaining wall will have 175 to 300 day of nightime closures.
Patricks Creek Narrows #1-3, will have 80 to 100 days of full hwy closures without detour for 1 hour delays.

These closures are a significant hazard for emergency vehicles. These closures will be significantly damaging to the important tourist economy of Del Norte. Most excavation work needs to happen during the dry summer months, when our tourist season is in full swing.

Disruption of a community:
significant property right of way acquisitions of small privately developed residential parcels 17

The DEIR claims that there will be no community discontinuity effects, as the residential community of Hiouchi along hwy 197 is not recognized as existing. We disagree, and consider the residential neighborhood along 197 and close to 199 to be a part of the community of Hiouchi. Residents walk, bicycle and drive to the nearby Jed Smith Park, and the Hiouchi Market. Along 197 residents cross frequently to visit each other and to go for a swim in the river, or to visit the riverside parks. There is frequent egress across and along the road to do all these activities. This is not a good place for a super truck hwy. What is the basis of conclusions about no community disruption?

The 197 Hwy improvement project will require extensive right of way acquisition of many small parcels. Roadside buffers and vegetation will be removed, leaving homes more exposed to noise and without vegetative screening. Some homes will become significantly devalued as a result. Mitigation cannot always compensate for such significant disruption that such a large project can have. Homes will become less private and less enjoyable. How are you going to mitigate for these effects? 18

If Caltrans has not carefully field marked the areas of intrusion, property owners may not be aware of the full impacts. Has the impact field been marked?

Significant ecological impacts:

Tree Root impacts not adequately identified 19

Although the DEIR does a good job of identifying where all potential tree removals will be, it does not identify where or how many tree root systems will be effected. Only one paragraph is devoted to tree root damage mitigation, stating hand tools will be used around tree roots. However, hand tools can significantly damage and kill trees as well. Mitigation for tree loss should take these damaged trees into consideration as well. Please provide adequate information to evaluate and mitigate this impact. Adequate protected lands is the mitigation of our choice. How many trees are likely to have their roots damaged in the Ruby2, two foot spot location alternative, which is the alternative of our choice? Where are they located?

Northern Spotted Owl and Marbled Murrelets Impacts
Enumerated on pages DEIR 2.4-75 through 2.4-77, is foraging and dispersal habitat permanently taken from these listed endangered and threatened species. We ask for replacement of these losses, by land aquisitions into protected status. No compensation for these losses has been offered or mitigated. As enumerated: 20
Ruby 1 .16 acres

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Ruby2	.25 acres- 2' spot locations
PCN 1	1.00 acres
PCN 2	3.00 acres- downstream with retaining wall
PCN 3	.30 acres
Narrows	.40 acres
Wash.C	.60 acres- retaining wall
Total	5.71 acres

20 cont.

Preferred DEIR alternatives as listed:

21

The no build alternative is our preference. However, we do support safety enhancing projects to make current access safer. We reiterate our previous statements concerning a safety only alternative:

Truck drivers and critics both agree that it would be a good thing to make the highway safer. The public asked for an alternative that focused on highway safety alone, without consideration of accommodating STAA trucks.

Looking at the choices that were presented within the DEIR, our preferences are as follows:

22

Ruby2, Two foot spot location improvements

The Ruby2, two foot shoulder spot location improvements is preferred because there are fewer impacts to trees, including old growth trees, less habitat impacts to endangered and threatened species, less grading and sediment issues, and fewer impacts to the neighborhood in general.

Patricks Creek Narrows #2: Down Stream bridge replacement with retaining wall or via duct is our preferred alternative. Either one is fine with an arched bridge, because there will be less dangerous grading of steep upslopes, with less geologic hazard, and less potential sediment and landslide impacts. The scenic impacts are important here.

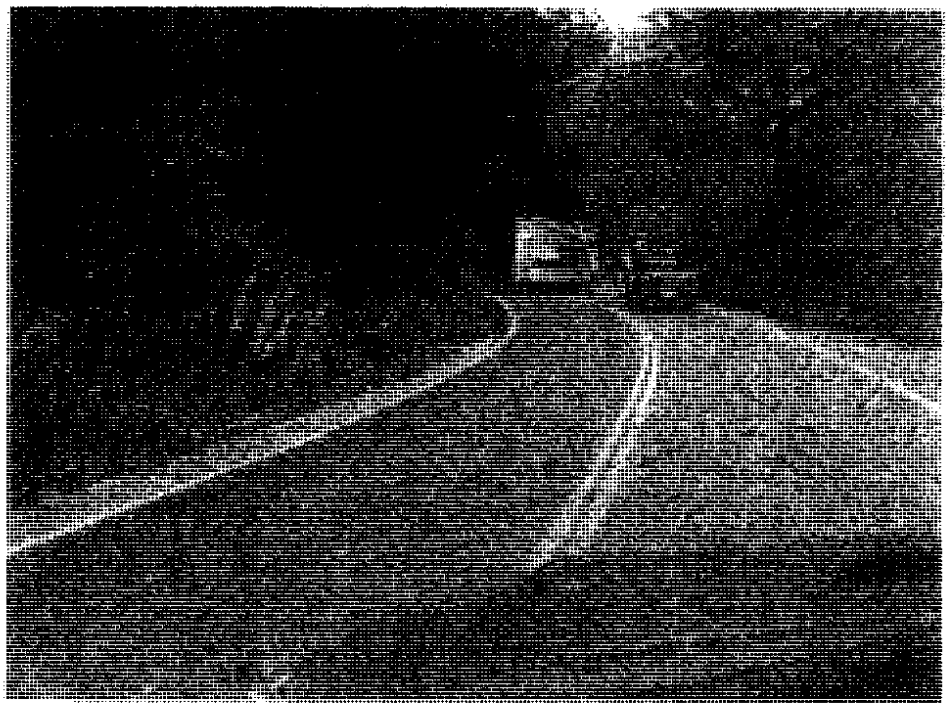
The Washington Curve retaining wall is our preferred alternative, again because of significant landslide concerns, resultant sediment issues, and scenic impacts from extensive upslope grading. There would be significantly less total excavation necessary. Aesthetic treatment is important.

Thank you for your consideration and attention to our comments.

Don Nikkema
Friends of Del Norte
4/6 2075 Kenseley Rd.
Crescent City, Ca
95531

Friends of Del Norte

DN-197/199 CORRIDOR EXTRA-LEGAL LOAD AND STAA VEHICLE ACCESSIBILITY STUDY



A Report to Improve Mobility and Accommodate Large Vehicles on Routes 197 and 199 in Del Norte County

MARCH 2006

Friends of Del Norte

This study was produced by Caltrans District 1, Office of Permits. The point contact for this study is:

Mr. Daniel Wing
Truck Services Manager
Caltrans District 1
1656 Union Street
Eureka, CA 95501

Telephone: (707) 441-5875
Email: dan_wing@dot.ca.gov

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TRUCK TRIALS

Since 1983, videotaping of truck trials have been staged on various highways within District 1. The Traffic Operations/Permits offices were involved in tapings beginning in 1994, covering several routes within District 1, including Routes 197 and 199 in Del Norte County. Prior to 1994, truck trials on various routes in Districts 1, 2 and 3 were taped by HQ & CHP personnel but did not include the DN-197/199 corridor. These tapings typically utilized longer vehicle combinations and did not address wide loads until 2003.

EXTRA-LEGAL LOAD TRIALS

Two truck trials to simulate permitted wide loads were taped in January and May of 2003. The January trial used a tractor-low boy combination of 10' wide and 65' overall length and the May trial utilized a 12' wide lowboy, 85' long. As expected, these trials demonstrated that when load widths approach the limits of existing lane widths, the oversize trailers would off-track onto the double yellow stripe and into the opposing lane.

STAA TRUCK TRIALS

The two most recent STAA truck trials on Routes 197 and 199 took place in August of 2003 and October of 2005. The August 2003 taping utilized a tractor-trailer combination of 71.5' overall length with a 53' trailer with 40' king pin to rear axle setting (KPRA). The October 2005 taping employed a longer tractor than used before to achieve a 75' long combination to better illustrate the industry standard. The latest taping also used a 53' trailer with 40' KPRA setting. Results of the latest trial with the longer vehicle did not produce evidence of additional off-tracking incidents that had been documented in earlier trials.

Evidence from these most recent trials validates the 1997 study of Route 199, which identified 12 areas in need of improvement for STAA access. Although these trials were conducted under CHP escort and at speeds lower than typical truck travel, the tapings illustrate the offtracking trucks demonstrate through tight radius curves. Route 197 was deficient at two locations.

Commenter-highlighted text

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EXTRA-LEGAL LOAD RECLASSIFICATION

Route 197

While improvements to Route 197, especially in width clearance, would assist in the overall safety of the route, none are required, as it is currently classified as a Modified Brown route with respect to permitted loads.

Route 199

The DN-197/199 Route Review Committee improvement strategies identified four locations in need of improvements in order for Route 199 to return to a Modified Brown route. Three of those locations that have been completed are as follows:

- A Minor B project to widen the northerly approach to Bridge #01-0015 (PM 24.1/24.2) was completed in 2002.
- The Washington Hill project (PM 26.1/26.3) widened the left shoulder of DN-199 and was completed in 2002.
- The Windy Point project (PM 26.7/26.9) implemented curve improvements and was completed in 2001.
- The Narrows proposed project (PM 22.7/23.0) to widen the left shoulder and achieve a 28' total width.

The fourth location at 'The Narrows' (PM 22.7/23.0) has been programmed in the District 1 SHOPP program and is currently under design. It will provide 12' lanes and 2' shoulders, this project is scheduled to go to construction in the summer of 2008 and upon its completion, Route 199 will be reevaluated with regards to extra-legal load classification. It is anticipated that this section of Route 199 from Bridge #01-0019 to the Oregon border will be reclassified back to the Modified Brown rating.

Reclassification of routes for permit loads required following guidelines set forth by the Caltrans' Office of Truck Services in HQ. Input concerning all pertinent issues from public agencies, California Highway Patrol (CHP), transportation industry representatives and the public is essential before the change can be implemented. The Office of Truck Services in HQ has developed a Route Color Classification Guide for requests to classify/reclassify a State route. This guide may be viewed in Attachment A.

Commentar-
highlighted text

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Friends of Del Norte

COMPREHENSIVE STUDY

OF ROUTES 197 AND 199

CALIFORNIA DEPARTMENT OF TRANSPORTATION
DISTRICT 1

IN COOPERATION WITH

DEL NORTE LOCAL TRANSPORTATION COMMISSION

JUNE 1998

Friends of Del Norte

Comprehensive Study of Routes 197 and 199

- **Additional scenic overlooks**: Caltrans would work with the US Forest Service and the State and National Parks to establish additional scenic overlooks on Route 199. Scenic overlook locations should be identified early, so their construction can be coordinated with other highway improvement projects (e.g., roadway rehabilitation projects).

The strategy for the portion of Route 199 from Route 101 to Hiouchi (KP T0.8/10.0 or PM T0.5/6.2) would be "maintain and rehabilitate at existing width". Safety improvements should be made when justified under the safety program. Most of this portion of Route 199 is within the Jedidiah Smith Redwoods State Park, and widening for capacity or STAA trucks is not considered to be an option.

- **Estimated Cost (upgrade to accommodate long trucks)**

The following is a summary of the estimated cost for improvement of Route 197 and Route 199 (from Route 197 to the California/Oregon State Line) to a 9.75-m (32') wide facility. This cost information is from Caltrans Traffic Operation's staff in their "Large Truck Highway Improvement" report. The 9.75-m (32') width used for this estimate was based on historic 2-lane highway development on Route 199; no concept width standard has been selected for these Routes. Costs cited are preliminary estimates, and should only be used in gauging the approximate magnitude of the cost of improvements. Such preliminary costs are often low, since not all of the geological or engineering problems that exist are readily apparent.

A few shoulder obstructions would continue to exist along Route 199 between Route 197 and Hiouchi (generally Redwood trees in Jedidiah Smith Redwoods State Park), and the Collier Tunnel (7.92-m or 26' wide) would not be widened. Estimates do not include any work on Route 199 between Route 101 and Route 197.

SUMMARY OF ESTIMATED COSTS FOR IMPROVEMENT ROUTES 197 AND 199 9.75-m or 32' WIDE SECTION

LOCATION	ESTIMATED IMPROVEMENT COST
DN-197-KP 5.26/11.39 (PM 3.27/7.08)	$ 4 MILLION
DN-199-KP 9.98/20.71 (PM 6.20/12.87)	$ 9 MILLION
DN-199-KP 32.25/35.28 (PM 20.04/R21.92)	$ 1 MILLION
DN-199-KP 35.58/38.95 (PM 22.11/24.20)	$ 12 MILLION
DN-199-KP 40.25/44.26 (PM 25.01/27.50)	$ 3 MILLION
TOTAL ESTIMATED IMPROVEMENT COST	$ 29 MILLION

Comments highlighted text

Friends of Del Norte

Draft Comprehensive Study of Routes 197 and 199

- Consistency With Other Planning Efforts: This type of improvement would be less compatible with Six Rivers National Forest, Redwood National and State Parks, and Del Norte Economic Development Corporation planning than other potential strategies.

- Public Support: We heard little or no support for this type of improvement strategy at our agency and public scoping meetings for Routes 197 and 199.

Route Reliability

The high cost and environmental impacts to assure reliability through unstable areas of Route 199 limits our ability to do so. Further, the slides of the past several years were more active than previously experienced. When slides are active (continual rock fall), maintenance or construction crews cannot start slide removal until it is safe to do so. Our Maintenance Engineering Branch is currently investigating the use of remotely controlled loaders, which in the future may allow us to initiate road-opening activities, even during active rockfall periods. Under any strategy selected, Caltrans maintenance staff will work to minimize the length of road closures.

IMPROVEMENT STRATEGY SELECTION

The Del Norte Local Transportation Commission recommended the "Upgrade Routes 197 and 199 to Accommodate Long (STAA) Trucks" alternative improvement strategy to Caltrans Management at their April 9, 1998 meeting, with the following modifications:

- Reduce the minimum width requirement of 32' where feasible, while still addressing safety concerns and accommodating STAA trucks. Commenter-highlighted text
- Reduce the number of proposed additional passing lanes.
- Enhance the recreational opportunities and experiences.

Caltrans management concurred with this strategy in May of 1998, conditional on further study of segments where environmental factors, including large Redwood trees, could preclude upgrading to STAA truck standards. It is anticipated that the study would include a Project Study Report (PSR) that would identify and estimate the cost of projects to accommodate STAA trucks at these locations. (Route 197, KP5.3/9.8 or PM 3.3/6.1 (portions) and Route 199, KP 36.0/37.3 or PM 22.6/23.2). Commenter-highlighted text

FUTURE PLANNING

Caltrans staff will identify and recommend priorities for specific candidate projects to accomplish the "Upgrade Routes 197 and 199 to Accommodate Long (STAA) Trucks" alternative selected by the Del Norte Local Transportation Commission and Caltrans Management.

Responses to Friends of Del Norte

Response to Comment 1

This comment states that the commenter's main concern is that they see a lack of demonstrated need by local business and industry. It also states that the project gives minimal, if any, benefits to the local economy. Please see Grouped Response #1 and the revised purpose and need section of Chapter 1 in the Final EIR/EA for more information on purpose and need. See Grouped Response #2 for a discussion of anticipated benefits from the proposed project.

The comment also states that the DEIR/EA did not address the STAA trucking loop from Richardson Grove to the Collier Tunnel or associated impacts to motorists. See "Land Use" under Section 2.5.3.2 in the DEIR/EA, which states "The traffic analysis conducted for future (2030) conditions considered the effects of future background regional growth as well as the effects of the Richardson Grove Improvement Project on traffic from heavy trucks. By including the effects of regional growth and the Richardson Grove Improvement Project, the traffic study's assessment of future (2030) with-project conditions serves as a cumulative impact assessment of the change in the number of heavy trucks along the SR 197–US 199 corridor. Under future (2030) with-project conditions, an additional 92 one-way trips from heavy trucks are projected along the SR 197–US 199 corridor, with the percentage of total average daily trips attributable to heavy trucks increasing from 15.0% to 17.9% along SR 197, from 10.0% to 11.4% along the segment of US 199 between SR 197 and Gasquet, and from 17.0% to 19.2% along the segment of US 199 between Gasquet and the California/Oregon state line. The traffic analysis concludes that increased traffic from heavy trucks would be minimal along the SR 197–US 199 corridor, indicating that increases in truck emissions and noise, as well as resulting effects on the health and aesthetics of local communities along the route, would also be minimal."

No revisions to the DEIR/EA are necessary.

Response to Comment 2

This comment states that the DEIR/EA failed to demonstrate need for the purpose of the project, particularly with the traffic surveys, and the traffic study makes erroneous and misleading calculations about additional daily trucks. See Grouped Response #1 and the revised purpose and need section of Chapter 1 in the Final EIR/EA for discussions on purpose and need. Please see Grouped Response #9 regarding the comment that the traffic study makes erroneous and misleading calculations about additional daily trucks.

This comment also states that the proposed project costs are high and suggests that they might be higher if the scope or project locations are found to be insufficient, requiring additional work and costs. See Grouped Response #2 regarding costs of the project.

No revisions to the DEIR/EA are necessary.

Response to Comment 3

This comment states that the traffic study provided an inflated, inaccurate figure for the anticipated number of STAA trucks per day. Please see Grouped Response #9 regarding the comment that the DEIR/EA traffic study makes erroneous and misleading calculations about additional daily trucks.

No revisions to the DEIR/EA are necessary.

Response to Comment 4

This comment stated that Fehr/Peers inaccurately added daily trucks for retailers/general shippers. Please see Grouped Response #9 regarding calculations for additional daily trucks.

This comment also states a concern that US 199 will remain narrow and winding, even after improvements are made. See Grouped Response #8 for a discussion of safety concerns, including the narrow, winding condition of US 199.

No revisions to the DEIR/EA are necessary.

Response to Comment 5

This comment states that the number of trucks per day, for lily producers and the overall additional trucks per day after construction and by the year 2030, and the annual growth rate from the traffic study seem inaccurate. See the Response to Environmental Protection Information Center's Comment 11.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 6

This comment questions the monetary cost for the project, particularly if the number of additional trucks is so low. Please see Grouped Response #1 and the revised purpose and need section of Chapter 1 in the final EIR/EA for more information on purpose and need. See Grouped Response #2 for a discussion of costs versus benefits of the proposed project.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 7

This comment questions whether remote communities will rely less on shipping and more on local self-sufficiency, and whether the needs of the lily bulb producers could be met by a simpler and cheaper solution, such as redesigning lily bulb packaging to accommodate preservation of the bulbs. See Response to Environmental Protection Information Center's Comment 13, which addressed the same topics as for this comment. Additionally, economic benefits would extend beyond lily bulb producers.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 8

This comment states that the scope of projects and range of alternatives was inadequate, improvements between Hiouchi and Gasquet are needed, and limited project locations are insufficient to provide STAA access. See Grouped Response #7 regarding the concern that there was an inadequate range of alternatives. See Grouped Response #8 regarding safety and how the locations needing improvements were selected, which helps to address the concern about scope. See Response to Environmental Protection Information Center's Comments 14 and 15 for discussions regarding why Hiouchi and Gasquet are not included as project locations.

The comment also states that public controversy was ignored. The Department has been aware of local opposition, as well as local support, for the proposed project. The statement referenced in this comment was about controversy over any specific proposed alternatives in Section 1.2.3. Public opposition to alternatives which remove large redwoods at the Ruby 2 site has been noted. The Department has interpreted the opposition to be against the project in general, rather than against any specific proposed alternative considered in the DEIR/EA.

The comment also stated that mandatory design exceptions would result in unsafe STAA conditions. See Response to Environmental Protection Information Center's Comments 8, 14, and 16 for discussions regarding design exceptions and Grouped Response #8 for a discussion regarding safety.

The comment also mentioned the safety-only alternative. See Grouped Response #7 for a discussion of the safety-only alternative.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 9

This comment asks why the area between Hiouchi and Gasquet, including PM 6.2 to 12.87, are not included in the project locations. See Response to Environmental Protection Information Center's Comments 14 and 15 for a discussion of why this area is not included in the project, and see Grouped Response #8 for a discussion of speed limits and enforcement, safety and how project locations were determined.

This comment also states the concern that slower speeds used in the truck trials in the DN 197/199 Corridor Extra Legal Load and STAA Vehicle Accessibility Study may have resulted in some dangerous/questionable areas being overlooked and questioned whether these areas should be retested or analyzed differently to insure realistic results and recommendations. The truck trials were conducted at slower speeds with CHP escort to facilitate safe passage of the STAA truck during the test. The traffic in the opposite direction was not stopped, primarily because it is not feasible to close entire sections of highway in both directions for this type of study. The speeds varied and were not recorded as part of the study, primarily because trucks traveling through the corridor do so at various speeds depending upon the driver skill, comfort level, and other factors. At slower speeds, a trailer offtracks more to the inside, so having the truck travel at higher speeds, as suggested by the comment, could have potentially caused some locations to be overlooked. Since speed was not a determining factor for whether a truck would offtrack, and since higher speeds could have caused some locations to be overlooked, using higher speeds in the truck trials or making adjustments to the observed results was unnecessary. Using slower speeds allowed for the desired outcome, which was to determine the locations where trailer offtracking issues exist, to be achieved while at the same time maintaining a safer test environment for those conducting the test and for the traveling public.

The comment also asked what comments CHP had. The CHP had no comments for the DEIR/EA (although a comment card was submitted with CHP's contact information on the return address portion of the card, but no comments were written on the card).

No revisions to the Draft EIR/EA are necessary.

Response to Comment 10

This comment states that the goal of providing safe STAA access will not be met at Patrick Creek Narrows Locations 1 and 3 due to mandatory design exceptions for geologic instability, and it quotes two pages of the DEIR/EA that mention the inability to meet Department standards for shoulder width at these locations. See Response to Environmental Protection Information Center's Comments 8, 14, and 16 for more information regarding design exceptions. Grouped Response #8 regarding discussions on safety, and Grouped Response #10 and Response to Environmental Protection Information Center's Comment 19 regarding geologic instability.

No revisions to the DEIR/EA are necessary.

Response to Comment 11

This comment does not provide a comment on the DEIR/EA and is similar to Environmental Protection Information Center's Comment 17. The comment mentions text in the DEIR/EA regarding excavation of the slope at Patrick Creek Narrows Location 2, past geologic instability, anticipated rockfall, and mandatory design exceptions. See Response to Environmental Protection Information Center's Comments 8, 14, and 16 for more information regarding mandatory exceptions, Grouped Response #8 regarding discussions on safety, and Grouped Response #10 and Response to Environmental Protection Information Center's Comment 19 regarding geologic instability.

The comment also includes a statement about significant scenic impacts that cannot be mitigated, but the comment does not state where or what the statement is specifically referring to. See Grouped Response #3 for discussions regarding visual resources and effects.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 12

This comment does not provide a comment on the Draft EIR/EA and is similar to the Response to the Environmental Protection Information Center's Comment 18. The commenter paraphrases and quotes portions of the Draft EIR/EA regarding the alternative of widening toward the river at The Narrows that was considered but eliminated from further discussion and includes a quote regarding sliver cuts that will be done instead.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 13

This comment states concern regarding the Cut Slope Alternative for Washington Curve, specifically regarding the potential for rockfall and "pop-outs" after construction. The commenter requests clarification for the term "pop-outs." To clarify this term, when a slope is first excavated there is a period where the slope may relax (i.e., settle) and/or dilate (i.e., expand) due to changes in stress on the new slope face induced by the excavation. Sometimes, in response to the changes in slope stress, slope failures (i.e., rockfall or landslides) occur. Failures of this nature are often referred to as pop-outs. They tend to be localized and of a limited extent. See Grouped Response #3 and Section 1.3.7.4 in the Final EIR/EA for a discussion regarding a discussion of how the selected preferred alternative, the Cut Slope Alternative, would result in

more exposed rock compared to soil, with the new cut slope anticipated to be relatively stable. See Grouped Response #10 for a discussion regarding geologic instability.

Response to Comment 14

This comment states that permanent rock curtain retaining walls are a significant scenic detriment and that the increased falling rock hazards from new cut slopes would be a significant public health hazard that could not fully be mitigated. See Grouped Response #3 regarding a discussion of visual impacts and slope stability. See Grouped Response #10 for a discussion about geological stability.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 15

This comment states that the cumulative hazard impacts from existing and newly planned slope cuts is a substantial hazard that cannot be mitigated adequately. Please see Grouped Response #10 regarding stability of slopes and concern for geologic instability. Also, see the Geology/Soils/Seismic/Topography portion of Section 2.5.3.2 regarding a consideration of cumulative effects and geologic resources, which includes slope stability.

This comment also states that a “safety only” alternative rather than the proposed project would result in fewer environmental effects. Please see Grouped Response #7 regarding the “safety only” alternative.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 16

This comment states that there would be significant impacts with disruption of traffic, including nighttime closures at Washington Curve and full highway closures without detour for one hour delays at Patrick Creek Narrows Locations 1 to 3. See Grouped Response #2 and FEIR/EA Sections 2.4.3 and 2.5.3.2 for discussions regarding traffic delays.

This comment also states concern for the ability of emergency vehicles to travel during construction and nighttime closures and concern for tourism. See the response to Environmental Protection Information Center’s Comment 8 for a discussion regarding measures to minimize impacts to access and circulation, particularly of emergency vehicles, and how tourism impacts would be minimized. See Section 1.3.4.1 and Sections 2.4.3 and 2.4.5 of the Draft and Final EIR/EA for more information on General Traffic Management Plan Elements.

The comment also states that highway closures would be significant to the tourist economy for Del Norte County. See the measures in Sections 2.4.3 and 2.4.5 of the Draft and Final EIR/EA that are recommended to reduce potential effects of construction traffic delays on tourism, and see Grouped Response #2 and Draft and Final EIR/EA Section 2.5.3.2, in addition to Draft and Final Section 2.4.3, for discussions regarding traffic delays.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 17

This comment states concern that the DEIR/EA did not recognize the community of Hiouchi along SR 197, that the residents along SR 197 and close to US 199 consider the area to be part of the community of Hiouchi, and that there would be community disruption due to the proposed project allowing STAA truck access, which would affect the frequent crossing of SR 197 by residents. See Grouped Response #8 for a discussion of truck traffic and effects on local communities. That response considers the area between SR 197 and Gasquet, including Hiouchi, when discussing effects to local communities. See the Response to Environmental Protection Information Center's Comment 8 for a discussion regarding anticipated effects to communities along SR 197 and US 199 if the proposed project is constructed.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 18

The comment states concern that the proposed project would require extensive right-of-way acquisition of many small parcels on SR 197, including removal of roadside buffers and vegetation that would increase exposure of homes to noise in the absence of vegetative screening. It also states that some homes would become significantly devalued and questions the ability to adequately mitigate these effects. See Response to Environmental Protection Information Center's Comment 8 for a discussion of right-of-way acquisitions associated with the proposed project. See Section 2.2.6 of the Draft and Final EIR/EA regarding noise and vibration. In summary, no adverse noise and vibration effects from traffic are anticipated.

The comment also asks if proposed effects have been marked in the field. In general, the proposed effects were not marked in the field. Each location was surveyed and some remnants of staking, temporary benchmarks and other temporary flagging/tagging may remain.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 19

This comment states that the DEIR/EA did a good job of identifying where potential tree removals would be, but it did not identify where or how many tree root systems would be affected. The comment also states that only one DEIR/EA paragraph discusses mitigation for root damage and that the proposed mitigation of using hand tools could significantly damage and kill trees. It also requests information to evaluate and mitigate potential tree root effects and states that [setting aside] protected lands is the mitigation of the commenter's choice. The Department conducted an additional study and recirculated new information on this topic. No large redwoods (>36 inches dbh) would be substantially impacted by the preferred alternative. See Group Response #4 and the Forester/Arborist Report for more information.

Revisions were made to the Draft EIR/EA in Section 2.3.1. to discuss the new information, and these changes were circulated to the public for comment.

Response to Comment 20

This comment requests replacement of threatened and endangered species habitat that would be removed with construction of the proposed project. No nesting habitat for the federally listed northern spotted owl (NSO) or marbled murrelet (MAMU) will be affected. The areas that

would be altered by the proposed project are areas immediately adjacent to the roadway that are of low quality as foraging and dispersal habitat for NSO and MAMU. There is no statutory requirement for compensatory mitigation of dispersal and foraging habitat for federally listed species.

The marbled murrelet (MAMU) is also state listed. The California Endangered Species Act (CESA) requires "full mitigation" for take of state-listed species. Take is only considered as killing under CESA. No take of MAMU is anticipated under CESA. No MAMU nesting or foraging habitat will be affected.

No changes to the Draft EIR/EA are necessary.

Response to Comment 21

This comment expresses support for the No-Build alternative but also supports safety enhancing projects that do not involve STAA truck access. See the Response to Grouped Comment #7 for a discussion regarding the "safety only" alternative. See Draft and Final EIR/EA Section 1.3.2.8 for a discussion of the No Build Alternative, and see Final EIR/EA Section 1.3.7 for a discussion of identification of a preferred alternative for each location, which includes further discussion of the No Build Alternative.

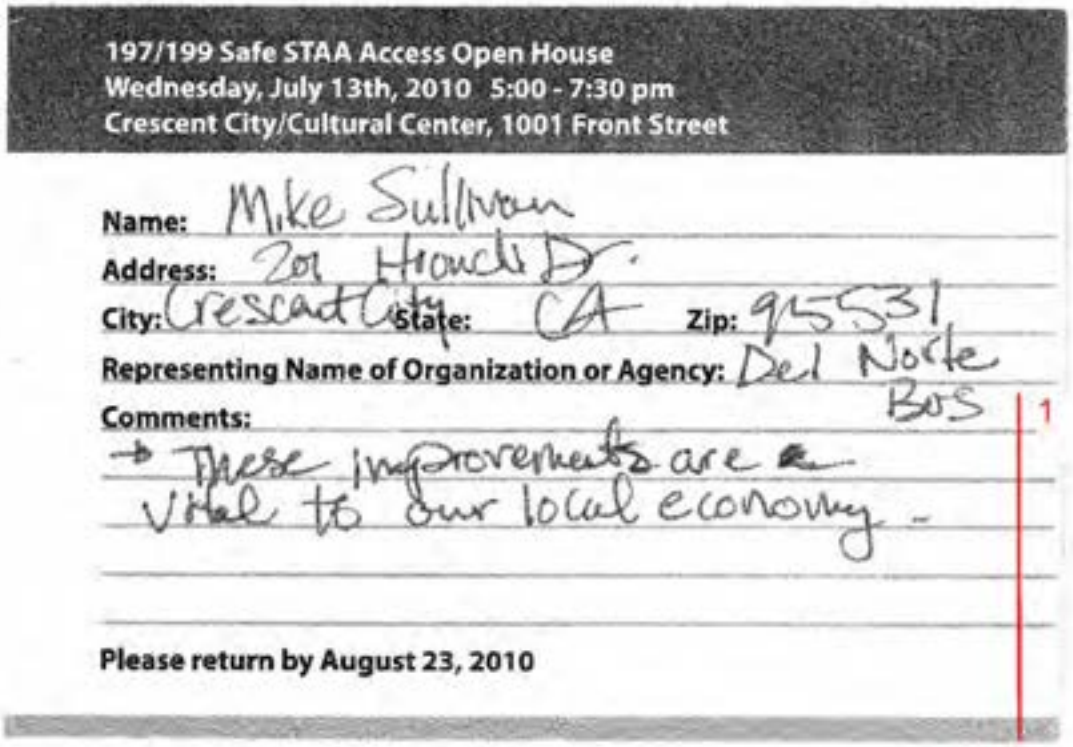
No revisions to the Draft EIR/EA are necessary.

Response to Comment 22

This comment states preference for the Two-Foot Widening in Spot Locations Alternative for Ruby 2, the Downstream Bridge Replacement Alternative with arch bridge option for Patrick Creek Narrows Location 2, and the Retaining Wall Alternative for Washington Curve. See the Final EIR/EA Section 1.3.7 for a discussion of the preferred alternative for each location, including the Two-Foot Widening in Spot Locations Alternative for Ruby 2 and the Downstream Bridge Replacement Alternative with arch bridge option for Patrick Creek Narrows Location 2. The Department selected the Cut Slope Alternative for Washington Curve for several reasons, including two seasons of construction instead of three for the Retaining Wall Alternative, the magnitude of the proposed wall that would have an unprecedented length and width for US 199 and a resulting greater visual effect than the Cut Slope Alternative would have. See Final EIR/EA Section 1.3.7.4 for a detailed discussion regarding the preferred alternative at Washington Curve. See Grouped Response #3 for a discussion of visual effects that were anticipated to occur if the Retaining Wall Alternative was selected for Washington Curve.

No revisions to the Draft EIR/EA are necessary with respect to this comment.

Sullivan, Mike (Del Norte County BOS)



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: Mike Sullivan
Address: 201 Hranch Dr.
City: Crescent City State: CA Zip: 95531
Representing Name of Organization or Agency: Del Norte BOS
Comments: 1
→ These improvements are vital to our local economy.

Please return by August 23, 2010

Response to Mike Sullivan (Del Norte County BOS)

Response to Comment 1

This comment does not provide a comment on the Draft EIR/EA. The comment expresses support for the proposed improvements.

No revisions to the Draft EIR/EA are necessary.

3.3 Individuals

Following is the index to 25 individual written comments. All written comments submitted by the following individuals can be found in alphabetical order by last name.

- Bankston, Oedus & Solveg
- Bankston, Oedus – comment card
- Bankston, Solveg – comment card
- Bertrand, Wendy Scott
- Brown, Susan
- Bruce, Donald
- Bruce, Doreen
- Cooper, Eileen
- Czapla, Carol
- Devlin-Craig, Brenda
- Elicker, Norberto – comment card
- Hague, Joe
- Miller, Ken
- Nowliss, Gekrgia – comment card
- Pederson, Richard – comment card
- Pounds, Jacob
- PoWeps, Vern
- Quick, Erika & Tony – comment card
- Rupert, DeAnn – 3 comment cards
- Simkhovitch, Perrianne – comment card
- Souza, Ted
- Zuehlke, Elmer
- Zuehlke, John

Bankston, Oedus & Solveg

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/13/2010 03:32 PM -----

BOB BANKSTON
<solveg@sbcglobal.net>

08/12/2010 04:53 PM

To Kimberly_Hayler@dot.ca.gov

cc

Subject North Bank Road ProjectKim Hayler

__Kim Hayler;

We are concerned about our Redwood tree by the roadway, one of which is pictured in the Public Hearing Notice of July 13th. We live at 4925 North Bank Rd. We read that 27 redwood trees will be destroyed in the Project. Our Parcel number is 122 240 07. We would like to know if outr OLD redwood is in danger of loss. 1

We can live with the road the way it is. We have done so since 1966. Plenty of trucks are already usine the road as it is now.

Some improvements can be made now, but save the old Redwoods.

Oedus W.Bankston and Solveg Bankston.

Respnse to this letter wouldbe appreciated. 707-458-3265

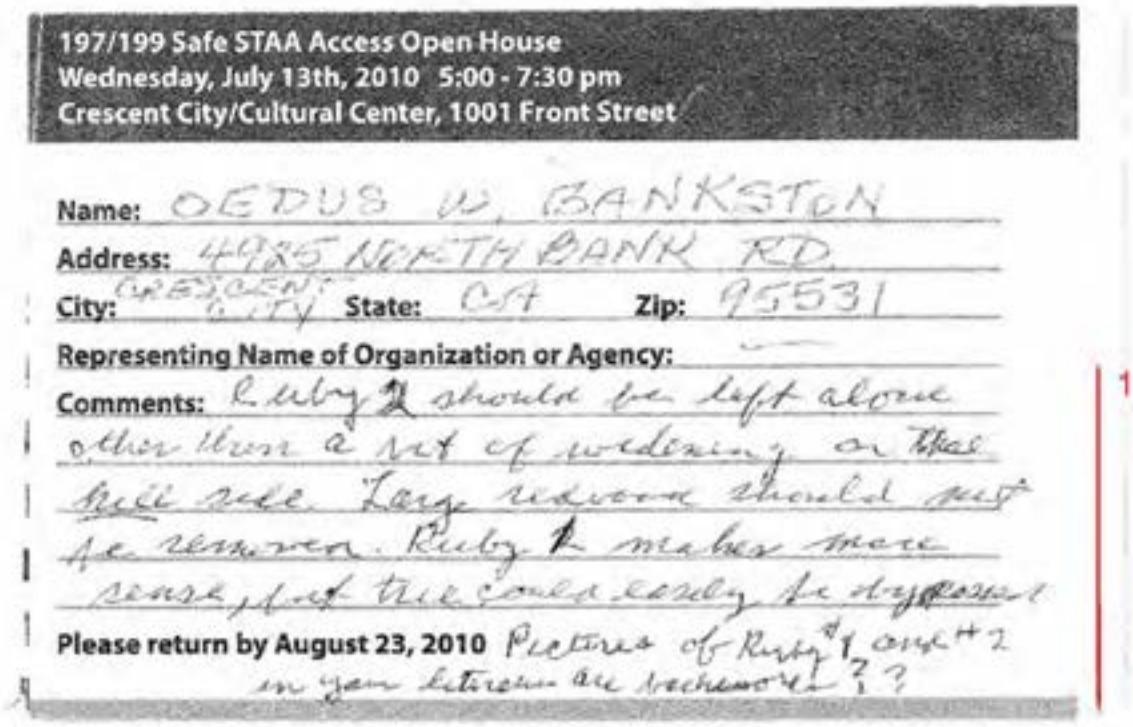
Response to Oedus & Solveg Bankston

Response to Comment 1

The comment states concern for a particular tree near or on their property as well as for "old redwoods" in general. The specific tree the comment refers to was reviewed by the project Design Engineer for potential to be cut, and the Design Engineer confirmed that the specific tree will not be cut. No redwood trees with a diameter greater than 36 inches will be removed or substantially affected by the preferred alternative. Where excavation is planned near redwoods with a diameter greater than 36 inches, measures will be taken to protect the roots. For details regarding the protocol for work conducted near roots of large redwoods, see Grouped Response #4.

No revisions to the Draft EIR/EA are necessary.

Bankston, Oedus



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: OEDUS W. BANKSTON
Address: 4925 NORTH BANK RD.
City: CRESCENT CITY State: CA Zip: 95531
Representing Name of Organization or Agency: —
Comments: Ruby 2 should be left alone other than a bit of widening on the hill side. Large redwood should not be removed. Ruby 1 makes more sense, but tree could easily be bypassed
Please return by August 23, 2010 Pictures of Ruby #1 and #2 in your letter are backwards ??

1

Response to Oedus Bankston

Response to Comment 1

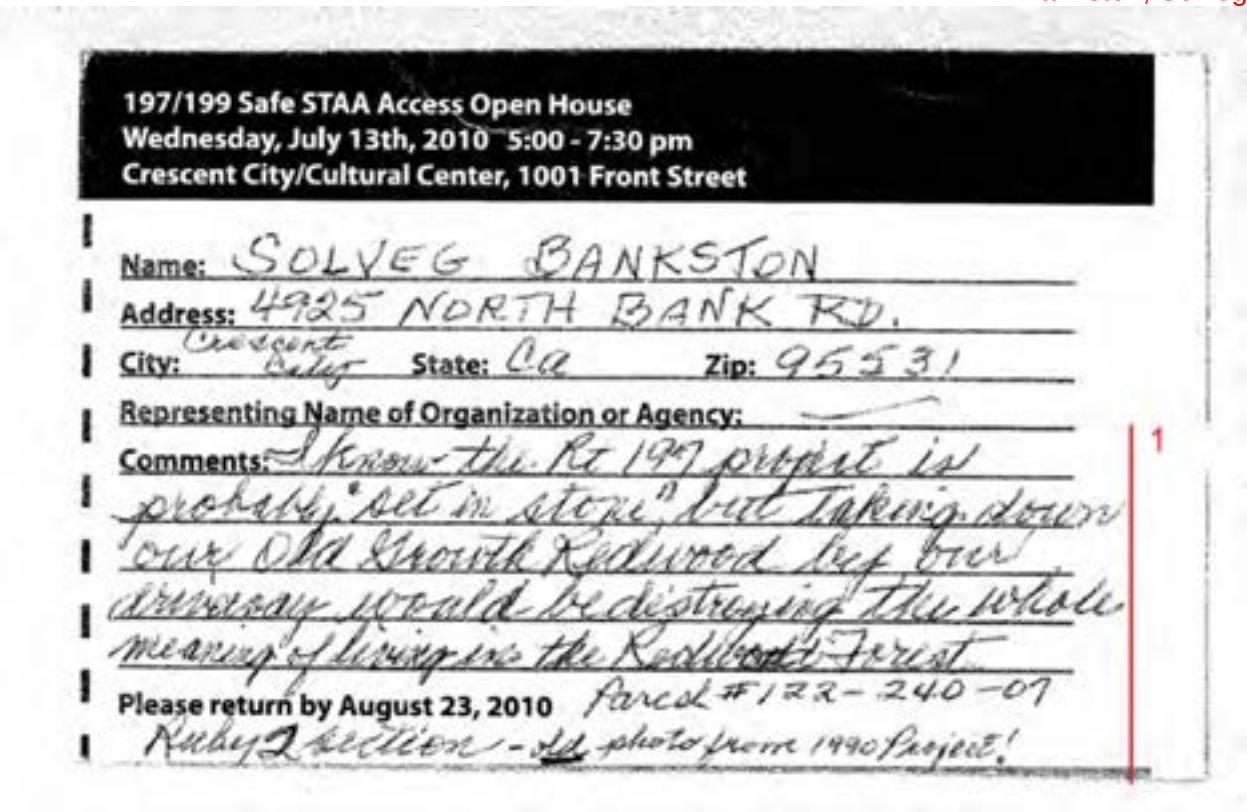
This comment states that Ruby 2 should be left alone other than a bit of widening on the hill side. The Department's Design Engineer considered options for widening on either side of the road at Ruby 2 and determined that widening on the hill side, as proposed, would require cutting large redwood trees as well as either excavation of a high, steep slope into the already steep slope in the middle of the location's limits, which could lead to an unstable slope in that area, or construction of a retaining wall. The slope is primarily soil and likely would not maintain its new higher, potentially steep shape if excavated unless a retaining wall was installed. A retaining wall would be very costly, create an unnecessary visual effect, and is unnecessary since the Design Engineer was able to create a proposed design that would avoid cutting large redwood trees and minimize other negative environmental effects while allowing for increased sight distance and safe STAA truck access.

The comment also mentions that a tree at Ruby 1 could be easily bypassed, but there is no reference to which tree is being discussed. The only Build alternative for Ruby 1 avoids cutting large redwood trees.

The comment also asks if the pictures of Ruby 1 and Ruby 2 are backwards. The Department reviewed pictures in the DEIR/EA and found that there appear to be no pictures that are incorrectly identified.

No revisions to the Draft EIR/EA are necessary.

Bankston, Solveg



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: SOLVEG BANKSTON
Address: 4925 NORTH BANK RD.
City: Crescent City State: Ca Zip: 95531
Representing Name of Organization or Agency:
Comments: I know the Rt 197 project is probably "set in stone" but taking down our Old Growth Redwood by our driveway would be destroying the whole meaning of living in the Redwood Forest 1
Please return by August 23, 2010 Parcel #122-240-07
Ruby 2 section - see photo from 1990 Project!

Response to Solveg Bankston

Response to Comment 1

This comment states concern that a large redwood by the commenter's driveway would be cut down. See Response to Oedus & Solveg Bankston's Comment 1, above.

No revisions to the Draft EIR/EA are necessary.

Bertrand, Wendy Scott

To Kimberly_Hayler@dot.ca.gov August 22, 2010
Gary_Berrigan@dot.ca.gov

By Wendy Bertrand

Re: Public comment on the Draft Environmental Impact Report (DEIR), regarding the 197/199 Highway, STAA project proposed by Caltrans and Congressman Mike Thompson

Caltrans workers keep the Smith River Canyon road in good repair, and local managers recently lowered the speed limit to 50 miles per hour, bike lanes were added, and vehicle lanes were reduced from two to one — all positive concrete results with NO negative environmental impacts — all very much appreciated in Gasquet. 1

HOWEVER.
Bigger trucks are not desired in the Smith River Canyon because the curves and rocky geology form a rugged geography inappropriate for road expansion, and according to the California Fish and Game Guidelines, set for all California rivers, expanding the existing highway into the fragile riparian zone of the Smith River watershed would cause environmental disturbances and significant negative impacts. The Smith River is one of the most pristine and beautiful rivers in the world, flowing with our drinking water — we want it to stay that way.

It is unlikely that Caltrans would entertain constructing such a road today, now that we know more how important the riparian attributes are to a river's health, bank stability, riparian animal habitat, and how protective natural riparian vegetation is critical for at least 150 feet from the top of the bank. Maintenance and repair of the existing road is realistic and appreciated, while expansion threatens this county's ecological heritage and the quality of rural life to humans and wildlife.

Once again, Caltrans project managers and our county and state representatives push unreasonable highway expansion in the name of dim hopeful economic development based on unsatisfactory evidence, while ignoring the essential existing economic force of this community: the residents and visitors who love the river, and are the major road users and buyers of goods. 2

1

Bertrand, Wendy Scott

To Kimberly_Hayler@dot.ca.gov August 22, 2010
Gary_Berrigan@dot.ca.gov

By Wendy Bertrand
In the mid 1990s, the community of Gasquet (via the Gasquet Community Council) wrote a Strategic Plan that was included by Del Norte County as part of the General Plan, a planning document deserving of respect. One of our plan's four topics targeted Caltrans with a request to limit the speed limit to 45 miles per hour, not to increase the hazards, risks, pollutions, and noise with road changes to accommodate potential use of bigger trucks. 3

Managing the road with lower speed limits and enforcement of those speed limits would do more to increased safety of all vehicles, without negative environmental costs or huge fiscal ones, than this project which plans to change a few of mother nature's curves, at a 26 million dollar price tag to taxpayers. Some might say that a few changes don't matter, but this is like erosion, a trickle soon and slowly grows into a roar out of control.

For this project, the negative environmental impacts are recognizably harmful and the project gains remain speculative, at best. Caltrans' engineers and planners have micro-focused on their business of building roads, while overshadowing and belittling the macro thinking for the environmental context, underestimating the risks and costs to land and society. High risk results like the BP's disaster in the Gulf and bankers' greed on Wall Street are no longer acceptable; we need a more conservative, respectful, and low risk approach to altering our natural resources and beautiful land features of the Smith River Canyon. Man over nature is not valid *everywhere* anymore. 4

Wendy Bertrand, Architect
Resident of Gasquet since 1990

Post Office Box 22,
Gasquet, Ca 95543

2

Responses to Wendy Scott Bertrand

Response to Comment 1

The comment states appreciation for recent improvements in the Smith River canyon and near Gasquet and states that the Smith River canyon is not an appropriate place to expand the highway for STAA truck access due to the rugged geology and significant effects that would occur to the sensitive riparian zone along the Smith River. The comment also states concern for potential negative effects that could occur to water quality, ecology, and the quality of rural life to humans and wildlife. The Department has coordinated, and will continue to coordinate, with California Department of Fish and Game to ensure that the proposed project will avoid and minimize negative effects to the Smith River watershed, its riparian areas, and other beneficial uses. As described in Draft EIR/EA Section 2.2.2, Water Quality and Storm Water Runoff, and Section 2.3.1, Natural Communities, to ensure beneficial uses of the Smith River are protected from potential effects from the proposed improvements, the Department will implement Best Management Practices (BMPs) at each project location to minimize or avoid degradation of storm water runoff flowing to the Smith River and its tributaries. Beneficial uses of the Smith River include: municipal and domestic water supply; water contact recreation; commercial and sport fishing; cold fresh water habitat; wild life habitat; rare, threatened, or endangered species; migration of aquatic organisms; spawning, reproduction, and/or early development; and others. See Response to California Regional Water Quality Control Board's Comments 1 through 5 and Draft and Final Section 2.2.1 for discussions regarding temporary and permanent measures to avoid and minimize effects to water quality due the proposed project. See Grouped Responses #2, #3, and #4 regarding a discussion of potential costs of environmental effects (including large trees), and see Draft and Final EIR/EA Sections 2.3 and 2.4.12 through 2.4.16 for discussions regarding measures to avoid and minimize effects to the biological environment, including wildlife. See Response to Environmental Protection Information Center's Comment 8 for a discussion regarding community effects and rural character of the area in the proposed project vicinity.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

The comment does not address the DEIR/EA; instead it states disapproval of the proposed project and states that economic gain would be minimal. It also cites local residents and visitors as the major road users and purchasers of goods. Please refer to Grouped Response #1 for clarification of the purpose and need of the proposed project and Grouped Response #2 for a discussion of costs versus benefits from the proposed project. Purpose and Need is also cited in Chapter 1 of the Draft and Final EIR/EA, and beneficial and adverse effects of the proposed project, including economic, recreation, and tourism effects, are also discussed in Chapter 2 of the Draft and Final EIR/EA.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment cites a previous request in the Gasquet Strategic Plan, which was included in the Del Norte County General Plan, for the Department to reduce the speed limit through Gasquet to

45 miles per hour and states that speed reduction would be increase safety more than the costly proposed project. See Grouped Response #8 for a discussion regarding speed limit reduction. No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment states that the proposed project's environmental effects are harmful, that the anticipated benefits are speculative, and that the Department underestimated risks and costs to land and society. See the Grouped Response #2 regarding costs versus benefits of the Proposed Project for more information regarding the benefit vs. the monetary and environmental costs of the project. See Grouped Responses #3, #4, and #5 regarding discussions of environmental resources and anticipated effects from the proposed project. See Grouped Response #8 and Response to Environmental Protection Information Center's Comment 8 for discussions regarding anticipated effects on local communities, including access and circulation effects. See Response to Center for Biological Diversity's Comment 4 for discussions of whether the anticipated environmental effects are considered substantially adverse or significant for the purposes of NEPA or CEQA and whether the effects were adequately analyzed.

No revisions to the Draft EIR/EA are necessary.

Brown, Susan

Brown
16429 Highway 101 S.
Brookings. OR 97415

August 13, 2010

RECEIVED
AUG 23 2010

Kim Hayler
P.O. Box 3700
Eureka, Calif. 95502

Dear Kim,

For over twenty years my husband and I have vacationed in the Crescent City, California, and Brookings, Oregon, area. We love the pristine, wild beauty of the woods, rivers and ocean beaches. So when we retired this past year it was an easy decision to locate in this area. Recently, we have read about road projects which will threaten the flow of traffic up and down Highways 199 and 197. Do we really need bigger semi-trucks moving through the Smith River scenic byway creating more traffic on Highways 199 and 197? We hope you will re-consider and let this area remain a haven for tourists Not STAA-Huge trucks. 1

Most Sincerely.
Susan R. Brown

Response to Susan Brown

Response to Comment 1

The comment states concern regarding proposed STAA truck access on SR 197 and US 199 and requests that the region maintain exclusion of STAA trucks and remain a haven for tourists; the comment does not address the DEIR/EA. Please see Grouped Response #1 for a detailed explanation of the purpose and need of the project, Grouped Response #2 for a discussion of temporary construction effects on tourism and potential permanent benefits to tourists, and Grouped Response #3 regarding the project's effects on visual resources.

No revisions to the Draft EIR/EA are necessary.

Bruce, Donald

Donald Bruce
550 Sierra Wood Road
Gasquet, CA 95543
(707) 299-6423

RECEIVED
AUG 25 2010

August 20, 2010

Kimberly Hayler
California Department of Transportation
P. O. Box 3700
Eureka, CA 95502

Comments on the Draft Environmental Document dated June 2010 for the 197/199 Safe STAA Access Project

Dear Kimberly Hayler:

I support the no build alternative to the CalTrans 197/199 STAA Access Project. I do support improvements and maintenance as needed to keep the highway navigable. I also support the replacement of any bridges that engineers deem necessary. However, the project will not make 197/199 safe enough for STAA trucks due to the long wheelbase of the truck tractor. Too many additional tight curves and short sight distances would remain. 1

In a letter to you (Kimberly Hayler) dated September 17, 2008 I pointed out that the highway between Hiouchi and Gasquet has many tight curves and narrow or no shoulders making it unsafe for STAA trucks. In fact, in the June 1998 study titled "Comprehensive Study of Routes 197 and 199 " by the California Department of Transportation, District 1,it states that one of the two areas of concern on Route 199 is "between Hiouchi and Gasquet." It stated that rock cut widening would be required at FIVE locations within this area. The other area of concern was from "south of Patrick Creek and south of Idlewild." So, why is the area between Hiouchi and Gasquet being ignored? Why wasn't the reason it's being ignored outlined in the DEIR of June 2010? The obvious areas of concern are at the following locations: The corner at Monument Drive at the North end of Hiouchi. It has an extremely sharp curve and a solid rock wall on one side with little or no shoulder on the riverside. Rockslides are also common here especially in the winter. This is simply a very dangerous spot in the best of circumstances. It's frightening to think of STAA trucks coming around this corner let alone meeting each other. The rock wall on one side and a straight drop to the river on the other continues until milepost (M. P.) 6.72. At M. P. 7.41 to 7.66 there is no guardrail on a narrow section of the road. Any over tracking of STAA trucks in this area will literally send you over the edge. At approximately M. P. 8.25 there is a very tight "S"shaped corner that STAA trucks will routinely over track on. M. P. 8.76 has no guardrail and drops directly to the river. Much of the road has little or no shoulder such as M. P. 8.84, which is also a sharp corner. M. P. 9.2 and 9.7 are dangerous curves. M. P. 10.28 has no guardrails and is a straight drop to the river. My wife and I have stopped to assist accident victims at least three times in this area over the past. People speed here because it's a straighter section of road. At about M. P. 11.56 there is no guardrail and no shoulder for about 100 to 150 yards. Any slight off tracking of STAA trucks will cause a collision with oncoming traffic or run them into the river. None of these dangerous areas were addressed in the DEIR of June 2010. Why?

Bruce, Donald

The DEIR of June 2010 did not address the concerns in a letter to you (Kimberly Hayler) dated September 16, 2008 regarding the following: How residents on North Bank Road (HWY 197) will be able to safely ingress and egress 197 from their driveways. And how will the road accommodate pedestrians, bicycles, and school buses with STAA trucks moving swiftly through. Additionally, no guardrails are being placed on the section of 197 that drops straight to the river with no shoulders on either side. It is undercut bank and is questionable whether it can withstand the weight of STAA trucks. At the April 2008 CalTrans public meeting in Crescent City, Kevin Church, Project Manager, stated there would be no reduction of the speed limit anywhere upon completion of the project. A study on "sight distances" also needs to be done more thoroughly on 197 and 199, as there are many areas with very limited visibility. 2

The accident rate between Hiouchi and Gasquet is very high. That information was submitted with the September 16, 2008 letter to you (Kimberly Hayer). Why was this not taken into consideration and discussed in the DEIR of June 2010? What mitigating factors are present to ignore this? 3

The DEIR of June 2010 also did not address specifics on how emergency vehicles will be accommodated while the construction phase is taking place. The heavy traffic on 199 will result in long lines during construction making it a serious impediment for emergency vehicles. Also, what is the plan concerning the transportation of high security inmates from Pelican Bay State Prison? Level 4 and SHU inmates (the highest level of inmates in the State) are routinely transported to the Rogue Valley for medical appointments. Also the California Department of Corrections uses 199 to transport busloads of inmates to and from Pelican Bay State Prison from other California prisons. Will this practice continue? If so, what additional security measures will be implemented to protect the public during the construction phase? 4

In addition, the DEIR of 2010 does not address the effect the construction phase will have on tourist dollars to Del Norte County, which could last up to five years and possibly longer. The extensive length of time of construction as well as delays and closure periods may result in many people avoiding the area. Many people from the Rouge Valley that routinely visit Del Norte County may curtail their visits resulting in a loss of revenue. Why hasn't this been considered, especially when the reason touted for STAA trucks is for an economic benefit? 5

Lastly, a review of a supporting document used in the DEIR titled "Traffic Analysis Report," which recorded the responses of businesses, revealed that only three claimed any significant benefit to having a STAA route on 197/199. It appears this is a tax-subsidized project for a few select businesses. If not illegal, it is certainly inappropriate given that there is no compelling reason to have a STAA route on highways 197 or 199. 6

Respectfully submitted,

Donald Bruce

Donald Bruce

Responses to Donald Bruce

Response to Comment 1

This comment states support for the No Build Alternative, maintenance of and improvements for the highway to maintain navigability, and replacement of bridges as deemed necessary, but it states that the proposed project would not make the SR 197-US 199 corridor safe for STAA trucks due to remaining tight curves, short sight distances, and narrow or no shoulders. See Grouped Response #8 for discussions regarding safety and how the Department's truck tracking trials and computer modeling software were used to determine which locations needed to be addressed to allow safe STAA access. Also, see Response to Environmental Protection Information Center's Comments 14 and 15 regarding why Gasquet and Hiouchi are not included as project locations and traffic safety investigations in the vicinity of Hiouchi and Gasquet.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment asks how residents on SR 197 will safely ingress and egress to driveways and how the highway will accommodate pedestrians, bicyclists, and school buses with STAA trucks "moving swiftly through." Ingress and egress to driveways will be unchanged or improved in the areas of the Ruby 1 and Ruby 2 projects. Driveways will be paved to the right-of-way line, which will improve conditions for some residents. Driveways will be improved, if necessary, to meet the Department's Encroachment Permit Standards for private driveways. Currently, sight distance from some driveways is limited by large redwood trees, and the Department will not be cutting those trees. In these cases, a design exception for sight distance standards will be pursued, and the existing sight distance conditions for those residents would not change. As stated in the DEIR/EA Section 1.3, the posted speed limit would not be raised. See Grouped Response #8 for a discussion regarding speed zone investigations and examinations of speed limits in Hiouchi and Gasquet. Additionally, the number of additional trucks per day is anticipated to be minor (see Grouped Response #8). For these reasons, the residents are not anticipated to experience an increased challenge for ingressing to, or egressing from, driveways onto SR 197. Similarly, accommodations for pedestrians, bicycles, and school buses on SR 197 will remain largely unchanged, with some minor improvement due to additional shoulder width through the project areas. Since the posted speed limit will not change, the number of additional trucks is anticipated to be minor, and shoulder width would increase in spot locations, special accommodation of pedestrians, bicycles, and school buses is unwarranted and does not meet the purpose and need (see Grouped Response #1 regarding purpose and need).

The comment also states concern for a portion of SR 197 where there is a lack of guard rail, there are no shoulders, the bank is reportedly undercut, and the commenter is concerned that the road could not withstand the weight of STAA trucks. Regarding the narrow section of SR 197 above the river, a post mile was not referenced, but it is likely that the commenter is referring to the area at PM 5.70. This location was under construction in 2012 for emergency slide repair. The project added more shoulder, a metal beam guard rail and cable mesh on the slope above the roadway to prevent rockfall. With respect to vehicle weight, STAA trucks are subject to the same weight limits as truck traffic that currently uses the route, so the road should be able to withstand the weight of STAA trucks.

Sight distance on a route is addressed on a project-by project basis, either by correction of the problem or design exceptions, when correction of the problem is impractical. If warranted, sight distance on a route or portion of a route may be assessed by the Traffic Safety office. A design exception for stopping sight distance will be obtained for a portion of the Ruby 2 project, as sight distance is limited by a cut bank, large redwoods and/or large redwood stumps. No sight-distance exception is expected to be needed on the Ruby 1 Project. See Response to Environmental Protection Center Comments 8, 14, and 16 for further discussion regarding design exceptions.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

The comment states that the accident rate between Hiouchi and Gasquet is very high. Please see the Response to Environmental Protection Information Center's Comments 14 and 15 and Grouped Response #8 for more information speed limits and on why Hiouchi and Gasquet and the surrounding areas are not included in the proposed project. The letter from September 16, 2008 was forwarded on to the Traffic Safety Office.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment states concern for emergency and California Department of Corrections (CDC) vehicles travelling through the corridor during construction. As discussed several places in Chapters 1 and 2 of the DEIR/EA, emergency vehicle and CDC vehicle access through the construction zone will be addressed in the project's Transportation Management Plan (TMP). The contractor will be required to give Emergency vehicles priority through the work zone by the contract specifications. The Department will also work closely with the CDC to also insure that priority through the work zone is given to any CDC vehicles carrying inmates and that the CDC is able to provide any additional security measures within the work zone if needed.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 5

This comment states concern for economic effects on the tourism industry. See Grouped Response #2 for a discussion regarding access and circulation impacts and measures to avoid or minimize impacts on access and circulation, including for tourists and travelers using the SR 197/US 199 corridor.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 6

The comment questions the purpose and need of the project; it does not otherwise address the DEIR/EA, other than to summarize the results of the trucking survey in the traffic study. See Grouped Response #1 for discussion and clarification concerning the project's purpose and need.

No revisions to the Draft EIR/EA are necessary based on this comment.

Bruce, Doreen

Doreen Bruce
550 SierraWood Road
Gasquet, CA 95543

RECEIVED
AUG 23 2010

Kim Hayler
California Department of Transportation
PO Box 3700
Eureka CA 95502

August 20, 2010

COMMENTS ON THE JUNE 2010 DEIR REGARDING THE 197/199 SAFE STAA TRUCK ACCESS PROJECT

Dear Kim Hayler,

After reviewing the 197/199 Safe STAA Access Project 2010 Draft Environmental Impact Report (DEIR), I have the following concerns, comments and questions:

The need for this project as promoted to the residents of Del Norte County is dubious. The DEIR and subsequent comments made to the Daily Triplicate by Kevin Church admit that economic gain and growth to Del Norte County would be minimal, and the cost of essential good to residents would be unaffected by this project. Who will profit most from this $26.5 million taxpayer funded project? In the DEIR, it appears the local lily bulb growers will. How is it that a public agency, California Department of Transportation, can embark on this hugely disruptive and costly project when the overwhelming benefactor is a private business? Isn't this illegal, or a conflict of interest? Why doesn't the public's **actual need and safety** take precedence in this project? 1

A review of the June 1998 CalTrans, Comprehensive Site Study of Routes 197 and 199 (a supporting document to the 2010 DEIR) states that safety, environmental issues, high improvement costs, storm damage/road closures, rock fall locations, hazardous spills, and lastly large (STAA) Truck restrictions as ongoing concerns with Route 199. "Most concerns on Route 199 exist in two general areas: between Hiouchi and Gasquet (MP6.20/12.87) and between south of Patrick Creek and south of Idlewild (PM20.04/27.50)" Why doesn't the DEIR address the documented roadway impediments between Hiouchi and Gasquet? The most recent STAA Truck off tracking trials conducted October 2005, validated the 12 previously identified areas needing improvement to accommodate STAA Trucks, yet the 2010 **DEIR ignored FIVE of these tight radius curves.** Why? 2

Why didn't the 2010 DEIR address the specific safety concerns raised by the public during the 2008 comment period? **Hiouchi and Gasquet have many dangerous highway and road intersects.** As stated in the Executive Summary of Traffic Analysis Report (a supporting document of the 2010 DEIR) it was concluded, "due to the rural

Bruce, Doreen

future of Hwy 197/199 actual analysis of intersection operations were not performed as part of this traffic analysis report." Why? 2 cont.

Due to poor sight visibility (V), high rates of vehicle speeds (S), pedestrian/bicycle use (P/B), and highway crossings (C) a traffic study needs to be conducted at the following intersection with Hwy 199: 3

MP 5.0 Redwood State (S, P/B,C)
Hiouchi Market/ business area (S, P/B,C)
MP 6.72 Monument Drive (S, V, C)
MP 7.0 South Fork Road (S, V, P/B, C)
MP 12.23 French Hill Road (S, V, P/B, C)
MP 12.99 Margie's River Access Forest Service wayside (S, V, P/B, C)
MP 13.0 Valley View Road and Gasquet Flat Road (S, V, P/B, C)
MP 13.4 Sierra Wood Road (S, V, P/B, C)
MP 13.66 Gasquet Mobil Home Park entrance (S, V, P/B, C)
MP 13.86 Fire House Road (S, V, P/B, C)
MP 14.2 Middle Fork Gasquet Road (S, P/B, C)
MP 14.8 Six Rivers Forest Service Head Quarters and French Hill Trail (S, P/B, C)

Excessive vehicular speeds through Gasquet and Hiouchi, compounded with the addition of larger, heavier STAA Trucks was raised as a safety concerns by residents during the 2008 public comment period. These concerns were not adequately addressed in the 2010 DEIR. The June 1998 CalTrans Comprehensive Study of Routes 197 and 199 states "Speed zones in the Hiouchi and Gasquet areas are an ongoing issue." So in light of this historical documentation and twelve more years of increased traffic, development, ingress and egresses onto the highway, more accidents/fatalities and near misses, why was this concern brushed off? Kevin Church stated in public prior to the 2010 DEIR that speeds on Hwy 197/199 could be, but will not be, reduced! Why? Is CalTrans priority fast transportation of the time sensitive lily bulbs instead of human safety? This defies public sentiment and common sense. 4

The Traffic Count data collected in September 2008 for this DEIR in Gasquet **did not capture a complete picture of the extremely dangerous situation** created by excessive vehicular speeds, poor sight visibility, vehicular cross traffic, and pedestrian and bicycle traffic along the highway and crossing the highway. The worst areas through Gasquet are between MP 13.0 and MP 14.2. The March 2006, DN-197/199 Corridor Extra-Legal Load and STAA Vehicle Accessibility Study, (a supporting document of the 2010 DEIR) stated "Field observations indicated some bicycle travel on US 199 concentrated in Gasquet and pedestrian activity was only observed in urban areas and within Redwood Park." Was this "field observation" made on Google Earth? How could such an inaccurate assessment be used to make critically important decisions regarding safe speeds, appropriate signage, striping or other safety measures needed in Gasquet and Hiouchi, factoring in the added liability of STAA Trucks? It is interesting to note that Gasquet has signs and road striping for bicycles and Redwood Park has signs for pedestrian activity. Was this the basis of this field observation? As an eighteen year resident of Gasquet who lives along Hwy 199 and travels through Hiouchi into Crescent City almost daily, I can 5

Bruce, Doreen

testify to the fact that many residents in both communities walk/ jog and bicycle along the highway for a variety of reasons. Also tourists dash to cross the speeding highway traffic at Hiouchi Market. In Gasquet, our regular walkers, joggers, kids and bicyclists face real hazards along highway 199 when trying to cross to the opposite side. The most dangerous crossings are: (1) Gasquet Flat Road and Valley View Road, (2) Sierra Wood Road, and (3) Gasquet Mobil home Park. The traffic speeds along this straight stretch of highway in conjunction with the grading dips makes oncoming traffic become invisible to crossing pedestrians/bicyclists and other vehicles attempting to cross the highway. I have witnessed, as well as personally experienced, many frightening near miss accidents. **Please do a survey/study of real people living in Gasquet and Hiouchi to determining appropriate, and safe highway speeds through our communities?** 5 cont.

What are the Federal standards and mitigating requirements for nighttime noise emitted by commercial truck accelerating and directions in many areas. I continue to support the no build alternative for this project. 6

decelerating on highways running through residential areas, and how will the addition of STAA Trucks add to this existing problem, and how will it be mitigated? This was not adequately addressed in the 2010 DEIR.

The March 2006 STAA Truck trials on HWY 197 and 199 were conducted under CHP escort and at speeds lower then typical trucks travel. How low were these speeds and how did you factor that into actual truck speed? Faster moving STAA trucks will not negotiate corners as sharply. Many short sight distances exist. Was this closely looked at? The 2010 DEIR does not address this. Why not? 7

I am amazed and disheartened that so much time, money, and effort has gone into this CalTrans work project. The 2010 DEIR fails to provide a compelling need for this project, and any reasonable and prudent person would realize after driving highways 199 and 197, that they never will be safe for STAA Trucks meeting one another in opposite 8

Sincerely,

Doreen Bruce

Doreen Bruce

Responses to Doreen Bruce

Response to Comment 1

This comment states that safety should take precedence over this project. Grouped Response #1 discusses the purpose and need for this project. Safety of the traveling public is always a concern for the Department, and proposed roadway improvements will enhance safety for the traveling public at the proposed project locations. Per the DEIR/EA, all seven locations have roadway geometries that can result in STAA trucks and other long-wheelbase vehicles (automobiles, trucks, and other large vehicles such as motor-homes, buses, and vehicles pulling a trailer) offtracking across the double yellow line and entering the oncoming traffic lane. Additionally, limited sight distances at all seven locations do not allow enough time for drivers to react to roadway conditions ahead. Safety-enhancing improvements, including wider lanes, wider shoulders, longer-radius curves, and improved sight distances, would provide a roadway that is easier to maneuver for all users.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment states that the DEIR/EA does not address specific sections of roadway for STAA access that were cited in a 2005 Caltrans report. All 12 of the sites in were either addressed by previous projects, are being addressed by this project, or were reevaluated and determined to not be a constriction to STAA traffic.

This comment also questions why the Traffic Analysis Report (2010) did not include an analysis of intersection operations. An analysis of intersection operations is conducted to ensure Level of Service and traffic flow through intersections. It is not an analysis of traffic safety at intersections. The lower traffic volumes in this area did not require an analysis of intersection operations to ensure the desired level of service. Please see the Response to Environmental Protection Information Center's Comments 14 and 15 for more information on why Hiouchi and Gasquet and the surrounding areas are not included in the proposed project.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment states that there are safety concerns at sites not included within the project. These sites are not restricting STAA vehicle access and are thus outside of the purpose and need of the project.

One of the tools that the Department's Traffic Safety Office uses is the calculation of collision rates. Collision rates are based on the number of reported collisions in a certain time period and the average daily traffic of that location. To insure that the limited funds available for upgrading existing roads will be spent at locations where it will result in the greatest safety benefit to the highway user, we compare the collision rates of specified locations to the statewide average collision rates for similar facilities.

The collision rates for the locations the commenter mentions were compared to the statewide average collision rates for similar facilities for the most recent 5 years of available data (1/1/2005

to 12/31/2009). Collision rates and data for the 11 half-mile segments and 1 one-mile segment (the Hiouchi Market/business area) were requested, as well as the eight intersections identified by the Department's Traffic Accident Surveillance and Analysis System (TASAS) that lie within these segments. Of these locations, three segments and three intersections had collision rates that were greater than the statewide average and for each the collision history was reviewed. Of these six locations, the Department recommended improvements for one intersection where a "Side Road" symbol warning sign will be installed to warn southbound US 199 motorists of the upcoming South Fork Road intersection. Of the other five reviewed locations, there were no discernible collision patterns upon which to recommend roadway improvements.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment suggests reducing speed limits through some sections of 199 and 197 as a safety measure. See Grouped Response #8 for a discussion of speed reduction in Hiouchi and Gasquet.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 5

This comment expresses concern over safety within the Gasquet and Hiouchi communities. Again, the Department shares your concern over the problem of excessive speeds and traffic safety. Accordingly, we have set the current speed limit through both Gasquet and Hiouchi at 50 mph because after conducting a series of studies, we believe this speed limit is appropriate to best facilitate the safe and orderly movement of traffic through these sections. For the community of Gasquet, four field surveys including speed studies have been conducted since February 2008. Additional information on speed limits and safety can be found in the Response to Grouped Response #8.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 6

This comment requested information on federal standards for vehicular noise in residential areas. For highway transportation projects with FHWA involvement, the Federal-Aid Highway Act of 1970 and the associated implementing regulations (23 CFR 772) govern the analysis and abatement of traffic noise impacts. 23 CFR 772 provides procedures for preparing operational and construction noise studies and evaluating noise abatement considered for federal and federal-aid highway projects. Under 23 CFR 772, projects are categorized as Type I or Type II projects. FHWA defines a Type I project as a proposed federal or federal-aid highway project for the construction of a highway on a new location or the physical alteration of an existing highway that significantly changes either the horizontal or vertical alignment or increases the number of through-traffic lanes. A Type II project is a noise barrier retrofit project that involves no changes to highway capacity or alignment.

Type I projects include those that create a completely new noise source, as well as those that increase the volume or speed of traffic or move the traffic closer to a receiver. Type I projects include the addition of an interchange, ramp, auxiliary lane, or truck-climbing lane to an existing

highway or the widening of an existing ramp by a full lane width for its entire length. Projects unrelated to increased noise levels, such as striping, lighting, signing, and landscaping projects, are not considered Type I projects.

This project does not meet the definition of a Type I project. Therefore, no noise analysis or consideration of noise abatement is required for the operational impacts of this project. A Noise Study Report was prepared however, to address construction noise.

No mitigation measures, such as a soundwall, are considered for this project because the type of work or highway improvements involved in this project is unlikely to cause a substantial temporary or permanent increase in traffic noise to the adjacent land users.

Pages 2.2-54 through 2.2-56 of the Draft EIR/EA discuss existing noise levels in relation to future noise levels. Predicted traffic volumes and traffic noise levels as compared between the 2030 no build and the 2030 build condition indicate that the project will not result in a perceptible increase in operational traffic noise.

In addition, the projected increase in truck traffic will not substantially increase ground vibration caused by trucks because of the relatively small increase in truck volumes and the fact that trucks with a proper suspension and pneumatic tires are not a substantial source of vibration unless there are substantial discontinuities in the roadway surface. No operational adverse noise and vibration impacts from traffic are anticipated; therefore, no mitigation measures are required.

A copy of the Noise Study Report provided to the interested parties upon request may be helpful to further clarify any questions regarding the noise analysis for this project.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 7

This comment states concern that slower speeds used in the truck trials in the March 2006 STAA study may have resulted in some dangerous/questionable areas being overlooked. Trucks will offtrack more at lower speeds. See Response to Friends of Del Norte Comment 9 for a discussion regarding truck speeds during trials.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 8

This comment questions the purpose and need for the project, states that the route will never be safe for STAA vehicles and expresses support for the “No Build” Alternative. There are several factors involved in the decision to pursue this project and the Department has strived to design the proposed project so that it would meet the purpose and need while minimizing costs and avoiding or minimizing environmental impacts. See Grouped Response #1 for details regarding the purpose and need of the project. Also see Grouped Response #8 for a discussion regarding safety of STAA vehicles.

No revisions to the Draft EIR/EA are necessary.

Cooper, Eileen

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/13/2010 03:30 PM -----

eileen cooper <upsprout@yahoo.com>

08/10/2010 08:10 PM

To Gary Berrigan <gary_berrigan@dot.ca.gov>

cc kimberly staa <kimberly_hayler@dot.ca.gov>, Dori and David Bruce <tangleblue@charter.net>

Subject Re: STAA 199/197 comments

Comments to the DEIR and review process, 8/10/2010 1
The documents that I requested are identified in the DEIR as being used to identify the project areas. Therefore, they are an integral part of the DEIR, substantiating the scope of the project. The public had strong concerns regarding the range of the scope of the project. In 2008, submital of comments by Dori and David Bruce gave strong voice to the concern that areas between Gasquet and Hiouchi were very dangerous, and were not being addressed. The DEIR ignored their concerns, giving absolutely no information about why such safety records, with greater accident rates and lower LOS than the predetermined pinch points, were not being proposed for improvements. They submitted specific traffic safety information. The DEIR has provided absolutely no information that

Cooper, Eileen

sheds light on the dismissal or elimination of this area of road. It simply states that the requested documents were used to substantiate the selection. The request for these documents should have been provided along with the other Documents of the DEIR. 1 cont.

We confirm that your traffic safety officer who is familiar with this project will not be available for questioning until after Aug. 16, 2010, and the documents that you are providing to me personally as a public records act request will not be available until about that date as well. These documents are essential for evaluating the DEIR, as the DEIR sheds absolutely no light on the process of elimination for improvements between Hiouchi and Gasquet, even after specific scoping comments requesting such.

Please be advised that such disregard and blindness of the DEIR to issues raised by the public, together with the ommission of key documents regarding their concerns raises substantial discordence to the purpose of CEQA, and handicaps the public participation.

Thank you, Eileen Cooper
--- On **Tue, 8/10/10, Gary Berrigan** ***<gary_berrigan@dot.ca.gov>*** wrote:

From: Gary Berrigan <gary_berrigan@dot.ca.gov>
Subject: Re: STAA 199/197 comments
To: "eileen cooper" <upsprout@yahoo.com>
Date: Tuesday, August 10, 2010, 10:23 AM

Dear Ms. Cooper,

Thank you for taking the time to contact us regarding the 197/199 Safe STAA
Access project.

Regarding your request to extend the deadline for review of the DEIR/EA, we
understand your interest in extending the public review period, but it is already longer than what is normally provided. Under the California Environmental Quality Act (CEQA) Guidelines the public review period for

Cooper, Eileen

a
DEIR is 45 days where there is public agency review through the State Clearinghouse. The State Clearinghouse review period for this project ends
August 12, however, we have provided an extended period to August 23, allotting 56 days that the DEIR/EA will have been available to the public. Due to the time frame already provided to the public for comment submittal,
we do not believe that an additional extension is warranted.

The Geotechnical reports you requested are in the public library in Crescent City, along with the other technical studies that were used to analyze potential environmental impacts of the project (Appendix S, List of Technical Studies). We understand that hard copies and CD copies have disappeared from the library, and we have been providing replacements as
soon as we have been advised of those losses. We also have requested that
the library staff attach bar codes to the technical studies and the DEIR/EA to minimize the chances that these documents might be removed from the
library.

Your request included documents that were not used to analyze potential environmental impacts of the project, and are not part of the technical studies of the DEIR/EA. These documents can be made available under the
guidelines of the Public Records Act, and I understand that Kathy King, Claims Officer, (707.445.6594) is compiling them to send to you. The availability of these documents does not affect the deadline for comment submittals on the DEIR/EA. The route concept reports you requested can be
found at the following web links:

197 Route Concept Report -
http://www.dot.ca.gov/dist1/d1transplan/r197.pdf
199 Route Concept Report -
http://www.dot.ca.gov/dist1/d1transplan/r199.pdf

Thank you, again, for your time and effort to communicate concerns and requests to us regarding the 197/199 Safe STAA Access project. We look

Cooper, Eileen

forward to receiving your written comments on the DEIR/EA.

Sincerely,

Gary Berrigan, E-1 Branch Chief
North Region Environmental Management
707.441.5730

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 08/09/2010 08:28
AM -----

eileen cooper <upsprout@yahoo.c
om> To
kimberly_hayler@dot.ca.gov
08/05/2010 03:03 cc
PM kevin_church@dot.ca.gov,
upsprout@yahoo.com, Dori and David
Bruce <tangleblue@charter.net>
Subject
STAA 199/197 comments

Please extend the deadline for review of the DEIR/EA for hwy199/197 staa
improvements. 2
This is because I have tried to contact the safety engineer for this
project, but he is unavailable until very late in the month of August. I
need several safety evaluation documents, and understanding of safety

Cooper, Eileen

engineering documents is impossible without assistance. We are concerned
that the number of tight spots and dangerous spots on hwy 199 is severely
limited in scope. Our original scope request expressed concern that this
hwy would remain unsafe even with fixing the particular recognized spots.
Citizens know of several unsafe areas between Hiouchi and Gasquet, and yet
this area remains untouched. 2 cont.
Why has this happened? We are also concerned about increasing geological
instability in the proposed actions. Please supply records of rock slides
before and after the last decade improvements to the upsloped areas along
hwy 199, patrick creek area. 3

Review of our concerns is impossible without the following being available
for public review, preferably in the library: 4
As stated in the DEIR, page 1-4:

The entire 197/199 road was evaluated and considered when need was

identified- Sept. 1989, "Route 199 Route Concept Report"

Individual spot improvement locations were identified for STAA access
"Comprehensive Study of Routes" June 1998

Two Concept reports SR197 and US199 for Dept, July 1999, describe long

range approach

Truck tracking trials by Caltrans District 1,
Traffic Operations/Permits on SR197 and US 199, dated August 2003 and

October 2005

Del Norte 197/199 Corridor Extra-Legal load and STAA Vehicle
Accessibilty

Cooper, Eileen

Study, dated March 2006 4 cont.

The Geotechnical studies listed in the DEIR.

Thank you, Eileen Cooper 707-465-8904

Responses to Eileen Cooper

Response to Comment 1

This comment informs that concerns were raised in 2008 regarding the area between Gasquet and Hiouchi and that data presented highlighting these concerns was ignored in the DEIR. See Response to Environmental Protection Information Center's Comments 14 and 15 for a discussion of the area between Hiouchi and Gasquet and Grouped Response # 8 for a discussion about reduced speed zones in Gasquet.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

The comment requests that the deadline for delivery of public comments be extended because the Department's safety engineer was not available to discuss the project until late August, 2010, and the commenter stated that assistance was needed to understand safety engineering documents.

As explained in an email response dated August 10, 2010, the Draft EIR/EA and supporting technical studies were available at the Department's District 1 office and Del Norte County Library in Crescent City. . Public comments on the Draft EIR/EA were officially accepted between June 29 through August 23, 2010. The California Environmental Quality Act mandates a minimum of 45 days be provided for the public review of an Environmental Impact Report (Title 14 California Code of Regulations Section 15105). The National Environmental Policy Act and the Federal Highway Administration require a minimum 30-day review period (Title 23 Code of Federal Regulations Part 771.119). The review period was a total of 56 days, which is 11 days longer than the mandatory 45 day review period allotted by the CEQA Guidelines. .

The comment requests documents that were not used to analyze potential environmental impacts of the project and are not part of the technical studies of the Draft EIR/EA. These documents were made available under the guidelines of the Public Records Act and sent to the commenter on August 23, 2010.

The comment also expresses that previous comments provided on the scope of the project to enhance safety at additional locations were not addressed in the Draft EIR/EA. See Response to Environmental Protection Information Center's Comments 14 and 15 for details on investigations and new projects that will address safety concerns between Hiouchi and Gasquet. See Grouped Response #8 for a discussion of how project locations were selected.

Response to Comment 3

This comment expresses concern regarding the proposed project and geologic instability and requests records documenting rockslides that occurred before and after improvements to the upslope areas along US 199. Preliminary geotechnical reports prepared for the project are listed on page 2.2-17 of the Draft EIR/EA and are available for public review at the Department's District 1 offices located at 1656 Union Street, Eureka, CA 95501. See grouped response #10 for a discussion regarding cut slopes and geologic stability.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment requests additional information and reports, stating they are necessary for review of the DEIR/EA. According to an email sent from Gary Berrigan to Eileen Cooper on August 10, 2010, the Geotechnical studies that the commenter lists were and are available for public review at the Department's offices located at 1656 Union Street, Eureka, as well as at the Crescent City Library. The other documents were stated as not being used to develop the DEIR/EA, so Mr. Berrigan suggested that Ms. Cooper make a request for those documents through a California Public Records Act (CPRA) Request. After the CPRA request was submitted by Ms. Cooper, the Department provided the remaining information, excluding the video tape of the truck tracking trials, on August 13, 2010. The cover letter for submittal of the CPRA documents to Ms. Cooper stated that a separate request and fees would need to be submitted if the video tape was desired.

No revisions to the Draft EIR/EA are necessary.

Czapla, Carol

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/13/2010 03:19 PM -----

"Carol" <carolzap@charter.net>

08/01/2010 11:07 PM

To <kimberly_hayler@dot.ca.gov>

cc

Subject Hwys 197 & 199 Proposed Expansion

Ms. Hayler:

I've been following the articles in The Daily Triplicate regarding the proposed expansions of Highways 197 & 199 to allow STAA trucks. I cannot see that as a justification for spending $26.5 million-plus on this road project, as well as creating traffic delays and havoc for 4 to 5 years during road construction on Hwy. 199, the main east-west route in Del Norte County . I think you are totally missing the point and not addressing the real problem, i.e. closures of this road due to rockslides. There are numerous locations on Hwy. 199 where rockslides have occurred repeatedly for many years resulting in repeated closure of this important link between the Rogue Valley and the NW CA coast. A real solution with substantial barriers like those erected on Hwy. 101, south of Crescent City, need to be erected. As pointed out by David Bruce of Gasquet in his letter to the editor of The Daily Triplicate, "If you want a freeway for the STAA trucks then an alternate route over the mountains should be pursued." 1

Thank you for your careful consideration of this matter.

Carol Czapla
carolzap@charter.net

Response to Carol Czapla

Response to Comment 1

This comment states that a road closures due to rock slides are the primary concern with 199 and suggests that access for STAA trucks should be provided by either substantial barriers along the roadway or a new highway over the mountains. Please see Grouped Response #1: Purpose and Need, grouped response #6 Alternate Route Linking US 101 to US 199 for further information regarding an alternative over the mountains, and Grouped Response #10 regarding geologic stability. Regarding the proposal to construct large barriers such as those south of Crescent City on US 101, that proposal would not address the purpose and need of the project. Barriers were not determined necessary to provide safe STAA access on SR 197 and US 199.

No revisions to the Draft EIR/EA are necessary.

Devlin-Craig, Brenda

Brenda Devlin-Craig
4771 Wonder Stump
Crescent City, CA 95531

August 19, 2010

Caltrans
Attention Kim Hayler,
Environmental Coordinator,
P.O. Box 3700, Eureka, CA, 95502

RE: 197/199 Safe STAA Access

Dear Ms Hayler,

I am writing to comment on the proposed work on HWY 197/199 project. The purpose of the project is to widen the HWY allow for the larger STAA trucks, which is expected to improve the economy of the area. I am concerned about the increase of traffic on 199, especially of larger trucks. The existing economy of the area already relies on daily travel along HWY 199, in all size vehicles. This project could adversely affect the existing economy through traffic delays and slower commute times. Tourist traffic added to current large trucks already slows traffic speed considerably. 1

One problem is that the current "turnouts" are often not used. This has not only led to traffic delays and back-ups; it has also led to dangerous driving by frustrated motorists. Although it will not completely solve the problem, better signing is imperative to increase the use of the turnouts. The current signs are in small lettering, off to the side (not very visible) and the "to allow passing" signs (in even smaller lettering) are almost always missing. In other parts of California and in Oregon, turnouts are marked with signs saying "slower vehicle turnout", which gives motorists a better understanding of what they are. In Oregon, the turnouts are very well marked, with larger signs and arrows on the roadway. Each turnout also has a sign stating that "slower vehicles must use turnouts". I am requesting that a sign plan for the turnouts similar to those of Oregon, be included in the project plan. This minor change to the project could significantly improve traffic flow. 2

Another change is to add the name "Brookings" to the direction sign at HWY 197. Numerous cars with Oregon plates slow at 197, but drive out to HWY 101 and then turn towards Oregon. This minor change will also help with traffic issues on 199. 3

One other problem area is the Redwood National Park Simpson-Reed grove parking area on 199. It is a seriously dangerous area during the tourist season. It appears that people on vacation forget HWY rules, and have frequently come to a complete stop on the HWY looking for a parking spot. I have narrowly avoided multiple car piles-ups several times, even though I always reduce my speed through there. People often walk across the HWY without looking, or have young children running around the parking area. The chances of someone getting hurt or worse at that site are very high. At a minimum, the speed limit should be reduced (45 max, and that is even too fast). The best scenario is to get the parking area off the highway. 4

I hope you will consider these suggestions when completing the project plan. I drive this road almost every day, and if these changes are not made, my commute will become even more difficult!

Thank you,

Brenda Devlin-Craig

Responses to Brenda Devlin-Craig

Response to Comment 1

This comment expresses concern over traffic volumes on the route and the potential for increased truck traffic to affect local commuting traffic. The results of the traffic analysis prepared for the Draft EIR/EA for with-project conditions indicate that no substantial negative impacts on the level of service (LOS) of roadways within the study area would result from the proposed project. [LOS is a qualitative measure of traffic flow conditions that varies from LOS A (least congestion) to LOS F (most congestion).] As discussed on pages 2.1-71 through 2.1-73 of the Draft EIR/EA, all roadway segments on US 101, US 199, and SR 197 included in the traffic analysis are anticipated to operate at or better than their selected concept LOS under both existing and future (2030) conditions. Traffic is expected to continue to travel at free-flow speeds on all study roadways. As a result, operational impacts on commute and travel times along the SR 197/US 199 corridor are anticipated to be less than significant.

Substantial impacts on travel times, however, would occur during the project construction period, as acknowledged in the Draft EIR/EA. The impacts of delays on travelers using the SR 197/US 199 corridor are described in the "Temporary Construction-Related Access and Circulation Impacts" section of the Draft EIR/EA, on pages 2.4-14 through 2.4-19. As discussed in that section, the lack of reasonable alternative routes between the US 101 and the I-5 corridor means that many US 199 users would often face substantial delays during construction of the project when traveling along US 199. The overlapping and long construction schedules for the project improvements, spanning five construction seasons, also suggest that impacts on motorists could be substantial. Measures to reduce temporary access and circulation impacts are described on pages 2.4-20 and 2.4-21. Additionally, see Grouped Response #2 for a discussion of potential impacts on the tourist economy resulting from delays during project construction.

Travel delays during the project construction period will be kept minimized and controlled by measures included in the project's Transportation Management Plan (TMP). The TMP will be updated as the project progresses through the project development process as is typical for all Department highway projects.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment states that slower vehicles are not using the turnouts appropriately and alternate signage would alleviate this problem. The State of California has published the California Manual of Uniform Traffic Control Devices (California MUTCD) to adopt uniform standards and specifications for all official traffic control devices in California, in accordance with Section 21400 of the California Vehicle Code. Although changing standard signs might be useful at certain locations, or bring more character to an area, we need to provide uniformity for the traveling public so that we don't confuse people, and so we are effective in conveying important information.

The California MUTCD incorporates two documents, Federal Highway Administration's Manual on Uniform Traffic Control Devices (2003 Edition Revision 1) dated November 20, 2004 and the MUTCD 2003 California Supplement dated May 20, 2004. The California Manual of Uniform

Traffic Control Devices (California MUTCD) specifies that the TURNOUT sign shall be placed at the entrance to a turnout. The SLOWER TRAFFIC USE TURNOUTS or SLOWER TRAFFIC USE TURNOUTS TO ALLOW PASSING sign shall be used in advance of the first turnout on a route and at other locations as needed. The SLOWER TRAFFIC USE TURNOUTS and SLOWER TRAFFIC USE TURNOUTS TO ALLOW PASSING signs are not intended to be used in advance of each individual turnout. This may help to explain why these signs are not at each turnout location.

It is the law for certain vehicles to use turnouts, however it is not the law for all vehicles to use turnouts. According to the State of California Vehicle Code, CVC 21656, "On a two-lane highway where passing is unsafe…a slow-moving vehicle, including a passenger vehicle, behind which five or more vehicles are formed in line, shall turn off the roadway at the nearest place designated as a turnout by signs erected by the authority having jurisdiction over the highway, or wherever sufficient area for a safe turnout exists, in order to permit the vehicles following it to proceed." Unfortunately, we cannot change the attitudes or etiquette of motorists using the facilities, but if we could, driving everywhere would probably be much more pleasant.

In regards to the sizes and visibility of the existing turnout signs, we appreciate your suggestions, and Traffic Safety has since performed a review of all of the turnout signs on DN 199 and 197. In July of 2011 we ordered 20 new signs and we are awaiting their arrival. As soon as we receive them, they will be scheduled for installation. We hope that you, and all other motorists, find the new signs easier to see.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment states that it would be beneficial to have a "Brookings" sign on US 199 at SR 197 to assist some motorists and reduce traffic on US 199. Traffic Safety has considered this suggestion and a new sign panel will be placed below the existing sign with an arrow pointing toward SR 197 that says 'Oregon' next to the '101' Route shield. Caltrans has ordered and received two of these signs (one for southbound Highway 199 and one for northbound Highway 199) and both signs are scheduled for installation. We appreciate this information (regarding confused motorists) and your efforts in communicating these issues.

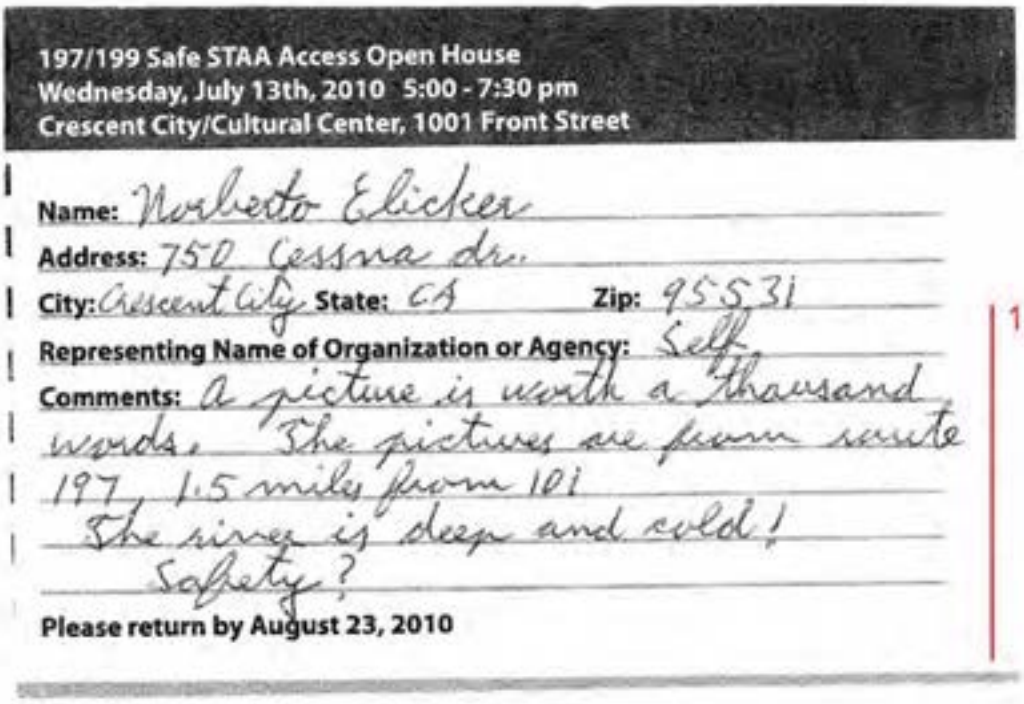
Response to Comment 4

This comment states the parking area for Redwood National Park Simpson-Reed grove on SR 199 presents a safety hazard and suggests lower speed limit, alternate signage and moving the parking off the highway. This site is outside the scope of this project and this DEIR/EA; however the following response is provided. The signing at this location has been enhanced to aid motorists and warns of the presence of pedestrians. The parking at this location has also been modified. In addition, State Parks has removed some of the trail head signing.

Also, see Grouped Response # 8 for a discussion regarding the process for reducing speed limits.

No revisions to the Draft EIR/EA are necessary.

Elicker, Norberto



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: Norberto Elicker
Address: 750 Cessna dr.
City: Crescent City State: CA Zip: 95531
Representing Name of Organization or Agency: Self
Comments: A picture is worth a thousand words. The pictures are from route 197, 1.5 miles from 101
The river is deep and cold!
Safety?
Please return by August 23, 2010

1

Response to Norberto Elicker

Response to Comment 1

This comment states that there is a safety concern at on SR 197 between PM 5.5 and PM 6.0. On 3/2/2012 Caltrans initiated a formal Traffic Safety investigation on SR 197 from PM 5.5 to PM 6.0. We will be investigating this area to determine if any changes are necessary. Thank you for the comment. Our Department agrees with you that safety for all users is a priority.

Please see Grouped Response #8: Safety and response to Center for Biological Diversity's Comment 6 for further discussions regarding safety.

No revisions to the Draft EIR/EA are necessary.

Hague, Joe

MEMORANDUM

To: Kimberly Hayler

Date: July 23, 2010

From: Joe Hague

Subject: Northbank Rd Project, Crescent City, Ca

Thanks for soliciting feedback to proposed project. I own 4751 Northbank Rd, the severely impacted home and three acres represented by my tenant, DeAnn Rupert, at your public meeting. The house/property, is situated between your proposed projects Ruby 1, and Ruby 2. Even a minimal widening of the road would render the house worthless due to traffic on the front porch. Increased traffic of larger tucks would significantly devalue my property due to noise and safety issues. 1

Naturally, I am vehemently opposed to anything that devalues my property, or takes my old farmhouse, an unofficial Del Norte County landmark for seventy years.

Please inform me of any mitigating gestures the state has planned, in the event this plan goes through.

Thank you.

Respectfully,

Joe Hague
707 815 5111
P. O. Box 5554, Ventura, Ca 93005
Jghague@yahoo.com

Response to Joe Hague

Response to Comment 1

The comment states concern that the Ruby projects will adversely impact his property due to encroachment, noise and safety issues. This parcel is outside the limits of work for the proposed project, thus there will be no road widening at this residence. See response to Doreen Bruce's Comment 6 for information about anticipated traffic noise as a result of the proposed project. Also see Grouped Response #8 for a discussion regarding safety.

The commenter also suggests that his property might be devalued. Effects to property valuation are not part of the NEPA and CEQA process, and are not addressed in the DEIR/EA.

No revisions to the Draft EIR/EA are necessary.

Miller, Ken

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 08/24/2010 08:44 AM -----
Ken Miller <tamer1@suddenlink.net>
08/23/2010 04:54 PM
To
Kim_Hayler@dot.ca.gov
cc
Kim_Floyd@dot.ca.gov
Subject
199/197 STAA Safe Access DEIR comments

TO: CalTrans
RE: 199/197 STAA DEIR
8/23/10
(Kim, please forward if I got the email address wrong, thank you)

Please respond to the following:

The traffic study concluding there will be no increase in STAA traffic failed to evaluate the cumulative effects of opening either or both Richardson Grove (RG) and 299 (and 20) to STAA traffic in the very near future (foreseeable). This would be like comparing traffic with and without a deadend at the end of the road. Please defend the validity of this study without these cumulative effects considered. 1

The pollution, noise, safety and growth induction potential of these trucks is very different when the north-south through-way through Richardson grove is complete, or the connector to I-5 via 299 or 20 is opened for STAA traffic than without these. Home Depot and WalMart have both actively lobbied your District 1 for opened STAA access through RG. Please include in your explanation why these Big Boxes would not benefit all along this route, opening up sprawl development potential that should at least be evaluated. Why have you dismissed these impacts with the glib response that bigger trucks mean fewer trips, when this reasoning obviously omits the effects from through traffic.

Thank you

Ken Miller
1658 Ocean Drive
McKinleyville, CA 95519

Response to Ken Miller

Response to Comment 1

The cumulative growth assessment conducted for the Draft EIR/EA considered the effects of the 197/199 Safe STAA Access Project together with those of the Richardson Grove Improvement Project (Draft EIR/EA pages 2.5-7 through 2.5-9). Considered together, the two projects would improve economic conditions in Del Norte and Humboldt counties by lowering transportation costs for some businesses. This would result in increased profitability for affected businesses, increased employment and income within the region. As summarized in Table 2.5-2 of the Draft EIR/EA, the cumulative effects of the projects are estimated to include about 130 additional jobs and a $7.4-million increase in jobs-related personal income in the two counties. While beneficial, these economic impacts would be relatively small in the context of the combined economies of the two counties, representing a 0.2% increase in both employment and personal income over 2007 levels. Cumulative population growth induced by the two projects in the two-county area is estimated at about 310 persons. This upper-range estimate of growth represents less than 0.2% of both the estimated 2008 and projected 2030 combined populations of the two-county area, a relatively minor increase and well within the growth levels anticipated for the two counties over the next 20 years.

The traffic forecasts were based on these economic growth forecasts and therefore include the cumulative impact of the Richardson Grove project on US-101. In a similar fashion, the traffic forecasts also considered the additional population growth in both the North Coast and the Northern Sacramento Valley, connected via SR 299.

The commenter also has raised the issue that providing improved STAA truck access to the North Coast region could attract more large retailers (so-called “big-box” stores) to the study area, leading to sprawl. Currently, big-box retailers Wal-Mart and Home Depot are located in the Crescent City area, a Target, a Kmart, a Walmart and a WinCo are located in Eureka and there is a Kmart in McKinleyville. As discussed in the Community Impact Assessment prepared for the project (pages 4-80 and 4-81), large retailers surveyed for the traffic study indicated that providing STAA access along the SR 197–US 199 corridor would do little to change their operations and would not likely generate expansion of their businesses. The information provided by these retailers indicates that many retail shippers in the area would not change the number of shipments or shipping patterns in the event of STAA improvements because shipping patterns to regional stores are already well established; trucks often travel north along US 101, delivering to stores along the route. For most large chain retailers, routes are determined by the location of stores in the chain and would not necessarily change in response to new STAA truck access. Therefore, it is unlikely that the incrementally lower transportation costs provided by improved STAA truck access to the region would play a major role in attracting new big-box retailers to Del Norte or Humboldt counties, and effects on small retailers and the natural environmental would be minimal. According to research conducted for the Community Impact Assessment (pages 4-42 through 4-44), regional market size would play a much more important role in attracting additional big-box stores to the North Coast region than would incrementally lower transportation costs. (This issue is discussed in greater detail on pages 4-42 through 4-44 and 4-80 through 4-81 of the Community Impact Assessment.)

No revisions to the Draft EIR/EA are necessary.

Nowliss, Georgia

197/199 Safe STAA Access Public Hearing
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City Cultural Center, 1001 Front Street

Name: Georgia Nowlis
Address: P.O. Box 4204
City: Brookings **State:** OR **Zip:** 97415
Representing Name of Organization or Agency: Business Owner / Curry County Commissioner
Comments: It is important to consider and give equal weight to the social/economic impacts of this project as well as the environmental. Sorry I was unable to attend the July 13th meeting. 1
Must be received by August 23, 2010

Response to Georgia Nowlis

Response to Comment 1

The Department's decision to implement the project will be made considering the information in the Draft EIR/EA, the PREIR/SEA and FEIR/EA, which characterizes the beneficial and adverse effects of the project, including the project's social, economic, and environmental effects. These effects are described in Chapter 2 of the Draft EIR/EA and in the Community Impacts Assessment, both of which are available at the Department's District 1 office, 1656 Union Street, Eureka, and at the public library in Crescent City.

No revisions to the Draft EIR/EA are necessary.

Pederson, Richard

197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: RICHARD PEDERSON
Address: PO BOX 1195
City: CRESCENT CITY **State:** CA **Zip:** 95531
Representing Name of Organization or Agency: SELF
Comments: NO AMOUNT OF IMPROVEMENTS WILL MAKE STAA TRUCKS SAFE IN SMITH RIVER CANYON. THERE WILL BE MORE ACCIDENTS AND SPILLS IN RIVER, OUR WATER SUPPLY. I APPROVE OF WIDENING AT THE NARROWS (GORGE), BUT THIS WILL ALWAYS BE A DANGEROUS HIGHWAY TO DRIVE AND NO PLACE FOR OVER-SIZED TRUCKS. SO I OPPOSE THIS PLAN AS IT HAS BEEN OFFERED UP. 1
Please return by August 23, 2010 Richard Pederson 8/22/10

Response to Richard Pederson

Response to Comment 1

This comment opposes the project and expresses concerns regarding road safety and hazardous materials spills and water quality issues and while it approves of widening at the Narrows, it states it will never be safe for STAA trucks and therefore opposes the proposed project.
The Department's decision to implement the project will be made considering the information in the Draft EIR/EA, which characterizes the beneficial and adverse effects of the project, including the potential for hazardous spills. This is described in Chapter 2 pages 2.2-31 through 2.2-33 of the Draft EIR/EA. See Grouped Response #8 for more information regarding safety issues.

No revisions to the Draft EIR/EA are necessary.

Peterson, David

197/199 Safe STAA Access Public Hearing
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City Cultural Center, 1001 Front Street

Name: LT. DAVID PETERSON
Address: 1444 PARKWAY DRIVE
City: CRESCENT CITY **State:** CA **Zip:** 95531
Representing Name of Organization or Agency: CHP
Comments:

Must be received by August 23, 2010

Response to David Peterson

This comment card did not include any comments. No revisions to the Draft EIR/EA are necessary.

Pounds, Jacob

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/16/2010 08:22 AM -----
Jacob Pounds <siskiyousunphlower@yahoo.com>
08/23/2010 04:21 PM
To
Kimberly.Hayler@dot.ca.gov
cc

Subject
NO Widening of HWY 197/199

Dear CalTrans Representative,

How do y'all keep coming up with these ridiculous projects in the face of the budget shortage? 1

DO NOT CUT OLD GROWTH REDWOOD ALONG HWY199. 2

I oppose this project, as a tax-paying citizen of California. The road is fine and usable in its current state to smaller trucks with equal payloads as STAA trucks. 3

Best regards,
Jacob Pounds
Eureka, CA

Responses to Jacob Pounds

Response to Comment 1

This comment questions the Purpose and Need for this project. Please see Grouped Response #1: Purpose and Need for an explanation of why this project is being considered despite the State's economy and where the majority of funding will come from.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment suggests finding an alternative which does not involve the removal of old growth redwoods on 199. There were no plans in the Draft EIR/EA to remove large redwoods on 199. The alternatives selected as preferred alternatives along 197 do not involve the removal of large redwoods. See Grouped Response # 4: Large Redwoods.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment states opposition to the project and questions the purpose and need. Please see Grouped Response #1: Purpose and Need for a detailed explanation of why the Department developed the purpose and need, and see Grouped Response #2: Costs versus Benefits regarding additional benefits of the project.

No revisions to the Draft EIR/EA are necessary.

Powers, Vern

swilcanvern@charter.net ()

08/01/2010 04:43 PM

To Julie_East@dot.ca.gov

cc

Subject traffic congestion/construction problem

Below is the result of your feedback form. It was submitted by (swilcanvern@charter.net) on Sunday, August 1, 2010 at 16:43:41

1

question: I cannot see how the minimal benefits for the Hwy 197-199 project justify the costs. Ill be keeping this in mind next time I vote for those involved. Weve already seen what a spill in the smith river can cost. Why would we risk this again? Many motorcyclist consider this one of the best rides in the Country. I guess that would change (along with the cash they bring)? I am opposed to this for too many reasons to name here.
Vern Powers, Gasquet Ca.

Response to Vern Powers

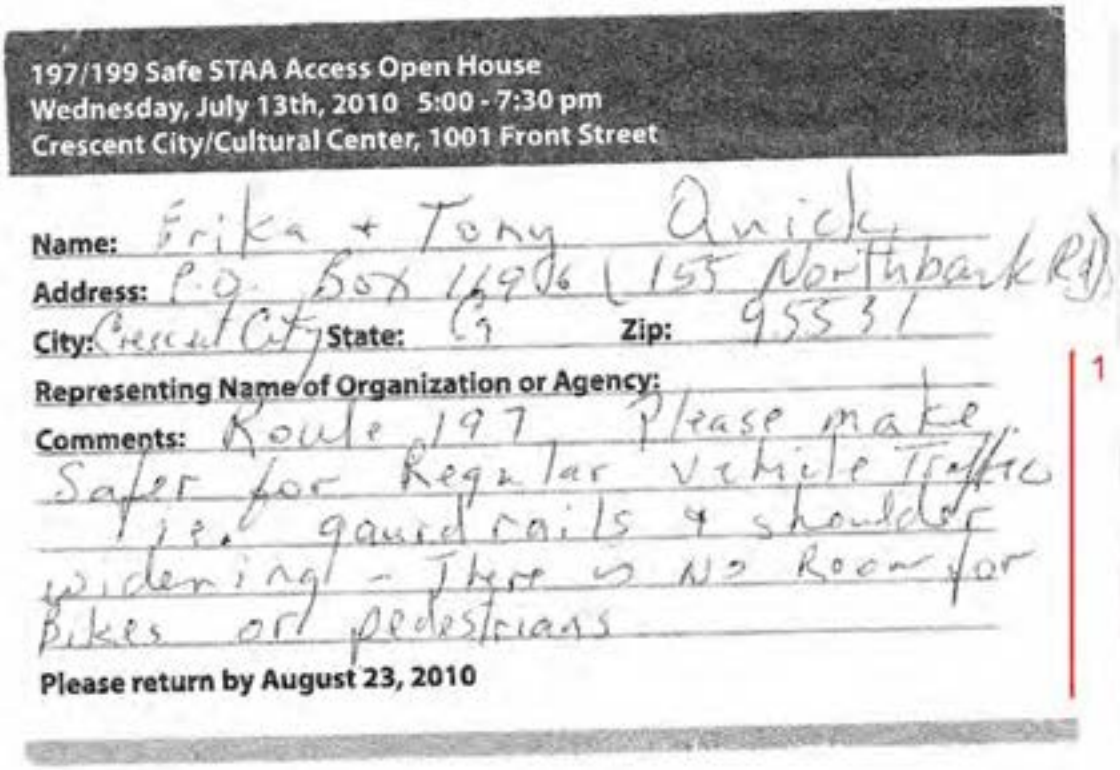
Response to Comment 1

This comment expresses concern regarding the costs vs. the benefits of the project, the potential loss of tourism revenue (motorcyclists, in particular) and the potential costs of hazardous material spills near the Smith River. Please see Grouped Response #1: Purpose and Need for a more detailed explanation of why the project is being considered despite the costs as well as the potential benefits. See Grouped Response #2 for a discussion of benefits versus costs of the proposed project.

Regardless of whether the 197/199 corridor is re-designated to allow STAA trucks, the potential for spills is not likely to change dramatically or at all. A discussion of hazardous material spills is provided in section 2.2.4, particularly starting on page 2.2-31, in the DEIR/EA. The trucking survey and subsequent traffic analysis did not identify any additional increase in hazardous material shipping (Fehr & Peers 2010). The research did not identify any new land uses (producers) that would require an increase in hazardous materials nor did any shippers state that they would increase any hazardous materials loads as a result of STAA designation and/or the safety improvements. The projected number of trucks that would use the corridor each day is not anticipated to increase significantly, and, likewise, shipping patterns of the local trucking industry are not anticipated to change significantly; therefore, the risk of accidental release of hazardous materials into the environment would not increase significantly due to the construction of the proposed project and the corridor becoming STAA accessible. In addition, the project will improve the highway geometrics, enhancing safety for all users. Therefore, an increase in hazardous materials spills is not anticipated.

No revisions to the Draft EIR/EA are necessary.

Quick, Erika & Tony



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

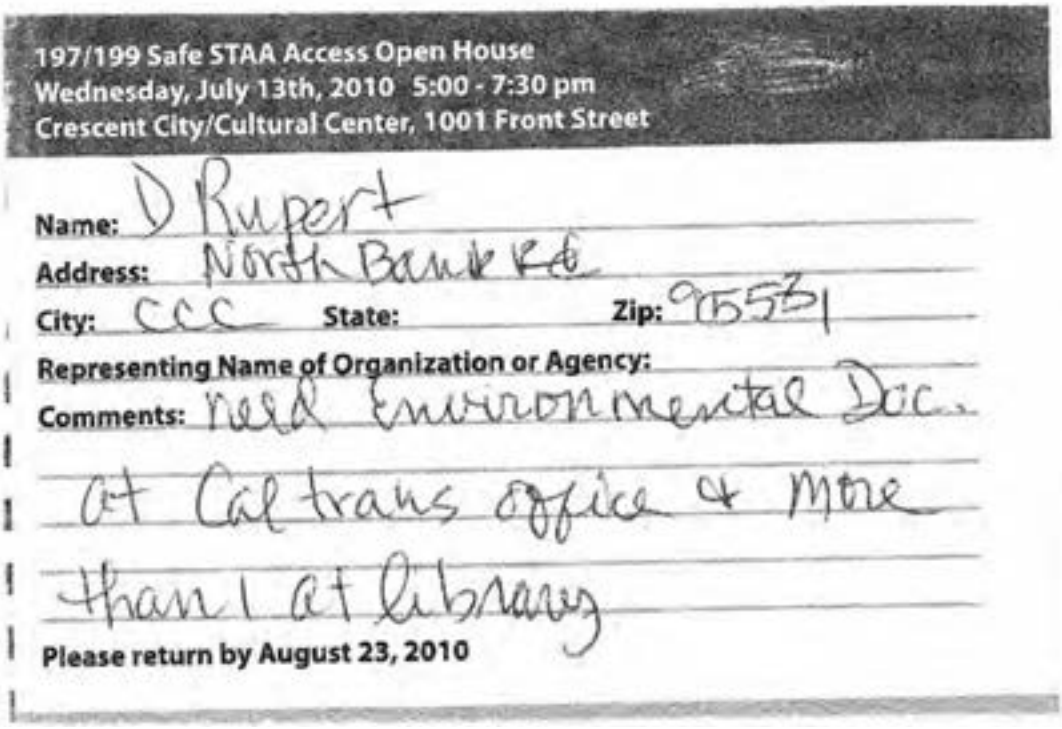
Name: Erika + Tony Quick
Address: P.O. Box 1696 (155 Northbank Rd)
City: Crescent City State: Ca Zip: 95531
Representing Name of Organization or Agency:
Comments: Route 197 Please make Safer for Regular vehicle Traffic i.e. guard rails & shoulder widening - There is No Room for Bikes or pedestrians 1
Please return by August 23, 2010

Response to Erika & Tony Quick

Response to Comment 1

This comment concerns the safety of all users on our state highway systems. We agree with you that the safety of all users is important. While the primary purpose of this project is to accommodate STAA trucks, the proposed project includes safety-enhancing improvements such as; wider lanes, wider shoulders, longer-radius curves, and improved sight distances. These improvements would create more recovery area for vehicles (small or large) as well as provide more space and visibility of pedestrians and bicyclists using the facilities. We also recently installed "Share the Road" signs that display an image of a bicycle. Although there are locations along these highways with no shoulder, bikes and pedestrians are not restricted from using these highway facilities. Also, see Grouped Response #8 and the response to Center for Biological Diversity's Comment 6 for more information regarding safety issues.
No revisions to the Draft EIR/EA are necessary.

Rupert, DeAnn



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: D Rupert
Address: North Bank Rd
City: CCC State: Zip: 95531
Representing Name of Organization or Agency:
Comments: need Environmental Doc. at Caltrans office & more than 1 at library
Please return by August 23, 2010

1

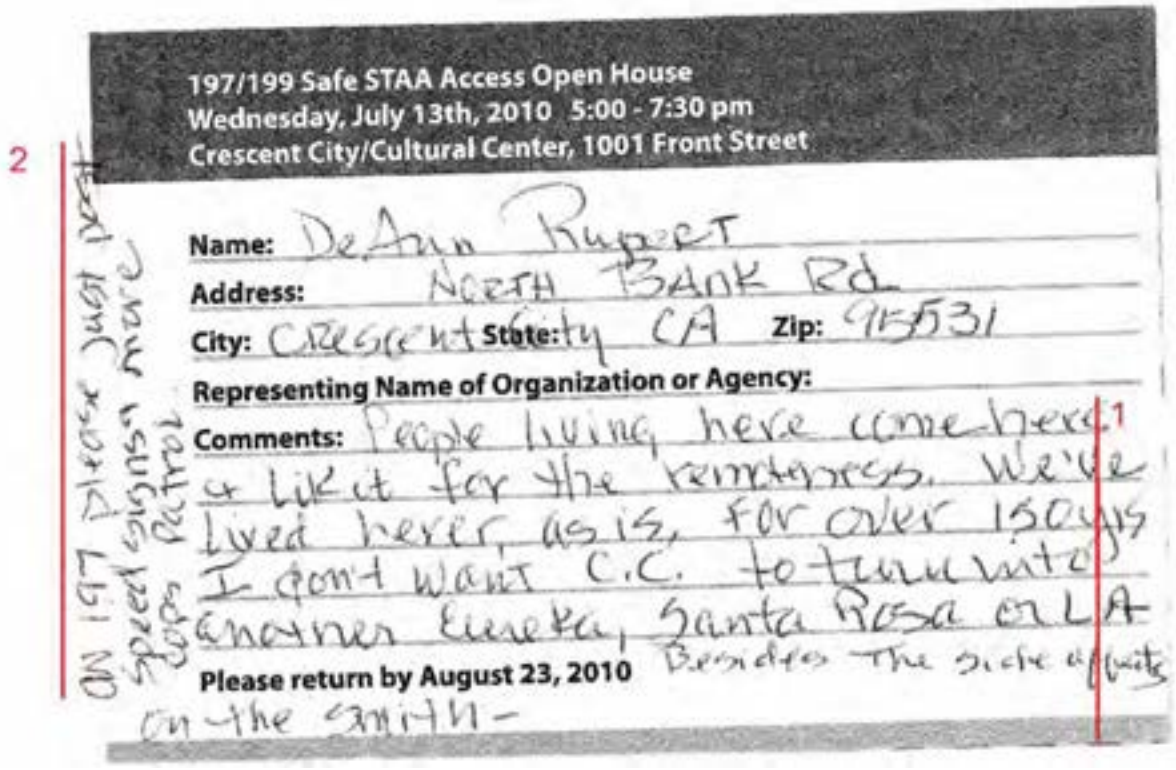
Response to DeAnn Rupert

Response to Comment 1

Environmental documents are made available at the District 1 Office at 1656 Union Street in Eureka as well as the public library in Crescent City. The Draft EIR/EA was made available for public viewing at the District 1 office, the local library, the Del Norte Transportation Commission office, and online for viewing or downloading.

No revisions to the Draft EIR/EA are necessary.

Rupert, DeAnn



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: DeAnn Rupert
Address: North Bank Rd
City: Crescent City State: CA Zip: 95531
Representing Name of Organization or Agency:
Comments: People living here come here & like it for the remoteness. We've lived here as is, for over 150 yrs I don't want C.C. to turn into another Eureka, Santa Rosa or LA Besides the side effects on the Smith -
Please return by August 23, 2010

2 On 197 Please just put speed signs, more patrol

1

Responses to DeAnn Rupert

Response to Comment 1

The comment does not address the DEIR/EA or the proposed project directly. The commenter is expressing concern that the remoteness of Crescent City would be lost and concern for "side effects on the Smith" River. Please see the response to EPIC's Comment #8 for a discussion regarding community cohesion and anticipated impacts. To ensure beneficial uses of the Smith River are protected from the proposed improvements, the Department will implement Best Management Practices (BMPs) at each project location to minimize or avoid degradation of storm water runoff flowing to the Smith River and its tributaries. Please see Section 2.2.2 for further information on water quality, measures to control storm water runoff, and BMPs. Also, see response to Vern Powers # 1 for information regarding the project's potential regarding hazardous materials spills.

The California Highway Patrol is responsible for speed enforcement on all state highways. And while adherence to posted speed limits can be increased by traditional law enforcement, resources for all state agencies are limited

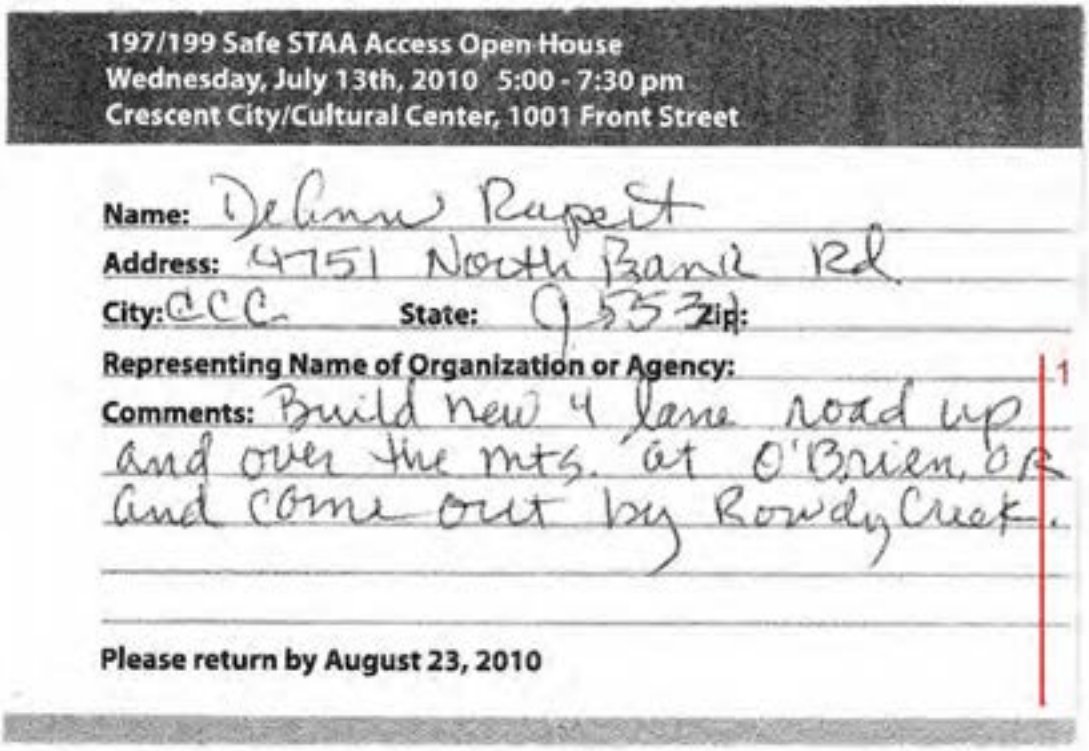
No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment is a request for speed limit signage and increased law enforcement on SR 197. The proposed project would improve sections of SR 197 and US 199 by widening, improving tight radius curves, and providing wider shoulders, allowing drivers additional room for recovery and for negotiating tight curves with opposing traffic, or when bicycles or pedestrians are present (DEIR pg1-3 and 1-4). And while increased speed limit signage and law enforcement could help increase safety on SR 197, these measures would not address the primary need for the project. See the revised Need statement in Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification of the project need and an explanation of safety benefits of the project.

No revisions to the Draft EIR/EA are necessary.

Rupert, DeAnn



197/199 Safe STAA Access Open House
Wednesday, July 13th, 2010 5:00 - 7:30 pm
Crescent City/Cultural Center, 1001 Front Street

Name: DeAnn Rupert
Address: 4751 North Bank Rd
City: CCC State: CA 95531 Zip:
Representing Name of Organization or Agency:
Comments: Build new 4 lane road up and over the mts. at O'Brien, OR and come out by Rowdy Creek. 1

Please return by August 23, 2010

Response to DeAnn Rupert

Response to Comment 1

This comment suggests an alternate route for transportation between I5 and Crescent City and US 101. The suggested route would be infeasible due to effects on the environment. See Grouped Response #6 for a full discussion regarding an alternative route linking US 101 to US 199. No revisions to the Draft EIR/EA are necessary.

Simkhovitch, Perrianne

August 18th, 2010

1 Dear Kimberly,
I talked to Eileen in the library, & appreciates all the difficult research she is doing concerning Hwy 199, where I live. We are on a fragile serpentine outcrop in transition. I believe Hwy 199 is as developed as it should be - barring just upkeep and maintenance.

2 By the way, cars here are doing 60 mph in spite of the clear speed warning. Meanwhile, I'm at 6 mph on my bicycle! We all need to slow down and simply appreciate the mystic corridor. Some byways - like Ortega, are naturally more dangerous.

Thank you, [illegible]

Statendam

Kimberly Hayter
CA Department of Transportation
North Region Environmental
unit E1
P.O. Box 3700
Eureka, California
95502

Responses to Perrianne Simkhovitch

Response to Comment 1

This comment states that only general maintenance should be performed on US 199; it does not address the DEIR/EA or the proposed project. See Grouped Response #1 for a discussion regarding the purpose and need of the project and Grouped Response #2 for a discussion of anticipated benefits. See Chapter 2 Section 2.2.3 for further information regarding the geology of the project area(s) and Grouped Response #10 for information on geologic stability. The commenter's proposed alternative of maintaining US 199, without further changes to the route, would not achieve consistency with the federal or state legislation or local program, plan, and route concept reports or the purpose and need of the project since maintenance would not affect offtracking by STAA trucks. Additionally, the proposed wider shoulders, road curve and superelevation improvements, and improved sight distances that would be achieved if the project was built would enhance safety of the route for all users.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment does not address the DEIR/EA or the proposed project. It expresses concern regarding speeding cars and that some areas (i.e. Ortega) are more dangerous than others. See the Grouped Response #1 for clarification of the project need and an explanation of safety benefits of the project. Grouped Response #8 for more information regarding safety and speed limits, and the response to Environmental Protection Information Center's Comments 14 and 15 for details on investigations and new projects that will address safety concerns between Hiouchi and Gasquet.

No revisions to the Draft EIR/EA are necessary.

Souza, Ted

20 AUG 2010

TO: KIM HAYLER ENVORNMENTAL COORDINATOR
CALTRANS P.O. BOX 2700
EUREKA CA 95502

FROM: TED W SOUZA
P.O. BOX 229
GASQUET CA 95543

SUBJECT: HWY 197/199 STAA PROJECT

A. MY LETTER DATED 28 APRIL 2008

DEAR MR HAYLER

I VIEW WITH GRAVE CONCURN THE MANY BAD TURNS ADDRESSED BETWEEN MILE POST 13.00 AND MILE POST 6.55 THAT HAVE MAJOR PROBLEMS THAT ARE NOT ADDRESSED IN THE DRAFT ENVORNMENTAL INPACT REPORT, THAT ARE SAFTY ITEMS. 1

THIS PLAN STATES THERE WILL BE ECONOMIC GAINS MAUBE OR COULD ? 2

THIS PROJECT DOSN'T STRIGHTEN ANY CONERS IT SLIGHTLY LENGTHENS THE RADIOUS OF A CURVES AND MANY DANGERIOUS AREAS REMAIN. 3

IN THE AREA OF MILE POST 6.55 THE SPEED LIMIT SIGN SAY END OF 50 MPH. THIS SHOULD BE REVIEWED AS YOUR GOING INTO A SHORT CURVE WITH A ROAD COMMING OUT IN THAT AREA.

ENCLOSED IS MY LETTER DATED 28 APR 08 SUBJECT CAL/TRANS MEETING STAA STILL APRLIES

SINCERELY

Ted W. Souza

Souza, Ted

April 28, 2008

To: Kevin Church, Project Manager
CAL.TRAN P O Box 3700
Eureka, Ca. 95502

From: Ted W. Souza
P O Box 229
Gasquet, Ca. 95543-0229

SUBJECT: CAL/TRANS Meeting of April 17, 2008
STAA Access

Dear Mr. Chruch,

My family has been coming to Del Norte County every since 1956, both winter to fish and summer for vacations and a full resident of Gasquet since 1972. 4

There have been many highway changes over those years; in 1963 the Collier Tunnel opened the East gateway to Del Norte County, was the Greatest; the Patrick Narrows, Blue Slide to name; a few others were very good.

I still pull my travel trailer up and down the canyon every year and still feel safe on both HWY 197/199.

For many years Loggers, Hambro, Lilly Bulb trucks and many other trucking lines used these roadways with very few problems. The roads are as safe asthe drivers and the loads they carry.

Do we need an environmental impack report? Yes. As your past record reads. 5

In 1962, CAL/TRANS made changes to the Smith River courses in several places. MP.20.05 Howard Griffith Bridgearea. To this day the Slides are Still active and coming down, effecting our Fishery. At MP.20.15 the hillside is still not stable.

At MP.19.00, after the 1964 flood CAL/TRANS used the old Cedar Forest camp ground fora fill site for every slide in the canyon. The high winter water usedto flood thru the camp ground and continue down stream.

PAGE 1 of 3

Souza, Ted

Now after your mountain of fill you have forced the high water on to the other side of the river, causing that other hill to come down destroying more large fishing holes and more precious fishery every year. Take some of your money and try to fix that. 5 cont.

Let's not forget the toxic spills of the past and not because of the roads. 6

As close as I can remember the dates are close and they did happen.

1962, the creosote spill above Bar-O got into the river, Not good for fish.

Early 1980's, late December, a ASBY gasoline truck full went into the river above Gasquet. High water at the time. Fumes were everywhere in the canyon.

In the 1990's the Hiouchi Bridge. A truck with a large crane took a shortcut, did not use Hwy.197, but used hwy.199 in the early AM took out the bridge. For 18 months we used Hwy197 to get to Crescent City. Not a road problem.

In 1993, above Bar-O, a beer truck spilled into the river, many cans of beer and some beer. Not good for the fish.

August, 1994, paint spill KP.28.00 area caused big fish kill: both Steelhead and Coho Salmon Smolts in the middle fork.

In 2000, around MP 25.30, an Otten Gasoline truck hit cement colvert, spilling a load of fuel in to ground water of the homes in the area. Not a road problem.

2006 or '07, MP. 2.56 in Jed Smith State Park, a large transformer fell off of a flat bed truck into Clarks Creek. Not good for fish.

PAGE 2 of 3

Souza, Ted

February, 2008, MP.11.30, 4000 Gal.+, diesel spill. CAL/HANS workers did an outstanding job of containing it with their quick response. Still being cleaned up to this day. Not a road problem either. 6 cont.

Del Norte County should promote tourism as our roads are very good by most standards. Remember, this is a National Recreation Area. We have had good growth without these STAA Trucks in Del Norte County. Let's keep it that way. This is a NRA and HWY 199 is a Scenic Highway. 7

Safty item not addressed at the meeting: HWY 197, MP 6.20 No guard rail. River very close and steep bank. HWY 199, just above MP.9.27, many, many single car accidents. (Speed?) Look at the trees on the turn. It may need a guard rail? 8

In the 15 years I was the Chief of the Gasquet Fire Dept., I don't remember one accident caused by the road. It was always the drivers, speed, wet weather or something else. 9

Thank you for this opportunity to express my thoughts.

Sincerely

Ted W Souza

Ted W. Souza

Copy to: Tamera Buchanan, Del Norte Local Trans. Comm.
Congressman Mike Thompson

PAGE 3 OF 5

Responses to Ted Souza

Response to Comment 1

This comment expresses concern regarding the safety of areas between PM 13.00 and PM 6.55 not discussed in the Draft EIR/EA. The Department agrees that safety for all users is a priority. Please see Grouped Response #8 for more information regarding safety and a discussion regarding the process for reducing speed limits, and the Responses to Environmental Protection Information Center's Comments 14 and 15 for details on investigations and new projects that will address safety concerns between Hiouchi and Gasquet.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment questions the economic gains from the project. See Grouped Response #2 for a discussion of anticipated benefits of the proposed project, including employment and personal income.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment states that the project does not straighten corners, but increases the radius of curves. Off-tracking is addressed with roadway geometrics by increasing the radius of a curve.

This comment also states that there is a problem with signs at post mile 6.55. Traffic Safety has reviewed the sign placement of the "End 50 Speed Limit" sign facing northbound traffic, and we find that it is still appropriate. Also, the narrowing and curvature of the road in this location is readily apparent to drivers, and a curve warning sign is posted to alert drivers to the sharp left-hand curve ahead.

Speed zones are set in accordance with the vehicle code. The rest of the highway has a maximum speed limit of 55 mph, which is the maximum speed limit per the vehicle code for two-lane, undivided conventional highways. See Grouped Response # 8 for a full discussion of safety and speed limits.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment does not provide a comment on the project or the Draft EIR/EA. The commenter notes his feeling of safety as he travels the SR 197/US 199 corridor and states that SR 197 and US 199 are "as safe as the drivers and the loads they carry."

No revisions to the Draft EIR/EA are necessary.

Response to Comment 5

The comment recalls work by the Department in the 1960's at specific locations that apparently affected the Smith River and the fisheries. The comment also suggests that the Department remedy environmental problems caused by past work by the Department. This comment does not

pertain to or mention the proposed project or the DEIR/EA. If the commenter is concerned about potential geologic impacts that might result from the proposed project, please refer to the discussion of potential geologic impacts and avoidance measures (e.g. stabilization of cut and fill areas) for the proposed project in the Draft EIR/EA in Section 2.2.3 and 2.4.8. The potential for debris to enter the river and a containment system at Patrick Creek Narrows Location 2 is discussed on page 2.4-38, Section 2.4.8 of the Draft EIR/EA. Additionally, preliminary geotechnical reports prepared for the project and which the Draft EIR/EA is based upon, are listed on page 2.2-17 of the Draft EIR/EA and are available for public review at the Department's offices located at 1656 Union Street in Eureka and at the public library in Crescent City.

The Department takes all practicable measures to assure that our projects have a minimal impact on water quality and minimize geologic instability, for both environmental and safety concerns. Department geologists assess every site and make recommendations as to the best and most stable roadway designs. See Grouped Response #10 for a discussion regarding proposed cut slopes and geological stability.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 6

The comment recounts several specific hazardous materials spill events that affected the Smith River. The survey and subsequent traffic analysis did not identify any additional increase in hazardous material shipping (Fehr & Peers 2010). The research did not identify any new land uses (producers) that would require an increase in hazardous materials nor did any shippers state that they would increase any hazardous materials loads as a result of STAA designation and/or the safety improvements. In addition, the project will improve the highway geometrics increasing safety for all users and the ability of STAA trucks to carry larger loads, including lightweight hazardous materials, is another attribute that could lead to a reduction in trucks needed to transport lightweight hazardous materials. Therefore, an increase in hazardous materials spills is not anticipated.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 7

The comment requests consideration of tourism, that the proposed project runs through a National Recreation Area, and that Del Norte County has experienced economic growth without STAA trucks. Please see Grouped Response #1: Purpose and Need for an explanation regarding the potential benefits of the project in addition to how the Department must meet federal, state, and regional programs, plans, and policies. This project is not anticipated to have a significant effect on tourism, please see Grouped Response # 2 for a complete discussion of tourism effects.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 8

This comment states there are additional sites with safety concerns within the corridor. See response to Grouped Response # 8 for an explanation of how the location of safety improvements are chosen and implemented.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 9

This comment does not provide a comment on the project or the Draft EIR/EA. The commenter states that he was Chief of the Gasquet Fire Department for 15 years and does not recall accidents being caused by the road, but recalls that accidents were caused by weather conditions or the driver's speed. This project was not initiated as a response to collisions. The purpose and need is to make the corridor STAA accessible. Please see Grouped Response # 1 for a full discussion of the purpose and need for the project.

No revisions to the Draft EIR/EA are necessary.

Zuehlke, Elmer

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/14/2010 01:08 PM -----

ERZuehlke@aol.com

08/20/2010 10:26 AM

To kimberly_hayler@dot.ca.gov

cc

Subject STAA access 197 199

Caltrans
Attention Kim Hayler
EnvironmentalCoordinator
P.O.Box 3700
Eureka, CA

Dear Ms. Hayler

Everything is backwards in CalTrans plan to modify North Bank Road (SR 197). North Bank Road is a residential area with old growth redwood trees over it's full length of 7 miles Also since there are no businesses along that road there is no reason for trucks to be on that road. So put the trucks on the road where the businesses are, US 199 and where it can best serve this vital function of connecting I 5 to Crescent City. 1

This brings to focus another backwards aspect of the plan, calling SR 197 a short cut. IT IS NOT. I can now drive south on the shortest side of the triangle and back up on the other side and add only 2 more miles. When the section of US 199 through the park is relocated too protect the tourist attraction , both the prize redwoods lining both sides of the road and the picture taking tourists who wonder out on the road at the very popular sub park, as if there were no cars or, worse still trucks , on it safety would be enhanced. Thus road safety would be vastly better, the trees and tourists would be protected, the road could be a strait high speed 4 lane one that might even be shorter than the present trip around the triangle, thus shorter for trucks to get from US 199 to Oregon. But who wants to drive a truck through Brookings? With this win / win plan trucks would also save driving time because the speed limit could be 55 mph. to CC or Oregon.

The modification will force STAA trucks from I 5 to drive 7 miles on the converted SR197 & 3 + more miles on US 101 to get to Crescent City unless they continue to battle the slow speed & the twist & turns of US 199 through the park with the high possibility of killing a
tourist . The truckers right now take that horse and buggy US 199 instead of SR 197 and when the north end of US 101 is fixed up, the trucker going to Oregon also will have clear sailing at 55 mph Oh yes, now the upper part of US 101 doesn't look suitable for the STAA but I think that band aides are being applied right now, I hope, to rectify that problem. The question at this point is, why is Caltrans so adamantly pushing changing SR197, one that is so

Zuehlke, Elmer

completely out of character for a 100 % residential area and one that is unsafe beyond belief? Smells like money. 1 cont.

Now with our plan of fixing US 199 through the park, the trucker will love going to CC . But what will he face going to Oregon? Well he can then speed around the 2 short sides of the triangle at 55 mph ignoring the long side., the miss labeled short cut. Even that is an improvement over what he can do now. For the residences on SR 197, even if the fixes started on SR 197 are not completed, it will be a far safer road without trucks and it will still be a very pleasant & a more safe one for the tourists going to the RED WOOD NATION PARK, the only
life blood that seems to be left for CC. How is this for a win / win fix especially when compared with the Caltrans 197 /199 plan?

There is yet another problem with putting trucks on SR 197. Touring bicyclists constantly ride
on SR 197 to get to the pa rk. This situation would be so dangerous with the change in SR 197 that bicyclists should not be allowed on it, as with freeways. 2
A MIX OF BIG TRUCKS &
BICYCLISTS ON SR 197 IS EVEN WORSE THAN CARS & TRUCKS ON THE SAME
ROAD !

What is SR 197 ? I hope not special road 197, because it is not special, it is a stand road with it's full length bordering the SMITH RIVER. 3

Also, how can I get a print out of the court reporter's notes ? I have a hearing problem & the
Trplicate's story was worthless . 4

Responses to Elmer Zuehlke

Response to Comment 1

This comment states that neither US199 nor SR197 are suitable for trucks, and suggests an alternative route. The Department is uncertain of the location of the alternative truck route. If the proposed alternative truck route is to have trucks use all of Route 199 instead of the Route 197-199 corridor, please see the "US 199 between US 199/SR 197 Intersection Alternative" discussion in Section 1.3.7.1 of the DEIR/EA. That alternative was considered but eliminated from further consideration because of the number of large trees that would have to be removed to improve this segment to STAA standards. Also, SR 197 is the designated route for movement of extralegal loads between US 101 and US 199, and there are no plans to change this.
If the proposed alternative truck route is in another location that requires new highway, or at least new lane construction, the anticipated environmental impacts would be too great to consider that a viable alternative. Environmental impacts would likely include water quality impacts, including many acres of new impervious surface, potential erosion and sedimentation into creeks and rivers; visual impacts; potential wetland impacts; cutting of many trees, some of which may be large redwoods; habitat impacts to, and potential take of sensitive and listed animal and plant species; and monetary costs that would be far greater than the currently proposed project. Please see the Group Response #6 for more details on alternative routes that were considered but eliminated from further consideration in the final EIR/EA.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment states concern for safety. Thank you for your comment concerning the safety of all users on our state highway systems. The Department agrees that the safety of all users is important. While the primary purpose of this project is to accommodate STAA trucks, the proposed project includes safety-enhancing improvements such as; wider lanes, wider shoulders, longer-radius curves, and improved sight distances. These improvements would create more recovery area for vehicles (small or large) as well as provide more space and visibility of pedestrians and bicyclists using the facilities. We also recently installed "Share the Road" signs that display an image of a bicycle. Although there are locations along these highways with no shoulder, bikes and pedestrians are not restricted from using these highway facilities.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment asks what SR197, and whether it is a "special road". "SR 197" stands for "State Route 197". This comment does not provide a comment on the project or the Draft EIR/EA.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment asks where a print out of the notes of the public meetings can be obtained. Environmental documents, including this one that contains the transcript of the public meeting, are made available at the District 1 Office at 1656 Union Street in Eureka and at the local library in Crescent City. The Final EIR/EA will be available for public viewing at the District 1 office,

the local library, the Del Norte County Local Transportation Commission office, and online for viewing or downloading.

No revisions to the Draft EIR/EA are necessary

Zuehlke, John

RECEIVED
AUG 23 2012

SCOPE

THIS DOCUMENT IS PRESENTED AS COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT (HEREINAFTER "DEIR/EA") SUBMITTED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION (HEREINAFTER "CALTRANS") FOR THE "197/199 SAFE STAA ACCESS" PROJECT(S).

SUMMARY

1. The use of STAA trucks will have an overall damaging effect on the economics and lifestyle of Crescent City and all of Del Norte County. 1

2. Allowing STAA trucks access to US-199 in Del Norte County, and North Bank Road (California SR-197) north of Crescent City poses an unacceptable additional risk to the health and safety of the City as well as additionally jeopardizing the fishing and recreational industries that are the lifeblood of the county. The proposed CalTrans "Ruby 2" project on North Bank Road increases all of these risks. 2

3. If the "Ruby 2" project segment is not scrapped outright, the "Two-Foot Widening In Selected Locations Alternative" is the best proposal of those currently submitted. **THE "FOUR-FOOT SHOULDER ALTERNATIVE," AS CURRENTLY CONFIGURED, IS FAR TOO ENVIRONMENTALLY DESTRUCTIVE TO WARRANT CONSIDERATION. HOWEVER, REALIGNING THE ROADWAY SLIGHTLY MORE TOWARD THE UNDEVELOPED HILLSIDE COULD MAKE THIS ALTERNATIVE ACCEPTABLE.** 3

4. CalTrans has engaged in unscrupulous, and possibly even criminal, behavior in the promotion of its "197/199 Safe STAA Access" plan. 4

1

Zuehlke, John

SPECIFIC COMMENTS

Part A:

ISSUES CONCERNING CALTRANS' PROPOSED PROJECTS ALONG US-199 AND NORTH BANK ROAD (SR-197)

SECTION 1

THE ALLEGATION OF ECONOMIC BENEFIT TO CRESCENT CITY CLAIMED BY THE DEIR/EA FOR THE "197/199 SAFE STAA ACCESS" PROJECTS IS BASED ON SEVERELY FLAWED RESEARCH. THE REPORT PRESENTS A BIASED, FALSE, AND MISLEADING CLAIM THAT THE PROJECTS WILL BENEFIT CRESCENT CITY'S ECONOMY. 5

THE DEIR/EA ANALYSIS PRESENTS ONLY THE HYPOTHETICALLY "POSSIBLE" ECONOMIC BENEFITS OF THEIR PROPOSED PROJECTS WHILE IGNORING THE VERY SIGNIFICANT ECONOMIC HARM THAT WILL BE CAUSED BY THOSE PROJECTS:

THE DEIR/EA IGNORES THE SIGNIFICANT LOSS OF PROPERTY TAX REVENUES resulting from the considerable loss of property values that will be suffered by the homes along North Bank Road. Unless the least damaging "alternative" is chosen for the "Ruby 2" location, most of the homes located there will suffer a proportionally much greater decline in value than would be suggested by the amount of property being seized by CalTrans.

2. The DEIR/EA economic analysis does not consider **THE LOSS OF BUSINESS** that will be suffered **BY THE RESTAURANTS AND MOTELS** along the project route as team-driven continuously-rolling trucks with on-board living quarters replace the current smaller single-driver trucks. Crescent City will be especially hard hit since **THE PROPOSED PROJECTS ENCOURAGE TRUCKS TO COMPLETELY BYPASS THE CITY!**

2

Zuehlke, John

3. The DEIR/EA states that if STAA trucks are not allowed on the US-199/SR-197 route, they would have to be off-loaded to "California Legal" trucks to deliver to Crescent City's merchants, and that this would lead to increased delivery costs. The DEIR/EA ignores the fact that if STAA trucks are allowed, their merchandise will have to be off-loaded to smaller trucks to safely navigate the city streets and utilize the merchant's existing loading docks. Utilizing "California Legal" trucks for the entire route would probably be more economical since they would not have to be off-loaded for local delivery. 5 cont.

4. Smaller businesses are the backbone of the economy, especially in the smaller towns found in Del Norte County, CA. These smaller businesses would be placed at an increased disadvantage to the "big-box" stores as the "big-boxers" derive savings from the use of non-California-Legal trucks. **THANKFULLY, THESE BIG STORES HAVE JOINED THE SMALLER STORES IN DECLARING THAT THEY HAVE NO INTENTION OF CONVERTING TO STAA TRUCKING AT THE PRESENT TIME!**

SECTION 2: 6

THE DEIR/EA ESSENTIALLY IGNORES THE SERIOUS THREAT TO CRESCENT CITY'S WATER SUPPLY AND DEL NORTE COUNTY'S FISHING INDUSTRY WHICH COULD RESULT FROM A TRUCK ACCIDENT SPILLING A HAZARDOUS MATERIAL INTO THE SMITH RIVER.

The Smith River is California's ONLY "Wild" river. Its waters are so pure that they are pumped, with little "processing" other than percolating through the river's sand bank, right out of the faucets in Crescent City and the Pelican Bay facility. Gasquet, Hiouchi, and other towns along the Smith similarly rely on the ultra-pure waters of the Smith River. Any spill of toxic or otherwise hazardous material into the Smith could have a devastating effect on the population, and therefore must be prevented at all cost.

All of North Bank Road (SR-197), and all of US-199 in the project area, lies adjacent to, or in very close proximity to, the Smith River, and there is the **EXTREME** danger that a trucking accident would spill toxic/hazardous/waste materials into the river. It is **ABSOLUTELY IMPERATIVE** that such a spill **NEVER BE ALLOWED TO HAPPEN.**

3

Zuehlke, John

THE DEIR/EA DOES NOT CHALLENGE THE DANGER TO CRESCENT CITY'S WATER SUPPLY: INSTEAD IT SIMPLY DISMISSES IT! The DEIR/EA essentially claims that caltrans' projects will not make the already extreme danger worse because CalTrans expects little change in either the volume of traffic or the quantity of hazardous material that would be shipped over the route. CalTrans is both **UNRESPONSIVE** to the Smith River safety concern comments submitted to it prior to the preparation of the DEIR/EA, and **IRRESPONSIBLE** to propose projects that do not take all reasonable steps to insure that a disaster not occur. 6 cont.

CALTRANS MUST, AS A MINIMUM:

1. **BAN THE TRANSPORT OF TOXIC, HAZARDOUS, OR WASTE MATERIAL** along the US-199/North Bank Road "corridor." Route 20, which is similarly adjacent to a California river, has such a ban, and Crescent City deserves the same level of protection,

2. **CLEARLY POST AND DEMAND THE STRICT ENFORCEMENT OF AN APPROPRIATELY REDUCED MAXIMUM SPEED** limits for large trucks at all truck-challenging locations along the route, and

3. Engineer the road design to contain any oil or similar spills, and **PREVENT ANY SPILLS FROM ENTERING EITHER THE RIVER OR THE GROUND WATER.**

Part B: 7

ISSUES SPECIFIC TO THE "RUBY 2" LOCATION

The "Ruby 2" location is a 0.8-mile stretch of North Bank Road running northwest to southeast essentially parallel to the Smith River. On the road's northeast (farther from the river) side, it curves around an undeveloped hill. As this hill was logged over in the relatively recent past, no "old-growth" trees are located on that side of the road.

Separating the Smith River from the southwest side of North Bank Road is a small community of private residences. A narrow forested band separates the area cleared for the homes from the road. This forested band, running along and quite near to North Bank Road, features several ancient giant redwoods that have been carefully protected by the homeowners. A small stream runs through part of this wooded band. This stream conducts water that emerges from springs on hill and crosses under North Bank Road via culverts. It parallels the road for a distance, and then turns toward, and empties into, the Smith River.

4

Zuehlke, John

7 cont.

THIS FORESTED BAND SERVES MANY IMPORTANT PURPOSES:

1. The forested band preserves the forest viewscape for the people driving along North Bank Road by blocking view of the homes from the highway. The traveler is greeted by huge, majestic redwood trees ... some estimated to be over 1,000 years old ... rather than seeing houses. This is especially important since this section of road is an important part of the contiguous forest viewscape linking the Ruby Van Deventer park to the Jedediah Smith Redwood State Park. **WHEN THE NORTH BANK ROAD WAS LAID OUT, THE PLANNERS WISELY CHOSE TO PRESERVE THE NATURAL BEAUTY OF THE AREA WITH ITS IRREPLACEABLE ANCIENT REDWOODS BY ROUTING THE ROAD AROUND THEM RATHER THAN CUTTING THE TREES DOWN. ONE WOULD HOPE THAT CALTRANS WOULD DISPLAY A SIMILAR RESPECT FOR THE AREA.**

2. The forested band shields the homes from the sight of, and the noise generated by, the traffic on the road.

3. The forested band creates a "filter" to capture much of the pollution, especially diesel particulate emissions, created by the traffic on the road. This protects both the health of the homeowners, and the purity of the Smith River.

4. The trees in the forested band create a very strong mechanical barrier to keep trucks that fail to negotiate the curve from overturning and spilling their cargo into the stream. Anything dumped into the stream will quickly be conducted into the Smith River.

5. The stream that flows through the forested band helps to protect the homes and yards from being flooded as rainwater cascades down the hill.

In its DEIR/EA, CalTrans proposes to construct one of three "alternative" projects for the "Ruby 2" location. It designates these as the "Four-Foot Shoulder Alternative," the "Two-Foot Shoulder Alternative," and the "Two-Foot Widening In Selected Locations Alternative."

According to the DEIR/EA, any one of the three alternatives will provide the a road curve radius of 400 feet or more, which will allow the safe passage of oversize STAA trucks.

THE "FOUR-FOOT SHOULDER ALTERNATIVE," AS CURRENTLY PROPOSED BY CALTRANS IN ITS DEIR/EA, IS BY FAR THE MOST ENVIRONMENTALLY DESTRUCTIVE OF THE ALTERNATIVES. This alternative calls for the immediate destruction of 49 trees, including 27 redwoods. CalTrans admits that the redwoods to be sacrificed include ancient "old-growth" trees of up to 37-feet in circumference! All of these giant ancients are located on the developed residential properties!

5

Zuehlke, John

7 cont.

In addition, this alternative calls for permanently seizing a 50-foot "Right of Way" from the homeowners. This appears to include much, if not all, of the vital forested band. **THE CURRENTLY PROPOSED "FOUR-FOOT SHOULDER ALTERNATIVE" IS FAR TOO ENVIRONMENTALLY DESTRUCTIVE AND DAMAGING TO THE RESIDENTS TO WARRANT ANY FURTHER CONSIDERATION.**

IF CALTRANS RE-ALIGNED THE ROADWAY SLIGHTLY MORE INTO THE UNDEVELOPED HILLSIDE, AND DID NOT SEIZE ANY OF THE RESIDENTIAL PROPERTY ON THE RIVER SIDE OF THE ROAD, FOUR-FOOT SHOULDERS WOULD BE POSSIBLE WITHOUT SIGNIFICANT ENVIRONMENTAL DAMAGE TO THE AREA. EVEN THOUGH THIS CHANGE WOULD PROBABLY SOMEWHAT INCREASE THE COST OF THE PROJECT, IT WOULD ALSO ALLOW AN EVEN GREATER CURVE RADIUS AND BETTER VISIBILITY FOR THE DRIVERS.

The **"TWO-FOOT SHOULDER ALTERNATIVE"** initially destroys only 22 trees (17 of which are redwoods). **NO OLD-GROWTH TREES WOULD BE DESTROYED** because all of the trees which CalTrans proposes to removal lie on the previously logged side of the road. **FOR THIS ALTERNATIVE, CALTRANS PROPOSES TO PERMANENTLY SEIZE A 40-FOOT "RIGHT OF WAY"** from the homeowners that still appears to includes much of the forested band.

The **"TWO-FOOT WIDENING IN SELECTED LOCATIONS ALTERNATIVE"** appears to be the least ecologically damaging of the alternatives presented by CalTrans. It destroys the fewest trees: 18 trees total and only 5 redwoods. For this alternative, CalTrans proposes to seize a 35- to 45-foot "Right of Way" from the residences, as well as additional "temporary construction easements" from four of the properties. IfSTAA access is granted, this would be the alternative of choice provided that none of the 5 redwood trees to be destroyed is "old-growth," and that CalTrans returns the temporary easement properties in the condition that CalTrans got them.

THE DEIR/EA DOES NOT PRESENT ANY JUSTIFICATION FOR CALTRANS TO SO GREATLY INCREASE ITS "RIGHT OF WAY" FOR SUCH MINOR WIDENING OF THE ROADWAY.

Acquiring land and clearing vegetation on the **INSIDE** radius (hill-side) of the roadway allows the curve radius to be enlarged and improves the visibility of opposing traffic. However, **NOTHING CAN BE DONE TO THE OUTSIDE RADIUS OF THE CURVE (HOME AND RIVER SIDE)** -- short of putting up mirrors -- **THAT WOULD HAVE ANY EFFECT ON THIS VISIBILITY! DOES CALTRANS HAVE SOME FUTURE AGENDA FOR THIS SIGNIFICANT PERMANENT SEISURE OF THE HOMEOWNER'S PROPERTIES? POSSESSING THIS ADDITIONAL "RIGHT OF WAY" WOULD GREATLY FACILITATE MORE ENVIRONMENTAL DAMAGE ON THIS LAND THAN IS CURRENTLY PROPOSED IN THE DEIR/EA.**

6

Zuehlke, John

CONCLUSIONS

1. **CALTRANS IS DELIBERATELY MISLEADING THE PEOPLE AND GOVERNMENT OFFICIALS BY ATTEMPTING TO SELL THE 197/199 SAFE STAA ACCESS PROJECT AS BEING BENEFICIAL TO THE RESIDENTS OF CRESCENT CITY AND DEL NORTE COUNTY WHILE DOWNPLAYING THE TRUE REASON FOR THE PROJECT**. The project's main objective is to provide a shortcut route bypassing Crescent City to linking I-5 with US-101 for the long-haul trucking industry. The drivers and their companies are overwhelmingly, if not entirely, from outside the county, and, when the provisions of NAFTA are fully implemented, some of the trucks traveling the route will be driven by include non-US drivers. 8

2. **THE 197/199 SAFE STAA ACCESS PROJECT WILL NOT BENEFIT THE ECONOMIES OF CRESCENT CITY NOR DEL NORTE COUNTY.** The only businesses in the county that **MIGHT** benefit from the use of STAA trucks are the handful of "big-box" retailers and the Smith River farm of a multi-national lily bulbs grower! **SMALL BUSINESSES FORM THE BACKBONE OF THE ECONOMY, AND GIVING "BIG-BOX" GIANTS A COMPETITIVE ADVANTAGE WILL SIGNIFICANTLY HARM DEL NORTE'S ECONOMY.** 9

3. **CONTINUOUSLY ROLLING, TEAM-DRIVEN TRUCKS SHOULD BE BANNED FROM OPERATING ON WINDING MOUNTAIN OR FOREST ROADS**. The constant swaying of the trucks as they wind back and forth along a serpentine road has a serious adverse impact on the quantity and quality of sleep attainable by the "off-duty" drivers. Driver fatigue is the number one cause of trucking accidents. 10

4. **ENCOURAGING THE CONVERSION TO LONG-HAUL, TEAM-DRIVEN TRUCKS, AS IS COMMON IN STAA FLEETS, NOT ONLY TAKES JOBS AWAY FROM THE LOCAL TRUCKING INDUSTRY, IT ALSO SUBSTITUTES DRIVERS THAT ARE FAR LESS FAMILIAR WITH DRIVING IN THE CHALLENGING MOUNTAINOUS AND FORESTED TERRAIN OF THIS AREA FOR THE LOCALS. THIS, COMBINED WITH THE INCREASINGLY COMMON PRACTICE OF LONG-HAUL TRUCKERS WHO ARE SQUEEZED BETWEEN RISING FUEL PRICES AND DECLINING BUSINESS TO IGNORE MAXIMUM SPEED LIMITS, IS A RECIPE FOR DISASTER.**

5. **CALTRANS MUST MAKE SAFETY THE PRIMARY GOAL** of any project, especially one that can have such serious adverse impacts on the health and welfare of the community. The water supply of Crescent City, Gasquet, Hiouchi, and Smith River are put into increased peril by the proposed projects **TRUCKS CARRYING TOXIC/HAZARDOUS/WASTE MATERIALS SHOULD BE BANNED FROM OPERATING ON ANY ROUTE RUNNING ALONGSIDE A MAJOR FISHING RIVER OR ONE SUPPLYING DRINKING WATER.** The Smith River qualifies in both categories. These cargoes are banned from similar routes elsewhere in California, they must be banned along US-199 and North Bank Road also! 11

7

Zuehlke, John

6. CALTRANS SHOULD CONCENTRATE THEIR EFFORTS AND REVENUES ON CORRECTING THE WORST STRETCHES OF ROADWAY, SUCH AS THE EXTREMELY HAZARDOUS SPOT ALONG US-199 WHERE A TRUCK ACCIDENT IN 2008 CAUSED A MAJOR SPILL. THAT SPILL, EVEN THOUGH OF RELATIVELY BENIGN OIL, SERIOUSLY THREATENED THE SMITH RIVER AND TOOK ABOUT A YEAR TO CONTAIN AND CLEAN UP. 12

7. THE BEST CHOICE FOR THE "197/199 SAFE STAA ACCESS" PROJECT IS THE "NO BUILD (NO ACTION) ALTERNATIVE". The accidents (all, thankfully, none fatal) along North Bank Road have overwhelmingly been caused by excessive speeds especially when the pavement was wet. Posting a reduced speed limit as well as "Slippery When Wet" warning signs would probably have a greater effect on reducing accidents than the very costly widening and re-alignment. OPENING NORTH BANK ROAD TO EVEN LARGER AND LESS MANEUVERABLE TRUCKS, AND THE INCREASED SPEEDS THAT WILL PROBABLY RESULT FROM THE OTHER CHANGES, WILL INCREASE BOTH THE NUMBER, AND THE SERIOUSNESS OF FUTURE ACCIDENTS. 13

8. THE "FOUR-FOOT SHOULDER ALTERNATIVE" FOR "RUBY 2," AS CURRENTLY CONFIGUTRED, WOULD CAUSE TOTALLY UNACCEPTABLE DAMAGE TO THE ENVIRONMENT, BOTH BIOLOGICAL AND HUMAN, AND MUST BE SCRAPPED. HOWEVER, WITH MINOR REALIGNMENT TOWARD THE UNDEVELOPED HILLSIDE, IT PROBABLY COULD BE MADE ACCEPTABLE. 14

9. THE BEST ALTERNATIVE – OTHER THAN NOT BUILDING THE "RUBY 2" PROJECT AT ALL – WOULD BE "TWO-FOOT WIDENING IN SELECTED LOCATIONS."

10. NO MATTER WHAT IS DONE AT "RUBY 2," THE CALTRANS PROPOSAL TO RELOCATE ALL OF THE MAIL BOXES TO THE INTERSECTION OF NORTH BANK AND KASPER/KEENE ROADS IS ABSOLUTELY RIDICULOUS! FORCING HOMEOWNERS, INCLUDING SENIOR CITIZENS AND THE HANDICAPPED, TO HIKE LONG DISTANCES (SOME OVER ONE MILE!) ALONG A NARROW AND BUSY TRUCK ROUTE IS CRUEL AND ABSURD!

11. THE DEIR/EA ADMITS THAT THE REMOVAL OF TREES, ESPECIALLY "OLD-GROWTH" REDWOODS CAN HAVE A PERMANENT ADVERSE EFFECT ON PROTECTED SPECIES. CALTRANS' ATTITUDE, AS EXPRESSED IN THE DEIR/EA, THAT THESE ENDANGERED SPECIES SHOULD RE-LOCATE TO MORE SUITABLE HABITATS VIOLATES THE SPIRIT, IF NOT THE LETTER, OF OUR ENVIRONMENTAL PROTECTION LAWS! 15

8

Zuehlke, John

12. In its DEIR/EA, CalTrans proposes several "mitigation" measures that it claims will compensate for the destruction of "old-growth" redwoods including ancients up to 37 feet in circumference that have lived since before Columbus "discovered" America! **THE MEASURES THAT CALTRANS PROPOSES IN ITS DEIR/EA RANGE FROM THE LAUGHABLE TO THE POSSIBLY CRIMINAL, AND DO NOTHING TO LIMIT OR "MITIGATE" THE ENVIRONMENTAL HARM OF THE PROJECT,** but rather range from off-site compensation to apparent outright bribery: 15 cont

12.1 In its DEIR/EA, CalTrans proposes to provide some secure trash bins to the Ruby Vandeventer county park to prevent "corvid" birds such as crows, ravens, magpies, and jays from feeding in the garbage. This, it claims will deter these birds from eating the eggs of an endangered bird, the marbled murrelet. **APPARENTLY CROWS AND RAVENS THAT HAVE GORGED THEMSELVES ON GARBAGE ARE MORE LIKELY TO EAT MURRELET EGGS THAN HUNGRY BIRDS!** Or, is it that CalTrans believes that crows, ravens, jays, etc. are only in the forest because humans have brought in waste bins, and will leave if that food source becomes unavailable. 16

12.2 CalTrans proposes to clear invasive "exotic" plants from their "Rights of Way." Isn't such cleanup normal every-day road maintenance work? **IT IS BITTERLY IRONIC THAT CALTRANS PROPOSES TO REMOVE PLANTS FROM THE SEIZED "RIGHT OF WAY" IN ORDER TO PROTECT THE REDWOODS AND OTHER "NATIVE" SPECIES, AND THEN CUT DOWN MANY OF THE VERY REDWOODS IT CLAIMS TO BE PROTECTING!** 17

12.3 CalTrans' EIR/EA proposes a third "mitigation" measure: **USING TAXPAYER'S MONEY TO PURCHASE "OLD-GROWTH" TREES** from private parties – probably lumbering corporations – **AND TRANSFERRING THEM TO** a "conservation organization." The DEIR/EA specifically names **THE "SAVE-THE-REDWOODS LEAGUE."** Clearly, for the "Save-the Redwoods League" or similar organization to receive the valuable "gift," the CalTrans projects would have to be approved. This action by CalTrans **WOULD SEEM TO BE TO BE A "QUID PRO QUO" CASE OF ATTEMPTING TO BRIBE THE "SAVE-THE-REDWOODS LEAGUE" IN ORDER TO STOP THEIR OTHERWISE EXPECTED OPPOSITION TO THESE ENVIRONMENTALLY DESTRUCTIVE CALTRANS PROJECTS!** 18

Respectfully Submitted,

John Zuehlke
5526 Marietta Avenue
Sherman Oaks, California
91401-5709
(818) 785-7548
jpzuehlke@prodigy.net

9

Responses to John Zuehlke

Response to Comment 1

This general comment states that STAA trucks will have an overall damaging effect on the economies and lifestyle of Crescent City and Del Norte County summarizing specific comments made in comments 5 and 9. Please see the responses to those comments for a discussion of specific issues raised by this commenter. The Draft EIR/EA addresses impacts on the human environment, including land use, growth, community, and visual/aesthetic resources in Section 2.1, "Human Environment." The Community Impact Assessment prepared for the project (Trott 2010) evaluates both the adverse and beneficial socioeconomic effects of the project, concluding that the project would result in temporary adverse effects on communities and businesses due to construction delays and other construction-related effects, permanent minor community-level effects resulting from a small increase in truck traffic on the SR 197/US 199 route, and small permanent regional economic benefits, including increased employment and income, resulting from lower shipping costs in Del Norte County. Additionally, the traffic analysis indicates no substantial adverse impacts on the roadway, transit, bicycle, or pedestrian systems or their operation within the study area. Traffic would generally travel at free-flow speeds on US 199 through Hiouchi and Gasquet. Based on the anticipated small increase in heavy-truck traffic through these communities under with-project conditions, the existing barrier between parts of these communities created by US 199 would not change appreciably and community cohesion effects are anticipated to be minor. The results of this analysis are reflected in Section 2.1, "Human Resources," of the Draft EIR/EA. Also, see Grouped Response #8 for a discussion of safety and anticipated increases in truck traffic and how that is anticipated to affect the local communities.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment summarizes concerns regarding health, safety, and recreation as well as the Ruby 2 improvements location. These issues are discussed in greater detail within other comments raised by this commenter. Please see the response to comments 6 and 7, below.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment states that the Two-Foot Widening in Spot Locations is the best Ruby 2 alternative and that the Four-foot Widening alternative is too environmentally destructive. The Department has chosen the Two-Foot Widening in Spot Locations as the preferred alternative for Ruby 2.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 4

This comment states that Caltrans is engaged in "unscrupulous" and criminal behavior. The proposed project is being considered by the Department to be in compliance with federal and state legislation and regional programs, plans, and policies. Please see Grouped Response #1: Purpose and Need for an explanation of the above.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 5

This comment states that the DEIR/EA ignores significant loss of property tax revenues. While the comment is correct in noting that the Draft EIR/EA does not include information on the loss of property tax revenue attributable to the acquisition of additional right-of-way for the project, this economic effect was addressed in the Community Impact Assessment prepared for the project. As discussed on pages 4-86 through 4-88 of that report, right-of-way acquisitions from private properties would result in the estimated annual loss of property tax revenue ranging from $7,120 to $10,940 annually, based on the countywide 1% property tax rate. On average, Del Norte County receives about 18% of the property tax revenues generated by the 1% tax levy on the value of properties within its jurisdiction. Therefore, property tax revenue losses to Del Norte County would range from an estimated $1,280 to $1,970, representing less than 0.1% of its total property tax revenues. Although adverse, this loss would not be substantial.

Property value effects resulting from the narrow strip acquisition of right-of-way from residential properties along SR 197 (North Bank Road) were not addressed in the Draft EIR/EA, although the size of the strip acquisitions and potential effects of the acquisitions on affected residential properties are evaluated in Section 2.1.1, “Land Use.” Homeowners would be compensated for the value of property acquired for right-of-way, which would presumably offset the property value effects of the acquisitions on individual property owners. See the response to EPIC’s Comment #8 for further discussion regarding impacts due to right of way acquisition of residential parcels.

The comment states that there will be an economic loss by business which cater to truckers stopping, specifically restaurant and hotel businesses. This was decrease in business was determined to be minor and not significant, see Grouped Response #2.
This comment states that STAA trucks would need to be offloaded to California Legal trucks to make deliveries to Crescent City businesses, resulting in increased delivery costs. In most cases, STAA trucks would be able to access local businesses without first offloading cargo.

This comment raised the issue that providing improved STAA truck access to Del Norte County could attract more large retailers (so-called “big-box” stores) to the study area, drawing sales away from existing retailers. Currently, big-box retailers Wal-Mart and Home Depot are located in the Crescent City area, a Target, a Kmart, a Walmart and a WinCo are located in Eureka, and a Kmart in McKinleyville. As discussed in the Community Impact Assessment prepared for the project, large retailers surveyed for the traffic study indicated that providing STAA access along the SR 197–US 199 corridor would do little to change their operations and would not likely generate expansion of their businesses. Therefore, it is unlikely that the incrementally lower transportation costs provided by improved STAA truck access to Del Norte County would play a dominant role in attracting new big-box retailers to Del Norte County and effects on smaller retailers would be minimal. (This issue is discussed in greater detail on pages 4-42 through 4-44 of the Community Impact Assessment.)

The Draft EIR/EA makes no specific claim that the project would generate economic benefits to Crescent City, although, as discussed on page 2.1-44 of the Draft EIR/EA, providing STAA truck access on SR 197 and US 199 could result in the creation, in the near term, of 30 or more

jobs in Del Norte County (a 0.3% increase in employment compared to existing county employment levels) and an estimated $1.4 million in annual personal. Some of these jobs would likely be located in Crescent City. The comment does not identify in what way research conducted for the Draft EIR/EA is "severely flawed" or in what way the findings of the Draft EIR/EA are "biased, false, and misleading; therefore, no response is possible to this general comment.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 6

This comment asserts, in part, that the Draft EIR/EA ignores the potential for hazardous materials spills that would impact the water supply and fishing industry. While spills caused by traffic collisions have resulted in pollutants reaching the Smith River in the past, the proposed project improvements will likely improve safety for all users. Please refer to the response to Vern Powers' Comment 1 for a discussion regarding the concern for potential increase in hazardous material spills.

To ensure beneficial uses of the Smith River are protected from the proposed improvements, the Department will implement Best Management Practices (BMPS) at each project location to minimize or avoid degradation of storm water runoff flowing to the Smith River and its tributaries. The Smith River beneficial uses include: municipal and domestic water supply; water contact recreation; commercial and sport fishing; cold fresh water habitat; wild life habitat; rare, threatened, or endangered species; migration of aquatic organisms; spawning, reproduction, and/or early development; and others. See Chapter 2, Section 2.2.2 for a discussion of water quality issues. In addition, mitigation measures such as implementation and adherence of regulatory control measures and implementation of Contract Standard Specifications, Special Provisions, and Permit Requirements will reduce any potential water quality impacts.
The commenter states that the transport of hazardous materials should be banned from US 199. This comment does not provide a comment on the Draft EIR/EA, however, it should be noted that the scope of this STAA project does not change the status of the Hazardous Materials transportation routes currently approved and that the STAA improvements included in the proposed project will improve road conditions and provide for a safe roadway for all users.

The commenter thinks that strict enforcement of a reduced speed limit for large trucks is appropriate. The California Highway Patrol is responsible for speed enforcement on all state highways. And while adherence to posted speed limits can be increased by traditional law enforcement, resources for all state agencies are limited. See Grouped Response # 8 for a discussion of speed limits.

Finally, the commenter also states that the roads should be designed to prevent spills from entering the Smith River. The Department will follow the Highway Design Manual for all signing and drainage design. As discussed in Section 2.2.4 of the DEIR/EA, a collision leading to accidental release of hazardous materials could happen unexpectedly, regardless of whether the proposed project is constructed and the corridor is re-designated as STAA accessible.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 7

This comment, in part, discusses each Ruby 2 alternative and the potential take of both property right-of-way and large growth redwoods and that the commenter prefers the Two-Foot Widening in Spot Locations alternative as it's the least damaging. The Department has chosen the Two-Foot Widening in Spot Locations as the preferred alternative for Ruby 2. The commenter also asserts that the Department does not provide any justification for right-of-way takes as proposed by the Ruby 2 alternatives. The proposed approximate 35-ft right of way acquisition was developed to be consistent with the Department's Highway Design Manual, but the reason this right of way acquisition is important to the Department and is being proposed is to allow maintenance and repair of drainage facilities and slopes adjacent to the highway without needing to obtain a permit to enter or temporary construction easement.

The commenter's suggestion of cutting into the hillside would involve potentially significant tree take, additional environmental effects, constructions of earthwork or walls due to steep slopes, and the potential to destabilize slopes that are well-vegetated and relatively stable. The centerline of the new road will be very close to the existing centerline in the vicinity of the large trees that the comment is concerned about, meaning that there would be minimal change or ground disturbance on the roadside. In the areas where the alignment diverges from the existing alignment, such as near the reversing curves at the center of the project, cutting into the slope is not necessary to provide truck access.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 8

This comment states that Caltrans is misleading the public, and the true objective of the project is to provide a shortcut that bypasses Crescent City. The purpose and need of the project was stated in the Draft EIR/EA, Section 1.2. Please see Grouped Response #1: Purpose and Need. This project does not provide a shortcut to bypass Crescent City, as both SR 197 and US 199 connect to US 101 north of Crescent City. The remainder of this comment is not regarding the Draft EIR/EA.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 9

This comment states that the project will benefit large retailers. As discussed in detail on pages 4-78 through 4-80 of the Community Impact Assessment prepared for the project, most producer/exporter businesses surveyed for the project's traffic study indicated that the proposed project would lower their transportation costs and provide financial benefits to their firms. As discussed, 15 producer/exporter businesses responded in some fashion to the survey, with nine reporting that opening the SR 197–US 199 route to STAA trucks would reduce their transportation costs to some extent. The survey found that lily bulb producers were the most likely producer business to benefit from project improvements, but other Del Norte County businesses, including a wood-product producer and a dairy, also would benefit from project improvements. Conversely, large retailers are not anticipated to substantially benefit from the project. As discussed in the response to Comment 5 and in detail in the Community Impact Assessment prepared for the project (pages 4-42 through 4-44), large retailers surveyed for the traffic study indicated that providing STAA access along the SR 197–US 199 corridor would do

little to change their operations and would not likely generate expansion of their businesses. Therefore, it is unlikely that the incrementally lower transportation costs provided by improved STAA truck access to Del Norte County would play a dominant role in attracting new big-box retailers to Del Norte County, nor would it substantially affect the existing competitive relationship between small and large retailers in Del Norte County.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 10

This comment states that "Team Driven" Trucks will contribute to driver fatigue due to poor sleeping conditions in the back of a moving truck. The level of use of Team Driven vehicles and fatigue levels of drivers is speculative

In response to the comment that "driver fatigue is the number one cause of trucking accidents", we offer the following information. During the five year time period between 10/1/2002 and 9/30/2007 the segment of DN 199 from the intersection with DN 197 to the Oregon border had a total of 42 collisions that involved large trucks or buses. None of these collisions were reported to have a primary collision factor of "fell asleep".

In response to the comment that "truckers…ignore maximum speed limits", we have the following information to offer. The California Vehicle Code (CVC) Basic Speed Law (Code 22350) states that "No person shall drive a vehicle upon a highway at a speed greater than is reasonable or prudent having due regard for weather, visibility, the traffic on, and the surface and width of, the highway, and in no event at a speed which endangers the safety of persons or property."

When the California Highway Patrol codes a collision with "speeding" as the primary collision factor, it may not be that the motorist was driving faster than the posted speed limit, but they could also be cited for driving too fast for conditions, and breaking the basic speed law. Of the 42 truck/bus collisions on DN 199 during the 5 years, 22 had a primary collision factor of speeding.

The CVC Code 22406, Maximum Speed for Designated Vehicles, states that "no person may drive any of the following vehicles on a highway at a speed in excess of 55 miles per hour; a motortruck or truck tractor having three or more axles or any motortruck or truck tractor drawing any other vehicle."

No revisions to the Draft EIR/EA are necessary

Response to Comment 11

This comment reiterates concern regarding hazardous materials spills. See response to Comment 6 above, and the response to Vern Powers' Comment 1 for a discussion regarding the concern for potential increase in hazardous material spills.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 12

The comment states that the Department should direct their efforts to other areas of concern. This comment is not regarding the Draft EIR/EA specifically. The Department agrees that safety for all roadway users is a priority. Please see Grouped Response #8: Safety and response to Center for Biological Diversity's Comment 6 for discussions regarding safety.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 13

This comment expresses support for the No Build alternative and submits that posting a reduced speed limit and additional hazard signs would be more effective at improving safety than roadway improvements. The No Build Alternative does not meet the Purpose and Need of the project, see Group Response #1. The Department follows the law and established policy in setting speed zones that ensure the safe and orderly movement of traffic on state highways. This includes continuing to work in consultation with local agency and community transportation groups and in coordination with the California Highway Patrol. See Grouped Response # 8 for an explanation regarding the process for reducing speed limits below the state maximum.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 14

This comment reiterates that the No Build alternative is ideal; however, the Ruby 2 Two-Foot Widening in Spot Locations Alternative is preferred to the Ruby 2 Four-Foot Shoulder Alternative. Caltrans selected the Ruby 2: Two Foot Widening in Spot Locations as the preferred alternative. The comment also states that moving resident's mailboxes is absurd. Caltrans coordinated with the Post Office to find reasonable, safe and convenient locations for the mailboxes.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 15

This comment states that the mitigation measures for removing large redwood trees are not sufficient. No redwoods with a diameter greater than 36 inches will be removed. Where excavation is planned near redwoods with a diameter greater than 36 inches, measures will be taken to protect the roots. See Grouped Response # 4 for a discussion regarding impacts to large redwoods. Caltrans is following all laws and is consulting with appropriate agencies to ensure compliance with all environmental regulations. Additionally, Caltrans selected the Ruby 2: Two Foot Widening in Spot Locations as the preferred alternative, which had no removal of or significant impacts to large redwoods, and therefore would not require mitigation.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 16

This comment questions the effectiveness of the corvid control measures proposed as mitigation for the removal of large redwoods. Studies have shown that crows, ravens, jays, etc. are more abundant where humans have made food more available for them. Reducing food availability (corvid proof trash containers) will reduce corvid density. It is also known that corvids are

predators on marbled murrelet eggs. Therefore, covered trash containers may reduce local corvid densities and thus reduce corvid egg predation rates. Additionally, Caltrans selected the Ruby 2: Two Foot Widening in Spot Locations as the preferred alternative, which had no significant removal of large redwoods, and therefore would not require mitigation. See Grouped Response # 4 for a discussion regarding impacts to large redwoods.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 17

This comment questions the effectiveness of the removal of invasive plants proposed as mitigation for removal of large redwoods. Removal of invasive non-native plants will improve habitat quality at the location by decreasing competition for native plants and increasing the amount of native habitat for wildlife. No redwoods with a diameter greater than 36 inches will be removed. Where excavation is planned near redwoods with a diameter greater than 36 inches, measures will be taken to protect the roots. Additionally, Caltrans selected the Ruby 2: Two Foot Widening in Spot Locations as the preferred alternative, which had no removal of large redwoods, and therefore would not require mitigation. See Grouped Response # 4 for a discussion regarding impacts to large redwoods.

The DEIR/EA states that Caltrans would implement a 3-year program of invasive weed control in all areas of disturbed soil, this effort would not necessarily extend to the limits of the Right of Way. Caltrans does have limited funds for general control of invasive weeds on a project specific basis based on need.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 18

This comment questions the effectiveness of the preserving old-growth redwood stands as proposed mitigation for removal of large redwoods. Save the Redwoods League is just one example of an organization which could potentially managed such lands if such a mitigation is pursued. Caltrans selected the Ruby 2: Two Foot Widening in Spot Locations alternative, which had no significant removal of large redwoods, and therefore would not require mitigation. No redwoods with a diameter greater than 36 inches will be removed. Where excavation is planned near redwoods with a diameter greater than 36 inches, measures will be taken to protect the roots. See Grouped Response # 4 and the PRDEIR/SEA for a discussion regarding impacts to trees.

No revisions to the Draft EIR/EA are necessary.

3.4 Public Meeting Transcript

A meeting to provide the public an opportunity to review and comment on the Draft EIR/EA was held on July 13, 2010 at the Crescent City Cultural Center. A court reporter was present to take comments directly from individuals before and after the meeting (commenters 1-9) as well as to record the entire public comment session (commenters 10-27). The transcript of that meeting, list of commenters, and responses to comments is below.

Individuals Who Commented before or after Public Meeting

- Zuehlke, Elmer
- Brown, Daniel
- Pass, Don
- Reichlin, Dwayne (President of Hambro Group)
- Gillespie, Don (representing Friends of Del Norte)
- Johnston, Meagan
- Rupert, DeAnn
- Kasbohm, Janet
- Sullivan, Mike (Del Norte County Board of Supervisors)
- Bruce, Donald

Individuals Who Commented during Public Meeting

- Reichlin, Dwayne (President of Hambro Group)
- Olson, Curt
- Zottola, Gina (rep CC-Del Norte County Chamber of Comm.)
- Johnston, Meagan
- Rupert, DeAnn
- Bruce, Dori
- Noble, Katherine
- Zuehlke, Elmer
- Gillespie, Don
- Reichlin, Dwayne
- Rupert, Jean
- Smaller, Gary

- Rupert, Jean
- Rupert, DeAnn
- Johnston, Meagan
- Zuehlke, Elmer
- Compton, Charlie

Public Meeting Transcript

TRANSCRIPTION OF PUBLIC HEARING RE:

197/199 SAFE STAA ACCESS

TUESDAY, JULY 13, 2010

CRESCENT CITY CULTURAL CENTER

1001 FRONT STREET

CRESCENT CITY, CALIFORNIA

BROOKS & BROWN REPORTERS
1018 Second Street
Eureka, California 95501
(707) 268-0233

Reported by:
SHERYL A. BROWN
CSR No. 3908

Public Meeting Transcript

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Commenters 10 thru 27		BEFORE KIM HAYLER, ENVIRONMENTAL COORDINATOR, MODERATED BY MIKE HALVERSON	
		---o0o---	

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Public Meeting Transcript

CRESCENT CITY, CALIFORNIA; TUESDAY, JULY 13, 2010

5:00 P.M.

---o0o---

INDIVIDUAL COMMENTS

1-1 MR. ZUEHLKE: The first thing is a question. You see, I want to know if they have checked any alternate routes to 197. See, I live on 197. And 197, other than parks and a gravel pit, which is a nothing, is a hundred percent residential. It should not have trucks on it. I will -- with STAA trucks, even now with heavy trucks, because of the lack of visibility, I'm in jeopardy of driving out of my driveway onto the road.

1-2 And trucks and cars, especially the modern cars, do not belong together on the road. I live in Los Angeles half of the year and half of the year up here, beautiful spot on 197. And Los Angeles, to a reasonable degree, already realizes that they've got to minimalize, at least, truck traffic and vehicle traffic on the same road. We have a number of cases of actual restriction on residential roads, of trucks. The other thing is, in my book, it's an absolute necessity for any mountainous road to have at least two lanes each way; in other words, a four-lane road.

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1-2 cont.

So, right now, as an alternative, if they want to save money, just forget about 197. A lot of people don't like that, but I think that's an easy way out. Forget about 197. And fix the little bit of 199 that goes through the park. Build a new four-lane road, parallel to the present 197.

Leave 197 for the tourists, because there's a beautiful tourist spot there. And the tourists, especially, when they back out in the road to take a picture, are in real jeopardy, and the driver is, also. In fact, my neighbor says that he would just rather not drive on that part of -- see, we're in the middle of 197, so we can go to 101 or 199. I always go to 199 because it's shorter. I think he's an Oregonian. He lives in our place period- -- just a week or two at a time. And so, he, I think, tends to go the other way, even though it's longer.

See, you know, this is the easy way for me. I have been putting all of this in my computer, but at my age I don't type properly. So, this is really very easy.

2-1

MR. BROWN: My name is Daniel Brown. I've been a commercial driver for 22 years. I've driven a 65-foot tractor-trailer on Route 199 over 50 times. Whatever it takes to make this better for larger trucks is what needs to happen. The roads were made for commerce, not

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2-1 cont.

leisurely travel.

Using a 53-foot trailer, as opposed to a 48, adds four additional pallets per load. For approximately every five to six truckloads, you eliminate another truck. So, it's an ecologically sound decision to eliminate the number of trucks that have to come through, due to the smaller loads they are required to carry at this point.

3-1

MR. PASS: I'm in favor of the retaining walls on Washington Curve and the alternative bridge with the fake arch. I think that's what really looks nice. That's really the only comment I have is the visual treatments are very well done.

I'm a recreational planner, and I was on a field trip when I went up there. Yeah, the box girder design with the retaining wall on the bridge is probably my favorite.

4-1

MR. REICHLIN: I'm the president of the Hambro Group, and we own businesses in Crescent City, Del Norte County, and Humboldt County, and in Lenoir, North Carolina. And we have been working on the STAA truck access for about 12 years. And we are fully in favor of having STAA access, both through Richardson's Grove and up 199 and on 197, in order to provide jobs for young working families that I believe

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4-1 cont.

are being denied that opportunity now.

5-1

MR. GILLESPIE: I represent the Friends of Del Norte, a local environmental group. And, you know, my main concern, I guess, is the safety considerations of increasing truck traffic, especially the big STAA trucks on Highway 199. And even though it says in the Draft EIR it's only going to increase it by, like, 17 trucks per day, but by 2030 that goes up to 92 trucks per day. And so, I think that's a significant safety issue on a road that's already fairly dangerous, regardless of the improvements you guys are going to make. It still remains fairly dangerous.

And it said in your Draft EIR that the second priority of this project, the second-most important priority, is safety of the motorists. And with truckers, truck drivers, who are used to driving freeways, as opposed to highways like 199, I think it's going to -- encouraging STAA trucks is going to just increase the safety hazards.

5-2

I'm also concerned about increased possibilities for spills of toxic chemicals into the Smith River. There was just a letter to the editor today by a citizen -- I'm not sure who -- but just worried about increased hazards of chemicals and toxic substance into the river.

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5-3 And then, in the EIR, for the Friends of Del Norte, I asked for a geotechnical study be made public for the projects on Milepost 23.9 and 24.8, which is both The Narrows and the Patrick's Creek Curve. And I haven't seen the geotechnical study. I would like to know where that is, or I would like to be able to read that, because if the slopes are highly unstable and some of the projects, like Washington Curve, might create increased soil erosion over the next decades, it seems like that ought to be addressed in a geotechnical study.

5-4 Another thing I haven't really seen addressed, that I asked for in our comments to start with, is that we are really creating a loop from Richardson Grove to the Collier Tunnel, or you could say the I-5. And that's not -- you know, the increased traffic flow isn't just the 199 project, but it's everything coming from the Bay Area to Eureka, and trucks are going to keep on coming north. And I haven't seen anything at all addressing that issue of the STAA loop that is being created and what kind of forecast for the increased traffic that way. And then -- so, anyway, I would like to see that addressed.

5-5 And then, in reading your economic analysis of the draft EIR, I was impressed that, you know, there might be a slight beneficial economic improvement to

Public Meeting Transcript

5-5 cont.

Del Norte County, but it's not really a major improvement. In fact, I think, over 50 percent of the businesses said that it wouldn't affect them at all, the businesses in Crescent City and Del Norte County.

5-6

So, those are issues that I have kind of already raised, and I have read a good part of your Draft EIR and still have some of these same concerns that -- especially the geotechnical study. Maybe I'm wrong, but I haven't found that yet. So, if somebody could point that out to me, I would appreciate it.

And I feel like Caltrans has done a pretty good job of taking care not to pollute the river during construction, but, you know, the pristine quality of the Smith River and its corridors, of course, is a huge concern to everybody, I think, here. And so, I just want to point that out, although I think Caltrans is sensitive to that.

5-7

And so, thank you. Oh, wait. One more thing. I would like to see the trees on Highway 197 that might be cut -- I would like to see those trees flagged to create a visual for people who are interested in that, to see what trees actually are going to be cut, even though I understand yet there are several choices to be made first. But as soon as that could be done, the sooner people would have a visual what's going to actually

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5-7 cont. happen in the Ruby 1 and Ruby 2 areas.

5-8 And then, of course, on the bridge replacement, Middle Fork Bridge, The Narrows Location 3, I would like to see the downstream bridge with an arched bridge for the aesthetic value of that. It would be important.

5-9 Oh, another thing I really haven't seen much is, I guess it's -- I'm not sure how you're going to police Highway 199 from the Hiouchi Bridge to Highway 101, where STAA trucks are not allowed. But I'm not sure the drivers are going to really -- you know, how are they going to be aware of that, and how are they going to be kept out of that area where it's just a natural progression of 199? That seems like a flaw in the overall idea of how are you going to direct truckers up 197, instead of Hiouchi to 101 up 199?

I think that's it.

6-1 MS. JOHNSTON: My concern with this is, this is also used as school bus routes, and there's children walking on the road. And how is that going to impact their route to school? And if we are already constructing these areas, are we going to allow -- because right now they do not have anywhere to walk, except on the side of the road where there is no walkways or sidewalks or anything. So, when this is being done, are they going to take that into consideration, the

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6-1 cont.

children's bus routes and things that are actually fitting in place for people to walk along this road? Because it's not safe at all.

6-2

In addition to that, the construction during the time of school isn't a very safe thing to do to the school. I just hope that they have considered that as one of their concerns, the children that have to walk on these routes. It's very unsafe. How we do it right now is walk in between yards. Well, those yards are going to be taken away a little bit. And so, where are these children going to walk now, and how is it going to be safe for them to get to and from their bus stops?

And that's about it.

7-1

MS. D. RUPERT: The $480,000 that they have for the one section on 197 I feel should be used to hire at least two more CHP's and install speed limit signs, because there aren't any, to speak of. I mean, there's one 45, one 55, two 55's. And then, just around the real tight corners, they only have, like, 30, and that's where they want to straighten them out.

7-2

And I live in the middle of one of them. And from the looks on the map, they're going to take half my front yard. My front yard is only maybe 50 feet, 60 feet. If they take half of that, I have already got belly dumpers -- construction trucks -- belly dumpers,

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7-2 cont.

dump trucks, doing 50, 60 miles an hour in front of my house. If Caltrans makes this road wider, they're going to do 60 or 70, kill off more of my pets for me.

7-3

I object to the road being widened. I believe that people live in Crescent City because they like the remoteness, and the road hitting here is like hitting through your mother's birth canal and you're popped out at the very end to God's backyard. And I want to leave it as God's backyard, not as Eureka or Santa Rosa or San Francisco. Thank you.

8-1

MS. KASBOHM: I would like to state that I am a resident of Gasquet, California. I'm a homeowner and a taxpayer for 30 years there. And my main concern with the project is the potential for a hazardous material spill into the Smith River. The document, the environmental document, establishes that the STAA trucks can carry a larger amount of lightweight hazardous material, and there will be an increase of a minimum of 17 trucks per day, which will increase the potential for transporting hazardous materials through the Smith River canyon.

It's -- several years ago, the Gasquet Water District had to shut down its intake of water while the river was contaminated by a spill from a big rig. Fortunately, the water was shut down, the intake valve

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8-1 cont.

was shut before our local water was contaminated.

I have no doubt that this project will go through in some shape or form. It's been in the works for many, many years. I would request that funds be made available to the Gasquet Volunteer Fire Department, the Hiouchi Volunteer Fire Department, Fort Dick Fire Department, and stipulated to be used for environmental disaster cleanup when that river is polluted.

This is a multi-million-dollar project, and it seems that funds should be set aside to mitigate the impact of environmental destruction when a hazardous spill goes into the river. It's not a matter of if; it's a matter of when. It has happened several times in the last ten years. It would be nice to see our Smith River corridor ready to be proactive, and we have the recent Gulf oil spill to reflect on.

So, again, I would request that contingencies be put in to make us prepared for whatever disaster might happen to the environment of our river. Okay. Thanks.

9-1

MR. SULLIVAN: I'm Michael Sullivan. I'm with the Del Norte County Board of Supervisors. We, as a community, feel this is essential for us to grow our economy to at least compete and getting STAA access on these roads, and it will improve the safety of it. This is essential to Del Norte County and the health of the

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9-1 cont.

community. It's one of the main -- five main projects in our county to just give us -- allow us to compete. And so, transportation is one, broadbrand, wastewater treatment plant, the airport, and Highway 199. And without -- even people that would oppose the projects would still agree that making -- improving these spots that we have talked about and making a safer highway is essential.

So, it's one of the main projects, and it's right through my District. So, I think it's essential, and without it we're going to be put backwards, so -- and it should have been done ten years ago.

(Mike Halverson introduces himself as the facilitator and then welcomes Kim Hayler. Kim Hayler introduces herself, thanks participants for coming, states comment responses will be in the final environmental document; comments are due by August 23; explains how to submit comments [e-mail, mail, may be left tonight in writing or with court reporter], then introduces Caltrans staff, consultants, and Tamera Leighton.)

PUBLIC COMMENT SESSION

MR. HALVERSON: All right. Thank you very much.

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Okay. Well, let me ask a couple of questions here. First of all, thank you for coming, and I would like to ask you, how many of you have had a chance to meet Sheryl, the court reporter, and give her any testimony or statement? Can you raise your hand for me? A few of you? Okay. Great. And then she'll be available at 7:00 o'clock.

I would like to explain a few of the ground rules here. Since she is going to be recording everything we say now, I want to ask you, if you would have a comment, when you make it, that I want you to start by giving us your name, speak it loudly and clearly. She'll nod if she got it. Watch her. And then, if she needs you to spell it, she'll ask you to. If it's Smith or something, she'll probably figure that one out. But, anyway, so I want you to speak slowly, distinctly, and clearly, so that she will be able to hear.

I have two people here that are going to be helping with the microphones, kind of like the Oprah Winfrey Show, and so, they will shuttle around and come around and talk to each one or allow you to make your comments.

The purpose of this portion of the meeting is for you to make any kind of open statement you would like

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to make in front of your community. And in order to help us out with that, I would ask, how many of you are planning on making a statement in front of your neighbors tonight? Raise your hand. Okay. A few of you. And let's see. We have one here. Raise your hand high. Let's get a look at it there.

So, in order to try to do this in a reasonable fashion, let me try to -- we have until, like, 7:00 o'clock, and that is the schedule for this portion. At 7:00, we will pick back up with private statements over here. Is that a good word, "private"? You know, it's not confidential, obviously. It's going into the record, but you get the drift, in case you're shy like I am. You can go ahead and see her.

And then, also, let's see. The schedule of this also says that we have to be out of here by 8:00 o'clock. So, by 7:30, the Caltrans staff will start taking down all of these easels and display cards and everything like that. And feel free to stand and chat with them as they move out, but by 8:00 o'clock the deal is that the hall is returned to its original condition, which will involve some furniture moving and some other things. And we will be out the door by 8:00, and the lights will be off. So, that's the plan for tonight.

This first portion of the meeting went very well

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so far. There are cookies up here. At 7:00 o'clock, I guess you can come back up and get some. I've been eating them, so they're pretty good. And let's see what else we have here.

In terms of the ground rules, the other -- I guess, everybody has been to meetings before. Anybody never been to a meeting? So, everybody knows what you're supposed to do at meetings. So, the ground rules I'm going to ask you to hold to here are, the main thing, really, that's important is, because we have a court reporter and it's our effort to try to get everything down in the record, we want to ask you to have one conversation at a time. Just make sure that we have only one person speaking at a time so that we can get it for the record.

Other than that, pretty much do the things you're supposed to do and don't do the things you're not supposed to do, and it should work out pretty well. And you probably can all figure that out as we go along.

So, in order to try to work this out so that everybody has a chance to participate, that's enough from me. Does anybody have any questions for me before we go any further? Okay.

My background is behavioral science. I'm not an engineer. I'm not from this community. I did spend the

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day looking around. I went into the museum today. That was very interesting. And it's my pleasure to be here to serve your community and the Department of Transportation.

In order to help you out, I have my friend, the stopwatch, and I want to ask you -- we have, it looks like, about a half a dozen people who wanted to talk. I would like to ask that what we want you to do is make a statement, and I'm thinking that maybe I can help you by asking that if you have questions that need followup, that you can hook up with the Caltrans staff at the 7:00 o'clock portion again.

But other than that, I would like to ask you to make your statement to the microphone. We'll get it down over here. And how much time do you want me to give each one of you? We have until 7:00. That's 50 minutes. If it was ten minutes apiece, that would only be five people. Right? About -- I'm going to suggest -- I don't know -- is five minutes an okay place to start with the statements? Is that all right?

MEMBER OF THE PUBLIC: Sure.

MR. HALVERSON: Everybody can live with that?

MEMBER OF THE PUBLIC: Sure.

MR. HALVERSON: Okay. Good enough. And I'll use Mr. Stopwatch and remind you when your time is up.

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And, of course, we won't give you the hook, but, you know, remember, if you do go over, you'll be taking time from your neighbors. Is that all right?

So, okay. Well, with that, I'm going to ask my microphone crew, we're going to take the front rows here, and I arbitrarily broke you up. There's ten rows. But, perhaps, however you guys want to work it out, you want to take three and three or something? Okay. Well, from the front first three rows, somebody raise your hand who would like to make the first statement, and I'm going to ask Kim to come hold the microphone.

So, who would like to go first? Are we shy? We have one over here. Like an art auction. And, remember, start with your name.

10-1 MR. BRUCE: My name is Donald Bruce. I'm a resident of Gasquet, California. And I support the no-build alternative on this plan. And the reasons is, I don't feel that 26 and a half million dollars justifies the small economic gain that could possibly happen from this. I don't see any evidence that it would improve the economics of the county, all except maybe for a few businesses, and it might even hurt it in the long run through tourism and the effects it would have on the road.

10-2 I think, even with these improvements, I don't

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10-2 cont.

believe that 199 is conducive in having these monster trucks coming through here. I think it's going to create a lot of problems. Even though you make it fairly legal, you're going to have a lot of time when these trucks are going to be over-tracking, and it could cause some serious problems.

I don't know. I had a few other thoughts, but I can't think of them.

MR. HALVERSON: Well, I'll tell you what, since you're the first guy, if you want to go ahead and sit, and, like, you come back up again, if you want, because I know this is a nervous -- public speaking --

10-3

MR. BRUCE: I was going to say, to me, if you're going to invest this type of money, why not find an alternative route? I know people have told me there is a better route that could be done somewhere in the mountains over through the Rowdy Creek, over in that area. And then you can have a -- heck, you could build a freeway, and these trucks could fly over and get back and forth a lot faster. It seems like a lot of money to invest in something that is -- still really isn't going to be fixed, so to speak.

10-4

And, of course, another issue I am afraid of, I have reviewed a ten-year California Highway Patrol report, and the main cause of accidents on 199 is

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10-4 cont.

speeding. The second main cause of accidents is over-tracking into the other lane. It seems like having -- widening these corners just might exacerbate that problem. Personally, I would like to see more law enforcement on the road and money spent in that direction.

Thank you for listening.

MR. HALVERSON: Thank you very much for your statement. Thank you. Go ahead, give him a round of applause.

What I want to do before we go ahead, just to coach all of you, remember, speak into the microphone and speak slowly, so that our court reporter can get it.

Sheryl, how did we do on our first one?

THE REPORTER: Good.

MR. HALVERSON: Did you get it?

THE REPORTER: A little hard to hear, a little quiet, but -- it could be louder.

MR. HALVERSON: A little hard to hear, a little quiet. Okay. So, don't be afraid of the microphone. It helps everybody.

And so, we're going to see if we can pick somebody from the back three right now. There's one right there. Yes, the gentleman in the -- okay.

11-1 MR. REICHLIN: Yes, my name is Dwayne Reichlin,

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11-1 cont.

and I'm the president of Hambro Forest Products and Snoozie Shavings, Inc. And we are the evil truckers that run up and down the 199 highway. We have been in business for some 40-some years.

And what I would add is that one of the reasons that we do have issues on the roadways are because we have not spent the money on those roadways over the years to make the areas safer. We have been after folks for a long time to straighten out curves and do different things to try to make this area safer for trucks.

11-2

Regardless of whether you have a 70-foot truck or a 65-foot truck, the highways needs to be safer, not only for truckers, but they also need to be safer for the tourist population that I have been hearing for the last 45 years is going to solve our economic problems. That hasn't happened. And we will never have economic development in Del Norte County, Humboldt County, or Curry County, for a fact, if we don't do something with what I call our highway or our driveway to the rest of the world, which is Highway 199.

11-3

Our drivers probably drive somewhere in the neighborhood of 4 to 5 million miles a year, and we have very few incidents on Highway 199. We have drivers that drive that road every day at least twice a day. We need to make that road a lot safer, not only for trucks but

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11-3 cont.

also for the -- for the passenger cars, for people that need to go to the hospitals, and some of the other places that they need to get out of Del Norte County to go to.

Thank you.

MR. HALVERSON: Thank you very much.

MR. REICHLIN: Oh, wait a minute. Can I add --

MR. HALVERSON: Yes, sir.

MR. REICHLIN: Can I read one thing real quick?

MR. HALVERSON: Feel free.

11-4

MR. REICHLIN: Let me get my glasses on so I can see. This has to do with something I downloaded today about the State of California and the state that it's in.

MR. HALVERSON: Remember to speak slowly, now. Go ahead.

MR. REICHLIN: California's manufacturing base has eroded by 34 percent since 2001, a loss of over 630,000 manufacturing jobs that paid, on an average, $25,000 a year more than service jobs. These losses have cost California nearly 75 billion a year in wages and 5 billion annually in tax revenue, money that once helped pay for schools, infrastructure, and other services. California aerospace and auto manufacturing has practically disappeared, and, as a result, the State now has one of the highest unemployment rates in the U.S. and is currently at 12 and a half percent.

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Thank you.

MR. HALVERSON: Thank you very much. Okay. You can all applaud at the end. How's that?

And we have the guy back there in the red and white T-shirt has got a statement he wants to make, and the lady up here in the black sweater has raised her hand, too. So, let's go ahead with that back there.

Remember, start with your name.

12-1 MR. OLSON: Curt Olson. I live at Ruby 2, and I'm concerned about that area not being considered a residential area. There are residences there. I'm concerned that -- I think, improving the road needs to be done. I'm just worried that people going by my house at 65 miles an hour, when I'm trying to enter the roadway, is not a fair situation.

12-2 I'm with Rumiano Cheese. We send three trucks a week up and down that road, and we we need it. We use that corridor.

12-3 I'm also concerned that the plan has nothing in it to take care of the water runoff, the streams that are there, that that has not been addressed. And that's start of your plan. No one has come and talked to us, really, about that.

12-4 And so, I just wanted to -- I think that they could widen the road. I think that's fair. The truck

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12-4 cont.

drivers are great operators. To me, we just need to slow people down in front of our house.

When you go by, one thing I suggest you do is go over to the Highway Patrol and look at their wall, and you're going to see Ruby 2 there has 32 pictures of accidents in the last five years. And you guys are not going to slow that down. That tree is not leaving. The old growth redwood tree is going to stay, and that's a visual problem and it seems to cause problems.

So, I want to see it -- I'm not seeing you address it, as far as residences. You could see our houses are there, and you come and you talk to us; you ask us to come. And I'm at Ruby 2, and you can look all along there. And everyone that drives up there says, "Boy, these are nice people that lived here," except that we have to go from zero to 65 in front of our house. It's not very good. And so, I would like to see that added to the list when you test these roads.

Thank you very much.

MR. HALVERSON: Thank you.

Sheryl, how are we doing? Good?

Hold your applause until the end. I know. I know. We have over here a lady that raised her hand over here. Okay.

13-1

MS. ZOTTOLA: Okay. Thank you. Gina Zottola,

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13-1 cont.

and I'm the executive director of the Crescent City-Del Norte County Chamber of Commerce. And the Chamber of Commerce fully supports this project, and I just want to get that on the record and make sure you have my comment. Thank you.

MR. HALVERSON: Thank you very much.

Over here, so we can catch up to right here. Thank you.

14-1

MS. JOHNSTON: Hi. My name is Meagan Johnston, and I just recently moved here, actually, from Boise, Idaho, and I also live off of 197 and enter that area with trucks flying at 75, 65 miles an hour all the time.

I just think that, with this plan, that something that people really need to think about is that children also walk on these roads. And this is actually an area for bus stops. And we really need to consider that, you know. You guys say that tourism is the major industry here. And in Idaho, we have a very bike safety area.

And there's no sidewalks. There's no safety on this road, whatsoever. Right now, our children have to go from yard to yard to yard to get to bus stops. So, if we're going to be making this even larger trucks being on this road, which I do understand that there is a need to get materials where they need to go, we need to think

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14-1 cont.

about the safety issues of children, the residents that live on this road. And that's what I wanted to say.

MR. HALVERSON: Thank you very much.

Hands, please. Right here. Thank you.

MS. D. RUPERT: My name is DeAnn Rupert. I, too, live on 197.

MR. HALVERSON: DeAnn, is that right?

MS. D. RUPERT: DeAnn.

MR. HALVERSON: She'll hold the microphone. You don't have to worry. There you go.

15-1

MS. D. RUPERT: I, too, live on 197. And I have looked at the maps there. And the tail end of one of their projects looks like it's going to end up in my front yard, so I'm very concerned. And a lot of the people have already said issues that I, too, am concerned about. I have children. I have pets. My bus stop is a mile away. And either way to the bus stop, she has to go through tight curves. So, she doesn't walk, you know. She's in high school. She doesn't walk, because....

15-2

$488,000, $480,000 for Ruby 1 to make that a wider way, you know, and that does need to be improved. There's no doubt about that. But I think, if we took some of that $480,000 and put up speed signs, speed limit signs --there's three speed limit signs on 197, three, and then there's some advisory speed limit signs. If we

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15-2 cont.

put up more speed limit signs and hired a couple more cops with that money, you could leave 197 alone.

15-3

You know, and the people that live here, we know what it's like, that it takes two or three weeks to get our stuff from Home Depot, if you want to shop at Home Depot, you know, but we live here because of the remoteness, because of the pristine. Where else is there redwoods? Where else do we have the Smith River? And where else can it get mucked up but here, doing this?

I vote no. I don't want it to happen, you know. We like it remote. That's why we're here. You all go home.

MR. HALVERSON: Thank you very much. Thank you. Okay. Hold your applause. I appreciate that.

Who else? Who else has a statement they would like to make in front of the rest of the community? Anyone else? Yes, ma'am. Right here.

16-1

MS. BRUCE: My name is Dori Bruce, and I live in Gasquet. I have lived there for 17 years. And we have property along 199. I have read a portion of the EIR that I was able to pull up on the computer. I haven't seen the whole document. It wasn't in the library, as it was supposed to be. But I appreciate seeing the magnitude, the size of the study. A lot of work went into that.

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16-2

One of the things that I did notice on the computer, when we pulled it up, the -- there was -- it appeared that the amount of economic impact and growth to Del Norte County, by your own admissions in your report, is minimal, folks, minimal.

So, we are having this very extensive project, costing 26 million-plus dollars, covering years of delays and construction and all sorts of impediments to people using 199 and traversing between the Rogue Valley and our county and, when it appears 37 businesses were surveyed in -- just recently, 2010 -- I forget the consulting company that did that, but 20 percent of the 37 businesses surveyed, which is around seven of 20 -- 37, said there would be some -- possibly some gain to their business and they might possibly hire some more people.

I mean, folks, that's -- that's not like a major boom to Crescent City or Del Norte County, at a stake of possibly greatly damaging our beautiful tourist draw along a scenic byway into our county, coming head to head with monster trucks, creating a much more dangerous situation with a few, seven, areas that you have identified on 199 and 197 to do some modifications to.

So, I am opposed to this project, also. Thank you.

MR. HALVERSON: Thank you very much. And back

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there in the corner.

17-1 MS. NOBLE: Hi, I'm a drop-in person. I haven't read about this plan. My name is Katherine Noble. And I'm here because I was born in a bedroom community of Los Gatos, and that bedroom community had a highway built right through the heart of it. So, now 280, that's how people from San Jose get to San Francisco. It's six or eight or I don't know how many lanes of ugliness, and the community that was my home is gone. And there is a big, huge highway, so that, ultimately, people who have lived in San Jose can then go to the redwoods and create something, you know, where they've got a little part of the bliss that I moved moved up here to find, because they're all down there.

17-2 And I really don't see that road repairs we really, really need, like what was done south of here, on 101, it's a good thing, but how many people here went to work? Maybe ten truckers? Not a lot of people here, because it was all jobbed out from other places. And so, the work -- if we're going to expect people here to do this work, I don't think it's going to happen. It's going to cost a small fortune.

17-3 The tourists can come to them, and maybe sidewalks are a good thing and maybe there can be some improvement. But, you know, the golden four-lane needs

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17-3 cont.

to be in the heart of the valley, where everybody wants to go. And I just think this is not the place to make our little, quiet tourist area into Disneyland.

Thank you.

MR. HALVERSON: Thank you.

Anyone else? Would you like to make a statement, sir? Let us get a microphone up here, a microphone right here. She'll hold it for you, sir. She'll hold it.

MR. ZUEHLKE: My big problem is --

MR. HALVERSON: Okay. Start with your name.

MR. ZUEHLKE: Oh. Elmer Zuehlke. You probably all have seen me here before.

MR. HALVERSON: Spell your name for the record.

MR. ZUEHLKE: She has it.

MR. HALVERSON: You have it? Okay. Thank you.

Okay. Go ahead. We'll start your clock over. Go ahead.

MR. ZUEHLKE: I'm an old codger, 92 years old, and I'm having a terrible hearing problem. So, I will try not to be redundant.

But I have a plan, which, according to a lot of people who said, "You're very radical." But, you see, I live in Los Angeles for six months of the year, and I have a beautiful house here on 197, right at the key spot

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of the interchange. And I fought with Caltrans in '64, and I think I'm probably responsible for the road getting lousy right at that point, because I have a beautiful set of trees. My double tree next to the road is over 50 feet in diameter. I don't think the park has anything any better. And in those days, Caltrans wanted to cut them down. And my entire family said, "Absolutely not." We wouldn't let people get on our property to make a measurement to cut them down.

Now, another bad thing about Caltrans is that the road condition there is so bad that I had to improve my driveway to make a better slope. And would you believe what I learned -- later learned was my property, Caltrans charged me for making that slight road change. That's Caltrans.

18-1 Now, what I'm proposing so radical, but since I'm an engineer I'm used to seeing into the future, I'm saying, let's leave 199 through the park -- or let's change the road through the park. Let's leave 197 alone and put a four-lane road up the side of the mountain in parallel with 199 through the park.

Because in the city, Los Angeles, we recognize that nothing less than a four-lane road on a mountain is safe. If you have a truck losing its brakes here, you have no way of getting around them. You've got a rock

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18-1 cont.

and the river. And what are you going to do if they lose their brakes? And that is a common situation. So, in Los Angeles, we have nothing less on a hill but four lanes. And of course, I live in the city, so we have five and six and seven, and they're adding lanes all the time.

18-2

Trucks -- oh, on I-5, when I drive -- and now I'm flying, because I can't afford to take a chance on the road. On I-5, approaching Los Angeles, trucks are a terrible menace. They're even using more than the three lanes allocated. And look at the history of accidents. We have a tremendous number of accidents on our 197/199 complex. So, our goal should be, ultimately, four lanes all the way to I-5 and four lanes through the park.

18-3

And, by the way, a lot of people think you can't cut a redwood tree. Well, think of it a little differently. You can't replace a redwood tree. So, therefore, maturity is the important thing. I have loads of spindly trees, maybe a foot in diameter, and I'll cut them at a moment's notice. But if you want to come over with a saw and try to cut one of my mature trees, you'll see a different action.

I've got a million things to say, but I just can't remember all of them. Safety, we all think of safety. But right now everything that Caltrans has

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done -- and maybe I should tell you about the bad part about 199 near 101. You know, you --

MR. HALVERSON: You go ahead and make a kind of a summary statement. Go ahead.

MR. ZUEHLKE: Pardon?

MR. HALVERSON: Kind of make a summary statement there. We're getting to the edge of the five minutes. Go ahead.

18-4 MR. ZUEHLKE: Well, briefly, you have no space between the edge of the road, the white line. It slopes directly to the river about 45 degrees. Can you imagine what will happen if you deviate from the road that much? You'll be dead.

Thank you.

MR. HALVERSON: Thank you very much, sir. All right. We have one back here? Thank you very much. Thank you.

19-1 MR. GILLESPIE: Hi. My name is Don Gillespie, and I'm speaking for myself. I just wanted to point out, I heard earlier a comment about somebody representing "the evil truckers of Del Norte County." And I don't think that's the issue at all. I think that our local truck drivers are very -- and I think the people here have some very genuine concerns that shouldn't be just put off.

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19-1

Our local truck drivers, I think, know this highway, they know Highway 101, and they do a very good job of driving it. But with the STAA trucks, we're really eliminating the stop-off point in either Grants Pass or Medford. I'm not sure where. And so, we are inviting truck drivers who are used to driving the freeways, who get paid by the miles they drive, and then asking them to come and drive Highway 199.

And even with the improvements you're making, I think that we are creating a safety situation. We're making safety situations worse by inviting unskilled drivers, driving these big rigs over a highway that they're not familiar with. And some of them will become familiar with it. It's not -- you know, they will get better at it.

But in the meantime, I think that your report says by 2030 there will be 92 more trucks a day driving 199, only 17, like, in 2014. But that's something to think about. As our population increases, we're trying to -- we're bringing more trucks, bigger trucks, and I think that's going to create a safety issue that is of a concern.

19-2

Your report does state -- that's the one -- it's difficult to read your Draft EIR, when it's just on a computer disk, because it's hard to get a feeling for the

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19-2 cont.

whole thing. But your economic state says that there will be nominal economic benefit to Del Norte County. And it is a benefit. It is an economic benefit. I can't deny that. But it's nominal. So, what's -- as far as safety issues are concerned, what is the price you're going to be paying?

19-3

I have a concern that -- you know, I made a suggestion that guardrails be established around Milepost 6.1 and 6.2 on Highway 197. There's a stretch there of about a quarter of a mile, maybe closer to half a mile, where you have a steep bluff and then a drop-off into the river, and there's not a single guardrail. And I was told by Kevin Church that there has been no accidents reported there at all, so those guardrails will not be part of the project. And, yet, when you start adding larger trucks that might sweep slightly wider, you know, it's just accidents waiting to happen, and I'm sorry that that can't be addressed in this process.

And so, thank you for hosting this open house and for all the work you have done for the Draft EIR.

MR. HALVERSON: Thank you very much.

Anyone else would like to make a statement? Yes, sir.

MR. REICHLIN: I had just a quick rebuttal.

MR. HALVERSON: Again, start with your name.

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MR. REICHLIN: I just, you know -- oh, Dwayne Reichlin with Snoozie Shavings.

MR. HALVERSON: And we're looking for statements, not rebuttals.

20-1 MR. REICHLIN: We are -- there's absolutely no question that the highway needs to be taken care of. And it is a trucking issue. It's also an automobile issue, because the safer you make the highway, the safer it's going to be for everybody on it that has to get in and out of here.

20-2 So, we're making a lot of assumptions based on what we don't know what the road is going to look like if we can get this infrastructure taken care of. We need to get this infrastructure taken care of. We're not going to -- you're not going to stop change. Change is going to take place. What we need to do is figure out how to make change in a reasonable manner and try to employ some of these young people in this community that don't have anything but welfare to turn to or leave this area.

I've been involved in economic development in this country -- in this county for about the last 40 years, and I always the hear, "We're going to try to figure out how to generate more jobs in Del Norte County." And I'm not -- I'm in the wood products business, but I'm not saying that we have to be

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20-2 cont.

in the wood products business.

But what we have to do is, we have to improve the infrastructure in this community so that we can fully develop what the potential is in this community. If it's tourism, that's fine. If it's wood products, that's fine, also, because I'm a firm believer that not everything and just one thing in this community, like tourism or wood products or farming, is going to solve the problems that we have from an economic standpoint.

But all of these things, a small percentage of all of these things, over a long term, are going to offer a lot more people a lot more opportunity. And maybe we won't be chasing our kids out of here because we belong to the crowd of, "I got mine and to hell with everybody else." And I've been hearing that for the last 25 or 30 years around here.

So, we are at a crossroads right now. We're going to have to figure out what's going to happen. I just read an article about the State of California. If you don't think the State and the federal government are in trouble, you know, ask Mike Sullivan here from the County what he's trying to do. And unless we can generate some jobs in this community and every other community in this country, this country is in for a hell of a ride for the next five to ten years.

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Thank you.

MR. HALVERSON: Thank you very much. And what I would like to ask you now is to remember we're not going to open this into an open forum for debate. We're looking for comment. So, if you have a comment that you would like to offer and someone hasn't already made it, feel free.

She'll hold the microphone for you, please.

21-1 MS. J. RUPERT: My name is Jean Rupert, J-e-a-n. And I have heard a lot of talk about the safety factor of this. And I also live in Gasquet, and I wasn't going to make a comment, because I agree with a little bit of what I heard everybody say.

I have heard a lot about the safety, you know, and the report, like you said, 17 -- 17 trucks, with the increase of 17 trucks by 2014. I think, the larger trucks, you know, there's bound to be some shipping costs reduction for businesses by being able to bring in bigger trucks. Obviously, their prices are going to go down. I don't think the prices are going to go down to the consumer. I don't think there's going to be that much of an economic improvement to waste 27 million on improving these stretches that you're talking about.

21-2 My thing with the safety factor is, you know, like, we had the spill a couple of years ago with

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21-2 cont.

Mike Renner. He did a fantastic job of cleaning it up. But what I haven't heard, you know, this money being spent to do this, there's no money to increase our local search and rescue -- or search and rescue -- our local emergency responders, fire departments and whatnot. What kind of safety features are going to be put into place with these new trucks, you know? And they're talking about lightweight hazardous materials and heavy hazardous materials and this and that.

You know, we've had our water system shut down for days and days at a time from spills before. And so, you know, my concern would be what safety features are going to be -- you know, new safety features are going to come into play with these larger trucks?

21-3

And I agree with Bruce that we definitely need more law enforcement. People don't respond to signs, and it is only so much, so more law enforcement would be handy.

21-4

And I'm one of these people that left this county because there wasn't a lot of opportunity as a young person, and I came back. And every young person that leaves this county has -- can come back, you know. And saying they don't come back because it's a small town, the majority of people I know who didn't come back and don't want to live here is because of the size of the

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21-4 cont.

town. Okay? They want to be in the city. Okay? It has nothing to do with jobs -- well, it has something to do with jobs, I'm sure, but the majority of them want to be in the city. If they wanted to come back, they could.

Those of us who do come back, come back because of the area. This is a wild and scenic river, the only wild and scenic river in California. And we're going to do what to it?

21-5

You ought to be more concerned with the environmental impacts of spills and damages and what kind of features are going to be put into place to help protect that, talk about retaining walls, you know, different stuff. What about spills? So, I'm not in favor of this.

MR. HALVERSON: Thank you. Thank you very much for your comment.

And how are we doing over here? Good? All right.

Thank you very much. Who is next? Over here? Okay. And, sir, start with your name for the record.

22-1

MR. SMALLER: I'm Gary Smaller. I live on North Bank Road. And I am in a funny position here. I find myself agreeing with everything that everybody says.

MR. HALVERSON: Don't talk too fast, now. We've got a court reporter here.

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22-1 cont.

MR. SMALLER: I believe in the environmental concerns. I feel the same thing. But I also believe we need economic development. There's critical need for a reasonable truck route. I just have a problem with running the truck route down the North Bank Road. I think that's a mistake.

I guess I would ask Caltrans, isn't there a better route? And I'm imagining a route that goes up Rowdy Creek and over the mountains and comes out at the Oregon border. The historical question is, why can't we consider that? It's a reasonable answer that makes everybody happy. I understand it's expensive, but it will never happen if we never get started.

That's it.

MR. HALVERSON: Thank you. Thank you.

Anyone else would like to make a statement? Yes. Anyone else? Going once. I know this is an important issue to your community, and I appreciate with a passion the way you feel for the issue.

I want to encourage you to remember that you can file comments with e-mail. Look on the back of the brochure, on the bottom, and there's information on the Web site for the various things that you can access. You can get copies of the environmental document, which someone can hold it up. I don't know. It's about this

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thick (indicating). You probably don't want to print it, unless you're really interested. There's a copy in the back of the room held by a strong guy. Yeah, weak guys like me can't hardly pick it up. But it's all online. You can download it. You can get copies of it available in the library and also a couple of other locations, including the Caltrans office, if you're ever down there in New York City -- I mean Eureka.

23-1 MS. J. RUPERT: Why isn't it here, in our Caltrans office? Why isn't it here?

MR. HALVERSON: Oh, it is. In the library?

MS. J. RUPERT: In the Caltrans office.

MR. HALVERSON: Oh, I'm sorry.

MS. J. RUPERT: There isn't any in the library, but why isn't it in our local Caltrans office?

MR. HALVERSON: Ah. Could you address that, please?

MS. HAYLER: Well, I guess we hadn't thought of that option. It was delivered to -- I apologize that it's not at the library at this moment, it sounds like, and I don't know what happened. I can guarantee it was delivered by our executive staff members, and sometime between when it was delivered and when it was looked for, apparently, today, it was not findable by the library staff.

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So, what's going to happen is, Tamera Leighton has offered to deliver a copy tomorrow morning, and so, there will be a copy there. Again, Tamera also has copies and the DVD's at her office, the local Transportation Commission Office here in town.

There is a copy at the District Office, which is the standard place that we have a copy. If it's been developed by District 1, the draft environmental document is at our District Office and the public library. But I don't know about -- I'm looking at my senior. I don't know. We can look into it.

The honest truth, actually, I know -- I have some family members who have worked out of that office, and I'm not sure that it's always staffed. There might not always be someone there, because most of the time they're actually in the field a lot of the time. Sometimes there is an office engineer present, but not always. So, it probably wouldn't be the best convenient place for the public to have a copy there. I would say the library would be the best.

And so, probably, what I would ask of any of you, if you do go to the library and a copy is not there again, please definitely e-mail me or call me, or call, even, the front office and let someone know that the copy isn't there anymore, and we can have another copy

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delivered. But that's really too bad that that copy is missing.

(Discussion off the record.)

MR. HALVERSON: Yes? Could we get a microphone over here? Did you want to make a statement?

MS. D. RUPERT: Yes.

MR. HALVERSON: Okay. Start with your name again. It's for the record.

24-1 MS. D. RUPERT: DeAnn Rupert, with a capital "A."

MR. HALVERSON: Thank you.

MS. D. RUPERT: The only thing -- well, what I want to know is, were you guys involved with the new freeway that bypassed Richardson Grove -- no, not Richardson --

MEMBER OF THE PUBLIC: Prairie Creek.

MS. D. RUPERT: Prairie Creek. Thanks.

Were you guys involved in that new freeway, four-lane, up over the mountain that bypassed Prairie Creek?

MR. HALVERSON: Well, we're trying to get the comments on the environmental document tonight. That's a fair question, to which you can get an answer.

MS. D. RUPERT: I'm getting to that. I'm getting to that.

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24-1 cont.

MR. HALVERSON: Go ahead. Your comment is?

MS. D. RUPERT: The comment is, let's do it again, like what the gentleman over there said, from, like, O'Brien to Rowdy Creek, you know. Don't touch the redwoods. Leave the roads as they are. Let people go down there if they want. Same thing with 199 and 197. Build a new mountain -- build a new four-lane up over. Let's do that.

MR. HALVERSON: Okay. Thank you very much. Thank you.

Yes? Start with your name, please.

25-1

MS. JOHNSTON: My name, again, is Meagan Johnston. And I just wanted to say, this place I came to as a child with my grandparents to visit, and it was just a pristine, beautiful place I always wanted to come back to. And as an adult -- I'm now 32 years old -- I have brought my children back here to raise my children here. So, if you want to come to this place and you want to work in this place, you can find work and you can find a job. We don't need to make every beautiful area of the redwoods into a Disneyland. So, that's my comment.

MR. HALVERSON: Thank you. Thank you very much.

Anyone else? We have a couple more minutes for this portion of the meeting. Anyone else would like to make a statement?

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26-1 MR. ZUEHLKE: I haven't given you all the information I see about this place. All this discussion involves a small triangle just a few miles long, south of Crescent -- oh, okay. I'm sorry, I'm getting mixed up. There is a triangle that's involved in this and the park.

But let me try to get you to think that you're dealing with traffic from I-5 to Crescent City. That's the most important. Oregon is important, too, but not nearly as much as Crescent City. But visualize a straight line from I-5 to Crescent City, high-speed, four lanes, 55 miles an hour. Can you beat that? There's nothing better than that.

Now, if you wanted to go to Oregon, you go up 101. Who, in their right mind, can ever think, if you want to go north and south, that you're going to take 197 east and west? Utterly ridiculous.

MR. HALVERSON: Thank you very much.

Yes, sir. Right here.

27-1 MR. COMPTON: My name is Charlie Compton. I'm the sales manager for Hambro, so I have to deal with all the economic issues associated with selling particle board out of our plant in Crescent City and Arcata. And these trucks will help our business. I'm for the changes.

27-2 I'm for it for a number of other reasons,

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27-2 cont.

though. There have been a number of young people that have died on our highways because they're not safe. No vehicles were involved, other than drugs, alcohol, and stupidity, and you're not going to change that, anyway. You're going to continue to have those kind of problems.

A straight road from Grants Pass to Crescent City, from my perspective, would be absolutely boring. I have driven on roads that are straight. There's many, many accidents on straight roads, whether they're four-lane or whether they're two-lane.

My only request, and I agree with a lot of the people in here, safety is a request for me. I have two young children that will be driving on this highway. And the way that you address safety is, you improve the conditions of the roadway. And you have less traffic. That's a just a statistical fact. You have a lot less traffic with less accidents on it.

So, my parents have an RV. They will not come over. They don't visit this area anywhere near as much as they used to, because the road is dangerous. They've had several close calls. My wife and I have a 30-foot RV that we take over to Hornbrook, California, and I don't even like pulling it on the highway because of the safety of the roads.

So, I see other issues. I see, actually, the

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27-2 cont.

road that we have is a beautiful road. I love driving 199 and 197 and going over to I-5. But even my driving, it's just -- it's just not safe, and it needs to be improved. That's my feeling. Thank you.

MR. HALVERSON: Thank you very much. Anyone else? We have time for a couple more comments here, please. Anyone? Anyone? Anything at all? What I would like to do, then -- you're sure. I'm not being too pushy, am I?

Okay. What I would like to remind you about is, public comments this way, public comments by e-mail. I would like to ask for us to try to figure out, the Caltrans staff that's going to meet with the lady about access to the document. And so, what we have are three -- I'm going to turn it over to you in just a second to go ahead and take it from there. I guess, is there anything else anybody wants to say?

Okay. Then, what I'm going to do is, I'm going to say thank you very much, as your facilitator. You have been very patient with me, and all of you have been very cooperative. I know this is a very important issue to all of you. I appreciate you working with this little bit of structure that we have provided.

So, at this point, I'm going to turn it back over to the Caltrans staff for the next portion of the

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meeting. Thank you very much. And give yourselves a round of applause. Come on.

MS. HAYLER: Thank you all very much for coming, again, and thank you for everyone who stood up and spoke tonight. We really appreciate receiving your comments, and all of them are really important to us. And we'll get them from the court reporter. And, like I said, your comment will be included in the final environmental document, and our response to that comment will be included in the final environmental document.

So, thank you very much again. Please feel free to stay and chat with us until about 7:30. Have some cookies and water. And we would be happy to answer any questions we can for you. So, thank you again.

MR. HALVERSON: Cookies, cookies.

MS. HAYLER: Thank you.

(The public hearing was concluded at 7:00 p.m.)

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STATE OF CALIFORNIA)
) ss.
COUNTY OF HUMBOLDT)

I, SHERYL A. BROWN, a Certified Shorthand Reporter in the State of California, hereby certify that the foregoing proceedings were reported by me and were thereafter transcribed under my direction into typewriting; that the foregoing is a full, complete, and true record of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceedings and caption named nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 23rd day of July, 2010.

Sheryl A. Brown

SHERYL A. BROWN
CSR No. 3908

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Responses to Public Meeting Commenter 1: Elmer Zuehlke

Response to Comment 1-1

This comment states concern for safety of the residents along SR 197 if the proposed project is constructed, states that safety is currently an issue, and proposes an alternate route to SR 197. Alternate routes were considered but determined to be infeasible, please see Grouped Response # 6. Please see the response to the Environmental Protection Information Center's (EPICs) Comment 8 for a discussion of how the local communities would not be significantly affected by the propose project.

No changes to the Draft EIR/EA are necessary.

Response to Comment 1-2

This comment suggests several alternative routes, including a 4 lane bypass for 197. Please see Grouped Response #6 and #7 for further discussion on alternative routes.

Also, see the revised Chapter 1 of the Final EIR/EA and Grouped Response #1 for a detailed explanation of the purpose and need of the project

No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 2: Daniel Brown

Response to Comment 2-1

This comment does not provide a comment on the Draft EIR/EA. The comment indicates support for the proposed project and suggests it provides ecologic benefits.

No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 3: Don Pass

Response to Comment 3-1

This comment indicates support for the retaining wall at Washington Curve and the box girder design with the retaining wall on the bridge at Patrick Creek Narrows Location 2. Please see the revised Chapter 1 in the Final EIR/EA for a discussion regarding the preferred alternatives and see Grouped Response #3 for a discussion of visual impacts.

No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 4: Dwayne Reichlin (President of Hambro Group)

Response to Comment 4-1

This comment does not provide a comment on the Draft EIR/EA. The comment indicates support for the proposed project.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 5: Don Gillespie (representing Friends of Del Norte)

Response to Comment 5-1

This comment states concern about safety with increased truck traffic and truck drivers unfamiliar with US 199. See Grouped Response #8 for an explanation of how the anticipated increase in trucks would affect safety for local communities, and see response to EPICs Comment 8 for a discussion of how anticipated truck traffic would affect community cohesion.

No changes to the Draft EIR/EA are necessary.

Response to Comment 5-2

This comment states concern for a potential increase in spills of toxic chemicals into the Smith River. See the response to Vern Powers' Comment 1 and the response for John Zuehlke's Comment 6 for a discussion this topic.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 5-3

The commenter requested the geotechnical study for The Narrows and Patrick Creek Narrows locations. The preliminary geotechnical reports prepared for the project are listed on page 2.2-17 of the Draft EIR/EA and are available for public review at the Department's office located at 1656 Union Street in Eureka and at the public library in Crescent City. Please refer to the response to Comment 13 for the Friends of Del Norte for more information regarding the anticipated cut slope conditions at Washington Curve. In general, preliminary geotechnical investigations and studies do not provide information on potential for erosion. Potential erosion is considered by the Design Engineer in coordination with the Landscape Architect and Environmental Engineers that assess stormwater and water quality concerns. The Design Engineers for Washington Curve, The Narrows, and Patrick Creek Narrows do not anticipate a significant increase in soil erosion at the proposed new cut slope areas. This is because some portion of each of the cut slope locations are rock, which do not discharge sediment as a soil slope might. The portions of the cut slope locations that would be soil after construction would be stabilized with an erosion control seed mix with regionally appropriate, native plant species and a bonded fiber matrix (i.e., wood or wood/paper fiber blanket bonded together by a polymer tackifier to help seeds stick to the slope until they can germinate) (see Appendix R, Enhanced Erosion Control Seeding and Revegetation Plan for more information). The Department's projects must comply with the new statewide Construction General Permit that strictly regulates erosion potential and requires Best Management Practices during construction.

Please see the Grouped Response #10 regarding concerns over geologic stability for more information.

No changes to the Draft EIR/EA are necessary.

Response to Comment 5-4

This comment suggests that the DEIR/EA did not address the connection of the project to the Richardson Grove Improvement Project in terms of traffic flow. The Richardson Grove

Improvement Project was considered in the 2030 analysis for future traffic impacts (see DEIR/EA 2.1.4), see the response to Friends of Del Norte Comment 1 for a discussion on this subject.

No changes to the Draft EIR/EA are necessary.

Response to Comment 5-5

This comment states that there will be only be slight economic improvement in Del Notre County as a result of this project. As discussed on pages 4-73 through 4-80 of the Community Impact Assessment prepared for the project, the proposed STAA truck access improvements along the SR 197–US 199 corridor would lower transportation costs by about 15% for an estimated 20% of the trucking firms and about 60% of the producers in the two-county study area, based on a survey of trucking and producer firms. This would represent less than 50% (46%) of the trucking and producer businesses located in the two-county area.

No changes to the Draft EIR/EA are necessary.

Response to Comment 5-6

The comment does not address a specific part of the DEIR/EA or project, and no specific concern is stated other than the topic of the geotechnical study and that the commenter is concerned about the pristine quality of the Smith River and its corridors. The geotechnical reports referenced in Appendix S, List of Technical Studies of the Draft EIR/EA are available for viewing at the Caltrans District 1 Office on 1656 Union Street in Eureka and at the public library in Crescent City. Section 2.2.2 of the DEIR/EA discusses and potential impacts and addresses avoidance, minimization, and mitigation measures, and Section 2.4.7 discusses water quality and stormwater concerns and BMPs during construction. To ensure beneficial uses of the Smith River are protected from the proposed improvements, the Department will implement Best Management Practices (BMPS) at each project location to minimize or avoid degradation of storm water runoff flowing to the Smith River and its tributaries. The Smith River beneficial uses include: municipal and domestic water supply; water contact recreation; commercial and sport fishing; cold fresh water habitat; wild life habitat; rare, threatened, or endangered species; migration of aquatic organisms; spawning, reproduction, and/or early development; and others. See the response to the California Regional Water Quality Control Board Comments 2, 3, and 4 for a discussion of BMPs and anticipated methods of protecting water quality and waters of the state.

No changes to the Draft EIR/EA are necessary.

Response to Comment 5-7

The commenter would like the trees slated for removal at the Ruby 1 and Ruby 2 locations to be flagged in order to allow the public to visualize the area. No changes to the Draft EIR/EA are necessary.

No changes to the Draft EIR/EA are necessary.

Response to Comment 5-8

The commenter prefers the downstream arched bridge replacement alternative for the Patrick Creek Narrows at the Middle Fork Smith River. This comment has been noted.

No changes to the Draft EIR/EA are necessary.

Response to Comment 5-9

Professional truck drivers and companies are responsible for routing their loads on legal routes. Various truck routes and their limitations are provided on the Department's website (Caltrans 2012). Signs are also installed at intersections to guide these trucks onto the proper routes.

CHP has responsibility for enforcement activities on the State Highway System and they are very active and informed with regards to current and new regulations and enforcing those regulations.

No changes to the Draft EIR/EA are necessary.

California Department of Transportation (Caltrans). 2012. Truck Size & Routes webpage. Caltrans Legal Truck Size & Weight Work Group, Revised 5/2/2012. Available at: http://www.dot.ca.gov/hq/traffops/trucks/routes/truck-routes.htm. Accessed: October 31, 2012.

Responses to Public Meeting Commenter 6: Meagan Johnston

Response to Comment 6-1

Thank you for your comments and concerns. The request to improve the routes that children use to get to school is outside the scope of this project and does not meet the purpose and need. See Response to Donald Bruce's Comment 2 for a discussion about school bus accommodation.

For clarification on how truck traffic is anticipated to increase after construction and under future conditions if the project was constructed, please see the Grouped Response #8. For a discussion of how the anticipated trucks per day would affect local communities, please see the response to EPICs Comment 8.

No changes to the Draft EIR/EA are necessary.

Response to Comment 6-2

See response to comment above.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 7: DeAnn Rupert

Response to Comment 7-1

This comment does not specifically address the DEIR/EA; it suggests hiring additional CHPs and installing speed limit signs. This comment indirectly refers to the Basic Speed Law, on which all fifty states base their speed regulations:

"No person shall drive a vehicle upon a highway at a speed greater than is reasonable or prudent having due regard for weather, visibility, the traffic on, and the surface and width of, the highway, and in no event at a speed which endangers the safety of persons or property."

Adherence to the Basic Speed Law can be increased by traditional law enforcement; however, resources for all state agencies are limited. These suggestions would not meet the purpose and need; see the revised Chapter 1 in the Final EIR/EA and Grouped Response #1 for a discussion regarding purpose and need. As the commenter noted, the only reduced speed zone on Route 197 is near the junction of 199/197; 45 mph from PM R0.10 to R0.56. This speed zone was set in accordance with the vehicle code; see Grouped Response # 8 for more information on how speed zones are determined. The rest of the highway has a maximum speed limit of 55 mph, which is the maximum speed limit per the vehicle code for two-lane, undivided conventional highways. Regulatory speed zones cannot be applied to spot locations.

No changes to the Draft EIR/EA are necessary.

Response to Comment 7-2

This comment it states concern for the amount of right of way acquisition on the commenter's property and concern that truck speeds might increase. See response to EPICs Comment 8 for a discussion regarding right of way acquisition. See Grouped Response #8 for a discussion of safety.

No changes to the Draft EIR/EA are necessary.

Response to Comment 7-3

The commenter objects to the road being widened and states concern that the region might become a larger city and lose the sense of remoteness. See response to EPICs Comment 8 for a discussion regarding how the proposed project would affect the rural character of the local communities.

No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 8: Janet Kasbohm

Response to Comment 8-1

This comment states concern that the project will increase the potential for hazardous materials spills and proposes that funds be set aside for spill cleanup efforts. See the response to Vern Powers' Comment 1 and the response to John Zuehlke's Comment 6 for a discussion of hazardous materials. Spills caused by traffic accidents have resulted in pollutants reaching the Smith River in the past. However, proposed improvements will enhance safety for all road users and reduce the likelihood of accidents and potential hazardous material spills that might be related to the existing road condition.

Regarding the commenter's proposal to allocate funds for local fire departments for environmental disaster cleanup when a river is polluted with a hazardous material spill, the Department has a Spill Contingency Plan for District 1 (updated in 2012), which includes Del Norte County, that would be implemented in the event that a spill occurred on a state highway

facility in District 1. The plan contains contact information in case of such emergencies, the requirement to develop and maintain verbal agreements with spill management groups to help ensure that the Department and these groups are prepared to act quickly if a spill occurs, and actions that would be implemented at various stages of spill cleanup. Among the actions are measures that the Department's Hazardous Materials Coordinator would follow to ensure that the spill would be cleaned up quickly and that the party responsible for the spill was involved in the cleanup process as required, including payment of cleanup activities. If the party responsible for the spill is unable or unwilling to pay for spill cleanup, the Department's Hazardous Materials Coordinator would then follow the protocol in the Spill Contingency Plan to ensure that the spill was still quickly cleaned up, and then follow the protocol to ensure that the cleanup activities were paid for. After the spill site is cleaned up, the site is reviewed and declared clean and safe by the county's Environmental Health representative. The Department's District 1 Spill Contingency Plan is available for review at the District 1 office at 1656 Union Street in Eureka, or it can be made available electronically or in hard copy form upon request.

No revisions to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 9: Mike Sullivan (Del Norte County BOS)

Response to Comment 9-1

This comment does not provide a comment on the Draft EIR/EA. The comment indicates support for the economic benefits and safety enhancements of the proposed project.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 10: Donald Bruce

Response to Comment 10-1

This comment states support for the no-build alternative. See the revisions to Chapter 1 in the Final EIR/EA and Grouped Response to Comment #1 for a discussion and clarification regarding the purpose and need of the proposed project. See Grouped Response #2 for a discussion regarding potential economic gains as a result of the project. See response to EPICs Comment 8 for information regarding impacts on tourism, which are essentially anticipated to occur on a temporary, and not a permanent, basis.

No changes to the Draft EIR/EA are necessary.

Response to Comment 10-2

The comment does not address the DEIR/EA specifically; it states concern regarding safety of the highway, even after improvements are made, if STAA trucks are allowed. The Department is designing the roadway specifically to accommodate STAA vehicles and does not anticipate increases in collisions due to off tracking. See Grouped Response #8 for issues concerning safety.

No changes to the Draft EIR/EA are necessary.

Response to Comment 10-3

This comment suggests finding an alternate route, such as Rowdy Creek. Alternate routes were considered but determined to be infeasible due to environmental effects. See Grouped Response #6 for a discussion regarding an alternative route linking US 101 to US 199. No changes to the Draft EIR/EA are necessary.

Response to Comment 10-4

This comment does not specifically address the DEIR/EA; it states that the commenter has reviewed a ten-year California Highway Patrol report, and the main cause of accidents on 199 is speeding, followed by offtracking into the oncoming traffic lane. The comment states the concern that widening some corners might heighten the problem and states a preference for more law enforcement instead. Additional law enforcement alone would not meet the purpose and need of the proposed project; see revisions to Chapter 1 in the Final EIR/EA and Grouped Response #1 for clarification of the purpose and need. Also, widening the road and increasing curve radii at the seven pinch-point locations, as proposed, would actually minimize the potential for offtracking of a long vehicle, including an STAA truck, into the oncoming traffic lane. The proposed improvements would allow an STAA truck or long vehicle to navigate a turn while staying on the correct side of the road. Please see Grouped Response #8 for more information on how the proposed project locations were determined and designed.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 11: Dwayne Reichlin (President of Hambro Group)

Response to Comment 11-1

The comment does not address the DEIR/EA specifically; it states that one of the reasons there are issues on the roadways is because money hasn't been spent on road improvements. The Department agrees that safety for all users is a priority.

Please see Grouped Response #8: Safety and response to Center for Biological Diversity's Comment 6 for discussions regarding safety. No changes to the Draft EIR/EA are necessary.

Response to Comment 11-2

The comment does not address the DEIR/EA specifically. The commenter thinks that the highways need to be safer for everyone, not just trucks, and that a better local economy will never occur without roadway improvements. The comment indicates support for the economic benefits and safety enhancements of the proposed project. Please see Grouped Response #8: Safety and response to Center for Biological Diversity's Comment 6 for discussions regarding safety.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 11-3

This comment is an extension of the previous comment, TC11- 2 and does not provide a comment on the Draft EIR/EA. The comment offers support for the project. Please see Grouped

Response #8: Safety and response to Center for Biological Diversity's Comment 6 for discussions regarding safety.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 11-4

This comment does not provide a comment on the Draft EIR/EA. The comment refers to the overall state of the California manufacturing economy. No response is required.

No revisions to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 12: Curt Olson

Response to Comment 12-1

This comment states concern regarding safety of residents near Ruby 2 and speeding traffic. See the response to DeAnn Rupert 7-1 above and Grouped Response #8 regarding safety, local communities and regarding speed limits. No changes to the Draft EIR/EA are necessary.

Response to Comment 12-2

This comment does not address the DEIR/EA; it states that Rumiano Cheese trucks use SR 197 at least 3 times a day. No changes to the Draft EIR/EA are necessary.

Response to Comment 12-3

The commenter states that water runoff and streams were not addressed in the Draft EIR/EA. The DEIR/EA did address water quality and storm water impacts and BMPs to protect water quality and waters of the state. Section 2.2.2, Water Quality and Storm Water Runoff describes the affected environment and potential impacts to water quality. Mitigation measures for impacts is discussed in Section 2.2.2.4, Avoidance Minimization, and/or Mitigation Measures starting on page 2.2-13 which describes how best management practices would be implemented at each project location to minimize or avoid degradation of storm water runoff flowing to the Smith River and its tributaries.

No changes to the Draft EIR/EA are necessary.

Response to Comment 12-4

This comment states concern regarding speed along SR 197 in front of residences and accidents that have happened nearby. Please refer to the response to Grouped Comment #8 for a discussion of traffic safety and impacts from the anticipated trucks per day, how speed zones are determined, and the Basic Speed Law.

No revisions to the DEIR/EA are needed.

Response to Public Meeting Commenter 13: Gina Zottola (rep CC-DN Co Chamber of Comm.)

Response to Comment 13-1

The comment indicates support for the project. No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 14: Meagan Johnston

Response to Comment 14-1
This comment expresses concern for safety of children walking to school bus stops. Please see Donald Bruce Response # 2 for a discussion on this topic.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 15: DeAnn Rupert

Response to Comment 15-1
This comment concerns safety of school bus stops. See Bruce Donald Response # 1 for a response to the issue of school bus stops and safety.

No changes to the Draft EIR/EA are necessary.

Response to Comment 15-2
This comment repeats the comment in Comment 7-1 of this chapter suggesting lower speed limits and more signs. Please see the response to comment 7-1 for more information and Grouped Response # 8 for more information on speed limits and safety.

No changes to the Draft EIR/EA are necessary.

Response to Comment 15-3
The commenter prefers the region remain remote and does not support the proposed project. See the response to EPICs Comment #8 in Chapter 2 of the response to comments volume for a discussion of the proposed project and maintaining the rural character of the communities near the proposed project locations.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 16: Doreen Bruce

Response to Comment 16-1
This comment introduces the commenter and explains that she has not read the entire document but appreciates the size and effort of the study.

No changes to the Draft EIR/EA are necessary.

Response to Comment 16-2
This comment states opposition to the proposed project, questions the rationale for the proposed project, and states concern for tourism, the scenic byway, and safety. See revisions in Chapter 1 of the Final EIR/EA and Grouped Comment #1 for a discussion of purpose and need. See Grouped Response #2 for a discussion regarding anticipated benefits of the project. See Chapter 2 of the Draft EIR/EA for a discussion of potential impacts and measures to avoid, minimize, and/or mitigate impacts to tourism, visual resources, and safety.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 17: Katherine Noble

Response to Comment 17-1

This comment makes a comparison between the proposed project and Interstate 280 through Los Gatos, CA. The comment does not specifically address the DEIR/EA. See the response to EPICs Comment #8 regarding how the project would affect the rural character of the proposed project and Grouped Response #2 for a discussion of anticipated benefits of the proposed project. No changes to the Draft EIR/EA are necessary.

Response to Comment 17-2

This comment questions the need for the project. Please see the revised Need statement in Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification of the project purpose and need. See Grouped Response #2 for a discussion of anticipated benefits of the proposed project. No changes to the Draft EIR/EA are necessary.

Response to Comment 17-3

This comment does not support the proposed project and states that four lane highways should stay in the valley. The comment does not directly address the DEIR/EA. See Chapter 1 of the Draft and Final EIR/EA for proposed project descriptions, none of which include proposed four lane highways. See response to EPICs Comment #8 regarding how the proposed project would affect the rural character of local communities. No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 18: Elmer Zuehlke

Response to Comment 18-1

This comment proposes an alternative to “put a four lane road up the side of the mountain in parallel with US 199 through the park.” See the Grouped Response #6 for more information regarding an alternative route linking US 101 to I 5. No changes to the Draft EIR/EA are necessary.

Response to Comment 18-2

This comment does not directly address the DEIR/EA; it states there a tremendous number of collisions on 197 and 199 that have occurred and that a four land highway to I-5 through the park would be the best decision. See the Grouped Response #6 for more information regarding an alternative route linking I-5 to US 199. See Grouped Response #8 for a discussion of how the Department responds to collisions in a given area and how road repairs are prioritized.

No changes to the Draft EIR/EA are necessary.

Response to Comment 18-3

This comment expresses concern over cutting down mature redwood trees. The Department has chosen the Two-Foot Widening in Spot Locations as the preferred alternative for Ruby 2. This alternative will have less of an impact on trees than the other Ruby 2 alternatives. No redwoods with a diameter greater than 36 inches will be removed or substantially affected by the preferred alternative. Where excavation is planned near redwoods with a diameter greater than 36“,

protective measures will be taken to protect the roots. See Grouped Response #3 regarding the project's impact on visual resources.

No changes to the Draft EIR/EA are necessary.

Response to Comment 18-4

This comment states a concern for the close proximity of the road to the edge of the slope that goes toward the river. See the Grouped Response #8 for information regarding safety.

This comment is likely referring to the narrow section of Highway 197 above the river between PM 5.5 and PM 6.0. On 3/2/2012 Caltrans initiated a formal Traffic Safety investigation on DN 197 from PM 5.5 to PM 6.0. We will be investigating this area to determine if any changes are necessary. This is however, outside the scope of this project and this DEIR/EA

No revisions to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 19: Don Gillespie

Response to Comment 19-1

This comment states concern about safety and truck drivers that are inexperienced with the route. See Grouped Response #8 for a discussion regarding the projected increase in truck traffic and safety with regard to the local communities and road users. Also, see Grouped Response #2 for a discussion of anticipated benefits of the proposed project. No changes to the Draft EIR/EA are necessary.

Response to Comment 19-2

See Chapter 1 of the Final EIR/EA and Grouped Response #1 for discussions of purpose and need of the proposed project. See Grouped Response #2 for a discussion of costs versus benefits of the proposed project.

No changes to the Draft EIR/EA are necessary.

Response to Comment 19-3

This comment states that there is an unsafe turn at PM 6.1 on SR 197. On 3/2/2012 Caltrans initiated a formal Traffic Safety investigation on DN 197 from PM 5.5 to PM 6.0. We will be investigating this area to determine if any changes are necessary. See response to Center for Biological Diversity's comment #6 for an explanation of how the Department responds to collisions in a given area and how road repairs are prioritized.

No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 20: Dwayne Reichlin

Response to Comment 20-1

This comment does not directly address the DEIR/EA; it states that the safer the highways are made for trucks, the safer they are for all vehicles.

No changes to the Draft EIR/EA are necessary.

Response to Comment 20-2

This comment does not address the DEIR/EA directly. The commenter states that change will take place regardless and that it's important to improve the infrastructure while keeping local people employed. No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 21: Jean Rupert

Response to Comment 21-1

This comment questions the economic cost versus benefit of the project. Please see the revised Need statement in Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification of the project purpose and need. See Grouped Response #2 for a discussion of monetary costs of the project versus anticipated economic gain. Please see Grouped Response #8 regarding safety of the proposed project.

No changes to the Draft EIR/EA are necessary.

Response to Comment 21-2

This comment asks what safety measures might be implemented if STAA trucks are allowed on the SR 197/US 199 route, particularly if hazardous materials are being transported, and especially considering past spills and multiple days that the community's water supply was affected after a spill. See the response to Vern Powers' Comment 1 for further discussion regarding hazardous material spills. Also see the response to Transcribed Comment 8-1 (Janet Kasbohm) for a discussion regarding the Department's Spill Contingency Plan for District 1, which includes Del Norte County.

No changes to the Draft EIR/EA are necessary.

Response to Comment 21-3

This comment suggests more law enforcement. See response to Transcribed Comment 7-1 in this chapter of the responses to comments volume of the Final EIR/EA for a discussion regarding more law enforcement, and Group Response # 8 on safety and speed limits.

No changes to the Draft EIR/EA are necessary.

Response to Comment 21-4

This commenter is expressing the opinion that young people leave the area as a personal choice, not due to the lack of employment and career opportunities. It also states concern for the wild and scenic river. It does not directly address the DEIR/EA.

No changes to the Draft EIR/EA are necessary.

Response to Comment 21-5

The comment states concern for spills and associated impacts. See the response to Vern Powers' Comment # 1, and Transcribed Comment 8-1, above, for discussions regarding hazardous material spills and clean up.

No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 22: Gary Smaller

Response to Comment 22-1

This comment suggests the alternative route through Rowdy Creek. See Grouped Response #6 for a discussion regarding an alternative route linking US 101 to US 199. No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 23: Jean Rupert

Response to Comment 23-1

The commenter asked why the Draft EIR/EA was not available at the local Caltrans office. Environmental documents are made available at the Department's District 1 Office at 1656 Union Street in Eureka as well as the public library in Crescent City. The Draft EIR/EA was made available for public viewing at the District 1 office, the local library, the Del Norte Transportation Commission office, and online for viewing or downloading. The Caltrans office in Crescent City is not open to the public and is not staffed to provide the public with documents on a regular basis during business hours.

No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 24: DeAnn Rupert

Response to Comment 24-1

The commenter favors an alternative route over the mountains to the proposed project. See Grouped Response #6 for a discussion regarding an alternative route linking US 101 to US 199. No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 25: Meagan Johnston

Response to Comment 25-1

The commenter states that if one wants to find work in the area, they can and that the beauty of the area should remain untouched. The comment does not address the DEIR/EA directly.

No changes to the Draft EIR/EA are necessary.

Response to Public Meeting Commenter 26: Elmer Zuehlke

Response to Comment 26-1

The commenter states that a four lane freeway from I-5 to Crescent City is preferable to the proposed project. See Grouped Response #6 for a discussion regarding an alternative route linking US 101 to US 199. No changes to the Draft EIR/EA are necessary.

Responses to Public Meeting Commenter 27: Charlie Compton

Response to Comment 27-1

This comment does not provide a comment on the Draft EIR/EA. The comment states the importance of the economic benefits of the proposed project and support for the project.

No changes to the Draft EIR/EA are necessary.

Response to Comment 27-2

This comment is regarding the safety of the roads and how improvements are needed to make them safer. See response to Center for Biological Diversity's comment 6 for an explanation of how the Department responds to collisions in a given area and how road repairs are prioritized. Also, see Grouped Response #8 for a discussion of safety.

No changes to the Draft EIR/EA are necessary.

3.5 Form Letter

A total of 27 form letters were received, five of which were modified from the original form letter. One representative copy of the form letter is presented below along with each modified copy of the form letter that contained additional, unique comments.

- Ausman, Candi
- Bell, Jackie
- Brown, Devaney
- Coughenour, Michael
- Crawford, Ryan
- Donohue, Karen
- Fehrenbach, Anne
- Flowers, Bobbie
- Hergenrather, Harry
- McSweeney, Charles Otter
- Mitchell, David
- Morgan, Linda
- Nelson, Jill
- O'Conner, Meave
- Ornelas, Bob
- Rahn, Paul
- Rebman, Rick
- Saalfield, Katherine
- Scott, Celia
- Shearer, Robert
- Stebbings, Barrie
- Stocks, Doug

Form Letters with Additional Commentary

- Blakeley, Sheila +
- Farmer, Tim +
- Jamieson, Amber +
- Perricelli, Claire +
- Rahn, Paul +

Form Letter

To
kimberly_hayler@dot.ca.gov
cc

Subject
Stop the Highway 199 & 197

The "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should not be approved. 1

The project is unnecessary and only caters to a few large corporate interest groups.

Widening and realigning Highways 199 and 197 through a wild and scenic river corridor and through ancient redwood groves will damage the root and canopy structures of ancient redwood trees, and will negatively affect one of the last undammed rivers in the US. 2

The environmental assessment is too broad and includes too many locations to serve as the basis for a single environmental analysis. Please extend the comment deadline to give the public an adequate opportunity to review all of the different alternatives proposed in this project. 3

Responses to Form Letter Commenters

Response to Comment 1

The comment is not a comment on the DEIR/EA; it states that the project should not be approved and is unnecessary. See the revised Purpose and Need statement in Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification of the project purpose and need, and see Grouped Response #2 for anticipated benefits of the proposed project..

No changes to the Draft EIR/EA are necessary.

Response to Comment 2

This comment expresses concern regarding damage to redwood trees and the Smith River. The Preferred Alternative for Ruby 2 is the Two Foot Widening in Spot Locations. No large redwoods (>36 inches) would be removed or substantially affected by the proposed project at the Ruby 1 Location or the Preferred Alternative at Ruby 2. See Grouped Response #4 for a discussion of potential effects and the measures which will be taken to protect large redwoods. Caltrans consulted with the Forest Service and the National Park Service on potential impacts to the Wild and Scenic River. See grouped response #5 for information regarding the Wild and Scenic River status of the Smith River and the potential impacts.

No changes to the Draft EIR/EA are necessary.

Response to Comment 3

The comment states that the DEIR/EA is too broad and includes too many locations, and requests that the comment deadline be extended. The document encompasses multiple locations because they have the same purpose and need, and thus must be analyzed as one project under NEPA and CEQA. See Grouped Response # 1: Purpose and Need. The Draft EIR/EA and supporting technical studies were available at the Department's District 1 office starting on June 29, 2010 and were also available at the Del Norte County Library in Crescent City. Public comments on the Draft EIR/EA were officially accepted through August 23, 2010. The California Environmental Quality Act mandates a minimum of 45 days be provided for the public review of an Environmental Impact Report (Title 14 California Code of Regulations Section 15105). The National Environmental Policy Act and the Federal Highway Administration require a minimum 30-day review period (Title 23 Code of Federal Regulations Part 771.119). The actual review period for this project was 56 days, which is longer than the mandated durations.

No revisions to the Draft EIR/EA are necessary.

Blakeley, Sheila

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/14/2010 02:13 PM -----

Sheila Blakely
<eikon_renasci@hotmail.com>

08/21/2010 10:31 PM

To kimberly_hayler@dot.ca.gov

cc

Subject Stop the Highway 199 & 197

Please respond to
eikon_renasci@hotmail.com

Please, don't continue to turn the whole of our beautiful state, our beautiful lands, into a freeway. We need quiet and isolated places - not a fast way to get more cheap products form China nor more traffic speeding through quiet and tranquil stretches. 1
Please, stand on the side of life and respect, rather than on the side of someone elses dollar and profits.

CalTrans has no right to callously and indifferently kill lifeforms that were living here before this nation existed... standing for a thousand or more years. Yet, you 2

have the audacity to have no respect for this. Seemingly so full of entitlement that you could destroy such a magnificent and amazing national treasure, found nowhere else in our solar system... perhaps the universe. 2 cont.

How rare and precious a thing to chip away at for some temporary monetary gain. Some things, when lost, are never had again. 3

It's the right of the people who live with this beauty and pay for these roads to have the say as to whether or not the roads are widened; as opposed to the corporations who stand to profit and send their profits outside of the community.
What good is this for our communities?
It isn't.
You've already ignored the interests of We The People in regard to Richardson Grove, please don't continue to make another similar decision and prove your disdain for those who live in these communities.

Please. Don't continue with this project.

The "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should not be approved.

The project is unnecessary and only caters to a few large corporate interest groups.

Widening and realigning Highways 199 and 197 through a wild and scenic river corridor and through ancient redwood groves will damage the root and canopy structures of ancient redwood trees, and will negatively affect one of the last undammed rivers in the US.

The environmental assessment is too broad and includes too many locations to serve as the basis for a single environmental analysis. Please extend the comment deadline to give the public an adequate opportunity to review all of the different alternatives proposed in this project.

Sheila Blakely
1814 A st
Eureka, CA 95501

Responses to Sheila Blakeley

Response to Comment 1

This comment expresses concern for the beauty and isolation of the area and sees the project as validation to monetary profit rather than preservation of the environment. The comment does not address the DEIR/EA or the proposed project specifically. Please see the response to Environmental Protection Center's (EPICs) Comment 8 in Chapter 2 of the responses to comments volume of the EIR/EA for a discussion regarding anticipated minimal changes to the rural character of the area in the vicinity of the proposed project and community cohesion.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 2

This comment does not address the DEIR/EA or the proposed project specifically. The comment is unclear regarding what life forms are being discussed, but the Department assumes that the comment is regarding removal of large redwoods at Ruby 2 under the Two-Foot Widen Alternative and the Four-Foot Widen Alternative. The Department considered the removal of large redwoods (>36 inches) a significant impact under CEQA, and selected the Two-Foot Widening in Spot Locations Alternative, which does not remove or substantially impact any large redwood trees. See Group Response #4 for a discussion of large redwoods.

No revisions to the Draft EIR/EA are necessary.

Response to Comment 3

This comment does not address the DEIR/EA; it states opposition to the project. See the revised Purpose and Need statement in Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification of the project purposes need. Also, see Grouped Response #2 for a discussion of anticipated benefits of the project. Also see Grouped Response #3 regarding the project's impact on visual resources.

No further changes to the Draft EIR/EA are necessary.

Farmer, Tim

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 08/23/2010 09:26 AM -----
Tim Farmer <tjxfarmer@yahoo.com>
08/21/2010 10:47 AM
Please respond to
tjxfarmer@yahoo.co
m

To
kim_floyd@dot.ca.gov
cc

Subject
Questioning proposed projects: Hwy's 199 & 197

Dear Kim

Highways 199 and 197 in Del Norte County in Northern California pass through incredible, even precious, natural beauty and should be not be modified for the benefit of the few and at the expense of the many. In short, the "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should not be approved. 1

Widening and realigning Highways 199 and 197, which pass through a wild and scenic river corridor and through ancient redwood groves will, unavoidably, damage these groves to various degrees, including but not limited to their root and canopy structures. These projects will, without question, negatively affect one of the last undammed rivers in the United States. 2

The environmental considerations of these project proposals are too broad to be well-served by a single environmental analysis. Please extend the comment deadline to give the public an adequate opportunity to review all of the different alternatives proposed in this project. 3

Thank you for considering this point of view.

Tim Farmer
404 N. Mount Shasta Blvd.
#117
Mount Shasta, CA 96067

Responses to Tim Farmer

Response to Comment 1

This comment states opposition to the project because of potential effects to aesthetics. See the revised Need statement in Chapter 1 of the Final EIR/EA and Grouped Response #1 for clarification of the project need. Also see Grouped Response #3 regarding the project's impact on visual resources.

No changes to the Draft EIR/EA are necessary.

Response to Comment 2

See response to Form Letter Commenters Comment #2 above.

No changes to the Draft EIR/EA are necessary.

Response to Comment 3

See response to Form Letter Commenters Comment #3 above.

No changes to the Draft EIR/EA are necessary.

Jamieson, Amber

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/14/2010 01:10 PM -----

amber Jamieson
<tahoeamber@yahoo.com>

08/20/2010 05:41 PM

To kimberly_hayler@dot.ca.gov
cc
Subject Stop the Highway 199 & 197

Please respond to
tahoeamber@yahoo.com

The "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should be rescinded. 1

Widening and realigning Highways 199 and 197 through ancient redwood groves will damage the root and canopy structures of ancient redwood trees, threatening some of California's few remaining cathedral redwood groves. This project will also forever alter the character of the wild and scenic Smith River.

The environmental assessment is too broad and includes too many locations to serve as the basis for a single environmental analysis. Caltrans has ignored potential alternatives, failed to provide critical information about impacts to endangered species, improperly address the project's potential climate impacts, and downplayed the far-reaching effects of allowing STAA truck traffic into Del Norte County. 2

State and federal legislators should step in to rescind this unnecessary and destructive project. The risks to imperiled species like the marbled murrelet and the ancient redwoods upon which they depend are simply unacceptable. The project could also facilitate additional big-box development and urbanization, forever altering the human and natural environment of Del Norte County. The Smith River and the ancient redwood groves along the river are too important to be sacrificed to big trucks and the big-box stores that will follow close behind. 3

amber Jamieson
kingston
Fieldbrook, CA 95519

Responses to Amber Jamieson

Response to Comment 1

See response to Form Letter Commenters Comment #2 above. No changes to the Draft EIR/EA are necessary.

Response to Comment 2

This comment claims specific failures in the DEIR/EA. For questions on potential alternatives, see Group Response # 7. Potential impacts to endangered species are discussed Section 2.3.5 and Section 2.4.16 of the Draft EIR/EA. No significant impacts are anticipated for endangered species with the selection of the preferred alternatives (see revised Chapter 1 in the Final EIR/EA) and avoidance, minimization, and mitigation measures, as discussed in the Final EIR/EA (see FEIR/EA Sections 2.3.5, 2.4.16, and 3.2.1-3.2.2). The project's effect on climate change is discussed in Chapter 3 on page 3-5 of the Draft EIR/EA, and in the revised Section 3.2.4 in the Final EIR/EA. Grouped Response # 2 discusses the potential costs and benefits of the project including general effects of STAA access. No further changes to the Draft EIR/EA are necessary.

Response to Comment 3

This comment does not address the DEIR/EA. This comment raises the issue that providing improved STAA truck access to Del Norte County could attract more large retailers (so-called "big-box" stores) to the study area. See the response to Ken Miller's Comment 1 for a discussion on this subject.

No large redwoods will be removed, as Caltrans has chosen the Ruby 2: Two-Foot Widening in Spot Locations as the preferred alternative. See also the avoidance and minimization measures as described in Sections 2.3.1.3 and 2.3.5.4 of the Draft and Final EIR/EA, which would reduce potential effects on redwoods and marbled murrelet to a negligible level. No significant impacts are anticipated for any environmental resource with the selection of the preferred alternatives (see revised Chapter 1 in the Final EIR/EA) and avoidance, minimization, and mitigation measures, as discussed in the final EIR/EA (see avoidance, minimization, and/or mitigation measures sections of each topic in Chapter 2 of the Draft and Final EIR/EA plus Section 3.2.1 and 3.2.2 in the Draft and Final EIR/EA). See Grouped Response # 4 for information on potential impacts to trees.

Please also refer to Grouped Response #1 for more information on purpose and need and Grouped Response #2 for a discussion regarding anticipated benefits of the proposed project.

No revisions to the Draft EIR/EA are necessary.

Perricelli, Claire

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/14/2010 02:07 PM -----

Claire Perricelli
<ceperr@sbcglobal.net>

08/21/2010 12:41 AM

To kimberly_hayler@dot.ca.gov

cc

Subject Stop the Highway 199 & 197

Please respond to
ceperr@sbcglobal.net

We need to focus on short sea shipping and other such lower impact alternatives to more truck pollution and habitat destruction for roads. 1

The "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should not be approved.

The project is unnecessary and only caters to a few large corporate interest groups.

Widening and realigning Highways 199 and 197 through a wild and scenic river corridor and through ancient redwood groves will damage the root and canopy structures of ancient redwood trees, and will negatively affect one of the last undammed rivers in the US.

The environmental assessment is too broad and includes too many locations to serve as the basis for a single environmental analysis. Please extend the comment deadline to give the public an adequate opportunity to review all of the different alternatives proposed in this project.

Claire Perricelli
2259 16th
Eureka, CA 95501

Response to Claire Perricelli

Response to Comment 1

This comment suggests studying short sea shipping rather than trucking and "other such lower impact alternatives" but does not provide specific alternative suggestions. Studying short sea shipping and alternative shipping methods is beyond the scope of this project and would not meet the purpose and need. See the revised Chapter 1 in the Final EIR/EA for clarification of the purpose and need and Grouped Response #1 for details regarding the purpose and need of the project.

No revisions to the Draft EIR/EA are necessary.

Rahn, Paul

----- Forwarded by Kimberly Hayler/D01/Caltrans/CAGov on 09/29/2010 08:50 AM -----

Paul Rahn <paul_rahn@cashmanequipment.com>

To kimberly_hayler@dot.ca.gov

cc

Subject Stop the Highway 199 & 197

09/29/2010 08:21 AM

Please respond to paul_rahn@cashmanequipment.com

The "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should not be approved.

The project is unnecessary and only caters to a few large corporate interest groups.

Widening and realigning Highways 199 and 197 through a wild and scenic river corridor and through ancient redwood groves will damage the root and canopy structures of ancient redwood trees, and will negatively affect one of the last undammed rivers in the US.

The environmental assessment is too broad and includes too many locations to serve as the basis for a single environmental analysis. Please extend the comment deadline to give the public an adequate opportunity to review all of the different alternatives proposed in this project. My wife and I drive this hiway all the time and drive it specificly for its pristine beauty. cutting down these trees and widening this higway is not needed. surely you can find better ways to improve California without destroyimg the awesome beauty of this hiway. Paul D. Rahn Reno, Nv. 1

Paul Rahn
5557 cornflower ct
sun valley, NV 89433

Response to Paul Rahn

Response to Comment 1

The Department has chosen the Two-Foot Widening in Spot Locations as the preferred alternative for Ruby 2. This is the least damaging alternative of the Ruby 2 alternatives and no large redwood trees would be removed as a result of construction of that alternative. The Department strives to strike a balance between preserving the natural beauty of the area and addressing the purpose and need of the project. No significant impacts would occur to visual or other environmental resources if the proposed project is constructed.

See Grouped Response #1 for a detailed explanation of the purpose and need of the project and Grouped Response #3 regarding the project's impact on visual resources.

No changes to the Draft EIR/EA are necessary.

Chapter 4 Specific Responses to Public Comments on the Partial Recirculated Draft Environmental Impact Report / Supplemental Environmental Assessment

This chapter is organized as follows:

- 4.1 Public Agencies and Governments
- 4.2 Organizations
- 4.3 Individuals
- 4-4 Form Letters

4.1 Public Agencies and Governments

One public/government agency, California Department of Fish and Wildlife (CDFW), submitted comments in response to the Partial Recirculated Draft EIR/Supplemental EA. Comments submitted by CDFW, as well as responses to those comments, are provided below.

California Department of Fish and Game

State of California
Department of Fish and Game

Memorandum

Date: November 19, 2012

To: Ms. Katrina Pierce, Chief
California Department of Transportation
North Region Environmental Planning
703 B Street
Marysville, CA 95901

From: **NEIL MANJI**, Regional Manager
Region 1 – Northern

Subject: **Partial Recirculation of Draft Environmental Impact Report / Supplemental Environmental Assessment (SCH # 2008082128) for the 197/199 Safe STAA Access Project, Del Norte County**

On September 20, 2012, the Department of Fish and Game (DFG) received a copy of the Recirculated Draft Environmental Impact Report/Supplemental Environmental Assessment (RDEIR/SEA) for the proposed 197/199 Safe Surface Transportation Assistance Act (STAA) Access Project (Project). The California Department of Transportation (Caltrans) is proposing to construct spot improvements on State Route 197 (SR 197) and U.S. Highway 199 (US 199) in Del Norte County to comply with federal and state legislation and regional programs, plans, and policies to allow STAA access.

The Project includes seven locations found in five previously identified and separately proposed projects. Since the circulation of the RDEIR/SEA, two of the five original projects (Washington Curve and The Narrows) were combined into one project. Two project locations – Ruby 1 at Post Mile (PM) 4.5 and Ruby 2 at PM 3.2-4.0 – are located on SR 197. The remaining two projects, with five spot locations, are located on US 199: Washington Curve at PM 26.3-26.5, the Narrows at PM 22.7-23.0, and Patrick Creek Narrows (PCN) in three locations: PCN1 at PM 20.5-20.7, PCN2 at PM 23.9-24.3, and PCN3 at PM 25.55-25.65. Improvements at PCN2 include bridge replacement over the Middle Fork of the Smith River.

As a trustee agency for the State's fish and wildlife resources, DFG has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary to sustain their populations. As a responsible agency, DFG administers the California Endangered Species Act and other provisions of the Fish and Game Code that conserve the State's fish, wildlife, and plants. DFG provides the following comments and Recommendations on this Project in its role as a trustee and responsible agency under the California Environmental Quality Act (California Public Resource Code §21000 *et seq.*)

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DFG's most substantial concern is that the RDEIR/SEA does not clearly describe and analyze the magnitude and nature of the direct physical impacts to the environment from the loss of more than 1.2 acres of old growth and late-seral forest along US 199, nor does it provide feasible and effective mitigation for significant impacts of project activities on these forest habitats. 1

Recommendation 1. Based on information provided in this memorandum, DFG recommends Caltrans consider as significant, and provide appropriate mitigation for the permanent removal or loss of: 1) late-seral and old-growth upland Douglas-fir forests, 2) riparian forests including red alder and bigleaf maple, and 3) wetlands.

Additionally, the Tree Survey information in the text and tables of the RDEIR/SEA is unclear and offers conflicting statements in numerous locations regarding tree surveys, numbers of trees affected and/or proposed for removal, and extent of natural communities impacted by project activities. 2

Recommendation 2. DFG recommends the discrepancies in the RDEIR/SEA be resolved as described under Tree Surveys, below.

Late-seral Douglas-fir Forest: Significantly Rare, Unique, and Important Habitat 3

The loss of late-seral Douglas-fir forest is a significant impact for many reasons including a dwindling old-growth forest community; limited reserves of late-seral and old-growth Douglas-fir forests; the increasingly rare late-seral wildlife habitat elements on the landscape; and the cumulative long-term effects of loss of ecosystem inputs from these forests and large old trees.

Impacts of losing late-seral forests and large old trees from the landscape are long-term and far reaching, and limit available habitat for old-growth dependent species for decades or centuries. Impacts include both the immediate and the cumulative sustained loss of old-growth wildlife habitats, and the associated ecosystem inputs that drive and sustain these old-growth forests.

Decreasing forests and limited reserves
Within the last 150 years, forests in Northern California have changed tremendously from anthropogenic activities such as timber harvesting and road building. Compared to pre-settlement, a much smaller proportion of the forest is old-growth, and remaining old-growth stands generally occur on small and scattered parcels (Bolsinger and Waddell, 1993).

Old-growth forests in the western states, including Douglas-fir forests, have been decreasing significantly in recent years (Bolsinger and Waddell, 1993). The area with old-growth forest in California, Oregon, and Washington, including both redwood and Douglas-fir, has declined by two thirds within about 50 years, from 32.8 million acres in 1933-1945 to 10.3 million acres by 1992.

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The RDEIR/SEA states removal of old-growth Douglas-fir was not considered a significant impact because of the extensive range of the tree, and with more reserves than redwood. While it is true Douglas-fir has a more extensive range than redwood, the RDEIR/SEA provides no evidence to substantiate the claim of more remaining reserves of old-growth Douglas-fir than redwood. 3

In fact, results of DFG CalVeg analyses for Del Norte County estimate total old-growth Douglas-fir at 1,599 acres, while total old-growth redwood is estimated at 41,833 acres (Calveg, 2012). With regards to reserves in Del Norte County, DFG CalVeg analyses show protected reserves of old-growth redwood are 13 times more extensive than protected reserves of Douglas-fir (6,329 acres vs. 446 acres, respectively).

Late-seral wildlife habitat

Although removal of late-seral trees and forests adjacent to US 199 is generally linear in nature, removal of forests in and adjacent to sensitive and important riparian and riverine habitats increases old-growth habitat fragmentation by widening the US 199 footprint through the corridor along the Middle Fork of the Smith River.

The importance of late-seral forest habitats are extensively documented in the available literature. They provide structure and critical breeding and foraging habitats that are not found in young forests except as an occasional remnant feature of an older forest. Large old trees and their wildlife structural components require centuries to develop. In the Coast Range approximately 175 to 250 years are required to develop old-growth forests and reproduce the wildlife features associated with large old-growth trees (Franklin et al., 1981).

Old-growth forests are significantly different from younger forests in species composition, function, and structure, with differences related to several key structural components including: 1) live large old trees; 2) large snags; and 3) large logs on land and in streams (Franklin et al., 1981). These important old-growth structural components are related over time, typically going from component 1 to component 3 over decades or centuries. Effects of removal of component 1 (a live large tree) is magnified over time as it includes a resultant concomitant loss of wildlife habitat components 2 and 3 – the snag and large woody debris (LWD) attributes of late-seral forests.

In late-seral forests, numerous vertebrates find optimum breeding and foraging habitat features, including cavities, basal hollows, large limbs and broken tops, snags in varying states of decay, and dead and down woody material (Thomas 1979). Sensitive or lesser-known vertebrates requiring these old-growth habitat features for breeding or foraging include Vaux's swift (*Chaetura vauxi*); pileated woodpecker (*Drycopus pileatus*); red tree vole (*Arborimus pomo*), northern flying squirrel (*Glaucomys sabrinus*); ringtail (*Bassariscus astutus*), silver-haired bat (*Lasionycteris noctivagans*), long-eared

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Other species, including mycoheterotrophic plants and epiphytic lichens, also find optimum habitats in old-growth forests. The RDEIR/SEA reports mycotrophs are common at Washington Curve. 3

Old-growth Douglas-fir trees have significant attributes

On Page 2.3-3, the RDEIR/SEA considers removal of any large old redwood trees a significant effect as they are "...an irreplaceable resource because of their longevity, large diameter, height, the amount of time it takes to achieve their size, the unique micro-ecosystem supported by their upper canopy habitat and less than 5 percent of the original 'old-growth' forest remains uncut."

However, the same important attributes and conditions can be assigned to large old Douglas-fir trees. For example, old-growth Douglas-fir may be an irreplaceable resource due to: longevity of 350 to 750 years, diameters of 3 to 6 feet, typical heights between 165 and 295 feet, providing large snags and LWD for wildlife more quickly than redwood, and a long regeneration period. The removal and loss of irreplaceable large old Douglas-fir trees and forest must also be considered a significant effect of the Project.

Late-seral forest habitat loss: longevity of Project effects

Under "Effects on Natural Communities" on Page 2.3-11 the RDEIR/SEA discusses and acknowledges removal of mature trees is considered a permanent long-term effect. However, later on Page 2.3-23, the RDEIR/SEA states "Adverse effects to native species composition in existing natural communities as a result of this Project are expected to be minor and temporary."

Recommendation 3. DFG concurs that removal of mature trees from the landscape results in long-term and permanent effects to the natural community species composition, and recommends Page 2.3-23 be revised to reflect the more accurate information provided on RDEIR/SEA Page 2.3-11.

Greenhouse Gas Emissions and Climate Change 4

Significant effects of loss of forests and large old trees include the loss of ecosystem services such as long-term carbon sequestration. A disproportionately high percentage of an old-growth forest's biomass and sequestered carbon (nearly half) can stem from as few as 1% of the trees (Lutz et al., 2012). Large trees ($\geq$ 3 feet dbh) sequester carbon in plant tissue, often for centuries, and forests 200 years and older are estimated to sequester 8.8 tCO_2/ha/y on average (Luyssaert et al., 2008).

Along US 199, the RDEIR/SEA identifies more than 1.2 acres of mature forest and several large old-growth Douglas-fir trees to 52 inches dbh that will be removed as a result of the Project.

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Recommendation 4. DFG recommends the Final DEIR/SEA disclose and provide an analysis for the Project's contribution to greenhouse gas (GHG) emissions from the Project's removal of more than 1.2 acres of mature Douglas-fir forest vegetation along US 199, including an analysis of cumulative impacts of GHG on climate change. 4

Late-seral forest habitat at PCN2 5

Project disturbance for the Downstream Bridge Replacement takes place directly adjacent to and over the Middle Fork Smith River, where US 199 is currently located. This location is along the edge and transition zone between the river's aquatic habitat and the adjacent old-growth upland Douglas-fir forest.

The Arborist/Forester Report states approximately three-quarters of the 120-acre PCN2 action area (that area affected directly or indirectly by the Federal action) is composed of late-mature and old-growth coniferous forest with high canopy closure (over 80 percent). The remainder is primarily composed of early- and mid-mature coniferous forest with high canopy closure (over 80 percent). A stand-replacing fire in the late 1990's destroyed approximately 20 percent of the coniferous forest within the action area, equally distributed amongst early-, mid-, and late-mature seral stages.

The RDEIR/SEA and the Arborist/Forester Report describe the old-growth Douglas-fir stand on the east side of the northern approach, including some large old-growth trees >36 inches dbh in the Project Area that would need to be removed. The overstory in the Project Area also includes at least 14 mature Douglas-fir trees 24 to 36 inches dbh in addition to the old-growth trees. To the west of US 199 in the location of the fire, most of the larger trees have died in or after the fire.

An active northern spotted owl activity center (the Dollar Bend pair) is located near PCN2. In 2010, the pair was detected within the PCN2 action area. The pair's activity center was estimated approximately 0.12 mi (630 feet) south of the action area. Project activities at PCN2 will result in loss of approx. 0.7 acre suitable northern spotted owl nesting/roosting/foraging habitat in Douglas-fir forest (USFWS, 2012).

Table 2.3.1-1 in the RDEIR/SEA documents 2.88 acres of Douglas-fir forest at PCN2. Table 2.3.1-5 shows an estimated 1.0 acre of mature Douglas-fir forest will be permanently affected (removed) by Downstream Bridge Replacement Project activities at this site.

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Wetlands and Riparian Forests

Ecological functions and the importance of limited wetland and riparian habitats are extensively documented in the literature. California has experienced a substantial loss of wetland and riparian habitat in recent years, with California losing the largest percentage (91 percent) of original wetlands (Dahl, 1990). It is the policy of the Fish and Game Commission to ensure that proposed projects result in no net loss of wetland or riparian habitat acreages or values. All habitats should be protected by buffers or other measures as necessary to prevent impacts to water quality, fish and wildlife resources. Conversion or permanent loss of these limited wetland and riparian forest acreages, including red alder and bigleaf maple forests, must be considered a significant impact. 5

On SR 197, based on preferred alternatives, Tables 2.3.1-2 through 2.3.1-3 show permanent impacts to 0.013 acres of waters/wetlands (Ruby 1 and Ruby 2), and permanent impacts to 0.06 acres of red alder forest at Ruby 2.

Based on preferred alternatives, Tables 2.3.1-4 through 2.3.1-8 show permanent impacts to 0.041 acre of waters/wetlands on US 199. The preferred alternative at PCN2 will result in permanent impacts to 0.01 acres of red alder forest and 0.01 acres of bigleaf maple forest, and approximately 0.76 acres of temporary impacts to waters/wetlands.

Recommendation 5. DFG recommends the Final DEIR/SEA identify and include mitigation for the permanent loss of 0.054 acre of wetland and 0.08 acre of riparian habitats, including red alder and bigleaf maple forests. Mitigation for permanent losses should result in "no net loss" of either habitat; a typical mitigation ration for the loss of high-quality wetland or riparian habitat is 3:1.

Tree Surveys 6

The RDEIR/SEA on Page 2.3-9 states surveys were conducted Feb 23-25, 2009, yet in subsequent sections, the RDEIR/SEA states surveys were conducted February 22, 2009, and on additional unstated dates in December 2011.

Recommendation 6. DFG recommends clarification in the RDEIR/SEA of the tree survey dates and survey information including who conducted the surveys and on which dates.

At PCN2 the RDEIR/SEA contains conflicting statements about the number of trees proposed for removal, and it's unclear exactly which trees may be removed. For example: 7

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On Page 2.3-18, 4th paragraph the RDEIR/SEA states, "The 137 trees shown in Table 2.3.1-10… would be removed under all three alternatives." However, there are 171 trees shown in Table 2.3.1-10, and only 84 trees would be taken under the Downstream Bridge Replacement Alternative. 7

On Page 2.3-18, 5th paragraph, the RDEIR/SEA states an additional 29 trees (total 154) would be removed under the Downstream Bridge Alternative. Five large old Douglas-fir (*Pseudotsuga menziesii*) trees > 36 inches dbh would be impacted, including one 52-inch dbh tree that would be removed; one 40-inch dbh tree with 20-30% of root zone disturbed ("moderate" root effects); one 53-inch dbh tree with 10-20% root zone effects; and two trees, 37-inch dbh and 51-inch dbh with no root effects. However, Table 2.3.1-11 shows only 24 trees removed via this alternative. The RDEIR/SEA also states: "The 40-inch dbh Douglas-fir tree with moderate root effects may need to be removed."

On Page 2.3-18, 6th paragraph: the RDEIR/SEA states an additional 16 trees (total 141) would be removed under the Upstream Bridge Replacement Alternative, including a 42-inch dbh and a 48-inch dbh Douglas-fir. However, Table 2.3.1-11 shows 13 trees removed via this alternative, and include a 42-inch dbh and two 38-inch dbh Douglas-fir trees.

On Page 2.3-18, 7th paragraph, the RDEIR/SEA states an additional 23 trees (total 148 trees) would be removed under the Upslope Retaining Wall Alternative. This includes two large old-growth Douglas-firs (a 42-inch dbh and a 48-inch dbh), a 26-inch dbh Douglas- fir and a 23-inch dbh bigleaf maple (*Acer macrophyllum*). However, Table 2.3.1-11 shows five trees removed via this alternative, and none of those in the text are listed in the table.

Recommendation 7. DFG recommends the RDEIR/SEA clearly disclose all large old trees that may be impacted through ground-disturbing activities (both within and adjacent to the Project Area), and recommends clarification of discrepancies within the text and between the text and Tables 2.3.1-10 and 2.3.1-11 regarding how many and which trees are proposed for removal.

Recommendation 8. DFG recommends Caltrans include an additional table in the RDEIR/SEA that shows all large old trees over 24 inches in dbh that may be impacted by ground disturbing activities both within and adjacent to the Project Area, including species, dbh, and nature and level of potential impact. 8

Reestablishment of Native Species Composition in Existing Natural Communities 9

Reestablishing the natural community species composition (i.e., late-seral forests) in locations like the Project sites on US 199 where steep, rocky or nutrient-poor soils prevail is difficult at best. For long-term maintenance of essential characteristics of old-growth forests, management must focus on key features associated with these forests,

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beginning with live large trees, large snags, and LWD. Retention of remaining large old trees, and recruitment of new large old trees and habitat elements is required if old-growth wildlife features and values are to be retained in future years. 9

Section 2.3.1.3: Avoidance, Minimization, and/or Mitigation Measures

This Project has the potential to permanently remove a number of old-growth redwood stumps and large conifer trees during construction, including more than 1.2 acres of Douglas-fir forest.

The three years of mitigation and monitoring currently proposed for Natural Communities does not adequately compensate for the long-term permanent loss of large old-growth trees and forest habitat. If limited late-seral wildlife features and values are to be retained in future years, retention and recruitment of old-growth trees and forests is required.

Recommendation 9. DFG recommends Caltrans provide in the Final DEIR/SEA appropriate mitigation for the long-term and permanent losses associated with late-seral forests including more than 1.2 acres of large old Douglas-fir forest, and that Caltrans consult with DFG before construction begins to assess salvage options for large trees and stumps.

Recommendation 10. In addition, DFG recommends the final EIR/EA provide a timeline for mitigation activities that provides for implementation concurrently with the Project and within 2 years of its completion. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. 10

Mitigation for the loss of the late-seral forest should focus on avoidance, retention, and recruitment of late-seral forest elements on-site and in-kind. If this is not possible, off-site or out-of-kind mitigation will likely be required for Project impacts. 11

Recommendation 11. DFG recommends Caltrans focus mitigation efforts on high risk and high value areas such as those found on-site and locally within the Middle Fork Smith River and Smith River watersheds. For partial on-site mitigation, DFG recommends Caltrans consider in the Final DEIR/SEA the following:

1. Use excavated stumps and trees on-site locally for enhancement and/or restoration, as LWD on the ground and in riparian and aquatic habitats;

2. Provide intensive treatment and removal of invasive species within the Project area and along the roadway and river corridor to help maintain forest resiliency;

3. Provide similar on-site protection measures for old-growth Douglas-fir as for old-growth redwood (e.g. using only handwork and pneumatic excavation tools;

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excavating duff and top soil, watering during construction, etc.), where impact to these late-seral Douglas-fir trees does not include removal; 11

4. Intensively manage to reestablish native species in increased densities in other natural communities within and adjacent to the Project area, (e.g., "sparsely vegetated slope" and "ruderal/disturbed");

5. Provide on-site protection and mitigation measures for affected riparian trees not proposed for removal, including excavating duff and top soil by hand, watering during construction, etc.

6. Create snags in or near the Project area by anchoring larger conifer tree boles to create new snag habitat.

Recommendation 12. For off-site mitigation, DFG recommends Caltrans consider in the RDEIR/SEA the following: 12

1. Protect additional unreserved old-growth forests, e.g., purchasing acreage of existing old-growth Douglas-fir stands for transfer to a non-profit conservation organization for off-site mitigation for Project effects;

2. Promote increased natural community habitat connectivity for plants and animals and restore natural ecological process and movement by removing impediments and barriers to migrations, including wildlife crossings and corridors, and fish passage;

3. Provide large wood and stumps to be used for placement in DFG or other fish habitat or large wood restoration projects in Del Norte County;

4. Provide intensive treatment/removal of invasive species in the Middle Fork Smith River corridor along the roadway and river corridor both in between the Projects on US 199 and beyond to assist existing older forests in maintaining resiliency;

5. Implement management options on younger second or third growth stands on nearby protected or reserved public lands to accelerate or recreate old-growth characteristics, e.g., selectively thinning to increase growth rates; selectively girdling trees to increase snag component; placement of Project-generated LWD on the ground and in streams; and

6. Create snags on lands off-site on nearby protected or reserved public lands where this habitat element is lacking, by anchoring larger conifer tree boles to create new snag habitat.

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If you have any questions or comments regarding this matter, please contact Staff Environmental Scientist JoAnn Dunn at 619 Second Street, Eureka, California 95501 or telephone (707) 441-2076.

References

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ec: See Page 11

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ec: Jason Meyer
California Department of Transportation
Jason_meyer@dot.ca.gov

Rosanna Bower
County of Del Norte, Community Development Department
rbower@co.del-norte.ca.us

Curt Babcock, Tony LaBanca, Scott Bauer, Richard Macedo, Michael van Hattem, Gordon Leppig, Justin Garwood, Joe Croteau, Susan Sniado, Laurie Harnsberger, and JoAnn Dunn
California Department of Fish and Game
cbabcock@dfg.ca.gov, tlabanca@dfg.ca.gov, sbauer@dfg.ca.gov, rmacedo@dfg.ca.gov, mvanhattem@dfg.ca.gov, gleppig@dfg.ca.gov, jgarwood@dfg.ca.gov, jcroteau@dfg.ca.gov, ssniado@dfg.ca.gov, lharnsberger@dfg.ca.gov, jrdunn@dfg.ca.gov

State Clearinghouse, Governor's Office of Planning and Research
state.clearinghouse@opr.ca.gov

Dan Free
National Oceanic and Atmospheric Administration Fisheries Service
dan.free@NOAA.gov

Gregory Schmidt
U.S. Fish and Wildlife Service
gregory_schmidt@fws.com

Jeremiah Puget
California State Water Resources Control Board
jeremiah.puget@waterboards.ca.gov

Responses to California Department of Fish and Wildlife

Response to Recommendation 1

This comment recommends that the EIR/EA change significance determinations for impacts to 1) late seral Douglas-fir forest, 2) riparian forests, and 3) wetlands. The Department believes that impacts to these resources have been avoided, minimized and mitigated to less than significant as described in the Draft Environmental Impact Report/Environmental Assessment (DEIR/EA), Partial Recirculated Draft Environmental Impact Report/Supplemental Environmental Assessment (PRDEIR/SEA) and Final Environmental Impact Report/Environmental Assessment (FEIR/EA).

The Department agrees that the mature (or late-seral) Douglas-fir forest habitat is important, but does not concur with the conclusions or analysis presented by CDFW based on CalVeg data. CalVeg is a GIS based vegetation classification system maintained by the U.S Forest Service which includes information on the major habitat classification, seral stage (maturity and canopy structure) and size class of forest. The analysis by CDFW found 1599 acres of mature Douglas-fir forest, and 41,833 acres of mature redwood forest in Del Norte County. The Department's analysis of the CalVeg data shows there are 130,304 acres of mature Douglas-fir/Mixed Hardwood/Conifer Habitat, and 19,380 acres of mature Redwood habitat in Del Norte County.

The CalVeg database uses fields based on definitions in the California Wildlife Habitat Relationships (WHR) database. The fields used in the CDFW and Department analysis are:

WHRSIZE = This variable represents the dbh (diameter at breast height) size class of the forest habitat type, with largest size class (5) was used for the analysis representing stands with trees > 24 inches. This size class was assumed to be "mature" for this analysis, because the CDFW letter states that 24 inch dbh Douglas-fir should be considered mature.

WHRTYPE = This variable represents the dominant vegetation community based on WHR habitat type definitions, the values used in this analysis were RWD = Redwood, DFR = Douglas-fir and MHC = Mixed Hardwood/Conifer.

NWSTRUCT = This variable represents forest structure and is from the U.S Forest Service for use with the Northwest Forest Plan. The values represent single-storied (1) or multiple-storied canopy (2).

The canopy structure field (NWSTRUCT) is an incomplete data set. While the data is well populated for the coastal strip (within approximately 10 miles of the coast line), it is not populated for the inland areas surrounding the US 199 sites. The Department is not inclined to use this field in the analysis, because it would eliminate all stands outside of the coastal zone, regardless of canopy structure, and the does not accurately represent multistoried habitat across the county.

The forest type (WHRTYPE) at the Patrick Creek Narrows Location 2 area in question is listed as WHRTYPE=Mixed Hardwood/Conifer (MHC). This is a common forest type with Douglas-fir and other conifers mixing with the hardwood species such as tanoak and big-leaf maple. This

habitat type fits what Department surveys found in the area, as the Douglas-fir stands did have components of tanoak and big-leaf maple, as well as alder closer to the river. The Department included both the Mixed Hardwood/Conifer (MHC) and Douglas-fir (DFR) forest types in the analysis.

The size class (WHRSIZE) of "5" represents trees greater than 24 inches dbh. This is the largest size class in the database, and while trees present may be much larger than 24 inches, at this size forests will begin showing signs of maturity such as stem exclusion and a more complex canopy structure. The was the largest size class in the database and was used for both the CDFW and Department analyses. It should be noted that within the north coast region timber operations are regularly harvesting trees from 12 to 40 inches and greater.

The Department did not include NWSTRUCT in the analysis, and combined the WHRTYPEs DFR and MHC. Based on this broader analysis, the Department found 19,380 acres of mature Redwood Habitat, and 130,304 acres of mature Douglas-fir/Mixed Hardwood/Conifer habitat in Del Norte County. Thus there are substantially more acres of mature Douglas-fir than Redwood within the county and even more within the region if this analysis were to extend outside of the county. It should be noted that there is also a substantial Douglas-fir component within the protected mature redwood stands. This is not to minimize the importance of mature Douglas-fir forest habitat, but to demonstrate how the Department reached its significance conclusions.

The 1.2 acre amount in the PRDEIR/SEA is the total impacted Douglas-fir habitat, but not all of that habitat is mature, some of it would be young and mid-age Douglas-fir habitat. Additionally, the design has since been refined, reducing the necessary hillside cut areas. The area of mature Douglas-fir forest was calculated following Recommendation 8, that trees greater than 24 inches dbh be considered mature. The area of late seral forest impacted east of the bridge at the Patrick Creek Narrows 2 site is approximately 0.1 acre. The area west of the bridge between US 199 and the river is a strip of trees where the project would impact approximately 0.02 acres of mature Douglas-fir with two trees greater than 24 inches dbh. The area west of the bridge uphill from US 199 would be excavated, removing approximately 0.3 acres of mixed Tanoak/Douglas-fir habitat, of which 0.12 acres may be mid- to mature, the area of impact in this location was substantially reduced after further geotechnical studies. This slope is sparsely vegetated and contains two Douglas-fir trees greater than 24 inches dbh. The project would remove approximately 0.2 acres of mature Douglas-fir habitat at the Washington Curve site. As currently designed, the preferred alternative of the proposed project would remove approximately 0.42 acres of mature Douglas-fir forest habitat, and approximately 0.12 acres of early- to mid-seral Douglas-fir habitat.

The project impacts approximately 0.42 acres of mature Douglas-fir habitat, under the recommended CDFW definition. The following avoidance, minimization and mitigating measures were considered in the significance determination:

1. The small area of mature habitat to be permanently affected.
2. All large trees removed by the project will be used as large woody debris in salmonid restoration projects.
3. All disturbed areas will be revegetated with native species.

4. A program of invasive removal will be implemented to improve the resiliency of mature forest within the project vicinity.

While the Department does consider the large Douglas-fir trees at these sites to be an important ecological component, given the acreages of large size class Douglas-fir present within the county, the Department does not consider impacts to less than 0.00001% of the mature Douglas-fir habitat in Del Norte County to be a significant impact under CEQA. Nonetheless, the Department recognizes the importance of improving the resiliency of this natural community. One way this can be achieved is through the control of non-native invasive plant species. Therefore, the Department will enter into a cooperative agreement with the U.S. Forest Service to help fund ongoing weed eradication projects in the mature Douglas-fir forest community on U.S. Forest Service land in the Middle Fork Smith River watershed in the project vicinity.

Impacts to riparian habitat (red alder and big leaf maple) and wetlands will be minimized, avoided or mitigated as outlined in the DEIR/EA Section 2.3.2.4, with exact impacts and mitigations to be determined after final design is completed during the permitting phase of the project. Approximately 0.08 acres of riparian habitat will be impacted by the project at Patrick Creek Location 2. The project will restore an equivalent amount of riparian habitat in footprint of the old bridge after it is removed, and will detail this information in the California Department of Fish and Wildlife's Stream and Lakebed Alteration Agreement (1602). The 0.0006 acres of permanent wetland impacts at Patrick Creek Narrows Location 2 will be replaced at a 1:1 ratio. Details of mitigation measures will be negotiated with the U.S. Army Corps of Engineers (USACE) and the North Coast Regional Water Quality Control Board (NCRWQCB) during the permitting phase of the project, and will be detailed in the Clean Water Act (CWA) Section 404 Permit and Water Quality Certification (CWA Section 401). Based on the level of impact and avoidance, minimization and mitigation measures, together with the requirements of the necessary permits, the Department determines that these impacts to wetlands and riparian areas are not significant under NEPA or CEQA.

The FEIR/EA Section 2.3.1 was updated to reflect this information.

Response to Recommendation 2

The three primary sources of tree count discrepancy within the recirculated draft document and specialist reports are: 1) Multiple-trunk trees were counted by initially Caltrans as a single tree and later by the Arborists as individual trees ; 2) On the steep slope cut areas of The Narrows, Patrick Creek Location 2, and Washington Curve tree surveys were initially conducted from the roadway with binoculars and 3 years later surveys by foot were conducted; 3) From when the first tree surveys were conducted in 2009, Caltrans engineers have modified and refined the project design resulting in changes in tree impact estimates. The Department believes that the estimates of acreages and number of trees provided are adequate to characterize and evaluate the potential impacts and make a significance determination. The inconsistencies in the numbers of trees would not change any significance determinations. The discrepancies were minor and still allowed for an analysis and comparison of impacts.

This information has been added to the FEIR/EA Section 2.3.1.

Response to Recommendation 3

The Department concurs that the removal of mature trees is a long-term and permanent effect to the natural community, but does not agree that it rises to the level of a significant effect under CEQA for the reasons stated above in the Response to Recommendation 1.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 4

Caltrans has provided a best faith effort with the methodology currently available to identify the projected Carbon Dioxide emissions that may occur as a result of this project. Currently there is no widely accepted scientific methodology to calculate the change in emissions due to removal of the identified .6 acres of mature Douglas fir habitat.

Caltrans remains committed to reducing CO2 emissions through various activities as outlined in the climate change section of the environmental document.

In addition, the re-vegetation of all disturbed areas will help offset potential CO2 emissions increase.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 5

The Department will restore and enhance an equivalent amount of riparian habitat in the footprint of the old bridge after it is removed. The habitat will be restored at a 1:1 ratio because the habitat to be lost adjacent to the highway and bridge, and is not exceptional or high quality habitat. The acreages listed in the DEIR/EA and PRDEIR/SEA are approximations based on the potential footprint of the project at the time the DEIR/EA was published (2010). The designs used to evaluate environmental effects are preliminary, and the footprint of the project can often be reduced during the final design process after the FEIR/EA is complete and signed. Acreages for mitigation will be determined based on final design, and permitted through the CWA Section 404 Dredge and Fill Permit, CWA Section 401 Water Quality Certification and Lake and Streambed Alteration Agreement 1600 processes with the appropriate agencies (USACE, NCRWQCB, and CDFW respectively).

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 6

Department's Office of Field Surveys surveyed the roadways, including tree locations in 2008 and 2010. Consultant staff conducted additional surveys in 2009. Department design and environmental staff conducted surveys in 2010, 2011 and 2012. Details by site are in the FEIR/EA.

These dates and surveyors have been updated in the FEIR/EA in Section 2.3.1.

Response to Recommendation 7

Under the preferred alternatives, no large (greater than 36 inch dbh) redwoods would be removed at the Ruby 1 and Ruby 2 sites on SR 197.

Under the preferred alternatives 8 large (greater than 24 inch dbh) Douglas-firs would be removed, and one would have potentially substantial root damage and need removal at the US 199 sites.

Changes have been made in the FEIR/EA Section 2.3.1 to clarify this information.

Response to Recommendation 8

The Department has included information on which trees would be removed and which large trees would have root impacts in the text describing tree impacts for each site and alternative. The Forester/Arborist Report includes a table with all impacts to all trees potentially affected by the project.

These changes have been made in the FEIR/EA Section 2.3.1.

Response to Recommendation 9

Approximately 0.42 acres of low quality mature Douglas-fir would be impacted by the project. Overall, the habitat value of the Douglas-fir habitat in the project area is diminished by previous logging and a fire that killed many trees. Additionally, the wildlife habitat value of this forest community is reduced by the proximity of the highway and the associated noise and human activity. Nonetheless, after the project is completed, all temporarily disturbed areas will be revegetated with native local plant species characteristic of Douglas-fir forest community.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 10

This recommendation is for mitigation to occur concurrent to and/or within 2 years of project completion. All revegetation and invasive plant removal will begin within one year after construction completes ground disturbing activities at a site. Riparian restoration activities will be detailed in and be conditional of the California Department of Fish and Wildlife Stream and Lakebed Alteration Agreement (1602 permit).

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 11

1. Use of Large Woody Debris for enhancement.

   The Department will make all Large Woody Debris available for restoration projects.

2. Invasive species removal.

   The Department will conduct invasive species removal to enhance the resiliency of mature forest within the watershed.

3. Use same avoidance on Douglas-fir as proposed for Redwood.

   The Department will implement the Redwood root avoidance and minimization measures (FEIR/EA Section 2.3.1.3) when conducting work near Douglas-fir.

4. Re-establish native species in disturbed areas.

The Department will re-establish native species in disturbed areas. This is described in the FEIR/EA Section 2.3.1.2 and 2.3.1.3, and Appendix R.

5. Use same avoidance on Riparian as proposed for Redwood.

   The Department will implement the Redwood root avoidance and minimization measures (FEIR/EA Section 2.3.1.3) when conducting work near riparian trees.

6. Create snags with removed trees?

   The Department will not create snags. There are sufficient snags in the area already due to the past fires.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 12

1. Protect unreserved late seral Douglas-fir.

   The Department found that the other measures (stream restoration, invasive plant removal) were more appropriate given the level of impacts.

2. Increase ecological connectivity: fish passage, wildlife crossings

   The Department considered these concerns and may find ways to incorporate wildlife crossing into other projects in the future.

3. Provide large stumps and woody debris to DFG for enhancement projects.

   The Department will make all Large Woody Debris available for restoration projects.

4. Invasive species control along corridor.

   The Department will conduct invasive species removal to enhance the resiliency of mature forest within the watershed.

5. Late seral management on reserved public lands.

   The Department considered this approach, but has settled on the invasive species removal measures.

6. Create snags on nearby reserved public lands by anchoring tree boles.

   The Department will not create snags. There are sufficient snags in the area already due to the past fires.

No revisions to the Draft EIR/EA were necessary.

4.2 Organizations

Two organizations, Environmental Protection Information Center (EPIC) and Friends of Del Norte, submitted comments in response to the Recirculated Draft EIR/EA. Both organizations submitted two separate comment letters. Comments submitted by EPIC and Friends of Del Norte, as well as responses to those comments, are provided below

EPIC (submitted by Andrew Orahoske)

epic

Keeping Northwest California wild since 1977

November 5, 2012

Transmitted via electronic mail

Jason Meyer
Environmental Coordinator
California Department of Transportation
P.O. Box 3700
Eureka, CA 95502
Email: jason.meyer@dot.ca.gov

RE: Comments on Caltrans' Hwy 197/199 STAA Access Project and Recirculation of Draft EIR and Supplemental EA

Dear Responsible Officials,

I am writing on behalf of the Environmental Protection Information Center ("EPIC"), a nonprofit organization that works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in northwestern California. Consistent with this mission, EPIC submits the following comments and attachments to the California Department of Transportation ("Caltrans") on the proposed Highway 197/199 STAA Safe Access Project (the "Project"). Please include all attachments in the administrative record for this Project.

EPIC is aware that Caltrans, through this recirculation, is attempting to limit public comment to supplemental reports concerning tree impacts. Given the marked changes in the recirculated document, however, EPIC believes comment is appropriate on the nature and scope of the Project, its impacts, and alternatives. Furthermore, under NEPA, the agency has an ongoing duty to continually evaluate new information presented by the public and other sources when that information bears on a decision. Here, Caltrans must accept all information presented on the overall impacts of the Project and cannot limit its evaluation based on an illegal restriction. EPIC incorporates by reference its previously submitted comments on this Project. 1

As an initial matter, EPIC opposes the Project and demands that Caltrans simply abandon the Project in its entirety. We view this Project together with several others, including the already completed STAA project at Big Lagoon, the Highway 101 widening project through Richardson Grove State Park, the STAA project on Highway 299, the and the Willits Bypass project. 2

Environmental Protection Information Center
145 G Street, Suite A, Arcata, CA 95521
(707) 822-7711
www.wildcalifornia.org

EPIC (submitted by Andrew Orahoske)

Fundamentally, these projects constitute one major project to establish a STAA transportation network into and through coastal Northern California. When taken together, these Caltrans' projects pose significant and unnecessary risks to our region. STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, we urge Caltrans to spend that limited public funds on maintaining existing facilities and improving safety in ways that make common sense. 3 4

If Caltrans does not abandon the project, then EPIC maintains that an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. Based on the clear risks involved with this major highway development project, it is clear that significant impacts "may" occur and therefore an EIS is required. 5

The project would have significant impacts on:

- The Wild and Scenic Smith River 6
- Old-growth Redwoods and Douglas-fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls, Coho and Chinook Salmon, Steelhead and Cutthroat Trout
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyon slopes
- Rare plants, including species only in the Smith River serpentine soils

Based on the recirculated documents, and information which EPIC has recently obtained from Caltrans, EPIC maintains that the following additional significant impacts will result from the Project:

- Increases in large truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove). 7
- Increases of safety hazards from increased large truck traffic, including truck cargo spills that threaten water quality and endanger the drinking water supply And increased potential for traffic accidents in general given the unsafe condition occurring as a result of the design exceptions being implemented to make way for STAA trucks. 8 9

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 10

EPIC urges Caltrans to adopt the "no project" alternative and abandon this Project and focus on maintaining the existing road infrastructure. 11

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EPIC (submitted by Andrew Orahoske)

Harm to Old-Growth Redwood and Douglas-Fir Trees, and Removal of Trees

Tree Roots and Removal of Hundreds of Trees

At both project locations on SR 197, many old-growth redwood trees (with a dbh of more than 36 inches) are within the project area. Caltrans admits that the agency will impact many old-growth tree roots. EPIC prevailed in the federal case against Caltrans' Richardson Grove project on the issue of old-growth tree roots and the lack of analysis by Caltrans. EPIC raised this point in a recent letter. Caltrans clearly has attempted to improve its analysis of the impacts to tree roots through development of an "Arborist/Forester" report and supplement to the Natural Environment Study through the submission of a Memorandum by Gail Popham, which are the basis for the recirculated DEIR/SEA However, Caltrans essentially ignored our concerns. 12

Moreover, the data in the Arborist/Forester Report and the Popham Memo is routinely inconsistent and unreliable. Here are some examples. 13

The August 21, 2012 Gail Popham Memorandum ("Popham Memo" or "Popham") provides inconsistent numbers of trees to be removed. It attempts to compare the numbers of trees to be removed as indicated in the March 2010 NES report with the more recent "Arborist/Forester Report." But these numbers are not consistent.

Popham reports that the March 2010 NES report determined that **224 trees** would be removed from seven locations. In the same document, Popham reports that Caltrans initially estimated **220 trees** would be removed.

Popham then reports that the "Arborist/Forester Report" revised estimate identifies **98 additional, or a total of 322 trees** to be removed. However, in the same document she then states the revised estimate is approximately **331 trees**, an increase of **111 trees**. Table 1, included in the memorandum, has a third and different number, listing **320 trees** to be removed.

Moreover, these figures are not consistent the figures in the "Arborist/Forester Report." For example, Popham Table 1 lists **138 trees** to be removed at the Washington Curve location, yet the Arborist/Forester Report advises at page 48 that **143 trees** will be removed. Other inconsistencies are noted in review of the Arborist/Forester report.

.

In the "Arborist/Forester" Report, the analysis is limited to only 4 of the 7 project locations, and potential effects only as to redwood trees at Ruby 1 and 2, and old growth Douglas-fir at PCN2. 14

The report advises that the "PEZ trees evaluated in this report are not necessarily the same trees that were identified in the DEIR/EA." The reason is "that the DEIR/EA identified many trees that are outside of the PEZ, and, as such, are not directly relevant to the project as planned." (p. 15) However, we could not find any explanation that justifies this statement, and identifies those trees which have been removed from consideration as potentially effected. 15

In addition, while summary conclusions are made as to what effects may or may not be "likely" we could not find any analysis of the current status of the trees, both individually and as 16

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EPIC (submitted by Andrew Orahoske)

ecological communities. In order to evaluate whether the conclusions, for example, that root zone effects are "mostly none, minimal or slight," we need an explanation of the current conditions and relative health of the trees and their ecological communities. We believe that is missing from the "Arborist/Forester Report," the Popham Memo as well as the Recirculated DEIR/EA. 16 cont.

The report considers the effect of natural fill on root systems (p. 10), but this does not equate to the kind of fill that root systems will encounter with this road project and use. 17

In addition, we note that the report failed to evaluate an "old growth" stand of trees, "although 2 large old Douglas-fir trees alongside the highway are unavoidable and will be removed as a consequence of the project." (p. 40) The claim that "their removal will not change the characteristic of the "old growth" is not documented or justified. 18

Even though the Report admits at p. 48 that a 33" DBH Douglas Fir may not survive due to substantial root area being affected, it fails to evaluate the related effect this loss will have on the surrounding trees and slope. 19

The Arborist/Forester report is also internally inconsistent as to the number of trees to be removed. 20

> **Ruby 1**, on page 19, it reports that 2 alders and 2 redwoods will be removed, for a total of **4 trees**. On the next page, however, it refers to the **6** trees to be removed.
>
> **Ruby 2**, the text lists **9 trees** plus one associated sprout will be removed (p. 29), but the Table 8 lists **only 6 trees** for removal.
>
> **Patrick Creek Narrows 2**, no clear summary of tree removal is provided. Adding the figures from Table 12 indicates that **74 trees** will be removed. Adding the trees identified in the Discussion on page 47 indicates that **61 trees** will be removed. The "Summary of Tree Removals on Hillside above Rt. 199" states "**80 stems** in all" but the list only identifies **27 trees** slated for removal. And these figures are inconsistent with the Popham Table 1, which indicates that **108 trees** will be removed.
>
> **Washington Curve**, the text at page 48 states that **143 trees** will be removed; the text at page 51 states **140 trees** will be removed. And the list immediately below identifies only **108 trees** to be removed. As noted, the Popham Table 1 advises that **138 trees** will be removed.

And, just as with Richardson Grove, Caltrans is consistent in its inability to adequately mitigate for harm to the trees. While it represents that only hand digging, and air-spades will be used around tree root zones, in fact, it authorizes the construction engineer to decide on other methods for excavation. (DEIR2.3-25.) Without any standards to ensure no harm to the root zones. The only guidance is "to *minimize*" disturbance or damage. 21

4

EPIC (submitted by Andrew Orahoske)

Possible Removal of Old-Growth Redwoods

Caltrans admits that the agency may choose to remove old growth redwood trees within Ruby Van Deventer County Park, along SR 197. Somehow, the agency maintains that by purchasing old-growth redwoods off-site would mitigate for this harm. The agency ignores that fact that less than 2 percent of the original old-growth redwoods remain, and that the loss of even one tree cannot be mitigated for hundreds of years. This potential for removing old-growth Redwoods is clearly a significant impact on an increasingly rare ecosystem, which Caltrans has failed to analyze. 22

Removal of Old-growth Douglas-fir

Caltrans admits that the project will result in the removal of old-growth douglas-fir trees. The Arborist/Forester Report declined to evaluate the impact of removing these irreplaceable resources. The removal of these trees, and in conjunction with extensive road side cuts, will have a significant impact on the visual quality of the Wild & Scenic Smith River as well as numerous negative ecological impacts. For purposes of the timeframe for this Project, the loss of old-growth trees is an irreparable harm that cannot be mitigated, because it takes centuries to replace these trees on the landscape. 23

Harm to Coho Salmon and other salmonids

The Smith Rivers numerous fish species, including Coho Salmon, Chinook Salmon, Steelhead, and Coastal Cutthroat Trout would be negatively impacted by the project in the vicinity of Patrick Creek. 24

Caltrans admits negative impacts to Coho Salmon, a species protected under both the federal Endangered Species Act (ESA) and California Endangered Species Act (CESA). 25

Effects on coho salmon are expected to occur at Patrick Creek Narrows Location 2 sites because of the work proposed at these locations and the proximity to the Middle Fork Smith River. Coho salmon may be killed by construction activity. CESA stipulates that any lethal take of a state-listed species be fully mitigated. To fully mitigate for lethal take of coho under CEQA, the Department may be required to improve fish passage at upstream tributaries to the Middle Fork Smith River to the extent deemed acceptable by DFG. Incidental take authorization may be requested from NMFS for impacts on coho salmon. Caltrans admits that the project is likely to adversely affect Coho Salmon and their critical habitat. See generally, DEIS at 2.3-67.

Caltrans admits that juvenile coastal cutthroat trout may be harmed or killed by the work associated with the bridge replacement at Patrick Creek Narrows. Both bridge replacement alternatives will destroy nearly an acre of rearing and foraging habitat for cutthroat trout.

Caltrans has failed to actually ensure that the Project will not jeopardize the continued existence of the Coho Salmon or destroy or adversely modify critical habitat. While the filling of wetlands and bridge replacement have been consulted over, the overall operation of increased large truck traffic has not been analyzed. Considering that several major accidents and spills of toxic

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EPIC (submitted by Andrew Orahoske)

chemicals have occurred on Hwy 199, it follows that the purpose of this project in bringing larger trucks and more traffic will only increase that risk in the future. 25 cont.

Caltrans also has failed to meet the duty to conserve, as defined by the ESA § 7(a)(1) and relevant caselaw. Section 7(a)(1) of the ESA directs Federal agencies to utilize their authorities to further the purposes of the ESA by carrying out conservation programs for the benefit of threatened and endangered species. Because Caltrans is operating under the delegation of authority to implement federal law by the Federal Highway Administration, Caltrans must comply with ESA Section 7(a)(1). Caltrans cannot point to a single action or set of actions, no less a program, for carrying out this conservation duty. Illustrative of this failure is the Caltrans bridge and culvert on Little Mill Creek on Hwy 197 just down the road from major work proposed in this Project. The bridge and culvert is a complete fish passage barrier, preventing the Coho Salmon from reaching spawning and rearing habitat. A Caltrans commissioned study in fact identified the Little Mill Creek barrier a priority for action, and yet the agency has completely ignored the problem. See Lang 2005 (attached via email to these comments). By failing to consider the existing fish passage barriers and other harm caused by Caltrans roadways and actions (including sediment, and polluted runoff), the agency has failed in its duties under the ESA. 26

Impacts Associated with Increased Large Truck Traffic

The recirculated documents fail to address the core impacts associated with expanding the use of Highway 197/199 to permit STAA trucks. Even with the project, the highways cannot physically accommodate these trucks without mandating design exceptions to not require adherence to the state highway design standards. The consequence is an **increased** safety hazard, which will impact not only the motorists who use these highways, but the natural resources along the highways, including the trees. 27 28

We asked Smith Engineering and Management to provide comment on this issue, as Caltrans continues to ignore it. Because the Project Study Report was not identified or listed as a Reference to the June 2010 DEIR/EA, and Fact Sheet Exceptions Reports were not available until a few months ago[1], EPIC provides Smith's comments now. In its thrust to open up coastal Northern California with an STAA transportation network, Caltrans has ignored these increased safety hazards. It must be addressed in document that the public is permitted to review and comment on. 29 30

In addition, as the Friends of Del Norte shows in its comments, opening Highways 197/199 to STAA trucks will definitely increase traffic from the inland Interstate-5 transportation network. This is particularly true during the winter months, when I-5 can be closed for extended periods of time due to snow and ice. Truckers will use the alternative coastal route to avoid those delays, and inherent hazards associated with weather conditions. Highway 197/199 do not have those weather limitations. These significant impacts must be evaluated including the direct, indirect and cumulative impacts. 31

[1] We note for the record that while Caltrans has made some materials available to EPIC for review, it has not made all public records available to EPIC for review prior to this November 5, 2012 deadline, thereby depriving EPIC of the ability to fully comment on all necessary issues. 29 cont.

6

EPIC (submitted by Andrew Orahoske)

Sincerely,

Andrew Orahoske
Conservation Director

Environmental Protection Information Center
145 G Street, Suite A
Arcata, California 95521

Enc.:

- November 5, 2012 Smith Engineering and Management Letter Addressed to Jason Meyer
- Lang, M. 2005. Caltrans District 1 Pilot Fish Passage Assessment Study: Volume 1 – Overall Results. Final Technical Report: Submitted to California Department of Transportation for the project: F 2001 EN 10 Researching State Highway Culverts to Determine Impacts on Threatened and Endangered Salmonids. Available at: http://www.calfish.org/

7

Responses to EPIC (Andrew Orahoske)

This letter included 2 attachments. The first, (Smith Engineering) is addressed below. The second attachment (Caltrans District 1 Pilot Fish Passage Study: Vol. 1 – Overall Results) is over 198 pages long, and is not included here. However, it is available for viewing online and upon request as a technical study.

Response to Comment 1

This comment states that Caltrans must consider all new information presented during the NEPA process. Under the CEQA guidelines for Recirculating an EIR, the agency need only recirculate the chapters relevant to the new information [15088.5(c)], and need only respond to the comments on the new information [15088.5(f)(2)]. Under NEPA, we are required to review all materials submitted, but we are not required to provide a written response to all comments. The Department meets these requirements by reviewing all comments submitted, and is providing written responses to these comments. It should be noted that the primary reason for the recirculation was to open public discourse on the methods and results or the Arborist/Forester study and the potential effects to large trees.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 2

This comment states opposition to the project and is not a comment on the RDEIR/EA.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 3

This comment states that this project in association with other projects in the region are to establish an STAA transportation network in Northern California. This is correct, please see Group Response #1. The comment also states that to projects pose significant risks. The risks, or effects, of this project were analyzed in the DEIR/EA and RDEIR/EA and determined to be less than significant under NEPA and CEQA.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 4

This comment states that the funds for this project should be used on different projects. Please see Grouped comment #1 and #2 for a discussion of the purpose and need, and costs vs. benefits of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 5

This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and accordingly proceeded to prepare a Finding of No Significant Impact (FONSI).

No revisions to the Draft EIR/EA were necessary.

Response to Comment 6

This comment states that the project would have significant impacts on various resources. The DEIR/EA and RDEIR/EA analyzed all of these resources and determined that there would not be significant impacts. For Wild and Scenic Rivers see DEIR/EA Section 2.1.1.3 and Chapter 4 of the FEIR/EA for the consultations with the Forest Service and National Park Service on potential effects, and Group Response #5. For effects to large trees see Grouped Response #4. For effects to endangered species see the DEIR/EA and FEIR/EA Section 2.3.5, and Chapter 4 of the FEIR/EA for consultations with USFWS and NMFS. For effects to tourism, recreation and parks see DEIR/EA and FEIR/EA Sections 2.1.1.4 and Appendix B (4f) Evaluations and the FEIR/EA Chapter 4 for 4(f) consultations with the Forest Service and Del Norte County Parks. For geologic stability concerns see DEIR/EA and FEIR/EA Section 2.2.3. For rare plants see the RDEIR/EA Section 2.3.3 and the Response to DFG comments on the DEIR/EA.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 7

This comment states there will be increases in large truck traffic between the Bay Area and Grants Pass. The Traffic Study for the project considered these effects found there would be a small increase in the amount of traffic along the 197/199 route. This increase was determined to not be significant, please see DEIR/EA Section 2.1.5.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 8

This comment states there will be increased safety hazards from cargo spills. Please see the response to Vern Powers comment #1 for a discussion of cargo spills and hazardous materials.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 9

This comment states there will be increased safety hazards from collisions. Please see Grouped Response #8 for discussion of safety concerns.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 10

This comment states that Department's Route Concept Report recommends leaving SR199 a 2-lane, conventional highway. This is correct, and the highway will remain a 2-lane conventional highway. STAA access can be achieved on a 2-lane conventional highway.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 11

This comment states support for the "no project" alternative.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 12

This comment states that the Department conducted an additional study to investigate the potential impacts to large trees, but failed to address the concerns of the commenter. The Department did conduct an additional study, incorporated the information into the RDEIR/EA and circulated it for public review. The Forester/Arborist Report did consider the issues raised in the Richardson Grove Operational Improvement Project when developing a methodology. It is not clear which specific concerns were ignored.

No revisions in the FEIR/EA were necessary.

Response to Comment 13

This comment states that data in internal technical memo, the Arborist/Forest, and the RDEIR/EA are not consistent. There are some discrepancies within the counts of trees to be removed at the various sites. The discrepancies are due to the data coming for different surveys being conducted under different methods and the project footprint changing slightly as the design is refined. The three primary sources of tree count discrepancy are: 1) Multiple-trunk trees were counted by initially Caltrans as a single tree and later by the Arborists as individual trees ; 2) On the steep slope cut areas of The Narrows, Patrick Creek Location 2, and Washington Curve tree surveys were initially conducted from the roadway with binoculars and 3 years later surveys by foot were conducted; 3) From when the first tree surveys were conducted in 2009, Caltrans engineers have modified and refined the project design resulting in changes in tree impact estimates. Some surveys focused on trees to be removed and the Forester/Arborist Report focused on the potential impacts to the trees that would remain. The larger impact (higher number of trees) for each site was used to ensure the full potential impact was analyzed and disclosed. It is likely that through final design the project the project footprint will be refined and the impacts may be decreased. The Department believes that the estimates of acreages and number of trees provided are adequate to characterize and evaluate the potential impacts and make a significance determination. The minor inconsistencies in the numbers of trees would not change any significance determinations.

The FEIR/EA Section 2.3.1 was changed to address this concern and updated with the most current tree numbers.

Response to Comment 14

This comment states that the Forester/Arborist Report only analyzed four of the seven project sites. The Forester/Arborist Report was primarily to address potential impacts to large trees adjacent to the project sites. The Patrick Creek Location 1 and 3, and Narrows did not have large trees adjacent to or potentially affected by the project and thus were not included in the analysis. This focus was due to concerns over large trees and late seral habitats. The north coast of California has extensive timberlands, both private and public, and younger seral stages are well represented within the region and thus were not considered as a sensitive resource requiring additional analysis.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 15

This comment questions the Potential Effects Zone and differences between which trees were addressed in DEIR/EA and the Forester/Arborist Report. The DEIR/EA discussed trees that would be removed by the various alternatives. The Forester/Arborist Report analyzed only the preferred alternative, and focused on potential effects to the trees which would remain. Thus there were trees potentially identified previously in other alternatives which were not included in the analysis, because they were not close enough to the project (based on the Root Health Zone). Also, the Forester/Arborist Report did not analyze potential impacts to individual trees that the Department had already determined would be removed by the preferred alternative. Trees which were over 5x dbh from the project footprint were not included in the Forester/Arborist Report.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 16

This comment states that there was no analysis of the current status of the trees relative health and ecological communities. The current health of the trees was recorded in Forester/Arborist Report as described on pages 16 through 18. Ruby 1 was described as being in a "remarkably healthy condition" on page 19; Ruby 2 is described as "fragmented yet healthy very large old trees" on page 27; the various stands at Patrick Creek Location 2 are described on page 40; and habitat at Washington Curve is described beginning on page 48. Data recorded on the current condition of the trees is reported in the Appendix at the end of the Forester/Arborist Report. The focus of the report was to analyzed the potential effects of the project on the individual trees, not to extensively characterize their current condition. The Forester/Arborist Report did state that in the overall context of forest resources within the region the effects of the project were not substantial. The DEIR/EA, RDEIR/EA and FEIR/EA Section 2.3.1 discusses the natural communities and ecological significance of the potential effects of the project. The DEIR/EA, RDEIR/EA and FEIR/EA Section 2.3.3, 2.3.4 and 2.3.5 discuss potential effects to specific plants, animals and federal and state listed threatened and endangered species. These effects were determined to be less than significant under NEPA and CEQA for the preferred alternatives.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 17

This comment states that the Forester/Arborist Report does not consider the effects of fill due to road projects. The Forester/Arborist Report states on page 8, under "c. Fill in the Root Zone" that "Fill soil is one of the most damaging construction operations affecting root systems." It continues to discuss the impacts that soil compaction can have on root systems. Fill within the Root Health Zone was one of the primary impacts analyzed.

Response to Comment 18

This comment questions the analysis and impacts to "old growth" Douglas-fir at Patrick Creek Narrows Location 2. This stand east and northeast of the bridge was described as an old-growth stand. The portion of the stand that was not evaluated was the portion uphill from the project site, outside of the zone of potential impacts. The trees to be removed and impacts to remaining trees are described in the RDEIR/EA Page 2.3-18. The trees to be removed are along the highway and constitute approximately 0.1 acres of a stand which is at least 70 acres, thus removing

approximately 0.14% of the stand. Thus, the character of the stand would not be affected because of the small portion of the stand which would be affected by the project.

Response to Comment 19

This comment states concern about effects to the trees and slope surrounding a 33 inch dbh Douglas-fir (45_PAT in the Forester/Arborist Report) which would have substantial root impacts and may not survive the implementation of the project. The tree does not provide shade to the river. It does not represent contiguous habitat, in that it is part of a narrow strip of trees between the highway and the river. Across the river is a slope which suffered a stand replacing fire and is currently in an early seral stage of shrubs. The slope is not geologically such that the loss of this tree would compromise the slope. Thus, potential effects of the loss of this one tree are insignificant.

Response to Comment 20

This comment states that the number of trees to be removed is not internally consistent within the Forester/Arborist Report. Please see the response to EPIC 2012 Comment 13 above.

Revisions have been made in the FEIR/EA Section 2.3.1 to update these numbers.

Response to Comment 21

This comment states that there are no standards for protection of tree roots, and the construction engineer is authorized to approve alternative methods of excavation. Because the exact location of underground roots is unknown until excavation begins, it is difficult to account for all instances which may be encountered during construction. The intent with this language is for the construction engineer and the arborist monitoring the construction to confer and come up with reasonable solutions to logistical problems during construction within the Root Health Zones of large trees. The measures in the FEIR/EA have been updated to reflect that the other excavation methods must be authorized by the on-site monitoring arborist.

Revisions were made in the FEIR/EA Section 2.3.1.3 to update the protection measures.

Response to Comment 22

This comment states that protecting large redwoods off-site is not sufficient mitigation for removal of large redwoods. The Department does not consider these trees to be representative of pristine old-growth redwood ecosystems, because it is a thin strip of edge habitat adjacent to a highway, residential, quarry and industrial timber activities. If the Ruby 2: Four-Foot Widening or Ruby 2: Two-Foot Widening, which would remove large redwoods, were selected, it may require a Statement of Overriding Considerations. However, the Department selected the Ruby 2: Two-Foot Widening in Spot Locations alternative, which has no significant removal of large redwoods, and therefore would not require mitigation.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 23

This comment states that the removal of a large Douglas-fir should be a significant impact. The Department does not consider the removal of large Douglas-fir to be a significant impact, please see the response to CDFW 2012 Comment #1 for a discussion. Effects on the visual character of

the Wild and Scenic Smith River were evaluated in the DEIR/EA Section 2.1.6 and in consultation with the Forest Service (see FEIR/EA Section 4.3) and determined to not be significant.

The FEIR/EA Section 4.3 was updated to include consultations with the Forest Service for 4(f) and Wild and Scenic Rivers.

Response to Comment 24

This comment states that the project will have negative impacts on salmonids within the Smith River at Patrick's Creek Narrows Location 2. The project described in the DEIR/EA included in stream work which had the potential for lethal take of Coho Salmon. The design and construction techniques have been modified to avoid in-stream work and through consultation with NMFS it was determined the project "may affect, but is not likely to adversely affect" the coho salmon or their critical habitat.

Revisions were made to the FEIR/EA Section 2.3.5 to reflect this change.

Response to Comment 25

This comment states that the project will have negative impacts on salmonids within the Smith River at Patrick's Creek Narrows Location 2. The project described in the DEIR/EA included in stream work which had the potential for lethal take of Coho Salmon. The design and construction techniques have been modified to avoid in-stream work and through consultation with NMFS it was determined the project "may affect, but is not likely to adversely affect" the coho salmon or their critical habitat.

The Department does not anticipate an increased incidence of spills, see response to Vern Powers Comment 1. The Department does not anticipate a significant increase in truck traffic over the route, and there is no evidence that increased truck traffic on the roadway would lead to an increased impact to fish in the river.

Revisions were made in the FEIR/EA Section 2.3.5 to reflect the new information on impacts to salmonids.

Response to Comment 26

This comment states that the Department is not meeting its obligations under NEPA assignment by the Federal Highway Administration to meet Endangered Species Act Section 7(a)(1) to carry out conservation programs. The Department has designated District Fish Passage Coordinators, and is part of the Fish Passage Advisory Committee (FishPAC), which meets quarterly and includes USFWS, NOAA-NMFS, CDFW and the California Coastal Conservancy. The Department commissioned the Lang 2005 report to prioritize efforts to address fish passage. This report is being used, and under Senate Bill (SB) 857 the Department keeps track of projects which improve fish passage. The Department is required by SB 857 to improve fish passage when a barrier is within the limits of a project. However, there are no fish barriers listed in the Lang report that fall within the boundaries of the project sites. The Department also worked with the California Department of Fish and Wildlife to implement the Chadd Creek Fish Passage Modification. Thus, the Department is actively working to improve fish passage and is meeting the requirements of ESA 7(a)(1).

No revisions to the Draft EIR/EA were necessary.

Response to Comment 27

This comment states that the highway cannot physically accommodate the STAA trucks without design exceptions. The project was specifically designed to accommodate the STAA trucks, even with the design exceptions. Please see the response to the Smith letter below for a discussion of design exceptions.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 28

This comment states that there will be an increased safety hazard after implementation of this project. The improved roadway design will offer safety enhancements to all drivers along this route such as, improved geometry, increased sight distance, wider lanes, and wider shoulders.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 29

This comment states that Smith Engineering and Management was asked to comment on the Draft Project Report. The Smith letter is discussed below. EPIC filed a California Public Records Act request during the circulation of the RDEIR/EA, the Department is responding to this request.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 30

This comment states that there is an increased safety hazard associated with this project. The improvements in this project will enhance safety through improved roadway geometry, greater sight distance, wider lanes and wider shoulders.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 31

This comment states that there are impacts associated with increased traffic along SR 197/US 199 when Siskiyou Pass closes due to winter weather conditions. Please see the response to Friends of Del Norte 2012 response to comments 1-23 below for a full discussion of potential impacts.

EPIC (submitted by Smith Engineering)

SMITH ENGINEERING & MANAGEMENT

November 5, 2012

Sent via electronic transmission: Jason meyer@dot.ca.gov

Mr. Jason Meyer
California Department of Transportation
P.O. Box 3700
Eureka, CA 95502-3700

Subject: Del Norte 197/199 Safe STAA Access Project

P12010

Dear Mr. Meyer:

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As requested by Friends of Del Norte and the Environmental Protection Information Center, I have reviewed the Caltrans Draft Project Report (hereinafter "the PR") and supporting documentation for the Routes 197/199 Safe STAA Access Project in Del Norte County My qualifications to perform this review include registration as both a Civil and Traffic Engineer in California and 44 years professional consulting practice in these fields. I have extensive experience in matters of highway design and highway safety in California. My professional resume is attached. My comments follow.

Assessment In Brief

Contrary to the repeated statements in the PR, introduction of the longer STAA trucks and construction of the measures necessary to enable them to theoretically navigate the route combination is likely to increase rather than decrease crashes. The PR and related documents fail to evaluate this probability.

A simpler program of improvements not involving provision for STAA trucks could improve traffic safety at lower cost and with less invasive changes to the roadside environment.

Supporting evidence for these points is provided below.

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Why the Project May Render the Route Combination Less Safe 1 cont.

What the Project does is to define a minimum program of improvements that *theoretically enable* an STAA truck to be driven through the route combination without crossing the centerline, running off the road or striking a roadside obstacle. We use the words "theoretically enable" advisedly, because the facilities that would be provided by the Project require that the drivers of STAA trucks and other long vehicles to select and maintain a virtually perfect line of travel through some curves to avoid crossing the centerline, running off the road or otherwise striking a roadside obstruction. For example, the fact sheet for exceptions to mandatory design standards for The Narrows (DN 199 PM 22.7 – 23.0) included as PR Attachment F-4 indicates that the swept path width for an STAA truck on the proposed alignment at this location is 12 feet wide. This means, as the cited attachment indicates, that with only 12-foot travel lanes and 2-foot shoulders on either direction of the roadway under the Project, the driver of an STAA vehicle has only 1 foot of tolerance to either side of the perfect line through the curve; any more deviation either way and the passage involves a hazardous incident. Ordinarily, if there were 12-foot lanes and shoulders conforming to the applicable mandatory 8-foot width standard, an STAA driver would have 4 times as much leeway to either side of the perfect line through the curve to negotiate it safely than the Project provides.

The driver's difficulty in picking and maintaining a near perfect line through this particular location are compounded by three closely spaced reversing curves, each of shorter radius (sharper curvature) than the mandatory minimum radius for a 40 mph design speed (respectively only 59%, 68% and 73 percent of the mandatory design minimum). Hence, the driver's task is not just picking and maintaining a near-perfect line through a narrow area, but doing so on thrice-reversing curves of substandard sharpness.

Moreover, the driver's difficulty is further compounded by the fact that these curves restrict stopping sight distance to that adequate for 30 miles-per-hour, and to only 25 miles-per-hour for a 120-foot section rather than the 40 mph approach speed. In other words, the driver must slow down from normal speed, pick and maintain a near perfect line through a narrow area on a set of sharp, triple-reversing curves at a place where line-of-sight to that perfect line-of-travel is restricted.

These compounding conditions, to say nothing of other normal ones like high wind, wet pavement and dark of night, lead to an obvious conclusion that the proposed Project's features impose too challenging task on big-rig drivers and as the result, frequent hazardous incidents involving failure to stay with the narrow 1-foot envelope of tolerance to either side of the perfect line will occur. Consequently, even with the proposed roadway modifications, introduction of

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STAA trucks to the route combination will increase hazard to the traveling public. It is insufficient to claim that the geometric features of the route, though continuing to be substandard with the Project improvements, are better than what exists and that an STAA truck, if perfectly driven under perfect conditions can safely negotiate the route combination. If Caltrans is determined to authorize STAA trucks on this route, it must define and implement an improvement plan that provides a normal envelope of safety for the variations from the perfect driving line that a normal, alert truck driver running the entire length of the route would typically experience including the variations that result from the vaguaries of wind, wet pavement and dark of night. If such an improvement plan is too costly or is too detrimental environmentally, then Caltrans must admit it is infeasible to approve STAA trucks on this route combination. 1 cont.

When the consequences of all the Project's exceptions to mandatory design standards are viewed in combination as in the above example, it becomes obvious that Caltrans attempt to justify designating this route combination for STAA trucks while avoiding the enormous cost and environmental consequences of improving the road to, or even close to, minimum mandatory standards, involves a significant compromise to public safety.

A second safety issue, aside from crashes involving big rigs, is how the Project's roadway features affect the safety of other roadway users. The PR's record shows that most of the crashes involve run-off-the-road or (to a much lesser extent) centerline crossover incidents where excessive speed, wet pavement and nighttime darkness were factors. The PR and its Exceptions To Mandatory Standards attachments assert that the added shoulder widths at most of the locations where work is contemplated will create an increased recovery area that will enable motorists to avert many crashes. This optimistic assertion ignores two salient contrarian factors.

- The added shoulder width at most locations is marginal in relation to mandatory minimum shoulder width and to true clear recovery zones.
- The increases in curve radius and other improvements to curve alignments and introduction of engineered superelevation on curves will tend to increase traffic speed, thereby increasing the propensity of run-off incidents and increasing the width of recovery area needed to avoid crashes.

Below we examine how the Project's features affect these considerations at each work location.

Ruby 1

Although the PR Table associated with Section 5 claims that Ruby 1 meets all mandatory design standards, the actual approved Fact Sheet Exceptions to

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Mandatory Design Standards for this location reveals that there are two exceptions and appears to have omitted a third. The first exception is to the mandatory shoulder width of 4 feet applicable at this location. The Project design does provide the required 4 foot shoulders on the inside of curves because it is needed to accommodate STAA offtracking. But on the outside of the curves, where run-offs due to speed, darkness and wet pavement most frequently occur, a variable shoulder ranging from as little as 0.5 feet (as little as 12.5 percent of mandatory minimum) up to the mandatory 4 feet would be provided (this is changed from the existing shoulder of 0.5 feet to 3.4 feet). The changes to the outside shoulders are obviously very marginal. Meanwhile, the Project would also increase curve radii in the area from seriously non-conforming 300 and 430-foot lengths to 575 and 550-foot radii and improve superelevation, though not fully conforming to mandatory standards as noted in the Exceptions Fact Sheet. These changes will *increase* the comfortable speed through the curves from 36 to 42 miles-per-hour (a 16.7 percent increase). This change in comfortable speed would offset the benefits of marginally increased recovery areas the Project provides on the outside of curves, the place on curves where most run-offs occur due to excess speed, wet pavement and darkness. 1 cont.

Interestingly, this overall section of Route 197 has a purported design speed and posted speed limit of 55 miles-per-hour although advisory speeds of 35 and 30 miles-per-hour are posted on the subject curves. This poses several issues.

- The standard curve radius for a 55 mile-per-hour design speed is 1000 feet.[1] The PR and the Exception Fact Sheet make no mention that the curve radii proposed in the Project at this location, although improved, remain only approximately half the mandatory minimum for the design- and posted speed.
- The fact that the posted speed limit on the specific Ruby 1 area approach is 55 miles-per-hour makes it likely that many vehicles will enter the subject curves at speeds well above the advisory speed signs of 30 and 35 miles-per-hour or the comfortable speed of 42 miles-per-hour. Contrary to the claim of the PR and its exceptions attachment, this makes it unlikely that the Project's marginal improvement to recovery area would reduce the incidence of the types of collisions experienced at the subject location.
- The PR admits that traffic enforcement on the subject routes is sparse. This makes it likely that many vehicles will attempt to travel faster than the posted and advisory speed limits.
- *Highway Design Manual* Topic 309.1(2) indicates that on conventional highways a clear recovery zone of 20 feet minimum is desirable. Although this is a desirable, not mandatory standard, it illustrates the sheer

[1] Value interpolated from Caltrans *Highway Design Manual* Table 203.2.

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inadequacy of the proposed 0.5 to 4-foot shoulders in this segment of the Project, especially with the changes to the curve radii and superelevation engendering increased speeds.[2] 1 cont.

In summary, there is no reasonable support for the PR's assertion that safety will be enhanced by the proposed marginal increases in shoulder width (recovery area) would reduce crash incidence and substantial evidence that changes in speed characteristics engendered by the Project would cause greater crash incidence.

Ruby 2

The concerns in this segment of the Project are similar to those described above for Ruby 1. The Project would widen shoulders at these curves from a variable 0- to 2 feet to a consistent 2 feet (minimum mandatory standard at this location is 4 feet). The Project would also change the radius of curves at this site from 200 feet to a still substandard 400 feet (minimum mandatory standard for 40 mile-per-hour speed limit is 550 feet. Sight distance, though improved, would remain 23% short of the mandatory minimum for 40 miles-per-hour. Rather than decreasing collision incidence, the increased speed engendered by the improved curve radius, compounded by the remaining sight distance deficiency, would likely offset any benefits of the increased recovery area provided by consistent 2-foot shoulders and result in increased crash incidence.

Patrick Creek Location 1.

The proposed horizontal curve and shoulder changes at this location appear as a reasonable response to the constraints of the site. However, the PR unreasonably minimizes its estimate of the potential consequences the considerable sight distance deficiencies at this location, dismissing them as likely to cause only minor rear-end collisions. In fact, at a 55 mile-per-hour speed, rear end collisions have the potential to be far worse than minor and in addition, losing sight of the road ahead can cause drivers to misjudge the alignment with more serious run-off-the-road and cross-centerline crashes as the result. In addition, the PR appears to have failed to assess the potential compounding effects of sight distance limitations on overlapping or closely spaced combinations of horizontal curves. More study of this issue is needed.

Patrick Creek Location 2

[2] Conventional highways with posted speed limits with posted speed limits at or below 40 miles-per-hour and curbs are exempt from clear recovery zone requirements. Since the posted speed limit is 55 and no curbs exist or are proposed, this exemption does not apply to the Ruby 1 segment.

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The PR considered 3 alternatives at this location: replacing the existing bridge at an upstream location with corresponding roadway changes, replacing the existing bridge at a downstream location with corresponding roadway changes, or preserving the existing bridge with changes to the approach roadway alignments to increase curve radii, eliminating the need for large vehicles to cross the roadway centerline while entering and exiting the bridge. Subsequently, Caltrans has settled on the downstream bridge replacement as the preferred alternative. The alternative to preserve the existing bridge is dismissed, despite costing only two-thirds the cost of the replacement alternatives (roughly $6 million versus $9 million). The reason given is "functional obsolescence".[3] Since the primary element of functional obsolescence apparently is the need of large modern vehicles to cross the roadway centerline while getting on and off the bridge, a condition remedied by approach realignments in the 'preservation alternative', this dismissal is ridiculous. Although the present bridge lacks room for walkable and bikeable shoulders, this is not reasonable justification for dismissal through functional obsolescence, since much of the entire 197/199 route combination lacks walkable and bikeable shoulders. 1 cont.

Caltrans PR also failed to consider two other very low cost alternatives for preserving the existing bridge that are easily and quickly constructible and that would avoid the environmentally intrusive massive rock slope cuts needed to realign the approaches in the 'bridge preservation' alternative and that are also features of the upstream and downstream bridge replacement alternatives. The simplest would be to place signs on the immediate approaches to the bridge requiring traffic approaching the bridge to "Yield To Traffic On Bridge". In this way, there would be no conflict when large vehicles need to cross the centerline while entering or exiting the bridge. The other slightly more sophisticated way of maintaining the functionality of the existing bridge and approaches without massive approach reconstruction is to operate the bridge and its immediate approaches in reversible one-way operation controlled by traffic signals at each end. This latter alternative would also remedy the current lack of shoulders satisfactory for use by bikes and pedestrians, since, with the bridge essentially operating as a one-lane bridge, there would be adequate room for walkable/bikeable shoulders.

The Exceptions To Mandatory Design Standards Fact Sheet for the downstream bridge replacement alternative reveals that Caltrans currently preferred alternative would involve significant compromises to design standards. In an area where the posted speed limit is 55 miles-per-hour, the three approach curves, realigned at high costs with massive rock slope cuts, would only support speeds of 25, 32 and 32 miles-per-hour respectively and would have curve radii

[3] No evidence of structural deficiency is presented.

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only 21.4%, 25% and 25% of the minimum mandatory curve radius for the 55 mile-per-hour speed limit. This large a disparity between the high speeds at which vehicles approach and the low design speeds supported by the substandard curve radii is a circumstance under which run off the road and centerline crossing hazardous incidents will continue to be prevalent. 1 cont.

Similarly, the compromises to mandatory minimum standards for curve radius, shoulder width and other separations from lateral obstructions result in 4 situations where the mandatory minimum 500 foot stopping sight distance to support the 55 mile-per-hour speed limit is not achieved, with available sight distance limited to respectively 131-, 177-,199- and 199-feet (26% to 40% of the mandatory minimum). These available sight distances support safe speeds of only 21, 26, 30 and 30 miles-per-hour respectively. The large disparity between the posted speed limit and the safe speeds that would be supported by available sight distance is a serious compromise to safety. This situation is compounded by portions of the road located within Patrick Creek Narrows Location 2 where stopping sight distance is also compromised below mandatory minimum by the proposed vertical alignment of the road. There are 4 such locations some of which are contiguous or overlapping to the locations where sight distance is also impaired by horizontal obstructions. Available sight distance at these locations are respectivel 300-, 442-, 330- and 370-feet, supporting safe speeds of 40, 50, 42 and 45 miles-per-hour (as contrast with the 500-feet minimum required for the 55 mile-per-hour speed limit).

Patrick Creek Location 3

Modifications proposed at Location 3 involve construction of a soldier pile retaining wall, eliminating an S-curve alignment and widening shoulders.
Although an S curve is eliminated, all of the 5 remaining curves in the segment continue to be substandard (less than the 1000-foot mandatory minimum for a 55 mile-per-hour design speed). The remaining curves have respective radii of 895-, 300-, 300- ,300- and 500-feet, supporting design speeds of 52, 30, 30, 30, and 38 miles per hour respectively. Hence, there remains a serious disparity between the safe speeds of the curves and the speed limit at 4 locations as identified in the Exceptions To Mandatory Design Standards Fact Sheet. However, the Fact Sheet fails to note that this creates substantial potential for motorists to over-drive the curve and that the proposed design is also in conflict with the principles of Alignment Consistency described in *Highway Design Manual* Topic 203.3. This topical section states:

> "*Sudden reductions in alignment standards should be avoided. Where physical restrictions on curve radius cannot be overcome and it becomes necessary to introduce curvature of lower standard than the design speed for the project, the design speed between successive curves should change not more than 10 miles per hour. Introduction of curves with lower design speeds*

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should be avoided at the end of long tangents, steep downgrades , or at other locations where high approach speeds may be anticipated." 1 cont.

Clearly, the disparity between Curve 31 (52 mph) and Curve 32 (30 mph) is more than double the tolerable maximum and is a safety concern. A similar disparity exists in Patrick Creek Narrows Location 1 between Curve 12 (53 mph) and Curve 11 (31 mph).

The proposed Project leaves stopping sight distance below minimums at 4 locations, two due to lateral obstructions and two due to vertical alignment. The lateral obstructions limit available sight distance to that suitable to 28- and 30 miles per hour. The vertical alignment sight distance obstructions limit available sight distance to that safe for 40 and 47 miles-per-hour. The safe speeds at the horizontal obstruction areas particularly disparate from the 55 miles-per-hour posted speed limit for the area.

The Narrows

The deficiencies in the Project proposal for this segment have already been discussed extensively in this report and will not be reiterated here.

Washington Curve

This area of US 199 has a posted speed limit of 55 miles-per hour. Inexplicably, Caltrans has chosen to design the Project in this segment for a design speed of 40 miles per hour instead of the posted speed limit and the actual design fails to meet mandatory standards for even that reduced design speed. The existing Washington Curve is a broken back-curve comprised of a compound curve of 422- and 161-foot radii curves joined to a 1410 radius curve by a very short tangent. The proposed alignment changes the broken-back compound curve to 430- and 180-foot radii curves joined to a 1308-foot curve by an even shorter tangent. Minimum radius for 40 mile-per-hour design speed curves is 550 feet, substantially more than what is proposed.

Even at the 40 miles-per-hour design speed, the proposed curves are seriously deficient. The longer radius part of the compound curve hase as safe speed of 23 miles-per-hour, the shorter part has a safe speed of approximately 35 miles-per-hour. When compared to the posted speed limit of 55 miles-per hour (which would require a minimum 1000 foot radius curve), the proposed curve is clearly hazardous.

The PR's Exceptions To Mandatory Design Standards Fact Sheet reveals that the proposed design fails to meet the mandatory minimum stopping sight distance for the purported design speed of 40 miles-per-hour (300) feet but fails to disclose what the actual available sight distance would be. Clearly, the available sight distance

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would be far below the mandatory minimum sight distance for traffic approaching at the signed speed limit of 55 miles-per-hour at this location (500 feet). 1 cont.

The PR Exceptions To Mandatory Design Standards Fact Sheet admits that even at the 40 miles-per-hour design speed, the proposed Project will not meet the mandatory minimum standards for stopping sight distance (300 feet), although it fails to disclose by how much. Clearly, the available stopping sight distance is vastly less than the 500 foot mandatory minimum for the posted speed limit of 55 miles-per-hour that should be the real design speed at this location. Although the Fact Sheet attempts to minimize the adverse safety consequences of the substandard design, the reality in this situation, as with other proposed situations in the Project where stopping sight distance is substandard, the fundamental fact is that if drivers cannot see far enough ahead on the road to stop safely, they are likely to run off it or hit something in it.

The proposed design would only provide 50% of the mandatory minimum shoulder width applicable to this segment. Given the other substandard design elements noted above, this would compound safety problems.

Cost Effective and Environmentally Sensitive Measures To Enhance Safety Without STAA Accommodation Are Possible

Caltrans could enhance the safety of the 197/199 route combination for the general motoring public without the high cost and environmental intrusion necessary to accommodate STAA trucks. Measures, some of which are currently included at some locations as minor features of the proposed Project, include:

- Open graded pavement surface at all locations,
- More prominent edge line and centerline delineation including raised reflective markers and centerline and edge line rumble strips,
- More extensive curve warning, and advisory speed signing
- Night lighting at selective locations,
- Transverse rumble strips in advance of the sharpest curves, most complex curve combinations, or ones with safe speeds at large differential from the approach roadway,
- Radar displays of vehicle speed,
- The previously mentioned signal-controlled, alternating one-way operation of the bridge at Patrick Creek Narrows Location 2 or the aforementioned "Yield To Traffic On Bridge" regulatory sign solution for the same location,
- Trucker-directed advisory signing such as is employed along the mountainous section of I-80 between the Nevada State Line and Auburn.

The PR should be redone to design and evaluate an alternative that is based on these principles.

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Other Issues

1 cont.

Lack of Measured Speed Data

It is evident from Caltrans documentation that speed, particularly the differential between approach speed limits and the speeds that are safe at the "pinch points" addressed in the Project as well as the differential between speeds at which drivers attempt to drive through the "pinch points" and the safe speeds through those "pinch points" is a major causal factor in the crash experience documented in the PR. However, there is no evidence on record that Caltrans has ever considered the actual distribution of speeds driven at the pinch points and there approaches. This vital data should be collected and considered in determining whether the modifications proposed in the Project are adequate improvements for public safety, detrimental, or measures that solely provide a justification for shoe-horning STAA trucks onto the road.

Inconsistency of Traffic Volume, Truck Volume and Truck Percentage Data Between PR and Caltrans Posted Data

Data posted on the Caltrans Traffic Data Branch internet web site for US 199 northeast of the junction with SR 197, the location closest to the proposed Project work sites on US 199 indicate 2010 annual average daily traffic (AADT) of 4200, a truck percentage of 18.52 % of AADT and a truck volume of 778 AADT. Yet the PR analysis for the Project locations on US 199 uniformly assume the existing traffic volume is only 3000 AADT, the truck percentage is only 12% of AADT. In fact, the traffic and truck volumes that existed in 2010 on this area of US 199 already considerably exceed the PR's projected traffic and truck volumes for 2013, 2023 and 2033. Clearly, the PR has based its analysis of Project adequacy and critical design variables like Traffic Index (TI)[4] on seriously understated traffic and truck volumes on US 199.

Caltrans Traffic Data Branch posts traffic and truck volumes at two locations bracketing the Ruby 1 and Ruby 2 sites on SR 197. These show AADTs of 1800 vehicles and a truck percentage of 12.33% (222 trucks) to the northwest of the Ruby sites and 2300 vehicles and a truck percentage of 5.65% (130) trucks to the southeast. The average, since the Ruby sites lie between these count points is 2050 AADT and 176 trucks (truck percentage of 8.59). The PR baseline for the Ruby sites is only 1700 AADT and a truck percentage of only 8 percent (equivalent to only 136 trucks – 50 per day less than the above average. In fact, the PR's 2013 forecasts are below the 2010 values and its 2023 forecasts barely exceed them.

[4] This is a critical parameter used in determining the required structural strength and composition of the roadway surface based primarily on the expected numbers of heavy vehicle axel passages over the expected life of the pavement.

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Again, the PR analysis appears to have relied on understated estimates of overall traffic and truck traffic both current and in the future. This is particularly disturbing since the section of US 199 between its junction with SR 197 and its junction with US 101 is reported to have carried an AADT of 719 trucks (15.63%). If the segment of SR 197 between US 199 and US 101 is improved as proposed in the Project, some of the truck traffic on the sinuous section of US 199 between its junctions with SR 197 and US 101 would likely shift to the improved SR 197, especially if Caltrans signs direct truck traffic that way. Caltrans analyses of Project truck traffic have made no evident attempt to estimate diversions of truck traffic from the westerly segment of US 199 to SR 197 that the Project would cause. This is a serious flaw in the analysis. 1 cont.

Improper Use of Accident Statistics

A well understood truism in highway safety analysis is the fact that curves are locations where some of the highest accident rates tend to occur. In the case of the PR, accident statistics are presented for short segments involving one or several curves. Accident rates at these locations are compared to the statewide average accident rate for 2-lane conventional highways in rural areas with similar terrain. This apples-to oranges comparison of accident rates for individual curve segments or short segments involving a multiple curve sequence to the overall statewide average for 2-lane conventional highways (which averages in many, many miles of tangent segments where few accidents normally occur) is a comparison that exaggerates the apparent deviation of crash rates on the subject route segments above that which is purportedly typical, thus exaggerating the need for some kind of improvement action based on safety. A fair comparison of crash rates on the subject segments to overall State Highway System 2-lane conventional highway crash rates in similar rural terrain on curves would present an unbiased depiction of the safety situation on the subject route segments and would doubtless show that the subject segments experience crash rates more typical of curve segments statewide.

Conclusion

Based on all of the points noted in detail above, we are convinced the Project Report's analysis and conclusions are inadequate and need to be revised. The Project's provisions are insufficient to authorize STAA trucks on the subject routes with reasonable safety to the public. Caltrans has failed to evaluate the safety impacts associated with the Project's exception to mandatory minimum design standards. An alternative that improves the operational safety characteristics of the route combination at modest cost and with minimal environmental intrusion is preferable to one that accommodates STAA trucks at significantly higher cost and environmental intrusion accompanied by detrimental effects on public safety.

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5301 Lowry Road, Union City, CA 94587 tel: 510.489.9477 fax: 510.489.9478

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Sincerely,

Smith Engineering & Management
A California Corporation

REGISTERED PROFESSIONAL ENGINEER
DANIEL T. SMITH, JR.
No. 0938
Exp. 6-30-14
TRAFFIC
STATE OF CALIFORNIA

Daniel T. Smith Jr., P.E.

TRAFFIC • TRANSPORTATION • MANAGEMENT
5311 Lowry Road, Union City, CA 94587 tel: 510.489.9477 fax: 510.489.9478

EPIC (submitted by Smith Engineering)

SMITH ENGINEERING & MANAGEMENT

DANIEL T. SMITH, Jr.
President

EDUCATION

Bachelor of Science, Engineering and Applied Science, Yale University, 1967
Master of Science, Transportation Planning, University of California, Berkeley, 1968

PROFESSIONAL REGISTRATION

California No. 21913 (Civil) Nevada No. 7969 (Civil) Washington No. 29337 (Civil)
California No. 938 (Traffic) Arizona No. 22131 (Civil)

PROFESSIONAL EXPERIENCE

Smith Engineering & Management, 1993 to present. President.
DKS Associates, 1979 to 1993. Founder, Vice President, Principal Transportation Engineer.
De Leuw, Cather & Company, 1968 to 1979. Senior Transportation Planner.
Personal specialties and project experience include:

Litigation Consulting. Provides consultation, investigations and expert witness testimony in highway design, transit design and traffic engineering matters including condemnations involving transportation access issues; traffic accidents involving highway design or traffic engineering factors; land use and development matters involving access and transportation impacts; parking and other traffic and transportation matters.

Urban Corridor Studies/Alternatives Analysis. Principal-in-charge for State Route (SR) 102 Feasibility Study, a 35-mile freeway alignment study north of Sacramento. Consultant on I-280 Interstate Transfer Concept Program, San Francisco, an AA/EIS for completion of I-280, demolition of Embarcadero freeway, substitute light rail and commuter rail projects. Principal-in-charge, SR 238 corridor freeway/expressway design/environmental study, Hayward (Calif.) Project manager, Sacramento Northeast Area multi-modal transportation corridor study. Transportation planner for I-80N West Terminal Study, and Harbor Drive Traffic Study, Portland, Oregon. Project manager for design of surface segment of Woodward Corridor LRT, Detroit, Michigan. Directed staff on I-80 National Strategic Corridor Study (Sacramento-San Francisco), US 101-Sonoma freeway operations study, SR 92 freeway operations study, I-880 freeway operations study, SR 152 alignment studies, Sacramento RTD light rail systems study, Tasman Corridor LRT AA/EIS, Fremont-Warm Springs BART extension plan/EIR, SRs 70/99 freeway alternatives study, and Richmond Parkway (SR 93) design study.

Area Transportation Plans. Principal-in charge for transportation element of City of Los Angeles General Plan Framework, shaping nations largest city two decades into 21'st century. Project manager for the transportation element of 300-acre Mission Bay development in downtown San Francisco. Mission Bay involves 7 million gsf office/commercial space, 8,500 dwelling units, and community facilities. Transportation features include relocation of commuter rail station; extension of MUNI-Metro LRT; a multi-modal terminal for LRT, commuter rail and local bus; removal of a quarter mile elevated freeway; replacement by new ramps and a boulevard; an internal roadway network overcoming constraints imposed by an internal tidal basin; freeway structures and rail facilities; and concept plans for 20,000 structured parking spaces. Principal-in-charge for circulation plan to accommodate 9 million gsf of office/commercial growth in downtown Bellevue (Wash.). Principal-in-charge for 64 acre, 2 million gsf multi-use complex for FMC adjacent to San Jose International Airport. Project manager for transportation element of Sacramento Capitol Area Plan for the state governmental complex, and for Downtown Sacramento Redevelopment Plan. Project manager for Napa (Calif.) General Plan Circulation Element and Downtown Riverfront Redevelopment Plan, on parking program for downtown Walnut Creek, on downtown transportation plan for San Mateo and redevelopment plan for downtown Mountain View (Calif.), for traffic circulation and safety plans for California cities of Davis, Pleasant Hill and Hayward, and for Salem, Oregon.

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EPIC (submitted by Smith Engineering)

Transportation Centers. Project manager for Daly City Intermodal Study which developed a $7 million surface bus terminal, traffic access, parking and pedestrian circulation improvements at the Daly City BART station plus development of functional plans for a new BART station at Colma. Project manager for design of multi-modal terminal (commuter rail, light rail, bus) at Mission Bay, San Francisco. In Santa Clarita Long Range Transit Development Program, responsible for plan to relocate system's existing timed-transfer hub and development of three satellite transfer hubs. Performed airport ground transportation system evaluations for San Francisco International, Oakland International, Sea-Tac International, Oakland International, Los Angeles International, and San Diego Lindberg.

Campus Transportation. Campus transportation planning assignments for UC Davis, UC Berkeley, UC Santa Cruz and UC San Francisco Medical Center campuses; San Francisco State University; University of San Francisco; and the University of Alaska and others. Also developed master plans for institutional campuses including medical centers, headquarters complexes and research & development facilities.

Special Event Facilities. Evaluations and design studies for football/baseball stadiums, indoor sports arenas, horse and motor racing facilities, theme parks, fairgrounds and convention centers, ski complexes and destination resorts throughout western United States.

Parking. Parking programs and facilities for large area plans and individual sites including downtowns, special event facilities, university and institutional campuses and other large site developments; numerous parking feasibility and operations studies for parking structures and surface facilities; also, resident preferential parking .

Transportation System Management & Traffic Restraint. Project manager on FHWA program to develop techniques and guidelines for neighborhood street traffic limitation. Project manager for Berkeley, (Calif.), Neighborhood Traffic Study, pioneered application of traffic restraint techniques in the U.S. Developed residential traffic plans for Menlo Park, Santa Monica, Santa Cruz, Mill Valley, Oakland, Palo Alto, Piedmont, San Mateo County, Pasadena, Santa Ana and others. Participated in development of photo/radar speed enforcement device and experimented with speed humps. Co-author of Institute of Transportation Engineers reference publication on neighborhood traffic control.

Bicycle Facilities. Project manager to develop an FHWA manual for bicycle facility design and planning, on bikeway plans for Del Mar, (Calif.), the UC Davis and the City of Davis. Consultant to bikeway plans for Eugene, Oregon, Washington, D.C., Buffalo, New York, and Skokie, Illinois. Consultant to U.S. Bureau of Reclamation for development of hydraulically efficient, bicycle safe drainage inlets. Consultant on FHWA research on effective retrofits of undercrossing and overcrossing structures for bicyclists, pedestrians, and handicapped.

MEMBERSHIPS

Institute of Transportation Engineers Transportation Research Board

PUBLICATIONS AND AWARDS

Residential Street Design and Traffic Control, with W. Homburger *et al*. Prentice Hall, 1989.

Co-recipient, Progressive Architecture Citation, *Mission Bay Master Plan*, with I.M. Pei WRT Associated, 1984.

Residential Traffic Management, State of the Art Report, U.S. Department of Transportation, 1979.

Improving The Residential Street Environment, with Donald Appleyard et al., U.S. Department of Transportation, 1979.

Strategic Concepts in Residential Neighborhood Traffic Control, International Symposium on Traffic Control Systems, Berkeley, California, 1979.

Planning and Design of Bicycle Facilities: Pitfalls and New Directions, Transportation Research Board, Research Record 570, 1976.

Co-recipient, Progressive Architecture Award, *Livable Urban Streets, San Francisco Bay Area and London*, with Donald Appleyard, 1979.

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5311 Lowry Road, Union City, CA 94587 tel: 510.489.9477 fax: 510.489.9478

Responses to EPIC (Smith Engineering)

Response to Comment 1

The letter asserts that by not designing the roadway to the standards laid out in the Caltrans Highway Design Manual, and by taking exceptions to the Manual, the roadway will not be safe for STAA vehicles. It argues that there is insufficient "margin of error" to account for driver error and imperfect driving conditions, and proceeds to provide detailed geometric critique of various project components. This response outlines the legal and logical basis behind the project design, which should address most of the comments put forth in the letter.

STAA Information

The Code of Federal Regulations, Title 23 requires that states allow STAA trucks reasonable access to terminals. In the 1980's, California evaluated all State routes and allowed STAA vehicles immediate on those routes that could readily accommodate them. These are called Terminal Access routes. State routes are continuously re-evaluated as improvement projects are completed. Local governments also evaluate local roads for STAA access to create local Terminal Access routes.

When highway improvements are implemented, routes may be re-evaluated to analyze whether they can accommodate STAA trucks. The evaluation of a route may also be initiated when requested by a local agency or business owner. The Caltrans Highway Design Manual, Topic 404, is recommended as a guide for analyzing and evaluating routes for STAA access. When the local Caltrans District is satisfied that a route meets the guidelines for STAA design vehicles, based on engineering analysis, a request is made to Caltrans Headquarters for review and approval. Upon approval, Terminal Access signs are installed and maps are updated on the Caltrans website to reflect the change in the route's classification. District 1 has opened STAA routes since the 1980's evaluation, including US 101 from the Oregon border to Benbow, CA in June of 2008 and a portion of Highway 175 in Mendocino County in January of 2004.

The Route 199/197 Safe STAA Project balances STAA access, ease of operation, cost and environmental impacts in an area with challenging terrain. At each location, engineers weighed cost, environmental impacts, highway design standards, and the goal to provide for STAA access. Once project geometrics and constraints were established, alignments were tested for STAA compatibility with "Autoturn" software, using an STAA truck with a 1 foot "buffer" on either side as a template to allow for driver variability. At all project locations, the result of the proposed widening and alignment improvements will be that an STAA truck, with its greater size and swept width around curves, will have more maneuvering room than the smaller California Legal trucks presently have on the existing highway. The maneuvering room for any vehicle smaller than an STAA truck will be improved considerably. This project will fully satisfy requirements for STAA access, and the improved roadway will be similar to the remainder of Routes 197 and 199, and to other STAA Terminal routes.

Safety

On two-lane, rural routes such as Route 199 and 197, there is a clear statistical relationship between additional shoulder width, curve improvement and reduced collision rates. Even though these projects were not initiated for safety reasons, existing collision concentrations,

where present, were taken into consideration during project design. The proposed designs all provide substantial geometric improvements over existing conditions, and the improved roadways will be similar to adjacent sections of the Routes.

In response to the "Improper Use of Accident Statistics" comment: It is true that the statewide collision rates include curves as well as tangents. However, not all curves have collision rates that are significantly greater than the statewide average. Thus we strive to decrease collisions at curve locations where the collision rates are significantly greater than the statewide average collision rates.

The primary purpose of the project is to provide for STAA Terminal Access. The curve and shoulder improvements that will enable STAA access should have a positive effect on overall collision rates at the project locations.

Design Exceptions

Design exceptions are a way of documenting and justifying deviation from the Caltrans Design Manual on specific geometric standards. Design exceptions will be needed for all project locations in the Route 199/197 Safe STAA Project, due to economic, environmental and physical constraints. The following passages were taken from the Caltrans Highway Design Manual. Emphasis is added where appropriate.

"Highway Design Manual guidance allows for flexibility in applying design standards and approving design exceptions that take the context of the project location into consideration; which enables the designer to tailor the design, as appropriate, for the specific circumstances.

The design standards used for any project should equal or exceed the minimum given in the Highway Design Manual to the maximum extent feasible, taking into account costs (initial and life cycle) traffic volumes, traffic and safety benefits, right of way, socio-economic, and environmental impacts, maintenance, etc. . . . **It is not intended that current manual standards be applied retroactively to all existing State highways; such is neither warranted nor economically feasible.** A record of the decision not to upgrade the existing non-standard mandatory or advisory features shall be provided through the exception process."

Per Highway Design Manual guidance, design standards are intended to be taken in context with the route, and it is expected that there will be instances where design standards will be impractical or infeasible. While some project features do not meet design standards due to severe terrain and the desire to minimize environmental impacts, at each location engineers strived to strike a balance between safety, environmental and aesthetic impacts, design standards and economic concerns. This project will provide for safe STAA access along the Route 199/197 corridor, while enhancing driver comfort and safety by improving geometrics in ways that are statistically proven to reduce collision rates. Since the improvements will be at spot locations, minimal change in the overall operation of the Route 199/197 corridor is expected.

Friends of Del Norte (submitted by Don Gilespie)

Friends of Del Norte
P. O. Box 229
Gasquet, California 95543

April 3, 2012

Protecting the WILDLANDS, WATERS and WILDLIFE of Del Norte County Since 1973.

Jason Meyer

November, 2nd, 2012

Cal.Dept. of Transportation

North Region Environmental, Unit E1

P.O. Box 3700, Eureka, Ca. 95502

Dear Mr. Meyer,

Thank you for this opportunity to comment on the Partial Recirculation of DEIR/Supplemental EA for SR 197 and US 199 in Del Norte County. We appreciate you reopening this document for further public review. Our concerns about vegetation and tree impacts are as follows.

We would like to emphasize to Caltrans and all involved parties, that both highways 199 and 197 are tourist gateways to Redwood National Park, a rare World Heritage Site. Both the National and State Parks are responsible for a very significant portion of the local economy of Del Norte County. The scenic quality of our highway gateways need to take a high priority in considering alterations to these highways. Caltrans proposed widening projects will forever change the character of these scenic byways. 1

On the proposed projects, Ruby 1 and Ruby 2, with the Two-Foot Widening in Spot Locations Alternative as the Caltrans preferred alternative, the proposed highway changes have reasonable tree removal guidelines though we prefer to keep the larger redwood trees on the east side. Serious consideration for redwood tree root compaction is lacking in your report. As we understand these proposals, there will be no trees removed on the west or river side of Hwy.197. We do however; have very grave concerns for tree removal if the Four Foot Alternative were to be chosen. These projects are along one of the most scenic portions of Hwy.197 and near Ruby Van Deventer County Park, so we appreciate your concern for the scenic quality of this portion of the highway. All tree stumps should be completely removed our ground down so they have no permanent visibility to the common motorist. 2 3

On the US Hwy.199 sites, Patrick Creek Narrows Location 1, PM 20.5, the removal of eighteen six inch to eight inch Douglas Fir and White Alder trees seems reasonable as outlined in the DEIR/EA. 4

At the Patrick Creek Narrows Location 2, PM 23.9 to 24.3, eighty three trees many of them large old Douglas Fir, are slated to be cut if the proposed down river bridge is to be built. Since the existing bridge is still structurally solid, the realignment of the highway to ease the approach to the bridge looks like the best 5

The Friends of Del Norte is a non-profit group advocating sound environmental policies for our region.

Friends of Del Norte (submitted by Don Gilespie)

Friends of Del Norte

alternative when considering the overall impacts on trees. The upstream bridge is out of the question as it will require the removal of 23,000 cubic yards of rock and will create an ongoing potential for rock slides into the Smith River. We question whether the downstream cut slope needs to be as extensive as proposed to get the necessary two foot shoulder. A smaller cut would maintain the present scenic values of this portion of the highway and have less impact on tree removal. There does not seem to be a solution that totally respects the scenic qualities of Hwy.199 and this remains a significant impact to our Wild and Scenic river Corridor. 5 cont.

The PC Narrows Location 3 seems appropriate with very little change to the scenic value of the highway. 6

At The Narrows Location, PM 22.7 to 23.0, forty six trees are slated to be removed. Since tree roots help create slope stability, and since the majority of this project is cutting into bedrock, we question the need to cut trees on the uphill slope. There are a few trees that were burned and killed by the Biscuit Fire and these need to come down. It is not clear if the burned trees are part of your original count of trees to be removed. We also question the need to cut any small trees on the river side of the highway, outside of the immediate vicinity of the retaining walls that are part of this project. 7

The Washington Curve cut slope, PM 26.5 requires the cutting of many small trees and is not a significant biological concern. The specified tree removal seems appropriate to the scope of the motorist safety issues addressed by this specific portion of the overall project. 8

We do have concerns for the impaction of old growth Redwood tree roots adjacent to the roadway throughout this project and in an area not mentioned in the DEIR/EA report. This is the stretch of Hwy.199 from the Jed Smith State Park entrance to the Hiouchi Bridge, approximately MP 4.5 to 4.0. This section is not slated for change, but it is part of the cumulative impacts as increased STAA truck traffic will impact these trees located within Redwood National and State Park boundaries. How will these trees be impacted by the proposed increase in truck traffic related to the seven STAA projects? Will the design features of the roadway need to be changed for excavation depth, thickness and compaction to handle many more trucks? There will be significantly more disturbances from highway failures and repair projects that affect the old trees adjacent to the highway. Such cumulative impacts, including impacts along Hwy.101 at Last Chance Grade, need to be addressed. 9

We further maintain that the DEIR/EA is faulty because the proposed projects create a "barely legal" status for Hwys.199/197 in allowing STAA truck traffic. You state on page ii of this Supplemental Environmental Assessment, in the Summary, that "All seven project locations currently have roadway geometries that can result in STAA trucks and other long-wheelbase vehicles off tracking across the double yellow line and entering the oncoming traffic lane. Additionally, the limited sight distances at all seven project locations do not allow enough time for drivers to adequately react to roadway conditions ahead and make timely decisions to avoid unexpected conditions ahead". We know of at least three other blind locations, MP 9.5, MP 8.0 and MP 6.3 that also meet these motorist safety, reaction time conditions. How many more are there? The concept of creating a 'barely legal' STAA corridor along Hwy.199 is something that Caltrans needs to seriously reconsider. 10

The Friends of Del Norte is non-profit group advocating sound environmental policies for our region.

Friends of Del Norte (submitted by Don Gilespie)

We also regard your Traffic Study for adding STAA trucks to Hwys.199/197 as the result of your proposed projects, to be seriously flawed. As you will find in the following pages of this document, much information has been left out of your very brief and flawed traffic study. Furthermore, the overall economic benefits of this project to the citizens of Del Norte County are negligible. 11

The Friends of Del Norte can only conclude that Caltrans needs to complete a full Environmental Impact Study of the proposed STAA projects. Please carefully review our attached submissions. 12

Thank You, Don Gillespie

Don Gillespie, President FDN,

P.O. Box 229,

Gasquet, Ca. 95543

Responses to Friends of Del Norte (Don Gilespie)

Response to Comment 1
This comment states that the project area contains significant tourist sites, parks and visual resources. The Department is aware of the value of the resources within the area and attempted to minimize impacts to all resources while meeting the purpose and need of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 2
This comment states the Ruby 1 and Ruby 2 sites have reasonable tree removal guidelines.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 3
This comment states that compaction of redwood roots was not considered in the report. The Forester/Arborist Report discusses soil compaction and tree roots on page 8, Section 4.b. and 4.c. Soil compaction causes negative impacts to root by preventing roots from obtaining water and nutrients and also slowing the growth rate of roots.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 4
This comment states that it is reasonable to remove the trees listed at Patrick's Creek Narrows Location 1.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 5
This comment discusses the Patrick's Creek Narrows Location 2 bridge replacement and cut slope. The bridge, although currently structurally sound, is nearing the end of its design life and will need to be replaced in the near future. Geotechnical engineers are currently investigating the downstream cut slope area and will make recommendations on the slope and extent of the cut. Stability of the slope is a major factor in this process. The Department will minimize the cut to the extent feasible as this will reduce the cost and environmental impacts of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 6
This comment states that Patrick's Creek Narrows Location 3 seems appropriate.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 7
This comment questions the tree removal at the Narrows. The slope is primarily rock and thus not held together by tree roots, in contrast to how a soil slope may be stabilized by tree roots. The excavation will be into the slope on the uphill side, away from the river. The trees will be

removed if they are in an area where the slope will be cut. Trees outside of the cut will only be removed if they are an immediate safety hazard due to proximity to the cut. This will be determined on an individual tree basis. There are no trees proposed for removal on the river side of the roadway.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 8

This comment states that the proposed project at Washington Curve seems reasonable.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 9

This comment states concern for redwoods between PM 4.5 to PM 4.0 due to increased truck traffic through the area. The area under the roadway was compacted during initial construction. The STAA trucks have the same weight limits as the current California Legal trucks. The forecasted increase in volume of traffic fits within the current design of the roadway and no additional impacts would be expected due increased traffic. Potential effects to Last Chance Grade are not anticipated because: there would be no increase to the weight of the individual trucks; and increase in the volume of trucks would not be significant.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 10

This comment states that the proposed project creates a “barely legal” status for STAA access along the route. The roadway improvements were designed to have a safety margin. See the response to the EPIC/Smith comment above for a discussion on design, safety standards, and design exemptions.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 11

This comment states that the Traffic Study for this project was flawed. Please see Grouped Response 9 for a discussion of the Traffic Study. This comment also states that the benefits to the citizens of Del Norte County are negligible. Please see Grouped Response 1 and 2 for discussions of the purpose and need and costs vs. benefits of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 12

This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and accordingly proceeded to prepare a Finding of No Significant Impact (FONSI).

No revisions to the Draft EIR/EA were necessary.

Friends of Del Norte (submitted by Eileen Cooper)

Friends of Del Norte, ***Committed to our environment since 1973,***
A nonprofit, membership based conservation group, **advocating sound environmental policies for our region. PO Box 229, Gasquet, CA 95543**

November 5, 2012
Comments to Caltrans Recirculated DEIR/EA for STAA truck access on Hwy 199/197, due Nov. 5, 2012
ATT: Jason Meyer, California Department of Transportation,
North Region Environmental, Unit E1, P.O. Box 3700, Eureka, Ca. 95502-3700
jason_meyer@dot.ca.gov

RECEIVED
NOV 05 2012

Summary

After the close of the previous DEIR/EA comment period, our organization became aware of new, relevant and significant information which exposes the current DEIR/EA to be fundamentally flawed and misleading. The DEIR/EA fails to provide an accurate evaluation of a broad range of impacts, including impacts considered within the Recirculated DEIR/EA. This new information raises significant new concerns that have not yet been previously considered or analyzed as well. 1

New information has now led us to believe that an immediate and significant increase of STAA truck traffic is likely to result as a cumulative impact of creating a frost free STAA bypass through Hwy 199/197 and Hwy 101 (Richardson Grove STAA project) that diverts, or significantly induces I-5 STAA truck traffic around Siskiyou Summit and the Weed/Shasta area in winter.

The cumulative impacts of this new I-5 bypass route, and the inducement of significant I-5 heavy truck traffic would substantially affect the evaluation of so many aspects of the DEIR/EA, and because these impacts are likely to be significant and far reaching and extend the scope of the project to such a broad range, we believe a fully recirculated DEIR/EIS is necessary for adequate reevaluation. NEPA requires an EIS under such circumstances. 2

We also believe that a new and accurate assessment will show that this is an ill-conceived project that will endanger the public welfare, and that the only rational decision would be abandonment of the project, in order to protect the public welfare. Within the following text are electronic references. Please use e-mail copy of comments to access those web sites.

Siskiyou Summit is known to be the most dangerous pass along I-5, with a steep grade of 6%, and frequent accidents, only two lanes, closures due to high elevation winter snow storms, and frequent truck chaining requirements. 3

Oregon Dept. of Transportation (ODOT) information, as Attachments: 9, 10, 11

New Information: In phone conversation on October 29, 2012, Caltrans District1 Maintenance Engineer, Royal McCarthy stated:

> *It is a rare occasion that Hwy 199 has required chains. Snow doesn't get up there because it is coastal and it is not that high.*
> Phone message, October 30, 2012, from Caltrans states:
> *We checked our records. The only chain control record we have is prior to 2009. Nothing since January 2009.*

/

Friends of Del Norte (submitted by Eileen Cooper)

Creating a relatively frost free alternate STAA coastal bypass around Siskiyou Summit changes the dimensions of the Hwy 199/197 project to likely involve substantial increased traffic and safety hazards, as well as exacerbating fragmentation and increasing the need for more traffic lights or traffic calming measures in all communities along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities. A project with such a broadly increased Interstate scope should be elevated to an EIS. 3 cont.

The DEIR/EA has completely failed to identify and assess induced I-5 traffic, both immediate and long term. The DEIR/EA has completely failed to inform the general public, as well as managers of trustee agencies, about such a traffic diversion.

The DEIR/EA and RDEIR have failed to evaluate the cumulative impacts that result from the combined projects that constitute an I-5 bypass around Siskiyou Summit. This omission significantly changes most aspects of analysis. The DEIR/EA fails to evaluate the following likely significant I-5 induced traffic impacts: increased motorist and pedestrian safety risks; Redwood National Park and National Recreation Area visitor safety risks; water quality risks and endangerment of public drinking water from increased truck cargo spill risks; as well as biological risks, vegetation impacts and endangered (Coho) and California Species of Concern (steelhead) impacts, from increased truck cargo spill risks; biological and vegetation impacts due to accelerated road failures, maintenance and repair projects; Wild and Scenic River impacts; National Park and National Recreation Area visitor impacts; exacerbation of community fragmentation that will likely increase the need for more traffic lights or traffic calming measures, including communities in Oregon that have not been noticed and engaged; and severe economic impacts from accelerated road maintenance and repair costs; economic impacts from loss of jobs due to the collapse of a niche local trucking network that utilizes California legal size trucks (short cab). Such a broad stroke of likely change in the region should necessitate a full EIS evaluation. 4

Furthermore, because the public has thus far been so misled as to think that there will be an insignificant increase in traffic, a full reassessment of the goals and policy decisions is in order, and a recirculation and opportunity for reevaluation by all agencies, including consultations for Endangered species, Wild and Scenic Rivers Act consistency, National Park Management Plan consistency, and National Recreation Area consistency.

The DEIR/EA has failed to provide useful and meaningful quantitative information about I-5 induced traffic increases and associated traffic risk analysis. 5

New Relevant, Significant Evidence has emerged.

New Information, Attachment 1, letter dated **March 12, 2012**: The Friends of Del Norte and Caltrans received a letter of communication from James R Barrett, an experienced truck driver who delivered freight using Hwy 199 and Hwy 101. In part it states: 6

"Using Interstate Route I-5 very frequently requires truck drivers to chain their trucks and trailers because of snow. This can happen as many as seven different times on a trip from the middle of Oregon to the middle of California. This chaining is easily dodged if one is allowed as I have been to use US Highway101 instead of I-5. One could easily imagine many times more trucks per hour on the proposed route in heavy snow if the planned changes are implemented. This does not take in to account what would happen to the traffic numbers if I-5 closed for snow or accident as it often does. A study could quickly and easily be done on the impact of the proposal by counting the number of trucks that pass any given I-5 mile marker verses the number of trucks that currently pass any given mile marker on US 101. I believe the variance would be shocking. This change in road usage is important because Cal-trans finds it difficult to maintain these roads now. With a huge increase of trucks with winter weather, I think maintaining the roads would be impossible."

2

Friends of Del Norte (submitted by Eileen Cooper)

New Information: Phone Conversation with Kevin Church: Within a few days after receiving the above letter, FODN (Eileen Cooper, vice president) telephoned Kevin Church, Caltrans project manager, with concern. Kevin Church informed Eileen Cooper that I-5 trucks would not be diverted because the coastal route was longer. He also directed FODN to examine the Cumulative Impact Analysis within Fehr and Peers Traffic Study. 7

FODN and James Barrett then carefully measured the difference in distance between the I-5 route and the Coastal route from Grants Pass, Oregon and San Francisco, using road length information from Rand McNally, The Road Atlas, 2008, and also checking trip info on the internet. The new STAA coastal bypass would be only 44 miles longer than taking I-5 from Grants Pass to San Francisco, or visa-versa.

New Information, Attachment 3 , http://www.dot.ca.gov/dist6/opsnowflake/guide.pdf

Caltrans' currently published pamphlet "Operation Snowflake" is a two page winter driving guide that directs traffic around Tejon Pass on I-5 in Southern California, another problematic pass on I-5. The various STAA bypasses shown around Tejon Pass are much longer than route I-5 to Los Angeles. The shortest difference is bypass route 41/ Hwy 101 to Los Angeles, about 91 miles longer than Hwy I-5. The Hwy 166 bypass is about 188 miles longer than route I-5 (these routes were measured using Rand McNally, The Road Atlas, 2008). Caltrans advertises and encourages the use of these longer I-5 coastal bypasses. 8

There is absolutely no evaluation or factual basis within the DEIR/EA for assuming that I-5 STAA trucks would not make good use of a frost free bypass around Siskiyou Summit (as well as other northern mountainous problematic areas along I-5, such as Weed/Shasta), a bypass that is only 44 miles longer.

New Information: Web site http://www.thetruckersreport.com/truckinginduistryforum/questions-from-new-drivers/189462-to-chain-or-not-to-chain-2.html 9

This survey is from a truck drivers' magazine that takes up the issue- "to chain or not to chain," to which truck drivers respond. They point out how dangerous it is to drive with chains; how trucking in the west shuts down because of winter weather; how drivers avoid chaining; how truck drivers get paid by the mile, and lose money and time waiting for bad weather to clear.

It is only logical that truck drivers will be highly motivated to take a frost free loop to avoid chaining, and avoid having to lose time and money waiting for bad weather to clear. The following are two entries.

Entry #6 If you are going to run the West, and (especially as a rookie making little cpm) you need to learn how to safely run in the snow...not necessarily ice, but in the snow. Your pay is depending on you making miles....you don't make any miles sitting at a truck stop waiting for the chain law to be lifted. Most times it will be a few hours...but every year there are several storms that will shut down highways for 2-3 or more days...can you afford to sit half the week? Had you kept moving when the conditions weren't as bad, you might have gotten through the snow and continue on with what you are getting paid to do.

Entry #12 If you don't handle the truck, and have an accident, it's on you and your record. The chance of injury, death and damage is higher. As one place I worked said, "If you chain up, you're fired". Why? Because in their opinion, that's endangering their equipment, cargo, the public and yourself and that means that your judgement wasn't sound. The greed isn't necessarily the company's in these cases. It's the driver's. Driving in those conditions is a gamble. Will it get worse? Will it get better? Will there be ice? Will the truck slide off the road because I can't control it? If you've never had that experience of a vehicle sliding uncontrollably, driving in mountain snow is not the place to experience it.

James Barrett writes a follow-up letter to Caltrans.
New Information, Attachment 2 , letter dated **April 17, 2012** from James Barrett, which in part states: 10

3

Friends of Del Norte (submitted by Eileen Cooper)

"I have been told that Cal-Trans officials do not believe truck drivers will use the chain free route of highway 199-197-101. This is difficult for me to believe because most everybody knows "energy flows to the area of least resistance". 10 cont.

What may not be known is how hard it is to chain a truck and trailer. Each chain weighs about 30 pounds. They must be pulled out of the truck, straightened, placed on the truck, removed, and replaced to wherever they were stored in or on the truck. This must be done for eight wheels in most cases. I think it is also worth pointing out, that there is a great deal of inertia to be overcome to get one to leave a warm truck cab and lay down in the snow to chain a truck and trailer. Needless to say chaining a truck is a lot of work.

When freight is shipped from the middle of Oregon to the San Francisco Bay Area, any part of Southern California, or from south to north, in winter driving conditions, a truck driver must ask themselves "do I want to chain my truck and trailer or just sit and wait until the chain requirements are lifted?" This is the actual decision that must be made now. The proposed change in status of Hwy 199, Hwy197, and Hwy101 will add a third choice, namely "or will I drive an extra 44 miles along the California Coast to avoid chaining?"

I think it is a safe bet that every driver asked would answer "yes" to the question "Would you drive and extra 44 miles out of your way to skip chaining your truck and trailer in the snow?", especially when one factors in the lost time involved in chaining and driving the 30 mile per hour speed limit which applies to all chained vehicles."

Upon Kevin Church's suggestion, FODN carefully examined the methodology of the DEIR/EA cumulative impact analysis, as stated on page ES-3 of Fehr and Peers Traffic Study. We attach page ES-3 which describes the methodology used by Fehr and Peers Traffic Analysis regarding Induced Travel under 2030 build conditions. This methodology is also described in the main text and a memo within the Traffic Analysis from Fehr and Peers. **Attachment 18:** It states: 11

"...a 2002 study by Robert Cervero of U.C. Berkeley explicitly estimated the amount of traffic that is caused by roadway projects. Cervero's research indicated that the long-term induced travel effect is about 3.9 times larger than the short-term induced travel effect...."

FODN was suspicious about the magic multiplier of 3.9, as there had been no appropriate survey of current STAA long haul users along I-5 that might be immediately induced. The DEIR/EA contains only a limited survey of current local users.

FODN contacted Dr. Robert Cervero. 12

New Information, Attachment 4, E- mail from FODN to Dr. Robert Cervero dated April 6, 2012, and response e-mail from Dr. Robert Cervero dated April 9, 2012 to Eileen Cooper, vice president FODN at upsproul@yahoo.com.
Dr. Robert Cervero states:

"I take it from your e-mail that the study borrows some of my research on induced growth effects of highways. That work was for road expansion projects in suburban parts of California thus how germane the results might be for a rural part of the state can be questioned."

The Friends of Del Norte engaged expert Mara Feeney to shed light on our concerns. 13
New Information- Attachment 5 & 6, expert Planning Consultant Mara Feeney, letter dated Sept. 26, 2012; with Mara Feeney Resume. Within this letter, Mara Feeney reviews and critiques the DEIR/EA, RDEIR/EA and the proposed STAA access project for Hwys 199/197. It states, in part:

4

Friends of Del Norte (submitted by Eileen Cooper)

"For a project as important as this one, in a setting with such extraordinary environmental resources, Caltrans should have used the opportunity of recirculating the draft document to provide additional information and address other key issues that have been raised by FODN – including the faulty assumptions underpinning the truck traffic analysis, the weakness of the economic impact analysis, and the lack of a cumulative traffic impact analysis.
Estimates of short-term increased truck traffic on US 199 in the Draft EIR/EA are based on a very limited survey of local businesses (based on a small number of brief survey questions), in which 80 percent of the respondents stated they did not need and would not use STAA trucks on US199 if the project were implemented...
Furthermore, the analysis does not include any consideration of additional through truck traffic that might be encouraged by the creation of a new STAA truck traffic loop connection I-5 via SR 197/US199 to US 101 south through Richardson Grove...

The irony is that the creation of a STAA truck route (with uncertain truck traffic and safety impacts)may kill the very goose that remains capable of laying golden eggs in Del Norte County in the future—namely, tourism in this area that is known for its pristine river, extraordinary parks, and scenic resources.

I have no stake whatsoever in this project. Nonetheless, on behalf of FODN, I urge local elected officials and the State of California to reconsider prioritizing funding for this project, which has been declared to be good for public safety and the Del Norte County economy based on wishful thinking and inadequate information pertaining to environmental impacts." 13 cont.

The purpose and need of the DEIR/EA states, page ii: 14

"The lack of STAA truck access on the SR 197–US 199 corridor restricts options for goods movement between Crescent City and Interstate 5 (I-5)."

There is no discussion within the DEIR/EA about what might happen regarding I-5 induced STAA truck traffic.

The Fehr and Peers Study focuses on current local users and local diversions from south Hwy 101. The Fehr and Peers Study interviews only local trucking companies. The surveys and evaluation of current local truckers within Fehr and Peers Traffic Study does make the point quite clearly that there is little or negligible local demand or economic benefit for STAA access on Hwy 199/197. So, why do such an expensive project?

TRAFFIC STUDY PURPOSE, Fehr and Peers, page 1
"This report assesses the extent to which new access provided by the proposed project could alter truck traffic patterns on the surrounding transportation network. The impacts related to the changes in truck travel patterns will be determined and mitigation measures, if required, to reduce the significance of project-related impacts will be identified."

Induced Travel, Fehr and Peers, page 7

"Roadway projects by themselves do not generate traffic, but by providing access, these projects change travel and land use development patterns. The phenomenon where new roadway capacity leads to additional traffic is known as induced travel. The following discussion summarizes the methodology used by Fehr & Peers to determine the change (increase, decrease, or no change) in, and impact of, future truck volumes on US-199 and SR-197 due to the planned STAA improvements."

5

Friends of Del Norte (submitted by Eileen Cooper)

Latent Demand, Fehr and Peers, page 7

14 cont.

"Latent demand is traffic that would use a route, but cannot or does not for some reason. For this study, latent demand itself is comprised of two components. First, there is latent demand related to STAA trucks that currently travel north on US-101 through Oregon and then onto I-5 that would switch to US-199 if it were accessible. Figure 4 summarizes this type of latent demand (the yellow path would shift over to US-199, the green path, after the improvements are made) and indicates that 160 miles can be cut-off for each one-way journey on US-199/SR-197. Second, there is latent demand for STAA trucks that would switch from CA-Legal trucks."

Attachment 7 , DEIR 199/197, Fehr & Peer Traffic Analysis, Figure 9. This figure provides heavy truck traffic volumes of regional Hwys 199/197, Hwy101, as well as I-5 heavy truck traffic. It clearly illustrates the dramatic differences in current average daily heavy truck volumes of I-5 compared to Hwys 199/197 and Hwy 101 south of Crescent City.

Fehr and Peers, Figure 9, current average daily heavy truck traffic data:

Hwy 197 carries (1800 x .15) = 270
Hwy 199 carries (2800 x .17) = 476
Hwy 101 south carries (4200 x .13) = 546
Hwy I-5 south of Grants Pass carries (35200 x .21) = 7392
Hwy I-5 north of Grants Pass carries (25400 x.26) = 6604

As you can immediately see, just a small percentage of I-5 heavy truck diversion in winter will result in extremely large increases of induced heavy truck traffic for Hwys 199/197 and Hwy 101 south. A real assessment with interviews of through route I-5 truckers during winter, when Siskiyou Summit requires chains or is closed (which is very frequent) is needed to evaluate this situation. A real assessment of impacts is needed.

15

New Information- Attachment 9 , ODOT traffic records for Siskiyou Summit closures/chainings, 2009, 2010, 2011. These events are frequent.

New Information- Attachment 10 & 11 , ODOT planning information about Siskiyou Summit Respect the Pass: http://www.oregon.gov/ODOT/MCT/docs/siskiyoupass.pdf

New Information- Web site and Attachment 12 , Snowfall data from National Climate Data Center NOAA, 2009,2010,2011. These maps show that the Coastal bypass for I-5 route between Grants Pass, Oregon and San Francisco is snow free, and the I-5 route has significant snowfall:

http://gis.ncdc.noaa.gov/maps/snowfall.map?view=daily

New Information- Web site, http://www.dot.ca.gov/dist2/planning/pdf/tcr/I5/factsht3.pdf
Fact Sheets from Caltrans District 2, with evaluations of each section of I-5.

These fact sheets demonstrate that the entire mountainous stretch of I-5 has problematic harsh winter weather that closes I-5.
The segment of I-5 at Black Butte is described on page 235: Fact Sheets, I-5 TCR, June 2008
General Issues

"High percentage of truck traffic limits maneuverability (creates rolling queues). Heavy truck usages at SouthWeed Interchange. Limited alternative routes/detours. Wide variations in terrain including a steep summit at Black Butte (3917 ft). Harsh winter and wind conditions can cause the route to be closed or traffic detoured..."

6

Friends of Del Norte (submitted by Eileen Cooper)

The Deir/EA fails to provide a Design and Cost Analysis based on accurate and relevant data that forecasts induced traffic volumes. 16

New Information- Web site: http://www.dot.ca.gov/hq/tsip/hseb/index.html 17

Highway System Engineering Branch About Us

"We provide information to State and Federal Legislators necessary to ensure the connectivity, integrity, continuity, and functionality of the highway system and of the California Road System (CRS). We provide data to the Governor's office, the State Legislators, and the Federal Highway Administration in order to secure transportation funding for California's highways."

In 1989, the FHWA established a policy saying that all states must have a pavement management system (PMS) to manage their Federal Aid Primary Highway System (Interstate and Principal Highways). As a result of this policy, all states were required to develop and implement a PMS as one of many conditions for federal funding. Pavement management is generally described, developed, and used in two levels: network and project level (AASHTO 1990). These two levels differ in both management application and data collected (FHWA 1995). The primary results of network-level analysis include M&R needs, funding needs, forecasted future impacts on the various funding options considered, and prioritized listings of candidate projects that must be repaired for the evaluated options.

The DEIR/EA fails to inform responsible Federal fiduciary agencies about the volumes of trucks that might be diverted from I-5, thus the DEIR/EA fails to provide the necessary data for a cost analysis.
The DEIR/EA fails to assess cost impacts from accelerated road maintenance from I-5 diversions.
The DEIR/EA fails to provide the necessary data to optimize the design selection process.
The DEIR/EA fails to provide alternatives for design that consider impacts from likely traffic volumes.

New Information- Web site: http://www.fhwa.dot.gov/cadiv/techapps/pms.htm

California Pavement Management System

"The State of California was among the first to adopt a Pavement Management System (PMS) in 1979. Like others of its era, the first PMS was based in a mainframe computer and contained provisions for an extensive database. After the data from each biennial condition survey was entered and analyzed, District Maintenance Supervisors used the voluminous printouts which they received to confirm their suspicions regarding pavement deterioration and recommended maintenance or rehabilitation activities. 18

For over twenty years, FHWA has actively promoted infrastructure management systems. Initially the states responded quickly to establish their baseline management systems for bridges and pavements. Not until the 1991 ISTEA legislation (and subsequent regulations in 23 CFR 500) were the requirements for management systems refined and expanded. Suddenly the states were burdened with new requirements for existing management systems. To add to the burden, CFR mandated four additional management systems.

CFR-mandated PMS enhancements fell under three general categories:

1. Data collection and management

- *An inventory of physical pavement features including the number of lanes, length, width, surface type, functional classification, and shoulder information.*
- *A history of project dates and types of construction, reconstruction, rehabilitation, and preventive maintenance.*
- *Condition surveys that include ride, distress, rutting, and surface friction.*
- *Traffic information including volumes, classification, and load data.*

2. Analysis, at a frequency established by the State, consistent with its PMS objectives.

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Friends of Del Norte (submitted by Eileen Cooper)

- *A pavement condition analysis that includes ride, distress, rutting, and surface friction.*
- *A pavement performance analysis that includes an estimate of present and predicted performance of specific pavement types and an estimate of the remaining service life of all pavements on the network.*
- *An investment analysis at network and project levels.*
- *An engineering analysis for appropriate sections to include evaluation of how design, construction, rehabilitation, materials, mix designs and preventative maintenance all relate to pavement performance*

3. Annual evaluations and upgrades as necessary in conformance with agency policies, practices, engineering criteria, and experience." 18 cont.

The purpose of project-level analysis is to provide the most cost-effective, feasible, and original design as a possible strategy for the maintenance, rehabilitation, or reconstruction for a selected section of pavement within available funds and other constraints (AASHTO 2001). 19

In the past three decades, PMSs have significantly improved. The early systems used simple data-processing methods to evaluate and rank candidate pavement rehabilitation projects only based on current pavement condition and traffic. Future pavement condition forecasting and economic analyses were not considered in such systems. Systems developed in the 1990s use integrated techniques of performance prediction, network- and project-level optimization, multi-component prioritization, and geographic information systems (GIS) (Kulkarni and Miller 2003). A mature PMS includes three key components: data collection, deterioration prediction, and cost analysis.

The costs of maintenance and repairs greatly increase with increased heavy truck traffic. Therefore, accurate information about traffic volume is required in order to optimize designs and obtain funding. The DEIR/EA fails to provide accurate and useful data for deterioration prediction and cost analysis regarding I-5 diverted STAA truck traffic.

There would be a significant and impractical economic burden, and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 under such increased winter traffic. 20

New Information- Attachment 13 - Caltrans presentation about project history and future projects to correct immediate road failures of Last Chance Grade and South Hwy101.

New Information- Attachment 14 - 2012 Report by Busch Geotechnical Consultants, regarding South Hwy 101 instability problems.

New Information- Web sites: Caltrans' reference about landslides and Last Chance Grade on South Hwy 101. Internet references for Land slide information, provided to FODN during public records act request.

Special Report 184 - Landslides in the Highway 101 Corridor between Wilson Creek and Crescent City, Del Norte County, California
by C.J. Wills, 2000, California Geological Survey, 24 pgs.

http://www.conservation.ca.gov/cgs/rghm/landslides/Pages/index.aspx

http://www.conservation.ca.gov/cgs/rghm/landslides/SR_184/Documents/CT101dn.pdf

Download Special Report 184- PDF Document (1.8 MB)
Download Geologic Map (1 MB)
Download Landslide Map (2.2 MB)

The DEIR/EA fails to evaluate the increased risk of road failure on Hwys 199, 197 and 101, due to the extra burden of significant increases in number of trucks diverted from I-5. 21

Friends of Del Norte (submitted by Eileen Cooper)

New Information- Attachment 15. Vehicle Weight and Road Damage, GAO study, which states that the damage done by one fully loaded tractor-trailer at 80,000 pounds compared to a 4,000 lb. car is exponentially greater. 21 cont

"That's 20 times difference in weight, but the wear and tear caused by the truck is *exponentially greater*."
http://www.ysbike.org/vehicle-weight-and-road-damage/

New Information- Attachment 16, and Web site, http://www.saferoads.org/issues/fs-trucks.htm

Cost. One legal 80,000 pound GVW tractor-trailer truck does as much damage to road pavement as 9,500 cars. (Highway Research Board, NAS, 1962). Overweight trucks chronically underpay their fair share of taxes and user fees for the repair of U.S. roads and bridges. By damaging roads, large trucks further degrade highway safety. (U.S. DOT, 1997).

Bigger Trucks Still Mean More Trucks. Increases in truck size and weight will not decrease the number of trips, result in fewer miles traveled, or improve safety by reducing the number of trucks on the highways. Past increases in truck size and weight have not resulted in fewer trucks, fewer trips, or fewer miles traveled. The number of trucks on U.S. highways has consistently grown, even after increases in both the sizes and weights of large trucks.

The most recent federal study to look at the issue showed that the federal government already subsidizes heavy truck operations almost $2 billion every year. (FHWA Addendum to Highway Cost Allocation Study, 2000)
• 80,000-pound single-trailer trucks only pay 80% of the cost of the damage they cause.

The Currently adopted District1 System Management Plan identifies maintenance funding needs to be growing as many facilities are reaching design life expectancy: 22

New Information- Web Site: http://www.dot.ca.gov/dist1/d1transplan/dsmp.pdf

DISTRICT 1 – DISTRICT SYSTEM MANAGEMENT PLAN – SEPTEMBER 2012

"Maintenance funding is also a concern, since many of our facilities are reaching their design life expectancy. This issue has been further exacerbated by recent budgetary constraints."

All set aside approvals of Federal funding, made by Caltrans Commission fiduciary agents for Hwy 199/197 STAA project, has been done so under misinformation about STAA induced truck volumes. The cumulative impact of the combined various projects that results in establishing an entirely new STAA long haul bypass around I-5, should be considered an expansionary new highway project with significant maintenance and repair cost impacts.

9

Friends of Del Norte (submitted by Eileen Cooper)

The Profound Significance of Inducing I-5 STAA truck traffic to a frost free coastal route in winter. 23

FODN is now more concerned than ever about the severe effects that are likely to happen, and that have not been investigated by the DEIR/EA for STAA cumulative impacts for Hwys 199/197 and Hwy 101 Richardson Grove.

The DEIR/EA has failed to survey likely STAA through truckers on I-5 to and from Grants Pass and San Francisco. The DEIR/EA has failed to survey through truck drivers that originate from Washington or Portland on North I-5 and are headed for I-80 or I-10 or I-40 across the U.S.A. or visa-versa. The DEIR/EA has failed to quantify these diversions both immediate and long term. Caltrans has completely overlooked the profound changes that may occur in national shipping. 24

The DEIR/EA fails to consider the economic burden for maintaining the roadway under induced traffic from an STAA bypass loop around Siskiyou Summit and the snowy Shasta region on I-5, as discussed above. The DEIR/EA fails to incorporate design features that accommodate such increases of induced heavy traffic. 25

Safety hazards would likely significantly increase from such great increased truck traffic during the most hazardous rainy winter conditions, along an already very challenging and dangerous route such as Hwy 199/197, even with proposed safety improvements, a narrow, rural winding canyon road that follows a Wild and Scenic River. 26

The DEIR/EA fails to evaluate and quantify *average accident risk increases or marginal risk elasticity*, and the *risk externality* for each route (199,197, and 101) as a result of induced STAA I-5 diversion estimates predicted from surveys of these through trucks along I-5, during the most hazardous winter driving conditions. 27

These diversions will not be distributed evenly throughout time, but will spike or peak during winter time I-5 Siskiyou Summit road closures, as well as other chaining events on I-5. This drastic spike in distribution of induced I-5 STAA truck traffic is likely to cause endless streams of trucks on already dangerous routes. The DEIR/EA has completely failed to identify peak diversion accident risk increases and the peak risk externality for I-5 diverted traffic based on relevant data, or surveys.

Hwy 101 south of Crescent City already has Fatality-plus-injury and Total Collision rates at 8 and 11 times the statewide average for a similar facility (ref: Caltrans, **Attachment** 19) 28

The three year accident rate for this segment of U.S. Hwy 199 exceeds the statewide average for similar facilities by over four times. (**Reference-** 2007 Del Norte Local Transportation Commission document, "Achieving STAA Route Status for Hwys 199/197, A Goods Movement Action Plan." 29

Hwy 197 is currently a rural residential road with 72 driveways directly entering onto the road. There will likely be a significant increased safety hazard to the residents along this road due to increased wintertime I-5 truck traffic diversions. The DEIR/EA fails to consider or evaluate safety issues in regard to egress to and from Hwy 199/197, as a result of significant increases of induced traffic from I-5 diversions. 30

Safety is inadequately addressed on Hwy199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate. 31

Resubmit: Attachment 8 , Summary of California Hwy Patrol (CHP) records, comments submitted by Dori and David Bruce to the DEIR/EA 199/197 STAA Access and scoping. Speed was listed within CHP records as the most common cause of accidents. The 7 spot locations were chosen based on off tracking truck studies that are based on geometry. The road tests took videos of trucks accompanied by CHP and traveling at 32

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Friends of Del Norte (submitted by Eileen Cooper)

unrealistically slow speeds. The DEIR/EA fails to consider and incorporate speed as a factor during their selection of locations for necessary project improvements and features. The DEIR/EA fails to consider accident history as a factor during their selection of locations for necessary improvements. 32 cont

As stated in FODN original comments, the DEIR/EA project will require mandatory design exceptions, due to geological constraints. Such design exceptions will likely become problematic with great increases in heavy truck traffic. The DEIR/EA has failed to consider the adequacy of these design exceptions with great increases of heavy truck traffic. 33

The DEIR/EA identifies the Hwy 199 corridor to be geologically unstable, and prone to rock slides. How will this corridor respond to such heavy volumes of increased truck traffic? The DEIR/EA fails to evaluate structural designs with regard to increased I-5 diversion loads. 34

Greater volumes of heavy truck traffic will increase the need for more traffic lights or traffic calming measures to address egress and pedestrian safety issues in communities along the entire highway from Grants Pass to California. Caltrans' DEIR/EA process has failed to engage Oregon in the conversation, although large truck diversions from I-5 would affect such communities. 35

Such I-5 diverted truck traffic increases would likely result in a significant increase in the risk of truck spills along Hwy 199/197, threatening the water quality of the Wild and Scenic Smith River, a refugia for California's last salmon, and only drinking water source for Crescent City. The City has very limited reserve water capacity. 36

New Information: Oct. 29 2012, Phone conversation with Eric Weir, assistant head Crescent City Engineer (permission to quote):

> *"Crescent City water tank holds 5.5 million gallons of water, plus Bertsch tank holds another 0.75 million gallons. Under normal use, 2 million gallons are used on average per day, which is a three day supply. In an emergency with restrictive use, the supply may last 5 days."*

The DEIR/EA fails to assess the increased risk of cargo spills based on real surveys of likely I-5 traffic diversions and peak diversion risk assessments that evaluate historical information about truck spills. The DEIR/EA fails to assess the endangerment and impact that an increased risk in cargo spills will have on Federally Endangered salmonids (Coho) and California species of Concern (steelhead), the water quality impacts to a Wild and Scenic River, California's Gem.

Attachment 20 ,Ted Souza comments to the DEIR/EA tracks the history of spills on Hwy 199/197, resubmitted. There have been 8 to 10 truck spills over the last 50 years (an additional one in 1983 that was glue -Don Gillespie, Triplicate Coastal Voices **Attachment-** 17). There appears to be two others mentioned in the Triplicate articles searched for truck spills: 37

http://www.triplicate.com/News/Local-News/Diesel-spills-on-Hwy-101-after-wreck

http://www.triplicate.com/News/Local-News/Petroleum-spilled-on-Hwy-101-in-Klamath

http://www.triplicate.com/News/Local-News/Spill-closes-highway

http://www.currypilot.com/News/Local-News/TRAILER-SPILL-SHUTS-DOWN-HIGHWAY-197

https://groups.google.com/forum/?fromgroups#!topic/parklandsupdate/xFsc5e2ec4s

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Friends of Del Norte (submitted by Eileen Cooper)

http://www.times-standard.com/ci_8332873

http://www.triplicate.com/News/Local-News/Diesel-from-Hwy-199-tanker-spill-in-river

http://www.triplicate.com/News/Local-News/Firewood-blocks-Highway-199

http://www.triplicate.com/Opinion/Letters/Letters-to-the-Editor-July-13-2010

http://www.triplicate.com/News/Local-News/Charges-filed-in-diesel-spill

http://www.triplicate.com/News/Local-News/State-OKs-money-for-Hwy-199

http://www.triplicate.com/Opinion/Editorials/Letters-No-toxic-substance-should-ever-be-trucked-on-Hwy-199

http://www.triplicate.com/News/Local-News/Truck-overturns-spills-diesel-on-Hwy-199

37 cont.

Increased volumes of diverted I-5 STAA truck traffic and the increased risks of truck spills would occur during the winter, the most dangerous time to drive our wet and windy roads. Is it acceptable to allow streams of STAA trucks onto such a narrow, windy dangerous route as Hwy 199 during the wet winter months every time Siskiyou Summit closes or requires chains? Is it an acceptable risk to endanger our drinking water so? Our fishery resources?

Imagine the devastation to our salmon fisheries, and our drinking water supply that can result from increased truck spills. We should not significantly endanger these irreplaceable resources.

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The DEIR/EA fails to provide pavement designs that take into consideration the extra loads from significant increases of volumes of trucks. Design changes for increased capacity will likely result in extra thickness, compaction, etc. Such changes in design can significantly affect the root systems of old growth Redwoods and other trees directly along the highways. And the DEIR/EA fails to consider the biological and vegetation impacts due to accelerated road failures, maintenance and repair projects from road deterioration.

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There would be a significant impairment of providing safe and enjoyable travel through a National Recreation Area, as well as Redwood National Park, and endangerment of tourists who travel to the Smith River during the winter for our fishing season and holiday season. Managers of the following trustee agencies have been so misled as to believe that there will be no significant increase of induced traffic and impact from induced traffic: Redwood National Park; the Six Rivers National Forest Service; managers of the Smith River National Recreation Area; as well as trustee agencies for protection of endangered species and California Species of Concern (US Fish and Wildlife, and California Dept. of Fish and Game).

40

The DEIR/EA fails to inform managers of these public trust lands about the inducement of traffic from I-5 in winter, through an I-5 STAA bypass loop, and does not provide these managers with factual data about I-5 average and peak diversions that will significantly impair safe and enjoyable travel, and significantly put at risk endangered species and the water quality of a Wild and Scenic River. Any concurrences they have made or are contemplating is based on misinformation. A new DEIR/EIS should be recirculated to all.

Thank you, Eileen Cooper

Eileen Cooper, Vice President FODN, on behalf of the Board

Attachments 21 & 22, 1989 Route Concept Reports Hwys 199/197
Attachment 23, **Friends of Del Norte Brochure**

12

Friends of Del Norte (submitted by Eileen Cooper) Attachment 1

Att: 1

3-12-2012

James R Barrett
1281 Anzio Street
Crescent City, California 95531

Kim Hayler, Caltrans Environmental Coordinator, Kimberly.Hayler@dot.ca.gov
Kevin Church, Kevin.Church@dot.ca.gov
P.O. Box 3700
Eureka, California 95502

Dear Kim,

This regards the Cal trans Hwy 199 / 197 / 101 STAA Truck Access DEIR

I am an experienced long haul (Truck Load) truck driver with a current Class A TX license. I have delivered freight using Hwy 199 and Hwy 101 for many years by sliding the trailer axles to within 40 foot of the rear axle / kingpin setting required and driving a short wheel base cab-over tractor. This has allowed me to see the roads in question at all times of the year.

I want to point out that the planned changes to the truck access rules will result in a huge increase in truck traffic and probable road damage for a very simple reason, namely greatly reduced chain requirements.

Truck drivers hate to chain their trucks needlessly. Using Interstate Route I-5 very frequently requires truck drivers to chain their trucks and trailers because of snow. This can happen as many as seven different times on a trip from the middle of Oregon to the middle of California. This chaining is easily dodged if one is allowed as I have been to use US Highway 101 instead of I-5. One could easily imagine many times more trucks per hour on the proposed route in heavy snow if the planned changes are implemented. This does not take in to account what would happen to the traffic numbers if I-5 closed for snow or accident as it often does. A study could quickly and easily be done on the impact of the proposal by counting the number of trucks that pass any given I-5 mile marker verses the number of trucks that currently pass any given mile marker on US 101. I believe the variance would be shocking.

This change in road usage is important because Cal-Trans finds it difficult to maintain these roads now. With a huge increase of trucks with winter weather, I think maintaining the roads would be impossible.

I would also like to point out that the so called "Manditory Safety Exemptions" in the proposed STAA Truck Access DEIR, would allow trucks to partially enter the on-coming traffic lanes and track off the road in spots. This is not a good idea as seen by current guard rail damage and the Hwy 199 accident history.

James R Barrett

Friends of Del Norte (submitted by Eileen Cooper) Attachment 2

Att 2

4-17-2012
James R Barrett
1281 Anzio Street
Crescent City, California 95531

ATT: Kim Hayler, Caltrans Environmental Coordinator, Kimberly.Hayler@dot.ca.gov
Kevin Church, Kevin.Church@dot.ca.gov
P.O. Box 3700, Eureka, California 95502

This is a follow up comment on the idea of changing the status of Hwy 199, Hwy 197, and Hwy 101 to allow them to be part of the STAA Truck Route in California for large full length trucks.

I have driven trucks and these roads for a long time, starting back in 1976 if one counts my military time. I have previously written a letter pointing out that the difficulty of chaining one's truck on I-5 will cause a radical increase in truck traffic on the proposed route. I have been told that Cal- Trans officials do not believe truck drivers will use the chain free route of highway 199-197-101. This is difficult for me to believe because most everybody knows "energy flows to the area of least resistance".

What may not be known is how hard it is to chain a truck and trailer. Each chain weighs about 30 pounds. They must be pulled out of the truck, straightened, placed on the truck, removed, and replaced to wherever they were stored in or on the truck. This must be done for eight wheels in most cases. I think it is also worth pointing out, that there is a great deal of inertia to be overcome to get one to leave a warm truck cab and lay down in the snow to chain a truck and trailer. Needless to say chaining a truck is a lot of work.

When freight is shipped from the middle of Oregon to the San Francisco Bay Area, any part of Southern California, or from south to north, in winter driving conditions, a truck driver must ask themselves "do I want to chain my truck and trailer or just sit and wait until the chain requirements are lifted?" This is the actual decision that must be made now. The proposed change in status of Hwy 199, Hwy 197, and Hwy 101 will add a third choice, namely "or will I drive and extra 44 miles along the California Coast to avoid chaining?"

I think it is a safe bet that every driver asked would answer "yes" to the question "would you drive 44 miles out of your way to skip chaining your truck and trailer in the snow?", especially when one factors in the lost time involved in chaining and driving the 30 mile per hour speed limit which applies to all chained vehicles.

In short, I have lots of experience chaining trucks and trailers in the snow on California roads and I can assure anyone that no one with any sense will chain a truck and trailer needlessly. Therefore, the option of using the coast roads instead of I-5 will become very popular with truck drivers in the winter.

James R Barrett.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 3

Frequently Asked Questions

Who decides when to close I-5?
The California Highway Patrol (CHP) with concurrence from the California Department of Transportation (Caltrans) makes the decision. Closures on the Grapevine as well as over mountain roads are designed to avoid a worst-case scenario and are based on road conditions as opposed to the operational level of individual drivers.

Why are chains not allowed on the Grapevine, as is the case on I-80 over Donner Pass?
Since the snow and icy conditions are often limited to the summit, a location for the removal of chains would have to be made available, and this is not feasible due to the traffic volumes. Trucks at intake driving all the more dangerous when it does snow because drivers who don't travel through the Grapevine regularly would not be carrying chains, or expect snow, or have much experience driving in it.

Other differences between the two passes are the grades and traffic volumes. The Grapevine is 6% grade for 5 miles, while Donner Pass is 3.6% grade for 30 miles. The graph illustrates the steepness of the Grapevine, over a shorter stretch of roadway as compared to Donner Pass, or add two to greater than double traffic volumes.

Where can I find updated information?
Caltrans, the CHP, the National Weather Service, along with commercial broadcasting services (TV and Radio) provide various methods to receive the status of weather closures.

Highway Advisory Radios (HAR) / Changeable Message Signs (CMS)
Caltrans broadcasts road conditions information to the frequency radio transmitters, Watch for flashing road signs and tune to the frequency listed. In addition, closure information is displayed on CMS along I-5 and other impacted routes.

California Highway Information Network (CHIN) - Road Conditions via Phone or Internet
Caltrans provides voice-activated up-to-date information on any California Highway by calling 1-800-427-ROAD (7623).
This information is also available on the Internet at:
http://www.dot.ca.gov/hq/tpp/chin.html
National Weather Service - Internet
http://www.nwscc.com

How long after it stops snowing, will the roadway be reopened?
Your safety is our top priority. Caltrans Maintenance Supervisors, along with the CHP, monitor the weather and highway conditions. If inclement weather is forecasted, a snow removal crew is activated to monitor and observe the actual conditions. If there is a high probability that a vehicle will pass through the Grapevine area, a blade crew will be mobilized. After the storm, the crew conducts "clean-up" operations in order to reopen the roadway and make it safe for motorists, including plowing, sanding, and deicing.

There are a number of factors that preclude the start of these operations, such as the air/ice temperature. It does not have to be particularly cold for the roads to freeze, road surface temperatures can be as much as 4 to 10 degrees colder than the air temperature. Other factors include the overnight temperatures, which dictate how quickly the snow and ice will stick, along with the available personnel and the severity of the storm.

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Caltrans
CALIFORNIA DEPARTMENT OF TRANSPORTATION

Operation Snowflake
I-5 Grapevine/Tejon Pass Closure

Winter Driving Guide

MOVE OVER

It's The Law!

On January 1st, 2010 a new law, California Vehicle Code (CVC) 21809(a), took effect. It states, in part, *that the driver of a motor vehicle while on a freeway approaching an Emergency Response Vehicle (CHP, Caltrans, tow truck, etc.) displaying emergency or flashing lights, shall approach with due caution and, before passing in a lane immediately adjacent to the Emergency Vehicle, make a lane change into an available lane not immediately adjacent to the Emergency Vehicle with due regard for safety and traffic conditions, if practicable and not prohibited by law. If the maneuver described above would be unsafe or impracticable, slow to a reasonable and prudent speed that is safe for existing weather, road and vehicular or pedestrian traffic conditions.*

http://www.dot.ca.gov/moveover/

Friends of Del Norte (submitted by Eileen Cooper) Attachment 3

Friends of Del Norte (submitted by Eileen Cooper) Attachment 4

(22992 unread) - upsprout - Yahoo! Mail

Page 1 of 2

Att : 4

From: Robert Cervero <robertc@berkeley.edu>
To: eileen cooper <upsprout@yahoo.com>
Sent: Monday, April 9, 2012 1:05 PM
Subject: Re: att profesor, could you help avert a disasterous misapplication of your research, from the Friends of Del Norte, an environmental organization

Hello Eileen:

It's always good to get contacted by concerned citizens about local transportation issues. Clearly this highway proposal has you and others gravely concerned about the consequences. I really, truly wish I could help you however I am simply too swamped with workload and pressing deadlines to take on any more work or assignments -- something I've had to tell a number of people over the last month. I take it from your email that the study borrows some of my research on induced growth effects of highways. That work was for road expansion projects in suburban parts of California thus how germane the results might be for a rural part of the state can be questioned. You might consider contact a consulting firm, such as Fehr & Peers, who does a lot of traffic impact evaluation.: http://www.fehrandpeers.com/ Jerry Walters is a principal for the firm and knows all the key issues in the state. They might be a bit pricey for your budget however Jerry might know a local traffic engineer or planner who could help your group out. Best wishes with this project. Robert Cervero

On Fri, Apr 6, 2012 at 10:57 PM, eileen cooper <upsprout@yahoo.com> wrote:

Friends of Del Norte, *Committed to our environment since 1973 A nonprofit, membership based conservation group*, advocating sound environmental policies for our region. PO Box 229, Gasquet, CA 95543 707-954-BIRD
ATT: Professor, Robert Cervero, University of Berkeley

The Friends of Del Norte is deeply concerned about the resulting cumulative environmental impacts of two currently proposed California Hwy improvement projects, which will in combination result in a new through traffic corridor for STAA trucks that bypasses I-5.

Perhaps you have been following the recent drama concerning improvements to Hwy 101 to allow STAA traffic through Richardson Grove State Redwood Park. Caltrans District 1 also intends to make STAA improvements along Hwy 199/197 along the federally designated Wild and Scenic Smith River in Del Norte County and within a National Recreation Area.

Combined, these two projects will create a complete new STAA truck route that bypasses Hwy I-5 from Grants Pass Oregon all the way to San Francisco California.

What is most disconcerting is that the inducement of truck traffic by creating such a STAA bypass loop has not been reasonably explored in the DEIRs. The Hwy 199/197 DEIR refers to your research, stating that the long term induced effects of creating new access generally results in a long term induced growth effect at 3.9 times the short term induced growth.

The traffic study for Hwy 199/197 DEIR relies on surveys of local users from the immediate area surrounding Crescent City who might immediately benefit and use STAA trucks. Amazingly this survey finds very little local need or change of use to STAA trucks. This is largely because most local users are already maxed out in weight with current smaller trucks, and would not benefit from utilizing larger trucks.

The traffic study then procedes to take this small number of local increased STAA use, multiply it by the slow growth rate of Crescent City and then multiply it by your research figure of 3.9 times for long term induced growth. The traffic study then concludes that long term induced growth will be a less than a significant impact from the project as compared to without the project.

What is wrong with this picture? The survey of users did not include those who would benefit from the combination of improvements to both Hwy 199 and Richardson Grove that

http://us.mg6.mail.yahoo.com/neo/launch?.rand=8tmqvbhlltrkt

9/25/2012

Friends of Del Norte (submitted by Eileen Cooper) Attachment 4

will not only impact the local area, but includes through STAA traffic along I-5 from north of Grants Pass all the way to San Francisco. What is unique about this situation is that the new STAA bypass Coastal Route has a mild climate, that does not experience freezes or snow, and does not require special tires or chains in the winter. While the current STAA route along I-5 frequently has long closures and requires truckers to chain up in the winter. Although the proposed new bypass is slightly longer, the convenience may induce large volumes of trucks from the I-5 truck corridor during winter.

Our organization received the attached letter from an experienced truck driver, that alerted us to these unusual circumstances.

Can you help us expose the disasterously inappropriate application of your research, in consideration of this case.

The the entire new STAA loop route along Hwy 101 spans crumbling ocean cliffs that can barely be maintained today because of geologic instability. These unstable cliffs continually slump and have "deep seated instability that cannot be fully corrected." The STAA loop will also continue through to Grants Pass along Hwy 199 and the Wild and Scenic Smith River canyon. This stretch is like a windy roller coaster ride, that cannot be widened adequately because of geologic instability of the canyon walls and narrowness of the canyon itself. The route will be barely legal. The STAA 199 HWY will require mandatory safety exemptions because of geologic instability.

Might you review (or for very small compensation) recommend some expert traffic consultant who might help expose the faults of the Traffic Analysis for the STAA Hwy 199/197 proposed project. Just the Traffic Analysis is not lengthy or complicated. We from the rugged northwest California would be profoundly greatful for any help you can extend.

Thank you, Eileen Cooper, boardmember of the Friends of Del Norte. 707-954-2473.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

Att 5

MARA FEENEY & ASSOCIATES
Community Relations and Socioeconomic Analysis
19 Beaver Street, San Francisco CA 94114

September 26, 2012

To Whom It May Concern:

The Friends of Del Norte (FODN) contacted me earlier this year and asked me to provide an objective review of the environmental impact analysis that Caltrans District 1 prepared for the proposed 197/199 Safe STAA Access Project (June 2010), as well as the comments that FODN has submitted on this project to date, and to offer my professional opinion on both.

I am a planning consultant with approximately 35 years of experience in community involvement and environmental review for complex and often controversial projects throughout the United States and Canada. My experience includes participating in multidisciplinary environmental analyses for numerous infrastructure development and improvement projects in California, including work for Caltrans on proposed roadway improvement projects throughout the State, including District 1 (see resume attached).

Although a Final EIR/EA for the 197/199 Safe STAA Access Project was scheduled to be released this summer, instead the Draft EIR/EA is now being re-circulated for public review and comment, with additional information provided on potential impacts to trees. For a project as important as this one, in a setting with such extraordinary environmental resources, Caltrans should have used the opportunity of re-circulating the draft document to provide additional information and address other key issues that have been raised by FODN--including the faulty assumptions underpinning the truck traffic analysis, the weakness of the economic impact analysis, and the lack of a cumulative traffic impact analysis.

Estimates of short-term increased truck traffic on US199 in the Draft EIR/EA are based on a very limited survey of local businesses (based on a small number of brief survey questions), in which 80 percent of the respondents stated they did not need and would not use STAA trucks on US199 if the project were implemented. Only three local businesses stated that they would use STAA trucks on US199 to lower shipping costs, but one of these has subsequently closed and another ships products only two months each year. Based on these local business surveys, the analysts concluded that Crescent City would enjoy substantial economic benefits from the project yet there would be a negligible short-term increase in truck traffic on US199 associated with local business demand.

The traffic analysis also uses data from a study done by a reputable transportation analyst at UC Berkeley, Dr. Robert Cervero, whose research indicated that long term induced effects of creating new access generally occur at a rate of 3.9 times the short term induced growth rate. However, in direct correspondence with FODN, Dr. Cervero indicated that the referenced research hadbeen done "for road expansion projects in suburban parts of California thus how germane the results might be for a rural part of the state can be questioned."[1]

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1 E-mail message from Robert Cervero, University of California Transportation Center, to Eileen Cooper, FODN, April 9, 2012

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

Furthermore, the analysis does not include any consideration of additional through truck traffic that might be encouraged by the creation of a new STAA truck traffic loop connecting I-5 via SR 197/US 199 to US 101 south through Richardson Grove. Caltrans evaluated proposed changes to US101 at Richardson Grove, a state park with significant old growth redwood resources south of Eureka, in a separate environmental document.2 These two proposed projects combined, however, would make it possible for STAA trucks to travel from I-5 at Grants Pass to San Francisco using a scenic coastal route—and, more importantly, one that would allow them to avoid chaining requirements in the Siskiyou range during winter storms. The Draft EIR/EA prepared for the 197/199 Safe STAA Access Project, based on limited survey information and a questionable multiplier, concludes that there would be no significant increase in heavy truck traffic and therefore no significant increase in associated safety risks to local residents, visitors, or the environment.

The project purports to improve safety—but the STAA truck off tracking modeling appears to have assumed unrealistic speeds. In addition, the project proposes no roadway improvements at all for those segments of US199 that now have the highest accident rates.

STAA access on SR 197/US 199 is also purported to be good for the local economy, but the Draft EIR/EA identifies no fiscal benefit to local government entities, nor does it document that the project in any way would result in lower consumer costs for products sold in Del Norte County. Clearly, the lack of STAA network status on SR 199 has not deterred businesses from locating to Crescent City to date. Despite its relatively small population size and remote location, Crescent City has succeeded in attracting such big box retailers as Home Depot and WalMart, as well as a major state prison with continuous resupply needs.

A handful of surveyed business owners in Del Norte County speculated that as many as 30 new local jobs *might* be created if the proposed roadway improvements are made. At a project cost of $22-34 million (depending on which alternative is selected), this would be an expenditure of on the order of $1 million per new job in a few businesses, but the economic analysis does not consider potential jobs that would be lost due to switching from local trucking firms that own predominately CA legal trucks to outside firms offering STAA trucks for deliveries, nor does it calculate potential job losses in the tourism sector (which employs more people than any other private sector in the County) resulting from the deterioration of prime scenic and recreational values and perceptions of increased safety and environmental risks.

Caltrans is proposing a large investment of public funds for little clear economic benefit, and for a project that would have substantial impacts on quality of life by: taking private property; decreasing existing buffers between highway right-of-ways and adjacent homes and businesses, increasing the risk of fatal traffic accidents3 due to increased heavy truck traffic; increasing the risk of toxic spills into the Smith River corridor (threatening community water supply sources, world class sport fishing, and critical habitat for several endangered species), and degrading scenic values4. The project would increase heavy truck traffic on a road that local residents and businesses depend upon for daily access, but that is also on a significant scenic byway that attracts many visitors annually for bird watching, sightseeing, camping, river rafting, boating and sport fishing—activities that would be disrupted by additional heavy truck traffic. These visitors are the backbone of the tourism industry that employs more people in Del Norte County than any other private sector of the economy, as noted in the Draft EIR/EA.

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2 In response to lawsuits filed by local environmental organizations, a federal judge ordered Caltrans to redo the environmental analysis for this project on April 4, 2012.

3 According to DOT statistics, while large trucks represent only 3 percent of all registered vehicles, they are responsible for 12-13% of all crash fatalities.

4 According to the draft EIR, "A vast area of cut slope with a rock fall mitigation system would greatly degrade the existing visual quality of the roadway corridor" (DEIR p. 2.1-86)

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

The land use analysis fails to identify project conflicts with adopted plans and policies pertaining to the protection of scenic, recreational and biological resources in the Smith River corridor, such as the Smith River National Recreation Area Management Plan, which states that "the management emphasis for the middle Fork-Hwy199 management area shall be on maintaining wildlife values and providing for a full range of recreation uses, with particular emphasis on the scenic and recreation values associated with the Smith River, old growth redwoods, and CA state highway 199." Designation of US 199 as part of the STAA truck network would not be consistent with this management priority.

Caltrans' own Route Concept Report, prepared in 1989 (well after the passing of the Surface Transportation Act of 1982, allowing 53' truck trailers), acknowledges "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make SR 199 "a poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." The report recommended developing additional passing lanes as necessary only to maintain acceptable Level of Service, and concluded that: "This Route Concept should serve as a guide for long range planning of improvements to Route 199. It will protect the State's investment in the Route, while recognizing environmental and financial constraints which will not allow the programming of extensive improvements for this highway."

It seems that local lobbying and calls for better STAA truck access to Crescent City have caused Caltrans to abandon this previous (and apparently rational) position. The proposed project will result in an increase in heavy truck use on a roadway whose main value is in providing access to environmental and recreation resources along the scenic Smith River Canyon, as well as access to the redwood forests that comprise one of California's two UNESCO World Heritage sites (the other being Yosemite). Enjoyment of these scenic drives and the natural resources that surround them would be marred by driver concerns about long, heavy trucks careening around curves in areas that would still have considerable variability in lane widths, shoulder widths, and sight distances. There is already a documented history of truck accidents on US199, including fatalities and diesel spills threatening the Smith River. The existing roadway is so narrow and twisting that the improvements Caltrans has proposed at seven locations along the roadway to allow STAA truck access cannot all meet Caltrans engineering design guidelines and will require mandatory design exceptions.

US199 is a vanishingly rare resource: a winding country road that meanders through an area with extraordinary recreational and scenic values. This road—one of only ten routes included in the Forest Service Scenic Byway Network--traverses rolling terrain in the most heavily visited part of the Smith River National Recreation Area, which lies within a National Forest. For much of its length, US 199 follows the course of the Smith River, the only major river system in California that remains undammed, with the longest stretch (over 300 miles) of designated as Wild and Scenic Rivers of any river in the United States. Together with several other roadways, Route 199 is part of the "Mystic Corridor" connecting Crater Lake National Park in Oregon to the redwoods and the California coast near Crescent City.

In my view (both personal and professional), there is still a place for winding country roads along scenic rivers with exceptional scenic, recreational, and ecological values. We should be trying to preserve them, rather than "improving" them to become part of the STAA truck network. Such resources will become more highly valued and sought after over time, as they become more scarce. The irony is that the creation of a STAA truck route (with uncertain truck traffic and safety impacts) may kill the very goose that remains capable of laying golden eggs in Del Norte County in the future—namely, tourism in this area that is known for its pristine river, extraordinary parks, and scenic resources.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

Furthermore, the proposed improvements, which *at great cost* would provide the bare minimum of changes needed to meet current STAA route qualification requirements are not likely to be a sensible long term investment. In the 1960s, the industry standard in trucking was a 40' trailer; in the 1970s it was 48', in the late 1980s, 53' trailers were authorized. The American Trucking Association recently has been seeking Congressional approval for even longer, heavier trucks, despite evidence that heavy trucks are the major source of highway and bridge damage, and that heavy trucks do not pay their fair share of the cost of roadway deterioration and bridge replacement. The continuation of these trends into the future is reasonably foreseeable.

I have no stake whatsoever in this project. Nonetheless, on behalf of FODN, I urge local elected officials and the State of California to reconsider prioritizing funding for this project, which has been declared to be good for public safety and the Del Norte County economy based on wishful thinking and inadequate information pertaining to environmental impacts.

Sincerely,

MARA FERNEY & ASSOCIATES

Mara Ferney

Principal

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

A#6

MARA FEENEY & ASSOCIATES
Community Relations and Socioeconomic Analysis
19 Beaver Street, San Francisco CA 94114

RESUME OF MARA FEENEY

EDUCATION
University of British Columbia: M.A. in Community and Regional Planning, 1977
Bryn Mawr College: A.B. with Honors in Anthropology, 1973

PROFESSIONAL HISTORY
Principal, Mara Feeney & Associates, 1983-present
Woodward-Clyde Consultants, Senior Staff Scientist, 1980-1983
Sonoma State University, Instructor in Environmental Impact Reporting, 1982
Strong, Hall and Associates, Senior Socioeconomist, 1978-1980

REPRESENTATIVE EXPERIENCE
Mara Feeney is a Planner with over thirty years of professional experience in environmental consulting, specializing in community impact analysis, socioeconomic impact assessment, housing market analysis, land use studies, recreation impact analysis, farmland impact analysis, public involvement and relocation studies. Her assignments have included evaluation of potential impacts to land use, regional employment and income, population and demographic characteristics, public finance, housing, community infrastructure, public services and quality of life. Ms. Feeney is thoroughly familiar with the requirements of NEPA and CEQA (as well as both FHWA and Caltrans) for growth inducement, land use and socioeconomic analysis, and Environmental Justice evaluations. In 1982, she was an Instructor in Environmental Impact Reporting at Sonoma State University. In addition, Ms. Feeney has extensive recent experience completing community impact analyses, relocation reports and section 4(f)/303(c) analyses for transportation improvement projects throughout California. Relevant project experience is summarized below.

> For Placer County Transportation Planning Authority, Caltrans and FHWA, she completed the socioeconomic impact analysis, environmental justice analysis, Section 4(f) analysis, and growth inducement analysis for the proposed Placer Parkway, a new 15-mile transportation facility that would connect the Roseville-Rocklin-Lincoln area with the Sacramento Airport vicinity. She also peer reviewed the land use and farmland impact analyses and produced the CIA report.

> For Caltrans and the Fresno County Transportation Authority, she completed socioeconomic and land use impact analyses for construction of State Route 168 through urban neighborhoods in Fresno, California. In addition, she was responsible for preparing relocation reports for the proposed project, which potentially would displace over 900 households.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

For URS Corporation and the California High Speed Train Authority, she evaluated potential community impacts associated with proposed alternatives for the new High Speed Train alignments for the Fresno to Bakersfield and Bakersfield to Palmdale segments.

For Caltrans District 1, she completed the community impact analysis for Proposed improvements to the US 101 corridor from Eureka to Arcata. This work Included a survey of potentially affected local businesses, as well as identification of Environmental Justice impacts to residents of an adjacent mobile home park.

For Caltrans and the Fresno County Transportation Authority, she was responsible for socioeconomic impact analysis, farmland impact rating and relocation studies for proposed improvements to State Route 180 east of the City of Fresno.

For Caltrans District 6, she completed a major growth study for southeastern Madera County. This project included developing population, housing and employment projections for southeastern Madera County for the year 2020 for scenarios with and without a future UC campus. Inputs were used to model future traffic to determine needed improvements to the Route 41 bridge connecting Fresno and Madera Counties.

For Caltrans District 1, she evaluated the land use and socioeconomic impacts, as well as Section 4(f) recreation resource impacts, associated with proposed improvements to Route 101 on Last Chance Grade south of Crescent City, involving changes to the historic Redwood Highway alignment through the Del Norte Coast Redwoods State Park, part of a UNESCO World Heritage Site.

For Caltrans and The Duffey Company, Ms. Feeney completed the land use and socioeconomic analysis for proposed widening of State Highway 156 through the community of San Juan Bautista in San Benito County.

For the Bay Area Rapid Transit District, she analyzed the potential land use and socioeconomic impacts associated with the proposed Dublin/Pleasanton heavy rail extension.

For San Francisco's Municipal Railway (MUNI), she assisted in the preparation of the EIS/EIR for the Third Street Light Rail line to connect Visitacion Valley and the Bayview/Hunters Point neighborhoods to the new UCSF campus and the downtown.

For the Port of Oakland, she has completed socioeconomic, land use and growth inducement analyses for the proposed 42-foot deep dredging project aimed at keeping the Port of Oakland competitive in international container shipping.

For American High Speed Rail and Woodward-Clyde Consultants, she prepared a work plan for analysis of socioeconomic and land use impacts associated with the proposed Los Angeles to San Diego "bullet train."

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

For San Francisco Airport, she completed analysis of the impacts of new runways in San Francisco Bay on recreation resources along the peninsula from San Francisco to Palo Alto. She also worked on the land use, farmland and socioeconomic analyses for this controversial project.

For Caltrans, she completed the socioeconomic and land use impact analyses, as well as the conceptual relocation plan, for site selection of the proposed CalTrain Peninsula Commute Service Rail Maintenance facility. Four potential sites were evaluated--in Brisbane, Santa Clara, San Jose and Gilroy.

For the Water Emergency Transportation Agency, she completed the analysis of community impacts associated with proposed improvements to the Downtown San Francisco Ferry Terminal to accommodate future new ferry services. This included identifying impacts to population, employment, housing, regional growth and environmental justice considerations.

For Reliant Energy Company, she analyzed land use plans and policies consistency, and prepared the land use compatibility and farmland impact sections for the Application for Certification for a proposed 500 MW power plant in a rural agricultural area of Colusa County, California. She also peer reviewed the socio-economic and environmental justice analyses for this proposed project.

For the San Francisco Public Utilities Commission, she evaluated impacts to agricultural and recreational resources associated with the Water System Improvement Project to replace aging water transport facilities carrying drinking water from the Hetch Hetchy Valley in Yosemite to the Bay Area.

For Mirant Corporation, she provided peer review services for the socioeconomic and Environmental Justice analyses for the proposed Potrero Power Plant in San Francisco and served as an expert witness at CEC evidentiary hearings for this controversial urban energy project.

For the Emeryville Redevelopment Agency, Ms. Feeney provided public participation consulting services for a U.S. Environmental Protection Agency Brownfields Pilot project grant aimed at developing a regional approach to groundwater monitoring that would facilitate the City's reuse of abandoned and underutilized industrial properties.

For the SFPUC Water Department, she managed public outreach activities for the environmental review process for the Chloramine Conversion project. This required publication of notices and conducting of public meetings in both rural and urban locations potentially affected by the project.

For Pacific Refining Company, she analyzed the potential local economic benefits (tax revenues, local purchasing, employment and income) associated with planned modifications to a petroleum refinery in Hercules, California.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

For Southern Pacific Transportation Company, she developed and implemented a Community Relations Plan required by a DHS Consent Order for the remedial investigation of an abandoned rail yard in Brisbane. She conducted interviews and held community meetings in the Visitacion Valley and Little Hollywood neighborhoods of San Francisco, the closest residences to the site.

For the Bureau of Land Management and Frontier Pipeline Company, she was Task Leader for the assessment of socioeconomic impacts for a crude oil pipeline proposed for construction through five counties in Wyoming.

For the U.S. Navy, she completed housing market analyses for facilities and personnel stationed in the San Francisco Bay Area (at Hunters Point and at Naval Air Station Moffett Field), as well as at the Navy's Postgraduate School in Monterey and at a Naval Air Station located in Fallon, Nevada.

For the Bureau of Land Management, Montana State Office, she designed a sample survey of homes and businesses on the Northern Cheyenne and Crow Indian Reservations. She conducted primary research to obtain information about the Reservation economies which was used in BLM's input-output model for Federal coal leasing in southeastern Montana.

For the U.S. Navy and the City of San Francisco, Ms. Feeney was responsible for analyzing the social and economic impacts associated with the proposed reuse alternatives being considered for both the Hunters Point Shipyard and Treasure Island.

For the Bureau of Land Management and La Sal Pipeline Company, she was Task Leader for the assessment of socioeconomic impacts for a shale oil pipeline proposed for construction through six counties in Colorado and Wyoming. This project included extensive interviewing with local elected officials and planners in affected counties and communities.

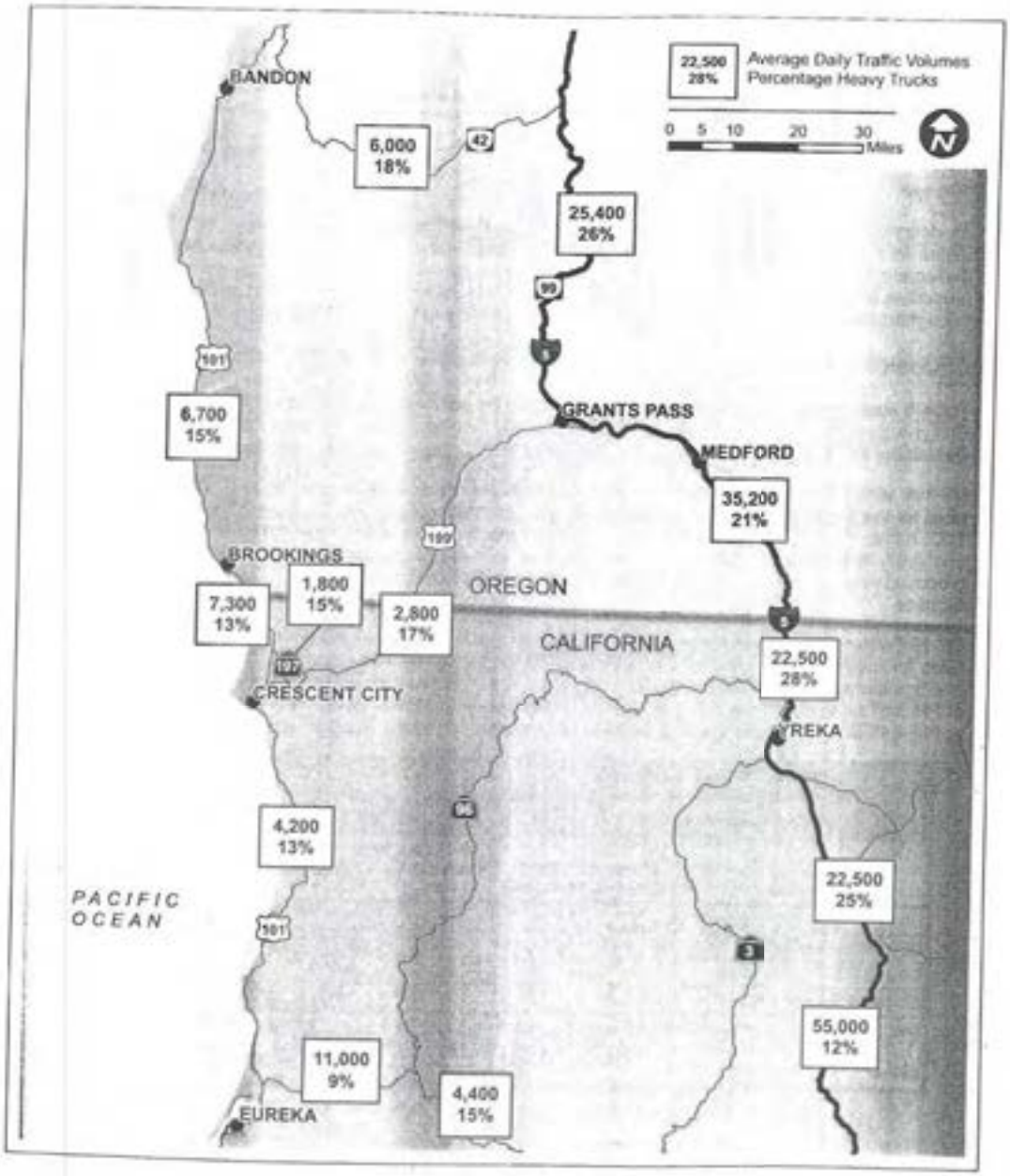
For West County Landfill, Inc., she revised and helped DTSC to implement the Public Participation Plan for RCRA closure of the Hazardous Waste Management Facility at the West County Landfill located in North Richmond, California. She was invited to be an Expert Witness in CERCLA and RCRA public participation requirements for the cost recovery suit associated with closure of this hazardous waste landfill.

In Cortez, Colorado, she mediated a conflict between Shell Oil Company and local human services agencies concerning community impacts that might result from a proposed CO^2 wellfield development, then facilitated local acceptance of an appropriate mitigation package.

For Del Norte County, California, she provided advice on the development and implementation of a public outreach program to enhance citizen involvement in assessing the potential environmental effects of a controversial nickel mine.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 7

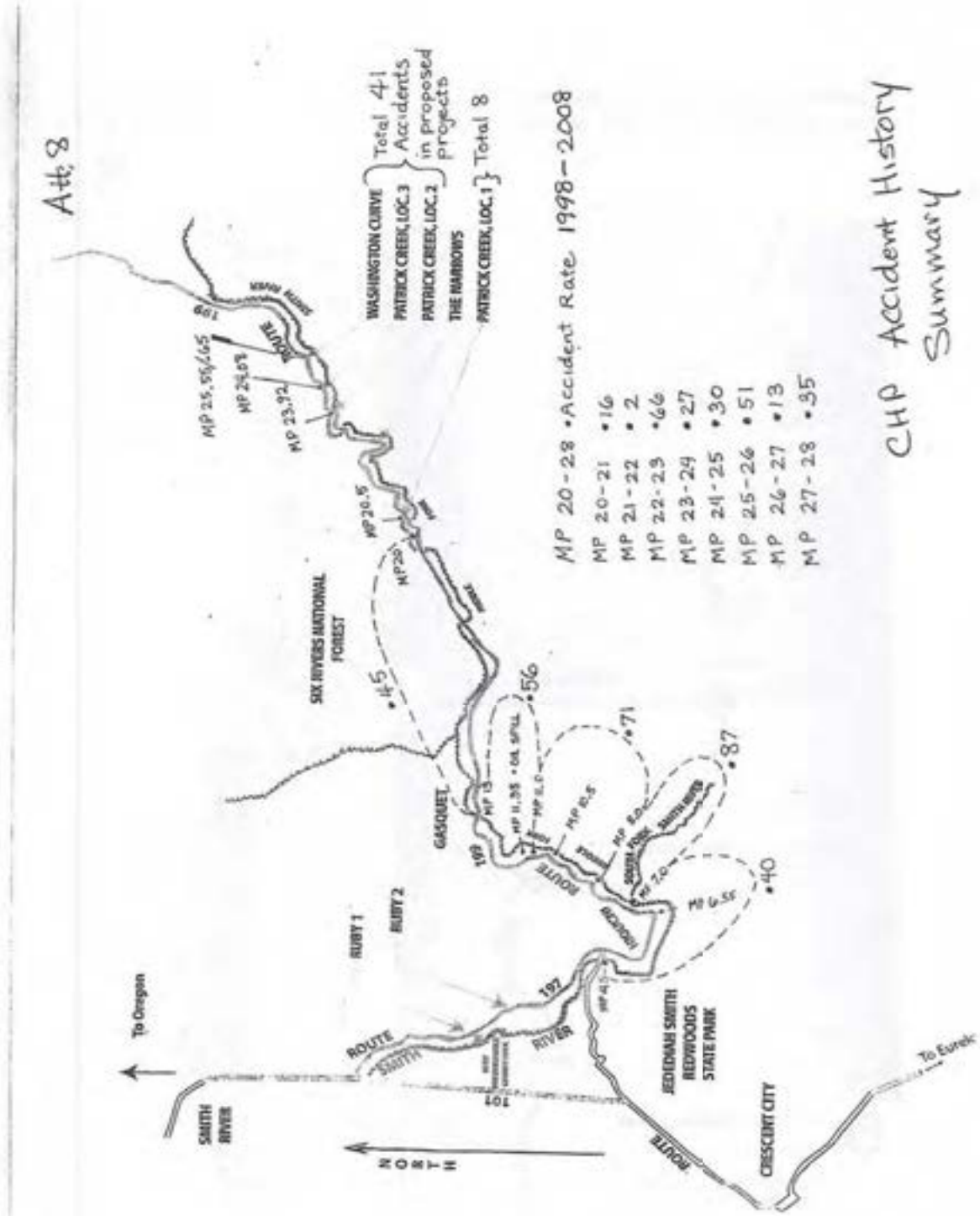
Att 7



EHR & PEERS
TRANSPORTATION CONSULTANTS

197/199 SAFE STAA ACCESS PROJECT
Regional Roadway System Comparison
FIGURE 9

Friends of Del Norte (submitted by Eileen Cooper) Attachment 8



Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

Att 9

Oregon Department of Transportation

ODOT PUBLIC RECORDS REQUEST

Please read ( ) before completing and submitting this request.

Section A – Requester Information

NAME: Eileen Cooper			TITLE: Ms
PHONE: 707-465-8904	FAX:	E-MAIL ADDRESS: upsprout@yahoo.com	
FIRM OR TRADE NAME: Friends of Del Norte			
MAILING ADDRESS: 2644 Roy Ave			
CITY: Crescent City		STATE: CA	ZIP: 95531

Section B – Record(s) requested

DESCRIPTION OF RECORDS REQUESTED

Please provide me in electronic form (by email or on disc) the following information for Siskiyou Summit Pass and chain-up area on I-5 for the last 5 years: the days and total number of all road closures and duration of road closures, the reason for the closure (bad weather and/or accident) and the days, total days, and duration for required chain-ups for large trucks.

Section C – Receiving record(s), certification

CERTIFICATION	PREFERRED METHOD OF RECEIPT: E-mail	PICK UP LOCATION (IF APPLICABLE)
AREA(S) OF ODOT CONTACTED REGARDING THIS REQUEST: ask odot, Kim Jordan		

Submit by fax: (503) 986-4025

Submit in person or by postal mail: Records Officer, ODOT Business Services Section, 3930 Fairview Industrial Drive SE, MS3, Salem, OR 97301

ODOT OFFICE USE ONLY				
ESTIMATE AMOUNT	DATE ESTIMATE PROVIDED	DATE AUTHORIZED TO PROCEED	REQUEST WITHDRAWN	REQUEST COMPLETED
ACTUAL COST	PAYMENT RECEIVED	MISCELLANEOUS BILLING DATE	COMPLETED BY	COMPLETED BY
COMMENTS				

Jim 541-774-6352 Oregon Traffic Info – Siskiyou Summit.

731-0489 (10/10)

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RDKILL TALLY
DARRIN NEAVOLL
CANYONVILLE

ASHLAND	CALL TYPE	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	TOTAL
	1216'S	26	17	16	4	3	5	6	4	9	15	15	30	150
	1216's	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	
		8	9	14	14	6	1	9	7	7	12	22	29	138
	1216's	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	
		15	12	24	9	8	4	7	5	2	9	13	8	116
	1216's	10	12	8	11									41

hold - for CA closure

full chain - everybody except 4 wheel drive - the Big Trucks

cond B1 single axle - including towing

Siskiyou Summit is most dangerous pass on I-5
6% grade & only 2 lanes

the grapevine is safer ≈ 4% grade & 6 lanes

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
	Oct-09									
1		10/23/09	HAZARD	SEMI BLOCKING	1	5 NB	12:22 PM	12:39 PM	0:17	
1		10/23/09	HAZARD	VEHICLE BLOCKING	1	6.5 SB	9:43 AM	11:02 AM	1:19	
									TOTAL	2
	Nov-09									
1		11/14/09	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	10:39 AM	1:33 PM	2:54	
1		11/18/09	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	10:29 PM	2:33 AM	4:04	
1		11/18/09	HAZARD	VEHICLE BLOCKING	1	6.5 NB	5:44 PM	6:55 PM	1:11	
1		11/21/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 NB	10:56 PM	4:07 AM	5:11	
1		11/21/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 SB	10:56 PM	4:29 AM	5:32	
1		11/22/09	HAZARD	VEHICLE BLOCKING	1	4.3 SB	4:37 PM	4:58 PM	0:21	
1		11/25/09	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	5:56 PM	6:50 PM	0:54	
1		11/26/09	HAZARD	VEHICLE BLOCKING	1	6	1:18 PM	1:37 PM	0:19	
1		11/29/09	HAZARD	VEHICLE BLOCKING	1	4.5 SB	6:31 PM	6:57 PM	0:26	
									TOTAL	9
	Dec-09									
1		12/1/09	HAZARD	SEMI BLOCKING UPPER ESCAPE RAMP	1	6 NB	1:40 PM	1:49 PM	0:09	
1		12/12/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 SB	1:34 AM	5:39 AM	4:05	
1		12/12/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 NB	1:36 AM	5:39 AM	4:03	
1		12/22/09	HAZARD	VEHICLE BLOCKING	1	3-5	2:27 AM	3:36 AM	1:09	
1		12/23/09	HAZARD	VEHICLE BLOCKING	1	4.32 SB	10:00 AM	1:13 PM	3:13	
1		12/25/09	HAZARD	VEHICLE BLOCKING	1	6 SB	6:35 PM	8:45 PM	2:10	
1		12/29/09	HAZARD	VEHICLE BLOCKING	1	6 NB	12:39 PM	3:21 PM	2:42	
1		12/29/09	CHAIN	TEMP HOLD/ CALIFORNIA	1	11 SB	3:56 PM	8:49 PM	4:53	
1		12/29/09	WINTER	TEMP HOLD/ CALIFORNIA	1	0 SB	4:44 PM	10:06 PM	5:22	
1		12/29/09	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB	9:08 PM	8:08 AM	11:00	
1		12/29/09	CHAIN	FULL CHAINS	1	4.32 SB	8:08 PM	8:08 AM	12:00	
1		12/30/09	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	8:09 AM	9:06 AM	0:57	
1		12/31/09	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	4:00 AM	8:10 AM	4:10	
									TOTAL	13
	Jan-10									
1		1/10/10	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	2:18 PM	2:59 PM	0:41	
1		1/11/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	6:16 PM	7:54 PM	1:38	
1		1/16/10	HAZARD	SEMI BLOCKING	1	4 SB	6:38 PM	10:40 PM	4:02	
1		1/20/10	WINTER	CALIFORNIA CLOSURE	1	0 NB&SB	1:27 PM	3:05 PM	1:38	
1		1/22/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	7:21 AM	8:19 AM	0:58	
1		1/24/10	CHAIN	TEMP HOLD/SISKIYOUS	1	4.32 SB	10:06 AM	10:13 AM	0:07	
1		1/24/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	5:27 PM	9:19 PM	3:52	
1		1/24/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	5:56 PM	6:27 PM	0:31	
1		1/25/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:23 PM	10:46 PM	1:23	
									TOTAL	9

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
1	Jan-10	1/25/10	CHAIN	FULL CHAINS	1	0 NB	10:46 PM	5:16 AM	6:30	
1		1/25/10	CHAIN	FULL CHAINS	1	11 SB	10:46 PM	3:51 AM	5:05	
1		1/25/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	3:51 AM	5:16 AM	1:25	
1		1/25/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:24 AM	5:28 AM	1:04	
1		1/29/10	HAZARD	VEHICLE BLOCKING/LOWER ESCAPE RMP	1	9 NB	6:18 PM	6:36 PM	0:18	
									TOTAL	5
	Feb-10									
1		2/10/10	HAZARD	VEHICLE BLOCKING/ONRAMP	1	14 SB	6:36 PM	8:38 PM	2:02	
1		2/17/10	HAZARD	SEMI BLOCKING	1	10	9:56 PM	2:00 AM	4:04	
1		2/23/10	CHAIN	FULL CHAINS	1	11	7:55 PM	3:11 AM	7:16	
1		2/23/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	3:11 AM	5:11 AM	2:00	
1		2/23/10	CHAIN	FULL CHAINS	1	0 NB	7:55 PM	2:53 AM	5:58	
1		2/23/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	2:53 AM	5:11 AM	2:18	
1		2/24/10	HAZARD	SEMI BLOCKING	1	9 NB	10:57 AM	11:34 AM	0:37	
1		2/26/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	8:38 PM	1:53 AM	5:15	
									TOTAL	8
	Mar-10									
1		3/5/10	HAZARD	VEHICLE IN LOWER ESCAPE RAMP	1	9 NB	10:08 AM	11:44 AM	1:36	
1		3/8/10	HAZARD	SEMI BLOCKING	1	3.5 NB	7:17 AM	8:47 AM	1:30	
1		3/9/10	CHAIN	FULL CHAINS	1	4.32 NB&SB	7:32 PM	9:42 PM	2:10	
1		3/9/10	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	9:42 PM	5:27 AM	7:45	
1		3/12/10	WINTER	TEMP HOLD	1	4.32 SB	12:21 PM	1:15 PM	0:54	
1		3/12/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:53 PM	1:34 PM	0:41	
1		3/13/10	HAZARD	SEMI BLOCKING	1	6 NB	11:13 PM	12:38 PM	1:25	
1		3/23/10	HAZARD	SEMI BLOCKING LOWER ESCAPE RAMP	1	9 NB	7:25 PM	9:19 PM	1:54	
1		3/24/10	HAZARD	SEMI BLOCKING UPPER ESCAPE RAMP	1	6 NB	12:29 PM	12:41 PM	0:12	
1		3/24/10	HAZARD	VEHICLE BLOCKING	1	10 NB	3:24 PM	3:44 PM	0:20	
1		3/29/10	HAZARD	SEMI BLOCKING	1	10 SB	11:39 AM	2:35 PM	2:56	
1		3/30/10	CHAIN	TEMP HOLD	1	4.32 NB&SB	6:39 AM	6:59 AM	0:20	
1		3/30/10	WINTER	TEMP HOLD/SEMI BLOCKING	1	4.32 SB	5:52 AM	6:12 AM	0:20	
1		3/30/10	WINTER	TEMP HOLD	1	11 SB	6:29 AM	6:40 AM	0:11	
1		3/30/10	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	6:39 AM	7:29 AM	0:50	
1		4/2/10	CHAIN	TEMP HOLD	1	4.32 SB	10:01 AM	11:16 AM	1:15	
1		4/2/10	CHAIN	TEMP HOLD	1	0 NB	11:01 AM	11:27 AM	0:26	
1		4/2/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	10:01 AM	10:17 AM	0:16	
1		4/2/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	10:13 AM	10:17 AM	0:04	
1		4/2/10	CHAIN	FULL CHAINS	1	11 SB	10:17 AM	1:30 PM	3:13	
1		4/2/10	CHAIN	FULL CHAINS	1	0 NB	10:45 AM	1:30 PM	2:45	
1		4/2/10	HAZARD	SEMI'S BLOCKING	1	6 SB	10:10 AM	10:33 AM	0:23	
									TOTAL	22

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND Apr-10	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
1		4/4/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	4:30 PM	5:01 PM	0:31	
1		4/4/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:31 PM	5:05 PM	0:34	
1		4/4/10	HAZARD	VEHICLE BLOCKING	1	4 SB	5:17 PM	6:26 PM	1:09	
1		4/11/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	7:32 PM	9:56 PM	2:24	
1		4/15/10	HAZARD	SEMI BLOCKING	1	7 SB	2:33 PM	3:16 PM	0:43	
1		4/16/10	HAZARD	SEMI BLOCKING	1	6.7	12:56 AM	1:18 AM	0:22	
1		4/29/10	HAZARD	VEHICLE BLOCKING	1	4 NB	10:04 AM	10:19 AM	0:15	
									TOTAL	7
	Nov-10									
1		11/5/10	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	3:00 PM	4:51 PM	1:51	
1		11/8/10	HAZARD	VEHICLE BLOCKING	1	10 SB	6:47 PM	7:19 PM	0:32	
1		11/17/10	HAZARD	SEMI BLOCKING	1	5.5 SB	8:04 PM	9:54 PM	1:50	
1		11/21/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	2:49 AM	5:56 AM	3:07	
1		11/21/10	HAZARD	VEHICLE BLKG LOWER ESCAPE RAMP	1	9 NB	4:05 AM	4:32 AM	0:27	
1		11/21/10	HAZARD	VEHICLE BLOCKING	1	14 NB	3:50 PM	4:05 PM	0:15	
1		11/21/10	HAZARD	SEMI BLOCKING	1	4.32 NB	4:58 PM	5:48 PM	0:50	
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:58 AM	8:54 AM	7:56	
1		11/23/10	CHAIN	FULL CHAINS	1	11 SB	8:54 AM	8:59 AM	0:05	
1		11/23/10	CHAIN	FULL CHAINS	1	11 SB	8:59 AM	10:10 AM	1:11	
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	10:10 AM	1:29 PM	3:19	
1		11/23/10	CHAIN	FULL CHAINS	1	0 NB	3:39 AM	4:03 AM	0:24	
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:03 AM	8:55 AM	4:52	
1		11/23/10	CHAIN	FULL CHAINS	1	0 NB	8:55 AM	11:07 AM	2:12	
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	11:07 AM	12:25 PM	1:18	
1		11/23/10	CHAIN	TEMP HOLD	1	0 NB	12:55 PM	1:19 PM	0:24	
1		11/23/10	HAZARD	SEMI BLOCKING	1	7.5 SB	7:03 PM	8:44 PM	1:41	
1		11/23/10	WINTER	TEMP HOLD	1	7 NB	12:47 PM	2:25 PM	1:38	
1		11/26/10	HAZARD	VEHICLE BLOCKING	1	7 SB	11:52 PM	12:29 AM	;037	
1		11/27/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	12:02 PM	12:18 PM	0:16	
1		11/27/10	CHAIN	FULL CHAINS	1	0 NB	12:18 AM	12:26 PM	12:08	
1		11/27/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:05 AM	12:23 AM	0:18	
1		11/27/10	CHAIN	FULL CHAINS	1	11 SB	12:23 AM	12:33 PM	12:10	
1		11/27/10	HAZARD	SEMI BLOCKING	1	14 SB	4:46 PM	5:07 PM	0:21	
1		11/30/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:17 PM	9:51 PM	0:34	
1		11/30/10	CHAIN	FULL CHAINS	1	11 SB	9:51 PM	7:11 AM	9:20	
1		11/30/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	9:18 PM	10:13 PM	0:55	
1		11/30/10	CHAIN	FULL CHAINS	1	0 NB	10:13 PM	7:11 AM	8:58	
									TOTAL	28

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
	Dec-10									
1		12/1/10	HAZARD	SEMI'S BLOCKING	1	1 NB	4:48 AM	5:06 AM	0:18	
1		12/2/10	HAZARD	SEMI BLOCKING	1	6 SB	2:51 PM	4:18 PM	1:27	
1		12/8/10	HAZARD	VEHICLE LOWER ESCAPE RAMP	1	9 NB	3:37 AM	4:00 AM	0:23	
1		12/12/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	1:54 PM	3:32 PM	1:38	
1		12/17/10	CHAIN	FULL CHAINS	1	11 SB	11:34 PM	11:44 PM	0:10	
1		12/17/10	WINTER	TEMP HOLD	1	4.3 SB	11:44 PM	12:10 PM	:26	
1		12/17/10	CHAIN	FULL CHAINS	1	11 SB	12:10 PM	12:41 PM	0:31	
1		12/18/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	2:47 AM	6:34 AM	3:47	
1		12/18/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	2:48 AM	6:28 AM	3:40	
1		12/18/10	HAZARD	SEMI BLOCKING	1	5 SB	2:50 AM	3:24 AM	0:34	
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	8:12 PM	8:26 PM	0:14	
1		12/19/10	WINTER	TEMP HOLD	1	4.3 NB	8:26 PM	8:50 PM	0:24	
1		12/19/10	CHAIN	FULL CHAINS	1	0 NB	9:06 PM	1:23 AM	4:17	
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	1:23 AM	5:15 AM	3:52	
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	8:12 PM	8:32 PM	0:20	
1		12/19/10	CHAIN	TEMP HOLD	1	4.3 SB	8:32 PM	8:52 PM	0:20	
1		12/19/10	CHAIN	FULL CHAINS	1	11 SB	9:06 PM	1:45 AM	4:39	
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:45 AM	5:41 AM	3:56	
1		12/26/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:43 AM	9:12 AM	1:29	
1		12/26/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:43 AM	9:12 AM	1:29	
1		12/26/10	HAZARD	VEHICLE BLOCKING	1	7 SB	9:42 AM	10:23 AM	0:41	
1		12/26/10	HAZARD	SEMI BLOCKING	1	7 NB	12:04 PM	12:06 PM	0:02	
1		12/28/10	CHAIN	FULL CHAINS	1	11 SB	6:13 PM	7:54 PM	1:41	
1		12/28/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:54 PM	8:38 PM	0:44	
1		12/28/10	WINTER	TEMP HOLD	1	4.3 SB	8:38 PM	8:43 PM	0:05	
1		12/28/10	CHAIN	FULL CHAINS	1	11 SB	8:52 PM	11:02 AM	14:10	
1		12/28/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:54 PM	8:45 PM	0:51	
1		12/28/10	CHAIN	FULL CHAINS	1	0 NB	8:45 PM	9:35 AM	11:50	
1		12/28/10	WINTER	TEMP HOLD	1	4.3 NB	9:35 AM	10:03 AM	0:28	
1		12/28/10	CHAIN	FULL CHAINS	1	0 NB	10:05 AM	11:21 AM	1:16	
1		12/28/10	HAZARD	SEMI BLOCKING	1	6 NB	8:38 PM	9:15 PM	0:37	
1		12/28/10	HAZARD	SEMI'S BLOCKING	1	7 SB	9:13 PM	10:23 PM	1:10	
1		12/28/10	HAZARD	VEHICLES BLOCKING	1	14 NB/SB	11:06 PM	11:44 PM	0:38	
1		12/29/10	WINTER	TEMP HOLD	1	1 NB	1:03 PM	1:20 PM	0:17	
1		12/31/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	11:17 PM	4:06 AM	4:49	
1		12/31/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	11:18 PM	4:06 AM	4:50	
									TOTAL	36

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
	Dec-10									
	Jan-11									
1		1/22/11	HAZARD	SEMI BLOCKING	1	6 SB	10:13 PM	10:31 PM	0:18	
1		1/29/11	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	1:16 PM	3:19 PM	2:03	
									TOTAL	2
	Feb-11									
1		2/4/11	HAZARD	UHAUL UPPER ESCAPE RAMP	1	6.23 NB	2:24 AM	3:48 AM	1:24	
1		2/18/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:49 AM	4:09 AM	2:20	
1		2/24/11	CHAIN	FULL CHAINS	1	0 NB	4:08 AM	8:40 AM	4:32	
1		2/24/11	CHAIN	FULL CHAINS	1	11 SB	4:08 AM	8:28 AM	4:20	
1		2/24/11	HAZARD	SEMI BLOCKING	1	12 SB	9:17 AM	9:39 AM	0:22	
1		2/25/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:06 PM	8:28 PM	1:22	
1		2/25/11	CHAIN	FULL CHAINS	1	11 SB	9:23 PM	6:57 AM	9:34	
1		2/25/11	CHAIN	FULL CHAINS	1	0 NB	9:24 PM	6:59 AM	9:37	
									TOTAL	8
	Mar-11									
1		3/5/11	HAZARD	VEHICLE BLOCKING	1	10 SB	2:38 PM	3:09 PM	0:31	
1		3/511	HAZARD	SEMI BLOCKING	1	9 NB	2:55 PM	6:57 PM	4:02	
1		3/18/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	6:53 AM	7:52 AM	0:59	
1		3/18/11	CHAIN	FULL CHAINS	1	11 SB	7:52 AM	9:40 AM	1:48	
1		3/18/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:01 AM	8:22 AM	1:21	
1		3/18/11	CHAIN	FULL CHAINS	1	0 NB	8:22 AM	11:58 AM	3:36	
1		3/18/11	HAZARD	SEMI BLOCKING	1	5.8 SB	7:18 AM	7:57 AM	0:39	
1		3/23/11	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	6:34 PM	7:11 PM	0:37	
1		3/24/11	CHAIN	COND B1/TEMP HOLD/FULL CHAINS	1	11 SB	12:12 PM	1:31 PM	1:19	
1		3/24/11	CHAIN	COND B1/FULL CHAINS	1	0 NB	12:14 PM	1:11 PM	0:57	
1		3/24/11	HAZARD	SEMI'S BLOCKING	1	6 SB	12:40 PM	12:45 PM	0:05	
1		3/25/11	CHAIN	COND B1/FULL CHAINS	1	0 NB	4:28 AM	10:08 AM	5:40	
1		3/25/11	CHAIN	COND B1/FULL CHAINS	1	11 SB	4:28 AM	9:20 AM	4:52	
1		3/25/11	HAZARD	VEHICLE BLOCKING	1	6	4:56 AM	5:12 AM	0:16	
1		3/26/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	1:54 AM	6:40 AM	4:46	
1		3/26/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:55 AM	5:38 AM	3:43	
1		3/26/11	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	1:11 PM	1:47 PM	0:36	
									TOTAL	17
	Apr-11									
1		4/1/11	HAZARD	VEHICLE BLOCKING	1	14 SB	2:54 PM	3:08 PM	0:14	
1		4/4/11	HAZARD	VEHICLE BLOCKING	1	6 SB	5:25	8:26	3:01	
1		4/7/11	CHAIN	FULL CHAINS	1	11 SB	4:07	8:28	4:21	
1		4/7/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:55	7:58	3:03	
1		4/13/11	HAZARD	VEHICLE BLOCKING	1	10 SB	17:31	18:38	1:07	
									TOTAL	5

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
	Nov-11									
1		11/6/11	CHAIN	FULL CHAINS	1	0 NB	1:47	8:26	6:39	
1		11/6/11	CHAIN	FULL CHAINS	1	11 SB	1:50	8:14	6:24	
1		11/18/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:27	7:48	0:21	
1		11/18/11	WINTER	TEMP HOLD	1	4 SB	9:45	10:17	0:32	
1		11/18/11	WINTER	TEMP HOLD	1	4 SB	14:19	14:57	0:38	
1		11/24/11	1216	TEMP HOLD	1	6 NB	22:09	22:30	0:21	
									TOTAL	6
	Dec-11								0:00	
1		12/12/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	4:26	6:14	1:48	
1		12/12/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:27	6:14	1:47	
1		12/12/11	FIRE	TEMP HOLD/TANKER FIE	1	4 NB	7:10	7:31	0:21	
									TOTAL	3
	Jan-12									
1		1/3/12	AGASST	CALIFORNIA CLOSURE	1	4 NB&SB	16:04	17:59	1:55	
1		1/18/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	6:42	12:18	5:36	
1		1/18/12	CHAIN	FULL CHAINS	1	11 SB	10:58	12:18	1:20	
1		1/18/12	WINTER	TEMP HOLD	1	11 SB	10:47	11:06	0:19	
1		1/18/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	14:07	15:05	0:58	
1		1/19/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:09	9:45	0:36	
1		1/19/12	WINTER	TEMP HOLD	1	4.3 SB	9:48	11:25	1:37	
1		1/19/12	CHAIN	FULL CHAINS	1	11 SB	10:38	15:27	4:49	
1		1/19/12	WINTER	TEMP HOLD	1	11 SB	12:14	13:22	1:08	
1		1/19/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	9:56	10:32	0:36	
1		1/19/12	WINTER	TEMP HOLD	1	0 NB	10:32	11:22	0:50	
1		1/19/12	CHAIN	FULL CHAINS	1	0 NB	10:38	15:27	4:49	
1		1/19/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	15:39	19:02	3:23	
1		1/20/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	17:43	18:02	0:19	
1		1/20/12	CHAIN	FULL CHAINS	1	11 SB	18:02	19:43	1:41	
1		1/20/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	17:46	19:36	1:50	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	10:48	13:54	3:06	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	10:49	11:20	0:31	
1		1/22/12	CHAIN	FULL CHAINS	1	11 SB	11:20	13:19	1:59	
1		1/22/12	WINTER	TEMP HOLD	1	11 SB	11:12	12:28	1:16	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	4:41 PM	4:42 PM	0:01	
1		1/22/12	WINTER	TEMP HOLD	1	11 SB	4:42 PM	5:35 PM	0:53	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	5:15 PM	6:02 PM	0:47	
1		1/22/12	CHAIN	FULL CHAINS	1	0 NB	6:02 PM	1:42 AM	6:40	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	1:42 AM	5:17 AM	3:35	
									TOTAL	25

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
	Jan-12									
1		1/22/12	CHAIN	FULL CHAINS	1	11 SB	5:48 PM	3:40 AM	9:52	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	3:40 AM	4:48 AM	1:08	
1		1/22/12	HAZARD	SEMI BLOCKING	1	4 SB	7:33 PM	7:47 PM	0:14	
1		1/24/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	5:49 AM	6:06 AM	0:17	
									TOTAL	4
	Feb-12									
1		2/28/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:15 AM	9:04 AM	1:49	
1		2/28/12	CHAIN	FULL CHAINS	1	0 NB	7:41 PM	7:15 AM	11:34	
1		2/28/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:15 AM	8:54 AM	1:39	
1		2/28/12	WINTER	TEMP HOLD	1	11 SB	8:22 PM	11:54 PM	3:32	
1		2/28/12	WINTER	TEMP HOLD	1	11 NB	9:03 PM	10:16 PM	1:13	
1		2/28/12	WINTER	WINTER WEATHER	1	11 SB	10:54 PM	2:41 AM	3:45	
									TOTAL	6
	Mar-12									
1		3/1/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:28 AM	10:06 AM	9:38	
1		3/1/12	WINTER	TEMP HOLD	1	11 SB	10:06 AM	10:10 AM	0:04	
1		3/1/12	CHAIN	FULL CHAINS	1	11 SB	10:10 AM	11:18 AM	1:08	
1		3/1/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	12:28 AM	10:14 AM	9:46	
1		3/1/12	WINTER	TEMP HOLD	1	1 NB	10:14 AM	11:14 AM	1:00	
1		3/1/12	CHAIN	FULL CHAINS	1	1 NB	10:14 AM	11:18 AM	1:04	
1		3/1/12	HAZARD	SEMI BLOCKING	1	10 SB	3:47 AM	4:45 AM	0:58	
1		3/1/12	WINTER	TEMP HOLD	1	11 SB	9:53 AM	10:05 AM	0:12	
1		3/1/12	WINTER	TEMP HOLD	1	11 SB	10:19 AM	11:14 AM	0:55	
1		3/13/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	2:53 AM	3:03 AM	0:10	
1		3/13/12	CHAIN	FULL CHAINS	1	11 SB	3:03 AM	7:22 AM	4:19	
1		3/13/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	3:00 AM	7:01 AM	4:01	
1		3/13/12	CHAIN	FULL CHAINS	1	1 NB	7:01 AM	7:34 AM	0:33	
1		3/20/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:45 AM	1:56 AM	0:11	
1		3/20/12	CHAIN	FULL CHAINS	1	4.3 SB	1:56 AM	7:23 AM	5:27	
1		3/20/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	1:46 AM	2:02 AM	0:16	
1		3/20/12	CHAIN	FULL CHAINS	1	1 NB	2:02 AM	7:34 AM	5:32	
1		3/20/12	HAZARD	VEHICLE BLOCKING	1	6 NB	3:47 AM	3:50 AM	0:03	
1		3/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:58 AM	1:55 AM	0:57	
1		3/22/12	CHAIN	FULL CHAINS	1	11 SB	1:55 AM	4:47 AM	2:52	
1		3/22/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	1:00 AM	1:55 AM	0:55	
1		3/22/12	CHAIN	FULL CHAINS	1	1 NB	1:55 AM	5:37 AM	3:42	
1		3/22/12	HAZARD	VEHICLE BLOCKING	1	4 NB	1:44 AM	2:07 AM	0:23	
1		3/22/12	HAZARD	SEMI BLOCKING	1	3 NB	3:41 AM	5:42 AM	2:01	
1		3/22/12	HAZARD	SEMI BLOCKING	1	3 NB	4:03 AM	4:35 AM	0:32	
									TOTAL	25

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
	Mar-12									
1		3/27/12	CHAIN	FULL CHAINS	1	11 SB	11:18 PM	1:09 AM	1:51	
1		3/27/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:09 AM	2:37 AM	1:28	
1		3/27/12	CHAIN	FULL CHAINS	1	1 NB	11:21 PM	1:23 AM	2:02	
1		3/27/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	1:23 AM	2:26 AM	1:03	
1		3/27/12	WINTER	TEMP HOLD	1	1 NB	11:25 PM	11:45 PM	0:20	
									TOTAL	5
	Apr-12									
1		4/4/12	HAZARD	SEMI BLOCKING	1	7 SB	9:20 AM	9:21 AM	0:01	
1		4/4/12	CHAIN	FULL CHAINS	1	11 SB	4:48 PM	5:58 PM	1:10	
1		4/4/12	CHAIN	FULL CHAINS	1	1 NB	5:28 PM	5:58 PM	0:30	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:54 PM	10:14 PM	0:20	
1		4/4/12	CHAIN	FULL CHAINS	1	11 SB	10:14 PM	12:50 AM	2:41	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:50 AM	3:26 AM	2:36	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	9:55 PM	10:14 PM	0:19	
1		4/4/12	CHAIN	FULL CHAINS	1	1 NB	10:14 PM	12:34 AM	2:20	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	12:34 AM	3:26 AM	2:52	
1		4/4/12	WINTER	TEMP HOLD	1	11 SB	10:19 PM	10:44 PM	0:25	
									TOTAL	10

Friends of Del Norte (submitted by Eileen Cooper) Attachment 10

RESPECT THE PASS!

The Siskiyou Pass, commonly called "The Siskiyous," is one of the most hazardous stretches of road along Interstate 5.

Truckers Beware

The summit is at an elevation of 4,310 feet. You'll lose about 2,300 feet of elevation in six miles at a 6 percent downgrade while maneuvering your truck through sharp curves and some of the most hazardous visibility (fog) and road surface conditions in Oregon.

More than 13,000 vehicles travel this stretch of highway daily. ***Approximately half*** of the vehicles involved in accidents on this stretch of highway were commercial trucks with trailers.

Extreme Caution Urged

Escape ramps are located ***Northbound*** at Mileposts 6.3 and 9.5

When in doubt about snow and ice conditions, chain-up your truck. It is better to be over prepared than to chain-up after you jackknife.

Why Do I Have to Chain-Up Here?

Chain-up areas are set up prior to inspection sites so that chains can be installed with ample shoulder space. Sometimes this needs to be done some distance from the snow line itself. Highway personnel are there to help you get over the pass safely.

Be cooperative. Work with them.

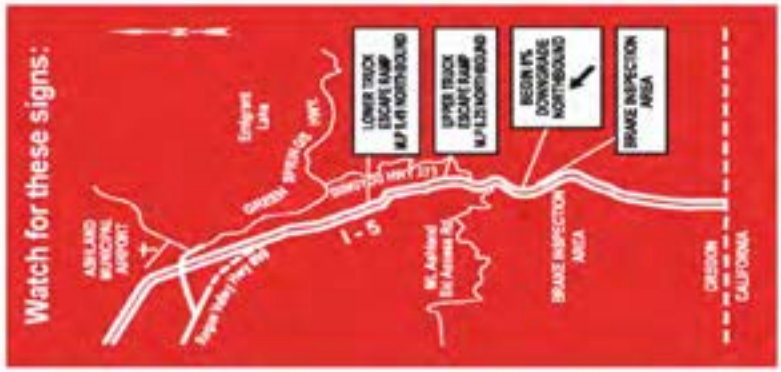
If you are not fully chained-up prior to the inspection site ***you will be turned around!*** When required, chains need to be installed prior to the inspection site. Inspection sites are at Milepost 1, Northbound and Milepost 11, Southbound.

When is it the Best Time to Go Over the Pass?

Mother Nature is hard to figure. At night temperatures drop and freezing is common. Early in the morning when the sun comes up is when fresh snow is the slickest. Mid-day is usually the best time to travel over the pass.

Reminders For a Safe Descent

- Remember to check brakes before entering the downgrade.
- Be aware of the safe recommended speed for your vehicle.
- Posted speeds are maximum in good weather. Bad weather demands slower speeds.
- Fog, snow, and black ice are common between October and April. Be prepared!
- Descend the summit in the proper gear.
- Oregon law requires that you carry and use tire chains when conditions warrant and/or signs posted.
- Be sure you have emergency warning devices (triangles) and use them if you are stopped.
- Be sure all your lights are working.
- Don't drive if you are fatigued!



DOT Registration Information

Motor carriers can obtain information and services about trucking regulations and appropriate Oregon permits at the Ashland Port of Entry located at I-5 Northbound, Milepost 18.

Tune radio to AM 1610 for updated weather information and road conditions

TRUCKER WARNING

RESPECT THE

Siskiyou Pass

Friends of Del Norte (submitted by Eileen Cooper) Attachment 11

Att 11

Guide to the 2012 Oregon Commercial Vehicle Safety Plan

Law Regarding Safety Plan

Oregon Revised Statute – ORS 825.248 – Annual commercial motor vehicle safety plan.

(1) The Department of Transportation shall develop an annual commercial motor vehicle safety plan. The goal of the plan is to reduce accidents involving commercial motor vehicles and to reduce injuries and fatalities resulting from accidents. . . The priority for each year's plan shall be determined on the basis of accurate and timely data. The department shall use performance measures to determine the success of an annual plan and to develop the subsequent plan.

(2) In conducting inspections described in ORS 810.560, a person who is trained and certified as a commercial vehicle inspector under ORS 810.560 shall adhere to the provisions of the commercial motor vehicle safety plan . . .

Friends of Del Norte (submitted by Eileen Cooper) Attachment 11

Summary of Key Problems & Objectives

The following series of state-specific problem statements and national program objectives represent the heart of Oregon's Safety Plan for 2012. This section describes problems that must be addressed and objectives that must be achieved in order to have the greatest positive impact on commercial vehicle safety. Oregon enforcement officers and inspectors need to particularly focus on state-specific objectives that seek to reduce the five-year average crash total by 5%.

Problem and Objective #1 – Address the number of truck crashes in Portland, Salem, and Eugene that are caused by non-commercial motor vehicle (non-CMV) drivers. Reduce the percentage of non-CMV-driver-caused crashes in these large metropolitan areas by 5%, from a five-year average of 55% to 50% in Fiscal Year 2012. Work with police to conduct intensified traffic enforcement operations, including Ticket Aggressive Cars and Trucks (TACT) exercises, to check aggressive driving and spread key safety messages.

Problem and Objective #2 – Determine the percentage of commercial vehicle drivers in Oregon who don't wear safety belts and reduce that number. A nationwide study in 2008 found 28% don't wear their belts. An Oregon stucy in 2010 put the number as high as 19%.

Problem and Objective #3 – Prevent truck-at-fault crashes in high-elevation stretches of Interstates 5 and 84 during Winter months, particularly in December and January. The

Friends of Del Norte (submitted by Eileen Cooper) Attachment 11

Siskiyou Summit on I-5 and Emigrant Hill, Ladd Canyon, and Nelson Point to Weatherby on I-84 are plagued with treacherous weather conditions. Reduce by 5% the number of truck-at-fault weather-related crashes in these areas from a five-year average of 43 to 41 in Fiscal Year 2012. Police will aggressively enforce traffic laws for both commercial and non-commercial vehicles as all enforcement officers focus on chain law awareness and compliance in inclement weather.

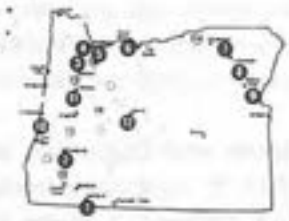
Problem and Objective #4 – Address the number of hazardous material incidents and truck-at-fault crashes involving hazmats and reduce both by 5%. Based on five-year average totals, reduce hazmat incidents from 286 to 272 and reduce truck-at-fault crashes involving hazmats from 18 to 17. Conduct hazmat bulk and non-bulk inspections and special operations targeting "at-risk" hazmat motor carriers and shippers.

Problem and Objective #5 – Maintain or decrease the number of bus-at-fault crashes, which have averaged three per year in the past nine years. Conduct 110 Level 5 terminal inspections, along with other Level 2 and 3 inspections at weigh stations and areas that can accommodate passengers.

Problem and Objective #6 – Return Oregon's State Safety Data Quality rating to "Good" for all crash categories – completeness, timeliness, accuracy, and consistency. Oregon was downgraded to an overall "Fair" rating in 2010, primarily due to the timeliness of crash report processing at DMV and uploads to the national database.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 11

Accident Intensified MCSAP Corridors



Safety officials working under the Motor Carrier Safety Assistance Program (MCSAP) focus enforcement efforts on 268 road miles in 12 parts of the state that are plagued by crashes, historically called AIM Corridors — Accident Intensified MCSAP Corridors.

AIM Corridor Truck Crashes

Corridor	2008	2009	2010
1. Siskiyou Summit, I-5, MP2-9	9	8	5
2. Weaver to Roberts Mountain, I-5, MP108-117	5	5	2
3. Salem, I-5, MP252-260	11	8	9
4. Tualatin to Portland, Marquam Bridge, I-5, MP289-300	11	13	20
5. West Linn to Clackamas, I-205, MP8-14	10	9	13
6. Hood River to Mosier, I-84, MP63-73	6	7	2
7. Emigrant Hill, aka Cabbage Hill, I-84, MP219-228	14	7	17
8. Ladd Canyon, I-84, MP270-278	12	5	5
9. Nelson Point to Weatherby, I-84, MP331-340	13	3	5
10. North Bend to Coos Bay; US101, MP233-243	2	2	0
11. Eugene, I-5, MP168-208, and Lane County, OR58, MP1-62	51	32	28
12. Deschutes County, US20, Sisters to Bend and Bend to 10 miles east of Bend US97, Terrebonne to LaPine, Deschutes County	15	14	17

Friends of Del Norte (submitted by Eileen Cooper) Attachment 11

2 Reduce the number of truck drivers who don't wear safety belts — A nationwide study has concluded that 28% of commercial vehicle drivers don't wear their belts. An Oregon study in 2010 put the number as high as 19%.

Safety Improvement Objective #1: Definitively determine the percentage of truck drivers in Oregon who don't wear safety belts and reduce that number.

Status: A study conducted in Oregon in 2010 found that safety belt usage varies by location in the state, but as many as 81% of drivers were seen using belts. This establishes 19% as a baseline percentage of drivers failing to use them.

Activity and Performance Measures:

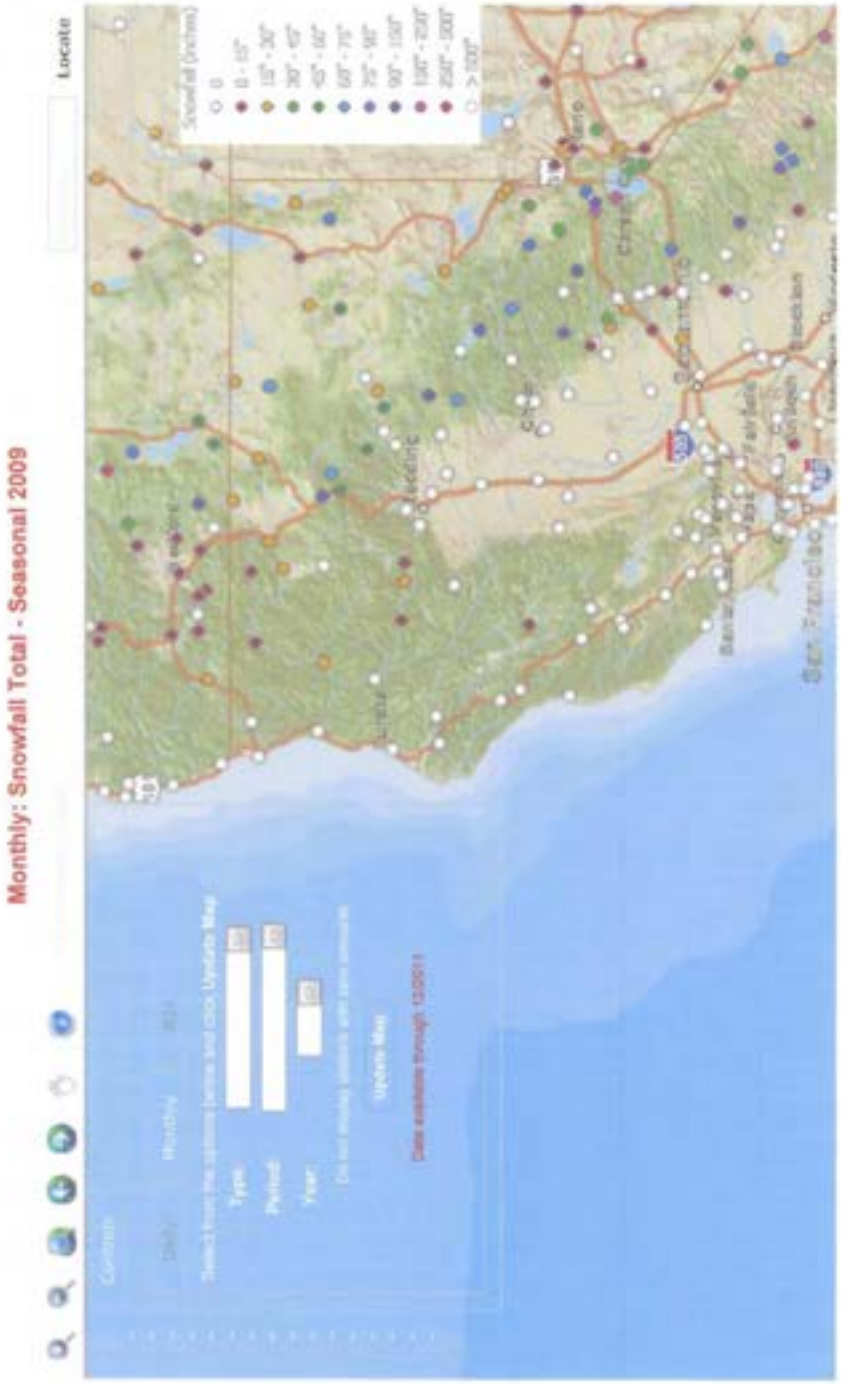
- All traffic enforcement operations and on-highway inspections include safety belt observation and enforcement. Inspectors document safety belt enforcement actions.
- Produce quarterly reports tracking the number of inspection form observations, violations, traffic citations, and warnings for failing to use safety belts.

BE READY.
BE BUCKLED.

3 Reduce truck-at-fault crashes in Winter — The highest elevations on Oregon's major freight routes are found at Siskiyou Pass – a 7-mile rural stretch of I-5 near the California border identified as AIM Corridor #1 – and in a 197-mile mostly rural stretch of I-84 in Eastern Oregon with particular trouble spots identified as Corridors #7, #8, and #9.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 12

Att 12



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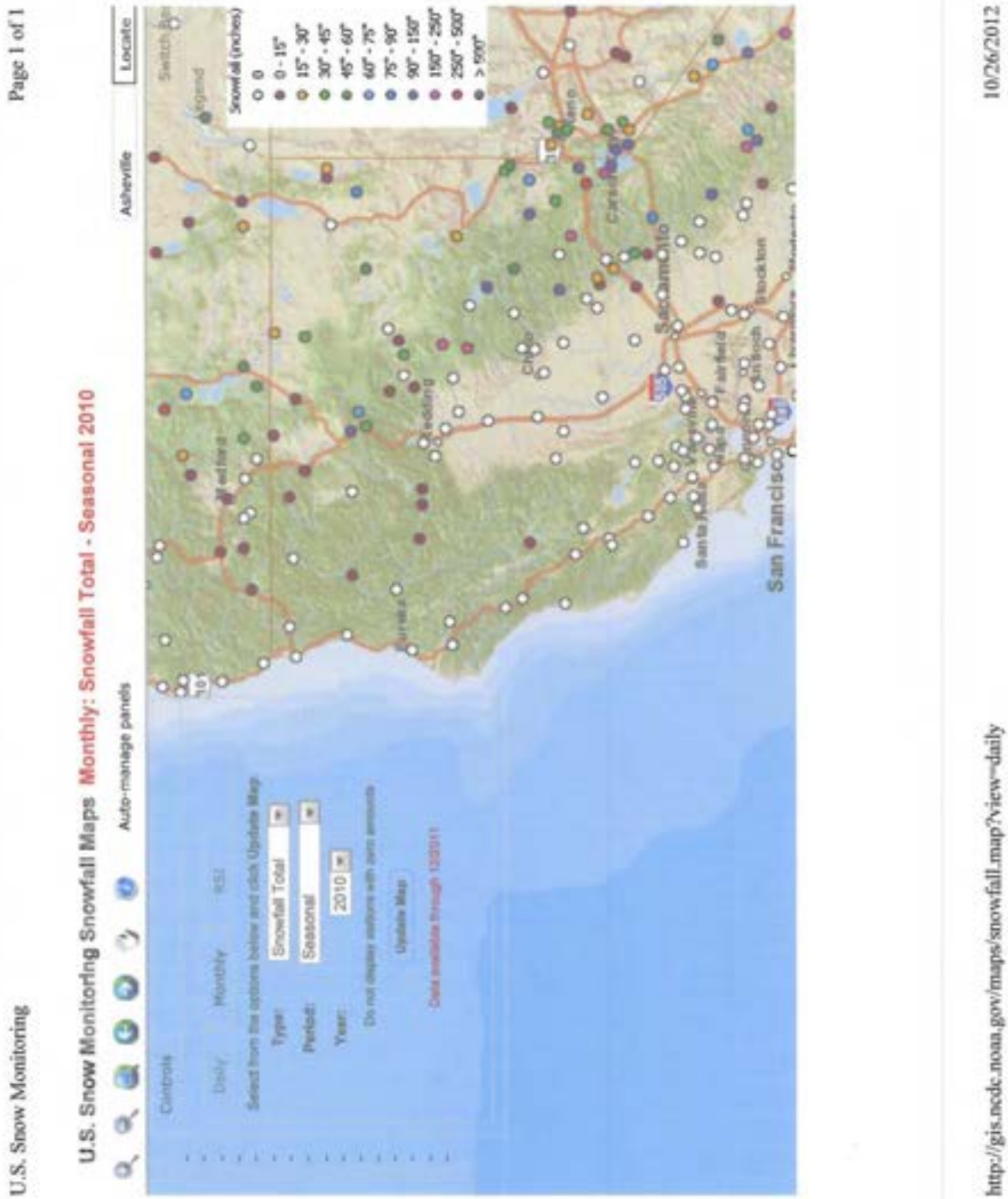

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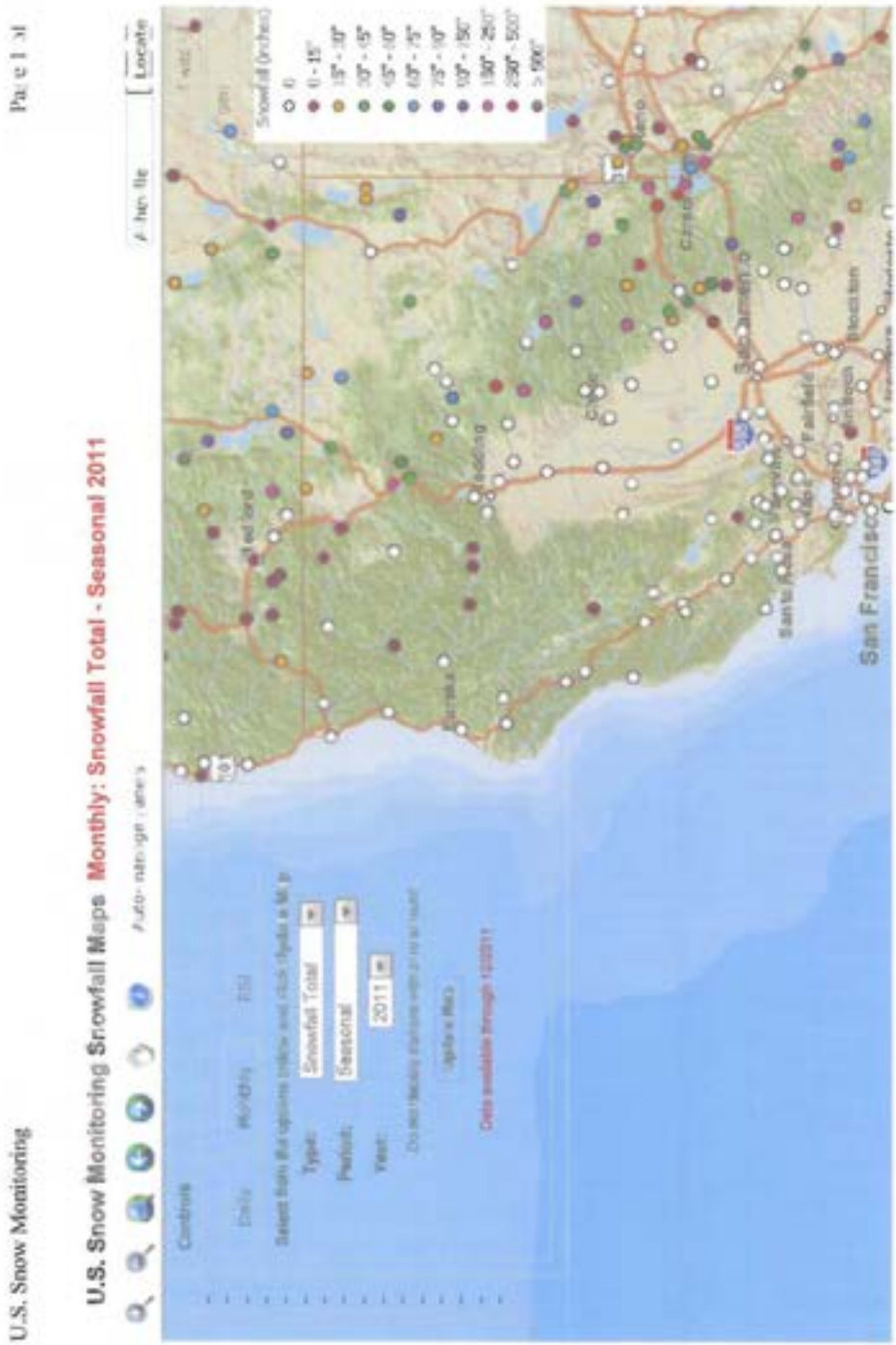

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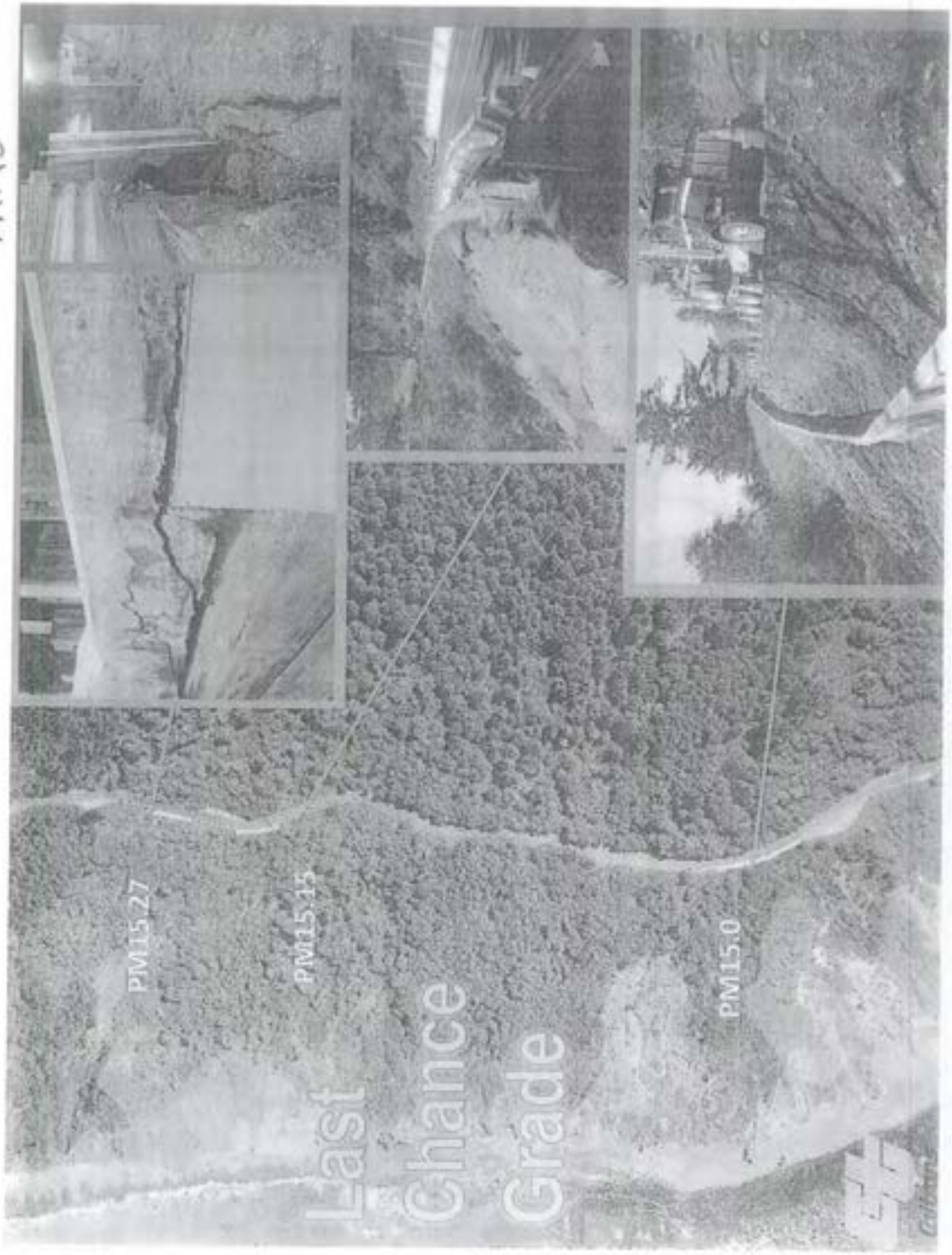

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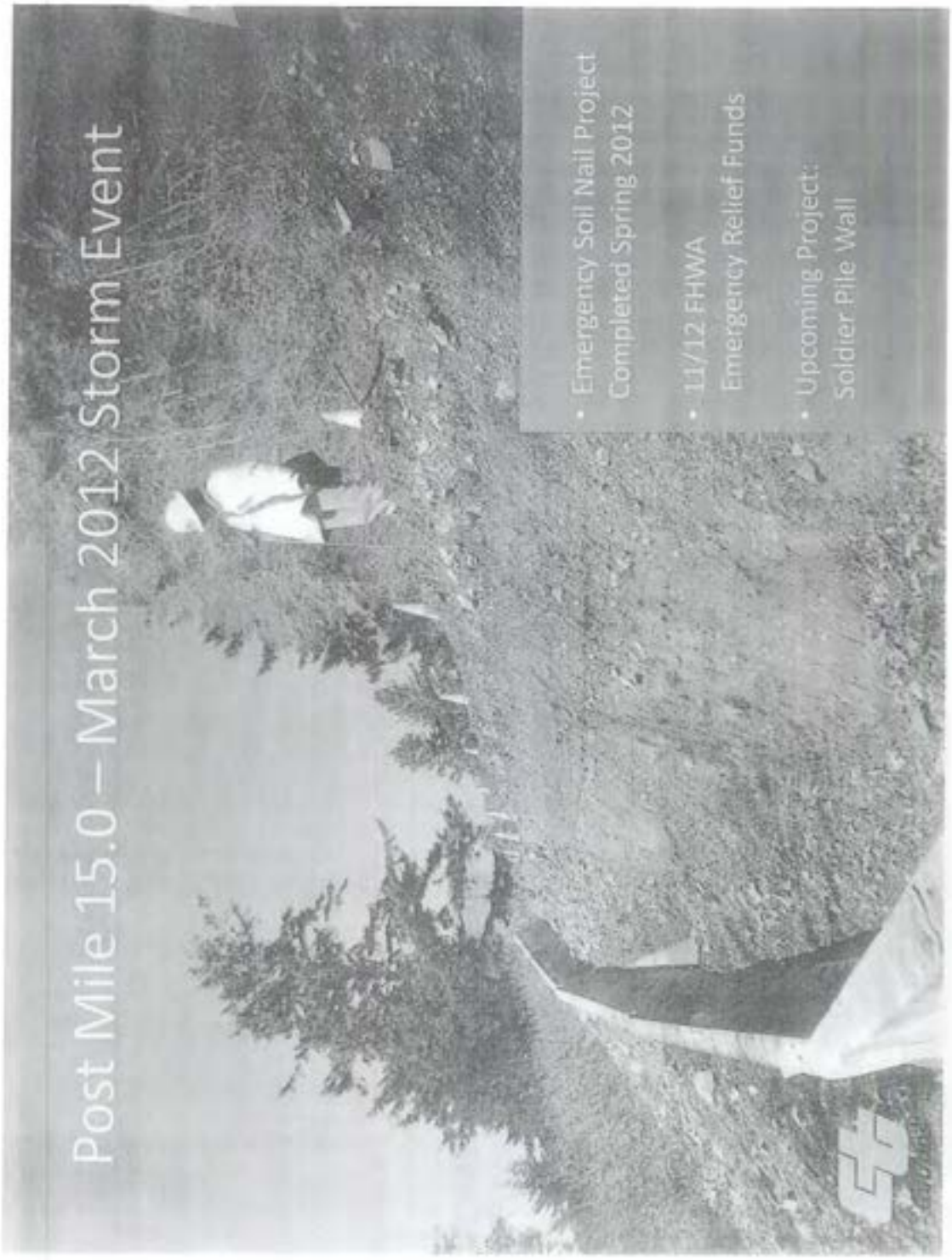

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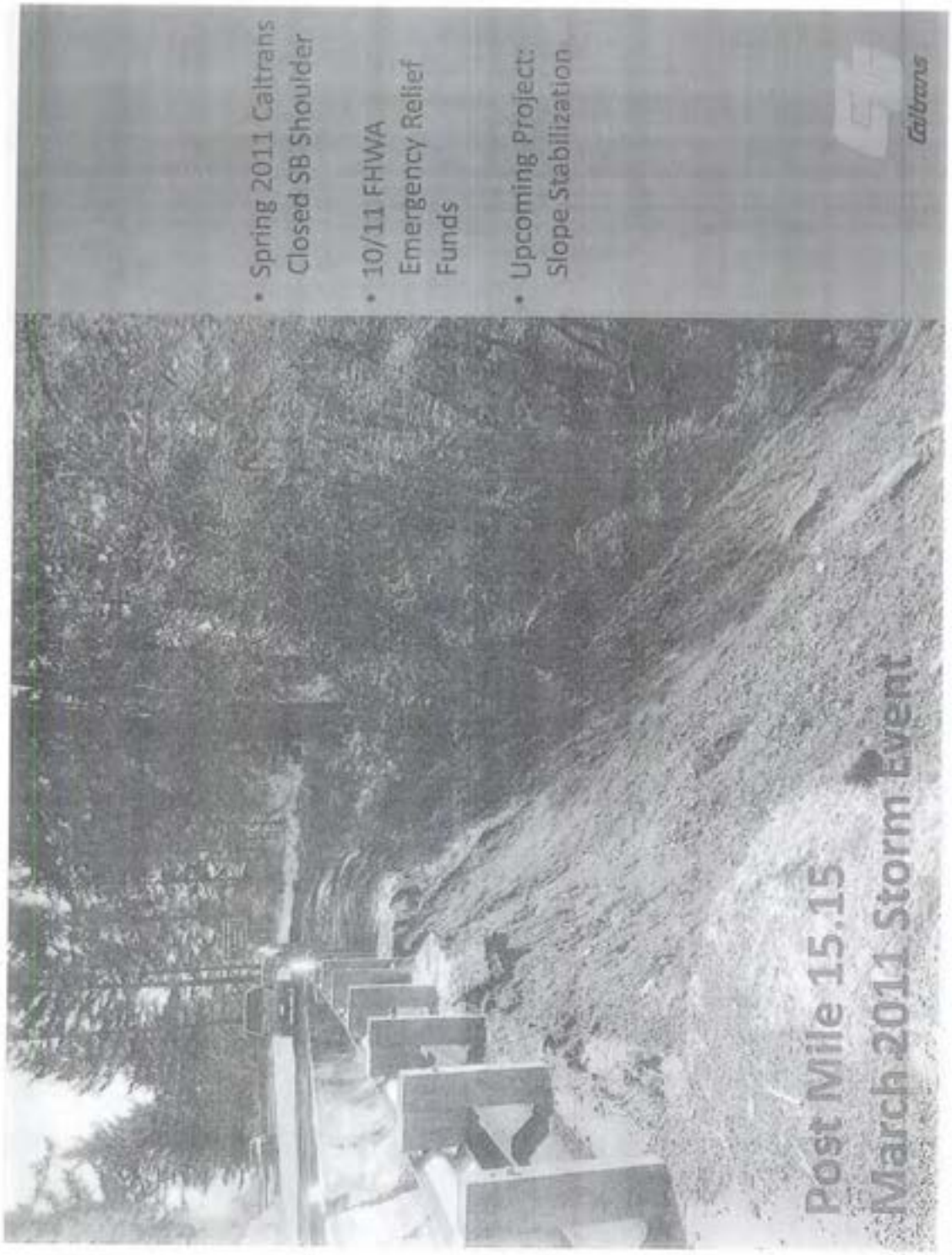

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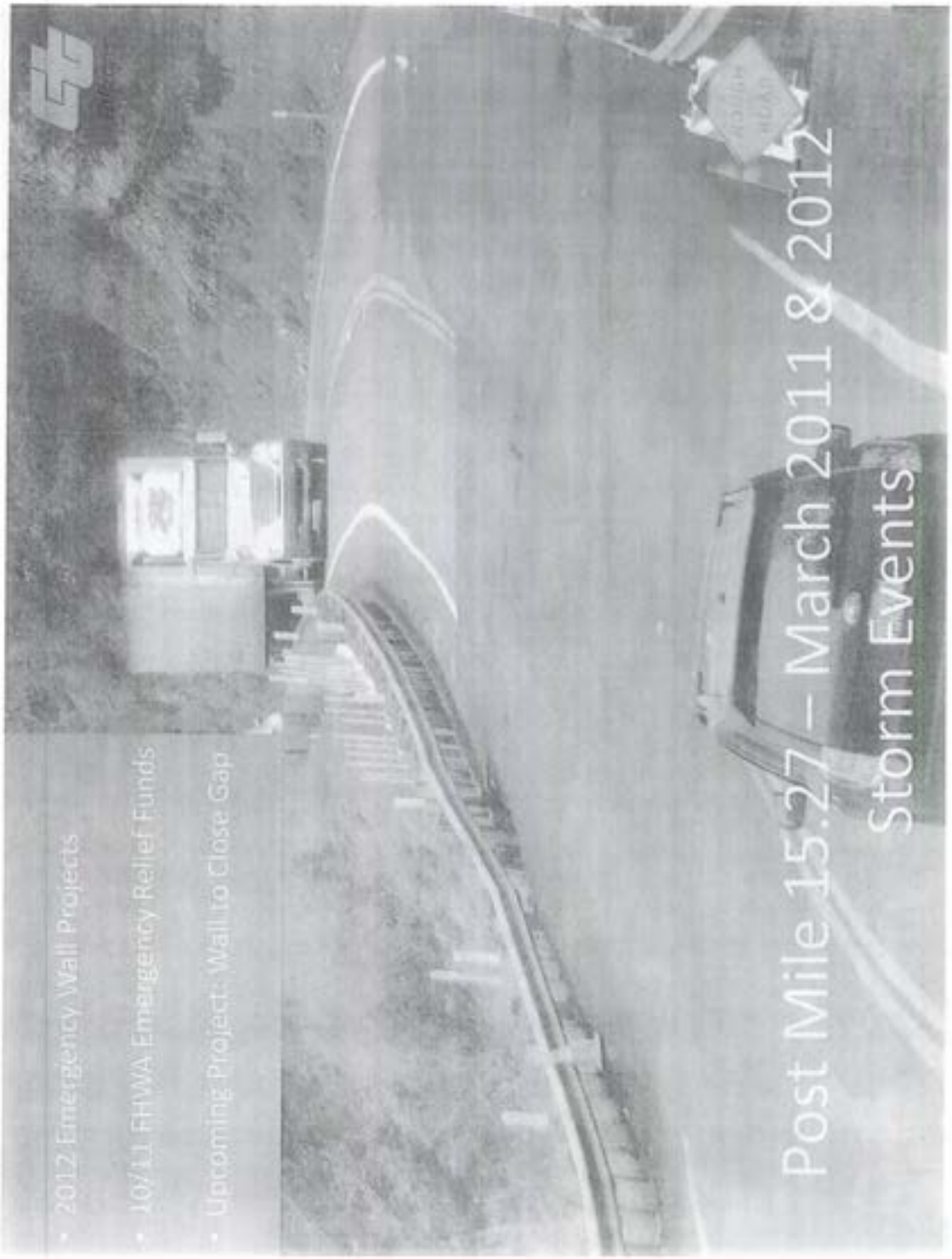

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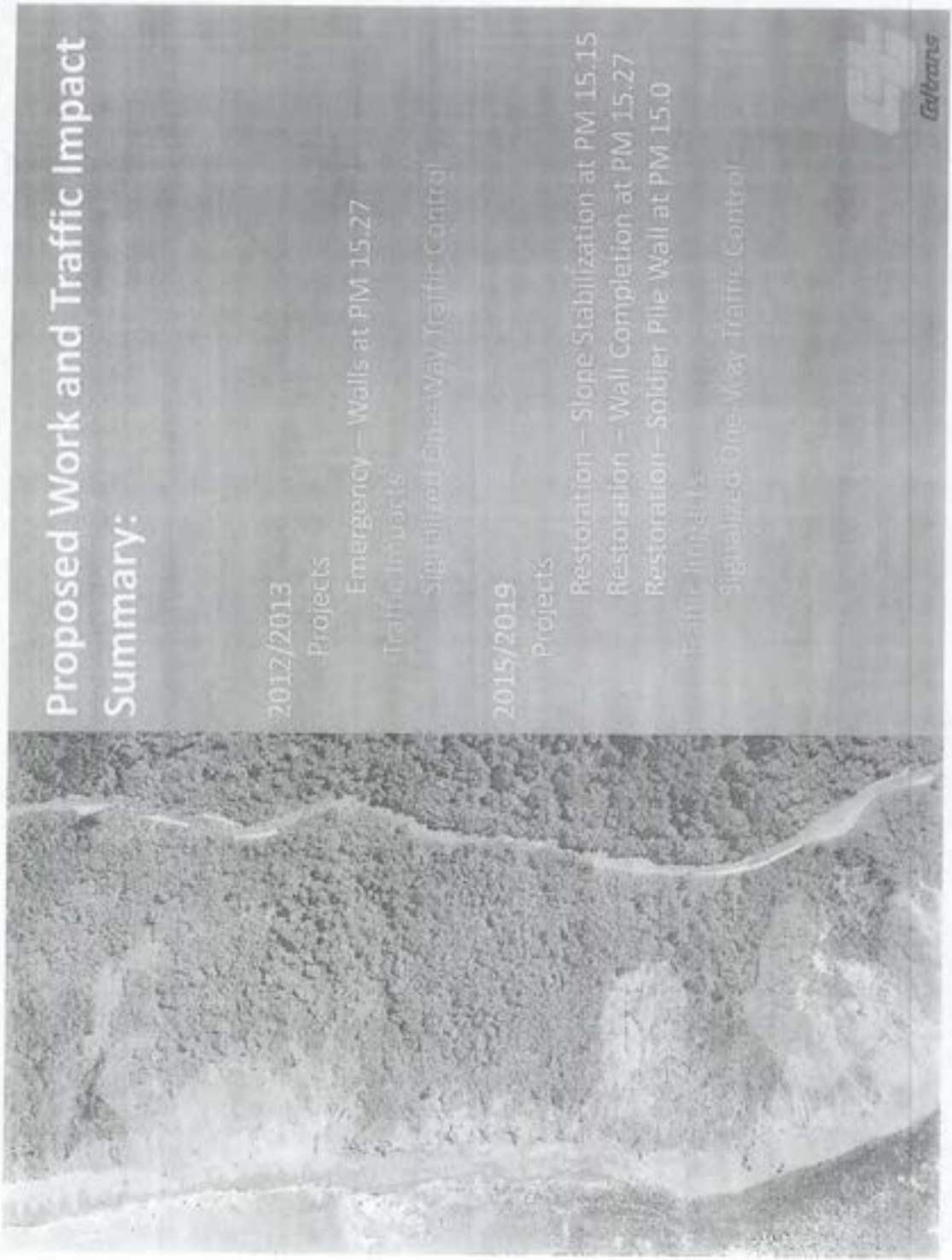

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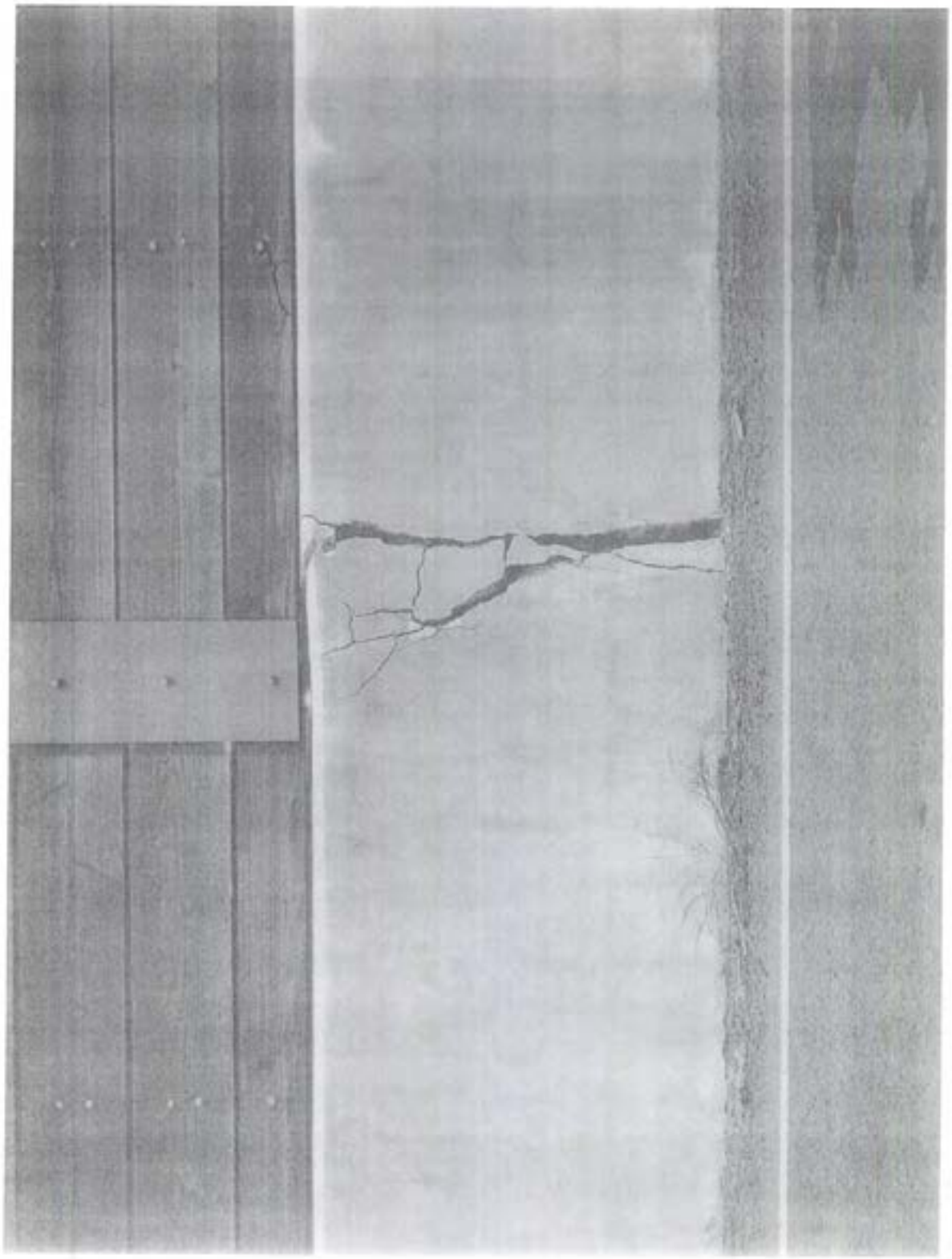

Friends of Del Norte (submitted by Eileen Cooper) Attachment 14

Att: 14

BUSCH GEOTECHNICAL CONSULTANTS

March 29, 2012

Friends of Del Norte
C/o Don Gillespie, President
2075 Moseley Road
Crescent City, CA 95531

Results of a Reconnaissance-Level Geotechnical Inspection of Specific US 101 Mileposts between Wilson Creek and the Cushing Creek Curve, Del Norte County, California for the Friends of Del Norte

Dear Mr. Gillespie:

Introduction

At your request, with the Friends of Del Norte Board's approval, and under the general terms of our Work Agreement of March 9 as amended, I am delivering this brief summary of the conditions at each of five specific mileposts (MPs) you asked me to evaluate on US 101. I have retained numerous documentary digital photographs in your job file (#12-010) as well as a copy of my field notes and other materials. This is a short form report in that it does not contain background geologic information, information on the tectonic setting, figures, photographs, or references. My scope of work was limited to visually inspecting each area from the road edge, categorizing the type of road problem I observed, and qualitatively assessing the risk of future problems at the locale. Hand-auguring boreholes, collecting soil and rock samples, doing lab tests, and making measurements were excluded from my scope of work.

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Observations and Conclusions

The MPs I inspected, the type of problem, and the risk at each are:

Milepost	Type of Road or Slope Problem	Long-Term Risk
MP 12.92 to 14.42	Slump / earthflow undercut by ocean	Very High
MP 15.27	Probable head of incipient debris slide	Mod to High
MP 16.5 to 16.9	Provisionally stable earthflow	Moderate
MP 17.5	Failure of outboard road prism	High
MP 21.9 to 22.0	Previously repaired failure failing again	High

GLOSSARY: To help you make sense of my observations and conclusions I first want to present some short-form definitions of critical words I use in this report.

Debris slide (n): A type of mass movement of soil and rock that often occurs on steep (often 65% and steeper) slopes following a prolonged rain. Debris slides occur rapidly so often are catastrophic. A prior study Busch Geotechnical did of the entire Wilson Creek bluff section for an energy company identified many debris slide scars on the slopes, some extending upslope to US 101 (reference available upon request). The study also determined that debris slides are reoccurring phenomena here.

Earthflow (n.): A plastic deformation of soils in which the failing materials typically tend to creep or otherwise move slowly downslope en masse, often above one or more slip planes or zones that roughly parallel the slope of the ground surface. The type of movement is primarily **translational.** Often the upslope (head) region of an earthflow begins as a **rotational** failure called a **slump**, hence the term slump-earthflow or SEF for the terrain as a whole. Common landforms in SEF terrain include hummocky ground supporting leaning trees, indeterminate drainages, steps and back-tilted benches, and others. SEF terrain is common in structurally weak bedrock such as sheared mudstone, particularly when it is on steep, wet, or surcharged slopes, slopes undercut by an ocean, river, or excavation, or slopes with several of these factors.

Inboard (adj.): The uphill side of a road. The downslope side is the **outboard** side.

Provisionally Stable (adj.): A provisionally stable slope is a marginally stable slope. It is "stable" on the day it is evaluated, but is at risk of a future failure if some external force acts on it (e.g., an earthquake, 25-yr storm, human excavation, etc.).

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Road prism (n): The cross-section of the road between the **top of a cutbank** on the inboard side and the **toe of the fill** on the outboard side. The upslope portion of a road prism often is a surface excavated into the slope materials whereas the downslope portion (usually called the **fill prism**) often consists of compacted soils. Failures of fill prisms are common on steep slopes, wet slopes, and poorly prepared slopes, and where the fill was inadequately compacted or placed on a slope that itself was unstable.

Additional Details by Mile Post

MP 12.92 to 14.42 Slump / earthflow terrain undercut by ocean Very High

The actual range of this slump / earthflow terrain is ~MP 12.92 (the northwest corner of the Wilson Creek Bridge) to ~MP 14.08 (the northernmost recognizable landforms indicative of earthflow movements beneath the road). This section of road crosses extremely hummocky terrain within a chronic failure. The failure is worst so most often affects the road near the north end of the Wilson Creek Bridge because the ocean is nearest to the toe of the slope at that location. Also, because this area is one of the few four-lane areas, passing cars tend to speed across a travelway surface where control is difficult. The long-term risk of failure of this section of road is Very High. Keeping the road open here will require continuous repairs and eventually the construction of some type of high-cost /mile stabilization structure (rip rap buttress, soldier pile wall, sheet pile wall, etc.) beginning at the north end of the bridge and extending fir several hundred feet. Currently this at-risk area is kept passable by filling open cracks and top-dressing it with asphaltic concrete. Each repair, in effect adds more weight to the top of the failing block of land, surcharging the slope.

As a note, I inspected this section of road on March 5th, and saw it again on March 23rd and 27th. It had been repaired (more asphalt top dressing had been added during the interim).

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MP 15.27 Probable head of incipient debris slide Mod to High

This milepost and a similar one at the curve at MP 15.15 are sites of possible future catastrophic outboard road edge failures because they are above precipitous provisionally stable to inactive debris slide heads that could be reactivated. These two sites will be difficult to stabilize without cutting old growth trees below the road. It is likely that it will be necessary to construct a high-cost stabilization structure much like those nearby on this grade because the road probably cannot be shifted inboard.

MP 16.5 to 16.9 Provisionally stable earthflow Moderate

This is the least threatening site of any of those I reviewed. Future repairs are likely to be minor and successful.

MP 17.5 Failure of outboard road prism High

This stretch extends from ~MP 17.4 or a little before to ~17.6. The outboard edge of the road is failing (settling, cracking) and is at risk of a more significant (larger, deeper) failure because the fill prism face is steep and it is located above a steep native slope. Risk is highest to the north. Slopes on the east side of the road are moderate, but there is a weakly defined drainage there that brings groundwater below the road, probably saturating the outboard toe. The road fill prism was constructed on top of a steep native slope. This section too was repaired in the short interim between my visits.

MP 21.9 to 22.0 Previously repaired failure failing again High

This section of road was repaired previously using high-density foam as the fill, rather than compacted soil or rock. Undoubtedly this is because it is steep and unstable below the road here, so the project engineers attempted to minimize the load on the bearing soils. Unfortunately, the native soils below the high-tech "fix" are still moving, so this section of road is still failing. I inspected and photographed this section on March 2nd, on March 22nd noticed the road shoulder and outboard travelway had cracked more. On March 27 I observed Cal Trans vehicles on the site and on March 28 new asphalt patching was obvious.

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Closure and Authentication

In closing, thank you again for hiring me. I hope this is not too technical and that it provides you the information you need to argue your case successfully. I am available to do a more detailed (preliminary) geotechnical investigation if necessary. That investigation would provide slope steepness data for the fill prisms and native slopes below; crack length and pattern information; more descriptive detail; and annotated photographs.

If I can help in any other way, please call.

Cordially,

Busch Geotechnical Consultants

CERTIFIED ENGINEERING GEOLOGIST
R. E. BUSCH, JR.
NO. 1448
STATE OF CALIFORNIA

R. E. Busch, Jr., Ph.D.
C.E.G. #1448
Owner

Distribution: Three (3) wet-signed copies to Friends of Del Norte

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 15

Att 15

Virginia Bicycling Federation

Advocacy, Safety, & Education

Vehicle Weight and Road Damage

by admin on December 2, 2009

Heavy trucks obviously cause more road damage than cars, but how much more? According to a GAO study, Excessive Truck Weight: An Expensive Burden We Can No Longer Afford, road damage from **one 18-wheeler is equivalent to 9600 cars** (p.23 of study, p.36 of PDF).

The study assumed a fully loaded tractor-trailer at 80,000 pounds, and a typical passenger car at 4,000 pounds. That's 20 times difference in weight, but the wear and tear caused by the truck is *exponentially greater*.

Food for thought: a bicycle and rider at 200 pounds is the same 20 times less heavy than a 4000 pound passenger car. Similarly, the wear and tear caused by that bike and rider would be *exponentially less* than a passenger car's.

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The DEIR/EA fails to identify and investigate how large increases in numbers of trucks (as a result of creating an STAA I-5 bypass loop) will affect Hwy 101 south of Crescent City, which is a very geologically unstable area.

These sites contain a special report that show that Hwy 101 is geologically very unstable. We are very concerned about this impact due to the creation of an STAA loop that induces large volumes of trucks.

Special Report 184 - Landslides in the Highway 101 Corridor between Wilson Creek and Crescent City, Del Norte County, California
by C.J. Wills, 2000, California Geological Survey, 24 pgs.

Download Special Report 184- PDF Document (1.8 MB)
Download Geologic Map (1 MB)
Download Landslide Map (2.2 MB)

http://www.conservation.ca.gov/cgs/rghm/landslides/Pages/index.aspx

http://www.conservation.ca.gov/cgs/rghm/landslides/SR_184/Documents/CT101dn.pdf

Friends of Del Norte (submitted by Eileen Cooper) Attachment 16

A#: 16

ADVOCATES for Highway and Auto Safety

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FACT SHEET

Press Room: Truck Safety

Fact Sheet: NAFTA Trucks

Fact Sheet: Young Drivers & Large Trucks

Young Drivers: What Others Are Saying

The Dangers of Large Trucks

Large trucks - including tractor-trailers, single-unit trucks, and certain heavy cargo vans with gross weight of more than 10,000 pounds - account for a disproportionate share of traffic deaths based on miles traveled. The fatal crash rate for large trucks is 2.4 deaths per 100 million vehicle miles traveled - more than 50 percent greater than the rate for all vehicles on the roads. People in passenger vehicles are especially vulnerable in collisions with large trucks because of the great difference in weight between cars and large tucks. *In two-vehicle crashes involving passenger vehicles and large trucks, 98 percent of the fatalities were occupants of the passenger vehicle.*

Overweight trucks are even more dangerous than trucks that stay within the current federal weight limits. *Overweight trucks not only take longer to brake and are more prone to roll over in crashes, but they also damage roads and bridges at rapidly increasing rates even when slightly overloaded.*

LARGE TRUCK CRASH FACTS

- 5,190 people were killed in crashes involving large trucks in 2004, representing 12 percent of all traffic fatalities. Of these, 77 percent were occupants of another vehicle, 14 percent were large truck occupants, and 8 percent were non-occupants. An additional 116,000 people were injured in those crashes. (National Highway Traffic Safety Administration, (NHTSA) 2005).
- Nearly one-quarter of occupant deaths in passenger vehicles that had multi-vehicle collisions were the result of crashes involving large trucks. (Insurance Institute for Highway Safety).
- Large trucks make up just 4 percent of all registered vehicles and 7 percent of all vehicle miles traveled, but are involved in 11 percent of all crash fatalities. (NHTSA).
- The annual death toll from truck-related crashes is the equivalent of twenty-six major airplane crashes every year.
- The large number of truck-related deaths and injuries carries an enormous personal and financial price tag. The costs of large truck crashes in a year exceed $19 billion. (Federal Motor Carrier Safety Administration (FMCSA)).

WHY FREEZE TRUCK SIZE AND WEIGHT?

Bigger Trucks Compromise Safety. The chances of a big truck crash resulting in deaths and serious injuries increase with

http://www.saferoads.org/issues/fs-trucks.htm 10/22/2012

Friends of Del Norte (submitted by Eileen Cooper) Attachment 16

each extra ton of weight over the 80,000 pound gross vehicle weight (GVW) limit in federal law. These federal weight limits are used by many states as the upper limit on truck weight even on most of their state roads. A big truck weighing even a legal 80,000 pounds is more than twice as likely to be involved in a fatal crash than a truck weighing about 50,000 pounds. (University of Michigan Transportation Research Institute (UMTRI) 1988).

Cost. One legal 80,000 pound GVW tractor-trailer truck does as much damage to road pavement as 9,600 cars. (Highway Research Board, NAS, 1962). Overweight trucks chronically underpay their fair share of taxes and user fees for the repair of U.S. roads and bridges. By damaging roads, large trucks further degrade highway safety. (U.S. DOT, 1997).

Bigger Trucks Still Mean More Trucks. Increases in truck size and weight will not decrease the number of trips, result in fewer miles traveled, or improve safety by reducing the number of trucks on the highways. Past increases in truck size and weight have not resulted in fewer trucks, fewer trips, or fewer miles traveled. The number of trucks on U.S. highways has consistently grown, even after increases in both the sizes and weights of large trucks.

TRB Study Supporting Increase in Truck Size and Weight is Fundamentally Flawed. The Transportation Research Board (TRB) Special Report No. 267, Regulation of Weights, Lengths, and Widths of Commercial Motor Vehicles (2002), has been rebutted by every truck and highway safety organization. The study supports two specific configurations as larger, heavier vehicles of choice without a single argument as to why these configurations are better than others. The Committee undermines any possible support for these combinations by pointing out that virtually nothing is known about the relationship between any specific design configurations, crash risk, and truck handling and stability. The Committee also issued warnings about the unintended consequences that may accompany the use of larger combination trucks with higher axle and gross weights.

Trucks Keep Getting Bigger. Trailer lengths for combination vehicles (tractor-trailers) have continued to grow over the past few decades, moving from an industry standard of 40 feet in the 1960s, to 48 feet in the 1970s, to 53 feet in the late 1980s. Some states even allow 57- and 59-foot trailers.

Infrastructure Cannot Support Bigger Trucks. A survey conducted in the early 1990s by the American Association of State Highway and Transportation Officials (AASHTO) showed that many ramps on even Interstate highways were unable to accommodate the off-tracking, swept path width of a tractor-trailer pulling even a 48-foot long semi-trailer. Many combination trucks currently pulling 53-foot long trailers cannot safely negotiate such ramps, especially elevated ramps bordered by bridge parapets or guardrails. These trucks also intrude into the traffic lanes used by passenger cars and threaten their safety.

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Bigger Trucks Require More Stopping Time. A truck weighing 100,000 pounds with unadjusted brakes travels 25 percent further after the driver steps on the brakes than an 80,000 pound truck. A 120,000 pound truck can travel as much as 50 percent further before stopping than an 80,000 pound truck. (UMTRI, 1983; TRB; National Academy of Sciences (NAS) 1990).

Americans Don't Want Bigger Trucks. By an 88 percent majority, the American public is opposed to allowing bigger and heavier trucks on the highways. (Lou Harris Poll, 1996). Seventy-eight (78) percent of Americans are willing to pay higher prices for goods shipped in trucks in exchange for tougher truck safety standards. (Caravan Poll, 1999).

September 2005

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 17

OPINION

A4
The Daily Triplicate
Wednesday
April 9, 2008

Att 17

Do we really want big truck access?

Coastal Voices

Don Gillespie

For the past year I have read with interest Triplicate articles about making changes to Highways 199 and 197 to accommodate STAA-approved trucks. The momentum is building to invite these trucks in the name of progress and economic viability.

There may be compelling arguments in favor of making these changes, and it appears that the money may be made available to Caltrans for these projects. However, I am amazed that no public officials, in any public forum that I am aware of, are asking the hard questions about highway safety for the motorist, the actual economic benefits of the STAA trucks, and the potential increased environmental hazards of pursuing such a project.

I would expect our county supervisors, the Local Transportation Commission, other elected officials and newspaper reporters to raise some questions, but so far there seems to be just a pep-rally mentality to support inviting these large trucks to our remote county. Are there really no concerns about the possible negative aspects?

Motorist safety

My first concern is for the safety of the regular motorists who drive our already dangerous highways. Truckers are not the only people who rely on safe access to Interstate 5 and beyond. What are the safety issues of allowing bigger trucks to access Highways 199/197?

Of course the highways will be widened at pinch-points to make them safer, but this will also create an STAA corridor to access Humboldt and Curry counties. This will increase truck traffic with bigger trucks from around the country, with hurried drivers who are unfamiliar with local highway pinch-points.

How will we be impacted when I-5 closes in winter at Siskiyou Summit? Won't truckers detour over Highway 199? In the same breath our local Chamber of Commerce talks of increasing the number of tourists in motor homes and trailers. I don't see how bigger trucks and more slow motor homes can be a safe mix. Our roadways are not being straightened, just a few realignments, and they will remain dangerous to drive.

In 2007 the Del Norte Local Transportation Commission published an 18-page document entitled, "Achieving STAA Route Status for Hwy's 199/197, A Goods Movement Action Plan." This document serves as the basis for asking Caltrans to improve our Hwy. 199/197 corridor, yet it dedicates one six-sentence paragraph to the issue of "Enhanced Public Safety." It doesn't even mention the possibility of negative impacts to motorists. It does state, "The three-year accident rate for this segment of U.S. Highway 199 exceeds the statewide average for similar facilities by over four times."

What happens when we add bigger STAA-approved trucks to this mix? It is possible that the accident rate may increase. Shouldn't we look at this?

Economic impact

Another thing that I have been looking for is a study showing the importance of STAA trucks to our economy. The closest anyone has come to this is Kelly Atherton in her Feb. 15 Triplicate article, "Big Cost of Small Trucks." She does a good job of delving into the core economic issues of STAA trucks. Ms. Atherton states, "One local company estimates it's losing hundreds of thousands of dollars because of the situation."

But there is no explanation of who this is, how this loss is calculated, or why the costs are so huge. Is the economic loss to a large company or to our community?

Short wheel-based trucks

We keep hearing about saving money because STAA trucks will pull bigger trailers to haul more goods per load and save on fuel efficiency. Sounds great, but the largest legal trailer in America is 53 feet. We already have 53-foot trailers legally coming into Del Norte County; but, they are being pulled by short wheel based, cab-over trucks. STAA trucks have a long wheelbase so they can carry the fancy sleeping accommodations and avoid hotel expenses for the company. This is a negative impact to the local hotel establishments.

We presently have a niche market for short wheelbase, cab-over truckers who haul freight over Hwy. 199/197. They are experienced drivers who are familiar with the problems of hauling 53-foot trailers along our narrow canyon. They stay in our hotels. Cab-over trucks are much cheaper to purchase than the big STAA trucks. So where is the savings to our economy? If these drivers are replaced, won't that be a net job loss to our community?

It would benefit us all if our Chamber of Commerce did a comparative economic analysis of other small communities who already have access to STAA trucks. How about the cities of Yreka, Cottage Grove, Coos Bay, or Cave Junction—they all have access to STAA trucking. It would be interesting to know how they benefit. I have friends who checked prices on 39 common items at Wal-Mart and Safeway stores in Cottage Grove, next to I-5, and Crescent City. They found virtually no difference in prices to the consumer.

Environmental concerns

Finally there are the environmental concerns of increasing the amount of goods being hauled along our pristine Smith River. The recent 4,000-gallon diesel spill, and the 1982 truck wreck that dumped a thousand-gallon industrial glue bag resulting in a Smith River fish-kill, exemplify these concerns.

These spills have to be handled by agencies outside our county and it takes hours for them to respond. How many more of these accidents will our river tolerate? The Smith River certainly has an economic value that is worth protecting. The improvements made to accommodate STAA trucks must contribute to this protection, not create more hazards. We must investigate the possibility of these impacts before we move headlong into spending millions to accommodate STAA trucks.

Get answers

With the current rah-rah-rah mentality of our community leaders concerning the use of STAA trucks, I feel that the only way to get viable answers to these questions is to demand a complete economic analysis and a full Environmental Impact Report before any construction begins on Highways 199 or 197.

We live in a remarkable and remote environment here in Del Norte and Curry counties. We accept driving rugged and challenging roads and understand that is the price we pay for living in this beautiful place. As drivers we can minimize the dangers of navigating routs 199/197 by being cautious, skillful and alert. But having to compete for road space with STAA trucks will degrade, not enhance, the benefits of living in this pristine environment.

Therefore, we must embrace an EIR before Caltrans acts. It is up to our community to make sure that our elected officials are doing a comprehensive review of all aspects of this project.

Don Gillespie is a Crescent City resident.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 18

Att : 18

Induced Travel Under 2030 Build Conditions

Induced travel is also a factor that must be considered under future 2030 conditions. To develop an estimate of future induced travel effects of the proposed improvements, a literature review of induced travel research was performed. In general, all the studies indicated that long-term induced travel is more pronounced than short-term induced travel because over time more people have the opportunity to change their travel patterns and adapt business strategies to take advantage of lower transportation costs. While most of the studies reviewed merely correlated the growth in traffic on a corridor to a reduction in travel costs, a 2002 study by Robert Cervero of U.C. Berkeley explicitly estimated the amount of traffic that is caused by roadway projects. Cervero's research indicated that the long-term induced travel affect is about 3.9 times larger than the short-term induced travel affect.

Although the STAA improvements for US-199 and SR-197 will not add any new lane miles (e.g. building a new road or widening a road) or add a significant decrease or increase in travel speed, the improvements will straighten curves and make safety improvements, increasing lane miles that are accessible to STAA trucks. Therefore, the improvements' induced travel effects will apply only to STAA trucks and not to general vehicular traffic. No measurable increase in non-STAA vehicles trips or vehicle miles traveled is anticipated.

Applying data collected from surveys, growth factors, research on induced travel, and changes in land use, in 2030 there would be approximately 46 (8.25 short-term truck growth x 3.9 short-term/long-term induced growth factor x 1.44 growth factor) round-trips or 92 more trucks per day using the US-199 and SR-197 corridors than the 2030 no-build scenario.

LEVEL OF SERVICE ANALYSIS

Traffic operations analysis was conducted to evaluate the level of service (LOS) for study area roadway segments under four scenarios: Existing, Existing Build, Future 2030, and Future 2030 Build. The Build scenarios assume the STAA improvements. Caltrans attempts to maintain LOS C on State highway facilities (as listed on page 1 of the Caltrans Traffic Impact Study guidelines). To account for financial, environmental, and right-of-way limitations of achieving LOS C on all roadways, Caltrans publishes Route Concept Reports (RCR) where a long-term concept LOS is defined based on what can reasonably be constructed. For this report, impacts are based on the following concept LOS thresholds published in the Route Concept Reports for the respective highways:

- SR-197 – the selected concept LOS is E.
- US-199 – the selected concept LOS is D.
- US-101 – the preferred LOS is C for four-lane segments in rural areas, and D for urban areas and two-lane segments in rural areas.

LOS was measured using methodologies contained in the Highway Capacity Manual 2000. The Highway Capacity Software was used to apply these methodologies.

All routes operate at, or better than, their respective concept LOS in all scenarios (see report for a more detailed report on LOS and percent time-spent-following). The traffic effects of improving US-199 and SR-197 to allow STAA trucks on truck volumes are minimal and do not significantly affect LOS between the no-build and build scenarios.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 19

Att 19

safety info for hwy 101 cushing creek curves:

SCH Number: 2012048123

Document Type: NOE - Notice of Exemption

Project Lead Agency: Caltrans #1

Project Description

Project is to apply a high friction surface tretment (HFST) to the traveled lanes, turning lanes and both shoulders of the highway. HFST is an epoxy-resin or polyurethane-resin binder topped with a calcined bauxite aggregate topping. Standard pavement markings will be applied to the road after HFST application. Shoulder backing is not anticipated. Purpose of treatment is to reduce collisions by increasing the traction of cars on the roadway. **Treatment is needed because Fatalility-plus-Injury and Total Collision rates are 8 and 11 times the statewide average for a similar facility.**

Contact Information

Primary Contact:
Valerie Gizinski
California Department of Transportation, District 1
707 445-5320
1656 Union Street
Eureka, CA 95501

Project Location

County: Del Norte
City:
Region:
Other Location Info: 3 mi S of Crescent City

Friends of Del Norte (submitted by Eileen Cooper) Attachment 20

Att 20

20 AUG 2010

TO: KIM HAYLER ENVORNMENTAL COORDINATOR
CALTRANS P.O BOX 2700
EUREKA CA 95502

FROM: TED W SOUZA
P.O. BOX 229
GASQUET CA 95543

SUBJECT: HWY 197/199 STAA PROJECT

A. MY LETTER DATED 28 APRIL 2008

DEAR MR HAYLER

I VIEW WITH GRAVE CONCURN THE MANY BAD TURNS ADDRESSED BETWEEN MILE POST 13.00 AND MILE POST 6.55 THAT HAVE MAJOR PROBLEMS THAT ARE NOT ADDRESSED IN THE DRAFT ENVORNMENTAL INPACT REPORT. THAT ARE SAFTY ITEMS.

THIS PLAN STATES THERE WILL BE ECONOMIC GAINS MAUBE OR COULD ?

THIS PROJECT DOSN'T STRIGHTEN ANY CONERS IT SLIGHTLY LENGTHENS THE RADIOUS OF A CURVES AND MANY DANGERIOUS AREAS REMAIN.

IN THE AREA OF MILE POST 6.55 THE SPEED LIMIT SIGN SAY END OF 50 MPH. THIS SHOULD BE REVIEWED AS YOUR GOING INTO A SHORT CURVE WITH A ROAD COMMING OUT IN THAT AREA.

ENCLOSED IS MY LETTER DATED 28 APR 08 SUBJECT CAL/TRANS MEETING STAA STILL APRLIES.

SINCERELY

Ted W. Souza

Friends of Del Norte (submitted by Eileen Cooper) Attachment 20

April 28, 2008

To: Kevin Church, Project Manager
CALTRAN P O Box 3700
Eureka, Ca. 95502

From: Ted W. Souza
P O Box 229
Gasquet, Ca. 95543-0229

SUBJECT: CAL/TRANS Meeting of April 17, 2008
STAA Access

Dear Mr. Chruch,

My family has been coming to Del Norte County every since 1956, both winter to fish and summer for vacations and a full resident of Gasquet since 1972.

There have been many highway changes over those years: in 1963 the Collier Tunnel opened the East gateway to Del Norte County, was the Greatest; the Patrick Narrows, Blue Slide to name; a few others were very good.

I still pull my travel trailer up and down the canyon every year and still feel safe on both HWY 197/199.

For many years Loggers, Hambro, Lilly Bulb trucks and many other trucking lines used these roadways with very few problems. The roads are as safe asthe drivers and the loads they carry.

Do we need an environmental impack report? Yes. As your past record reads.

In 1962, CAL/TRANS made changes to the Smith River courses in several places. MP.20.05 Howard Griffith Bridgearea. To this day the Slides are Still active and coming down, effecting our Fishery. At MP.20.15 the hillside is still not stable.

At MP.19.00, after the 1964 flood CAL/TRANS used the old Cedar Forest camp ground fora fill site for every slide in the canyon. The high winter water usedto flood thru the camp ground and continue down stream.

PAGE 1 of 3

Friends of Del Norte (submitted by Eileen Cooper) Attachment 20

Now after your mountain of fill you have forced the high water on to the other side of the river, causing that other hill to come down destroying more large fishing holes and more precious fishery every year. Take some of your money and try to fix that.

Let's not forget the toxic spills of the past and not because of the roads.

As close as I can remember the dates are close and they did happen.

1962, the creosote mill above Bar-O got into the river. Not good for fish.

Early 1980's, late December, a ASBY gasoline truck full went into the river above Gasquet. High water at the time. Fumes were everywhere in the canyon.

In the 1990's the Hiouchi Bridge. A truck with a large crane took a shortcut, did not use Hwy.197, but used Hwy.199 in the early AM took out the bridge. For 18 months we used Hwy197 to get to Crescent City. Not a road problem.

In 1993, above Bar-O, a beer truck spilled into the river, many cans of beer and some beer. Not good for the fish.

August, 1994, paint spill MP.28.00 area caused big fish kill: both Steelhead and Coho Salmon Smolts in the middle fork.

In 2000, around MP 25.30, an Otten Gasoline truck hit cement colvert, spilling a load of fuel in to ground water of the homes in the area. Not a road problem.

2006 or '07, MP. 2.56 in Jed Smith State Park, a large transformer fell off of a flat bed truck into Clarks Creek. Not good for fish.

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February, 2008, MP.11.30, 4000 Gal.+, diesel spill. CHP/CALTRANS workers did an outstanding job of containing it with their quick response. Still being cleaned up to this day. Not a road problem either.

Del Norte County should promote tourism as our roads are very good by most standards. Remember, this is a National Recreation area. We have had good growth without these STAA Trucks in Del Norte County. Let's keep it that way. This is a NRA and HWY 199 is a Scenic Highway.

Safty item not addressed at the meeting: HWY 197, MP 6.0[illegible] No guard rail. River very close and steep bank. HWY 199, just above MP.9.27, many, many single car accidents. (Speed?) Look at the trees on the turn. It may need a guard rail?

In the 15 years I was the Chief of the Gasquet Fire Dept., I don't remember one accident caused by the road. It was always the drivers, speed, wet weather or something else.

Thank you for this opportunity to express my thoughts.

Sincerely

Ted W Souza

Ted W. Souza

Copy to: Tamera Buchanan, Del Norte Local Trans. Comm.
Congressman Mike Thompson

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 21

Att 21

ROUTE CONCEPT REPORT

ROUTE 199

1-DN-199-T0.5/36.4

All information in this Route Concept Report is subject to change as conditions change and new information is obtained.

I approve this Route Concept Report to guide today's route development decisions and/or recommendations.

Approval Recommended:

JERRY HAYNES Date
Deputy District Director
Office of Project Development
and Construction

Approval Recommended:

RICK KNAPP 9/25/89 Date
Deputy District Director
Office of Planning
and Programming

Approved:

E. F. POCH 9-29-89 Date
District Director
of Transportation
District 1

Friends of Del Norte (submitted by Eileen Cooper) Attachment 21

ROUTE CONCEPT REPORT

Statement of Planning Intent

The Route Concept Report (RCR) is a planning document which describes the Department's basic approach to development of a given route. Considering reasonable financial constraints and projected travel demand over a 20-year planning period, the RCR defines an appropriate type of facility and level of service for each route. The objective of the effort is to provide a better basis for the development of the State Transportation Improvement Program and for determination of the appropriate concept for future highway projects.

Route Concept Reports are prepared by District staff in cooperation with local and regional agencies. They will be updated as necessary as conditions change or new information is obtained.

Route Concept Reports are a preliminary planning phase that lead to subsequent programming and the project development process. As such, the specific nature of proposed improvements (i.e., roadway width, number of lanes, access control, etc.) may change in later project development stages, with final determinations made during the project report and design phases. Roadway widths, as discussed in Route Concept Reports, are used for the purpose of estimating improvement costs, and may change depending upon operating conditions and design standards at the time of actual project development.

Assumption

The following assumptions form the basis for the development of Route Concept Reports:

1. The relative importance of State highways in the District can generally be established based on the functional classification of the routes. In general, higher priorities will be given to major improvements on principal arterial routes as compared to minor arterials and collectors.

2. For routes the District can reasonably expect to improve (generally Principal Arterials), realistic concept LOS must be established for each route in order to have route concepts and route development plans which are possible to achieve, given a forecast of future revenues. A concept LOS is not established on routes which will only be rehabilitated and/or maintained.

3. Level of service and capacity calculations are based on the 1985 Highway Capacity Manual. Previous Route Concept Report level of service and capacity calculations were based on the 1965 Highway Capacity Manual.

4. The 1985 Highway Capacity Manual Chapter addressing two-lane highways does not set a maximum limit on the level of service attainable based on restricted design speed. District 1 uses the table in Chapter 5 page 15 to limit the level of service attainable due to restricted design speed. Further, District capacity calculations include a factor to increase capacity based on the length of passing lanes in two-lane segments.

5. Determinations of future LOS for the routes in District 1 are based in part upon Statewide and District forecasts of State highway travel developed by Caltrans.

6. Route concepts are generally uniform for an entire route, unless there is a major change in function along the route.

7. Major projects will be developed to meet standards acceptable to the Federal Highway Administration in order to receive Federal funding for projects. Otherwise, a "design exception" will be prepared during the project development process.

8. For all routes, safety projects will be pursued on an on-going basis in order to be responsive to safety problems as they are identified.

9. No planned or programmed improvements were assumed to be complete in analyzing present and future operating conditions. Section V of the Route Concept Report details programmed improvements in the 1988 STIP, with all costs in 1988 dollars.

10. An environmental document will not be required for Route Concept Reports. However, individual improvement projects identified in Route Concept Reports will follow the appropriate environmental process as required by law.

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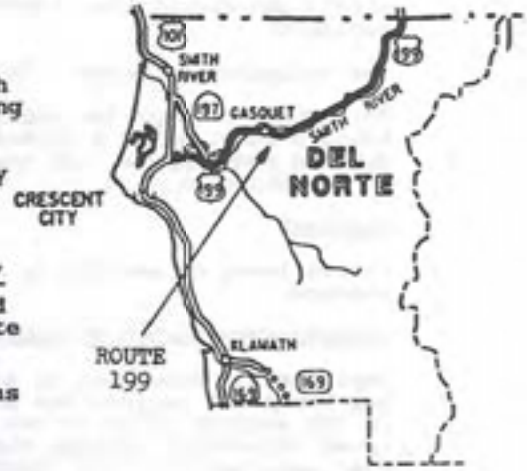
SUMMARY

ROUTE CONCEPT REPORT
FOR
ROUTE 199
1-DN-199-T0.5/36.4

ROUTE DESCRIPTION



Route 199 originates at Route 101 north of the City of Crescent City, traversing most of northern Del Norte County in a northeasterly direction to the Oregon State line. The Route is approximately 36 miles in length (within California) and is a Federal Aid Primary, Rural Principal Arterial. As a link between Route 101 and Route I-5 at Grants Pass, Oregon, it is used primarily for inter-state travel, recreational purposes and the movement of goods. The entire Route is part of the California Freeway and Expressway System and is eligible for designation as a Scenic Highway, but has not been officially designated. The Route is included in the "SHELL" Route System for the movement of extra-legal (permit) loads, however, it is not a STAA truck route.

The existing facility is typically 2-lane conventional highway with 12 foot wide lanes and 0- to 4-foot wide paved shoulders. Some locations are developed to 4-lane standards and passing lanes exist at other locations. Horizontal alignment is generally curvilinear, and vertical alignment reflects the rolling to mountainous terrain. Traffic volumes range from 2,450 to 3,100 AADT. Truck volumes range from 10% to 17% of the AADT, and peak month average daily traffic is approximately 135% of the AADT.

OPERATING CONDITIONS

Two lane segments of Route 199 operate at a "C" to "D" level of service currently. Level of service is expected to deteriorate to "D" and "E" on two lane segments by the year 2010. The one four lane segment currently operates at an "A" level of service, and is expected to continue to operate at this level through the year 2010.

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ROUTE CONCEPT/RATIONALE

Route 199 should remain basically a 2-lane, conventional highway, with passing lanes, maintained and rehabilitated as necessary. Additional passing lanes should be developed in the segment which does not meet the concept level of service. Where feasible, widening should be considered in conjunction with future rehabilitation projects to provide an adequate paved shoulder. Safety and operational improvements should be considered as necessary.

The recommended concept LOS for this Route is "D".

This Route Concept for Route 199 was selected based on the Route's function as a Principal Arterial, environmental and funding constraints, and competing priorities from other routes in the District.

CONCERNS

Future level of service is a concern on the DN-199-T0.5/13.0 segment.

IMPROVEMENTS NEEDED TO ACHIEVE ROUTE CONCEPT

Improvements necessary to achieve (or approach) the Route Concept for Route 199 include the provision of additional passing lanes in the segment which is not expected to maintain the concept level of service through the 20 year period. It is anticipated that such passing lane improvements will cost an estimated $3 million.

Safety and operational improvements should be considered as necessary.

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PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 199

DN-199-T0.5/13.0	DN-199-13.0/19.8	DN-199-19.8/27.1	DN-199-27.1/36.4
Terrain: Mountainous	Terrain: Rolling	Terrain: Mountainous	Terrain: Mountainous
Gradeline: Rolling	Gradeline: Rolling	Gradeline: Rolling	Gradeline: Rolling
Existing (1988)	Existing (1988)	Existing (1988)	Existing (1988)
2-lane Conventional	2/4-lane Conventional	2-lane Conventional	2-lane Conv./Expressway
22'-92' Paved Width	60' Paved Width	20'-40' Paved Width	28'-60' Paved Width
2500-3100 AADT	2450-2850 AADT	2450-2600 AADT	2450-2600 AADT
"D" LOS	"A" LOS	"C" LOS	"C" LOS
V/C: 0.28	V/C: 0.08	V/C: 0.26	V/C: 0.27
Accident Rate:	Accident Rate:	Accident Rate:	Accident Rate:
less than 1.5 times	less than 1.5 times	less than 1.5 times	less than 1.5 times
the statewide average	the statewide average	the statewide average	the statewide average
Future (2010)	Future (2010)	Future (2010)	Future (2010)
4150-5250 AADT	4050-4850 AADT	4050-4200 AADT	4050-4200 AADT
"E" LOS	"A" LOS	"D" LOS	"D" LOS
V/C: 0.45	V/C: 0.14	V/C: 0.43	V/C: 0.46

ROUTE CONCEPT

- Route 199 should remain basically a 2-lane, conventional highway with passing lanes, maintained and rehabilitated as necessary. Widening should be considered in conjunction with future rehabilitation projects.
- The concept level of service for this Route is "D".

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ROUTE CONCEPT REPORT

ROUTE 199

I. ROUTE DESCRIPTION AND PURPOSE

Description

Route 199, from Route 101 north of the City of Crescent City to the Oregon Border, is approximately 36 miles in length. Ultimately, the Route leads to Interstate 5, in Grants Pass, Oregon. The post mile description of this Route (within California) is: 1-DN-199-T0.5/36.4.

Originating at Route 101 north of Crescent City in Del Norte County, Route 199 generally follows the Smith River Canyon in a northeasterly direction to the Oregon State Line. The Route passes through the community of Gasquet (population approximately 400), however, most of the area is sparsely populated. At approximately post mile DN-199-4.4, the Route intersects with Route 197, a Rural Major Collector. The Route is wholly within the Six Rivers and Klamath National Forests from approximately DN-199-6.2 to the Oregon State Line.

Route Purpose

Route 199 is functionally classified as a Rural Principal Arterial. It is a Federal Aid Primary Route, and is a part of the California Freeway and Expressway System. Route 199 is a National Park road, and is eligible for designation as a Scenic Highway, but has not been officially designated. Route 199 is one of the most important State highway routes in northern California, and is essential for the interregional movement of goods (primarily forest related) within California, and the interstate movement of goods between California and Oregon. It serves for delivery of goods needed by residents in Del Norte County and the north coast, by linking Route 101 to I-5 and the Grants Pass/Medford area. It is a SHELL route, and as such is designated for use by extra legal (permit) loads. However, Route 199 is not part of the national network for STAA trucks and is not designated for use by STAA trucks (kingpin to rear axle length of up to 40').

Route 199 is a principal recreational route, passing through the northern portion of the Redwood National Park. Jedediah Smith Redwoods State Park, also along Route 199, and included within the National Park boundaries, is one of the most popular state parks in northwestern California. Route 199 provides access to the Smith River which is world renowned for its sport fishing. In addition, Route 199 serves as a local service route for the community of Gasquet and other smaller communities located along the Route.

The Route experiences generally light non-motorized traffic, with concentrations around the Jedediah Smith State Park and the community of Gasquet.

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II. Local & Regional Issues

Land Use

Land use adjacent to Route 199 in District 1 is expected to remain basically as it is now (open space, park land, and agricultural/timber products). Minimal development, primarily recreational/tourist oriented, is expected in and adjacent to existing communities. The Route currently experiences substantial recreational traffic, and this traffic is expected to continue to increase.

No substantial long-term right of way needs are anticipated for Route 199 in District 1. Some right of way may be needed for construction of passing lanes, storm damage reconstruction, maintenance, rehabilitation, or safety/operational improvements.

Environmental Considerations

Primary environmental considerations for Route 199 include the following:

- The Smith River is included in the Wild and Scenic River System, with a designation of recreational. Further, the Smith River is considered significant fishery habitat, and supports a sizeable salmon fishery.
- Areas near the Communities of Hiouchi (DN-199-6) and Gasquet (DN-199-14) are archaeologically sensitive.
- Rare plants may exist near the Community of Gasquet.
- A number of old growth redwoods exist within Jedediah Smith State Park, on the westerly portion of Route 199.

Regional Transportation Planning

The Draft 1988 Del Norte County Regional Transpcrtation Plan, Action Element, lists "Continued interest in development of the State highway system, particularly Routes 1C1 and 199,...." as a significant regional transportation issue of particular interest to the Del Norte Local Transportation Commission (DNLTC). A curve correction project (DN-199-24.1/24.6) and a passing lane project (DN-199-9.3/10.1) are listed as the first and second priority operational improvement State highway projects.

In reviewing Caltrans' system planning products, the Del Norte Local Transportation Commission expressed the concern improvements called for on Route 199 are not commensurate with the route's functional classification as a Principal Arterial; however, the DNLTC does recognize the severe environmental constraints to major development cf the Route.

While the DNLTC would like to see more development of Route 199, their highest priority for State highway development lies with specific segments of Route 101. Their two highest priorities for new highway construction are on Route 101 south of Crescent City.

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III. EXISTING FACILITIES

Route 199 is generally a 2-lane conventional highway, traversing rolling to mountainous terrain. One segment (DN-199-13.0/19.8) is 4-lane conventional highway, and much of the segment near the Oregon border (DN-199-28.1/36.4) is 2-lane expressway with passing lanes. Lane width is generally 12', and paved shoulders typically range from 0- to 4-foot, however, lane and paved shoulder widths vary considerably over the Route. Actual lane, paved shoulder, and total paved width ranges are shown in the table below:

HIGHWAY WIDTH
ROUTE 199

Post Mile	Location	No. of Lanes-Highway Type	Lane Width	Paved Shoulder Width	Total Paved Width
DN-199-T0.5/13.0	Route 101 to One mile west of Gasquet	2-C	11'-12'	0'-10'	22'-92'
DN-199-13.0/19.8	One mile west of Gasquet to two mi. west of Patricks Cr.	4-C	12'	4'	60'
DN-199-19.8/27.1	Two miles west of Patricks Cr. to Idlewild Maint. Sta.	2-C	11'-12'	0'-8'	24'-42'
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	2-C/E*	12'	1'-4'	26'-60'

* Several Passing Lanes in this segment.

Horizontal alignment on Route 199 in District 1 is generally curvilinear. The segment west of Gasquet to west of Patricks Creek (DN-199-13.0/19.8) has better alignment than the remainder of the Route, as it was constructed to 4-lane standards in the late 1960's. Vertical alignment is generally rolling, with some moderate to steep grades in the mountainous areas.

While the majority of right of way on Route 199 is 100 to 200 feet wide, some sections are as narrow as 60 feet wide. Much of the Route traverses Federal land, where the right of way has been provided to the State through special use permits, approved maps and easements. Most other right of way is either State owned, or the State has acquired an easement.

The entire length of Route 199 within District 1 is served by Greyhound Bus Lines. Buses make trips daily between Grants Pass, Oregon and Crescent City, California.

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No State-owned park and ride lots have been developed along Route 199.

Route 101, a principal arterial, intersects Route 199 north of Crescent City. Route 101 is the California Northcoast's primary highway access route. Route 199 is also intersected by Route 197, about four miles east of Route 101.

Ward Field, a public use airport in the Gasquet area, is served by Route 199. This is a small airport, with only two based aircraft and approximately 2000 aircraft operations annually. No railroads parallel or cross Route 199 within California.

IV. OPERATING CONDITIONS

Traffic Information

The following table summarizes projected Annual Average Daily Traffic (AADT) volumes for the 1988 year, and includes projections of future AADTs for the year 2010 on the major segments of Route 199. Also included are 20-year growth factors, truck volumes expressed as percent of AADT, and the present (1988) peak hour volume to capacity (v/c) ratio.

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TRAFFIC DATA
ROUTE 199

Post Mile/ Location	AADT Present (1988)/ Future (2010)	Present Peak Hour Volume[1]	Percent Trucks In AADT[2]	Average V/C Present (1988)/ Future (2010)	20-Year Growth Factor
DN-199-T0.5/13.0 (Rte. 101 to 1 mi. west of Gasquet)	2500-3100/ 4150-5250	350-400	10-17	.28/.45	1.60
DN-199-13.0/19.8 (1 mi. west of Gasquet to 2 mi. west of Patricks Cr.)	2450-2850/ 4050-4650	350	10-17	.08/.14	1.60
DN-199-19.8/27.1 (2 mi. west of Patricks Cr. to Idlewild Maint. Station)	2450-2600/ 4050-4200	350	10-17	.26/.43	1.60
DN-199-27.1/36.4 (Idlewild Maint. Station to the Oregon state line)	2450-2600/ 4050-4200	350	10-17	.27/.46	1.60

Peak month Average Daily Traffic volumes for Route 199 average approximately 135% of AADT. Peak hour volumes on Route 199 range from 12 to 14 percent of the AADT.

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[1] Calculated based on "1987 Traffic Volumes on California State Highways".

[2] Weighted average from "1986 Annual Average Daily Truck Traffic on California State Highways".

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Level of Service

The following chart identifies the present and future levels of service along Route 199:

LEVEL OF SERVICE
ROUTE 199

Post Mile	Location	Present (1988)	Future (2010)
DN-199-T0.5/13.0	Route 101 to one mile west of Gasquet	D	E
DN-199-13.0/19.8	One mile west of Gasquet to two miles west of Patricks Cr.	A	A
DN-199-19.8/27.1	Two miles west of Patricks Creek to Idlewild Maint. Sta.	C	D
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	C	D

Accident Rates

For the period 7-1-85 through 6-30-88, actual reported accident statistics for Route 199 were compared with the expected Statewide average for similar facilities. Based on the segmentation listed in the table on the following page, no segments have accident rates greater than 1.5 times (150% of) the expected Statewide average. However one segment (DN-199-19.8/27.1) has an accident rate which slightly exceeds the statewide average. Further, specific locations may exist with poor accident experiences. The District has an established accident surveillance and monitoring process which investigates and recommends safety improvements for specific locations with historically poor accident records as they are identified.

Actual accident rates and expected Statewide average accident rates (both expressed as accidents per million vehicle miles) are shown in the table on the following page:

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ACCIDENT RATES
ROUTE 199

Post Mile	Location	Accident Rate	Statewide Average	Accident Rate As a Percent of Statewide Average
DN-199-T0.5/13.0	Route 101 to One mile west of Gasquet	2.08	2.57	81%
DN-199-13.0/19.8	One mile west of Gasquet to two mi. west of Patricks Cr.	0.50	2.08	24%
DN-199-19.8/27.1	Two miles west of Patricks Cr. to Idlewild Maint. Sta.	2.94	2.46	120%
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	0.99	1.72	58%

Historic Maintenance and Road Closure Locations

In late March of 1989, a heavy truck collided with the superstructure of the Smith River Bridge (#1-6) near Hiouchi, causing major structural damage. Route 199 was closed and through traffic re-routed over State Route 197. This detour of Route 199 is expected to continue through the summer of 1990, pending replacement of the structure.

No other chronic maintenance or road closure locations have been identified on Route 199.

V. PROGRAMMED IMPROVEMENTS

Only one improvement on Route 199 is included in the 1988 State Transportation Improvement Program (STIP). This project involves replacement of Smith River Bridge #1-6 near Hiouchi (DN-199-4.2). This project is programmed for the 1992/93 fiscal year and is expected to cost approximately $5.7 million in 1988 dollars. However, due to structural damage to this bridge, the project will be expedited, with construction in 1990.

VI. ROUTE CONCEPT AND RATIONALE

Concept for Route Improvement

Route 199 is important, particularly regionally, for interstate travel, recreational use, and the movement of goods. However, this Route experiences relatively low traffic volumes, and development costs are generally high (principally due to the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon). Further, environmental concerns include old growth redwood groves in Jedediah Smith State Park,

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and the ecological sensitivity of the Smith River Canyon. These concerns make Route 199 a poor candidate for extensive upgrading.

ROUTE 199 SHOULD REMAIN BASICALLY A 2-LANE, CONVENTIONAL HIGHWAY, WITH PASSING LANES. ADDITIONAL PASSING LANES SHOULD BE DEVELOPED, ESPECIALLY IN SEGMENTS WHICH DO NOT MEET THE CONCEPT LEVEL OF SERVICE (WITHIN ENVIRONMENTAL AND FINANCIAL CONSTRAINTS).

Level of service on Route 199 currently ranges from "A" to "D" during peak hour periods. With projected traffic increases, level of service is expected to decrease to "D" and "E" on all two lane segments by the year 2010 if no improvements are made. Although this is less than desirable, it is not considered sufficient justification to plan for improvement to a 4-lane facility (necessary to assure a "B" or "C" level of service), in view of environmental constraints and the competition for projected revenues from highways of greater significance than Route 199 (primarily Route 101). Considering this, and the Routes Rural Principal Arterial status, A "D" CONCEPT LEVEL OF SERVICE HAS BEEN ESTABLISHED.

While passing lanes will be considered for segments which do not meet the concept level of service, these improvements may not generate sufficient capacity to meet the concept level of service.

Concept For Rehabilitation

ROUTE 199 SHOULD BE MAINTAINED AND REHABILITATED AS NECESSARY.

Based on current rehabilitation standards (3-R) in the Caltrans Highway Design Manual, existing roadway widths on Route 199 should be adequate to allow rehabilitation at the present width over most of the Route. However, consideration should be given to widening in conjunction with future rehabilitation projects where necessary to provide an adequate paved shoulder. Cost effectiveness and environmental considerations will need to be evaluated on a project by project basis.

Safety and Operational Improvement Concepts

Safety does not appear to be a significant factor in considering the need for improvement of Route 199, since the Route has no segments with accident rates exceeding one and one-half times the Statewide average based on similar facilities. However, safety improvements at spot locations will be considered as necessary.

Bridge replacement, storm damage, and operational improvement projects will also be considered as necessary. These projects, in addition to safety projects, should be constructed to appropriate State and/or Federal standards.

Caltrans is currently barrier striping two-lane highways to comply with Federal standards. This will reduce the number of passing opportunities (and the level of service) on most two-lane highways (including Route 199). A number of barrier stripe mitigation projects have been identified within District 1, including one on Route 199. A passing lane candidate from 0.9 to 1.7 miles south

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of Hardscrabble Creek (DN-199-9.3/10.1) is considered to be a barrier stripe mitigation candidate. It has been included in the 1989 PSTIP.

Route Concept Function

This Route Concept should serve as a guide for long range planning of improvements to Route 199. It will protect the State's investment in the Route, while recognizing environmental and financial constraints which will not allow the to programming of extensive improvements for this highway.

Alternative Concepts Considered

Two alternative level of service concepts were considered for Route 199 in District 1. The previous (1985 cycle) concept level of service for this Route, as well as all other Rural Principal Arterials in District 1 (except Route 101) was "C". The District considered retaining the "C" concept level of service, however this did not appear prudent since all two-lane segments of the route are expected to fall below a "C" level of service by the year 2010.

Reduction to an "E" level of service would subordinate Route 199 to all other Rural Principal Arterial routes in District 1, in terms of level of service. Further, local officials interested in improving Route 199 already feel that the limited projects included in the STIP reflect a lack of concern by Caltrans. And, a reduction in level of service would reduce the number of segments on which passing lanes would be considered as a means of improving the level of service. Therefore, a "D" concept level of service was established for Route 199.

VII. Areas of Concern

The following considers areas of concern on Route 199 based on an analysis of level of service and accident history. A segment is considered to be an "area of concern" if:

1. The concept level of service will not be achieved under present or future traffic conditions, or the segment operates at capacity during peak hour.

2. The total accident rate exceeds one and one-half the Statewide average for similar facilities.

On the chart on the following page, an "X" indicates a concern based on these criteria:

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AREAS OF CONCERN
ROUTE 199

Post Mile	Location	Level of Service Present (1988)	Level of Service Future (2010)	Accident Rate
DN-199-T0.5/13.0	Route 101 to One mile west of Gasquet	____	X	____
DN-199-13.0/19.8	One mile west of Gasquet to two mi. west of Patricks Cr.	____	____	____
DN-199-19.8/27.1	Two miles west of Patricks Cr. to Idlewild Maint. Sta.	____	____	____
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	____	____	____

VIII. ULTIMATE TRANSPORTATION CORRIDOR

It is anticipated that the Route 199 will remain basically a 2-lane conventional highway with passing lanes. No substantial long term right of way needs are anticipated, as shown on the following chart:

RIGHT OF WAY REQUIREMENTS
ROUTE 199

Post Mile	Ultimate Transportation Corridor	Local Master Plan
DN-199-T0.5/13.0	Existing R/W (80' minimum, much of existing R/W obtained through easements)	None Shown
DN-199-13.0/19.8	Existing R/W (100' minimum, most 150'& through special use permits or easements)	None Shown
DN-199-19.8/27.1	Existing R/W (generally R/W not described - special use permit from Forest Service)	None Shown
DN-199-27.1/36.4	Existing R/W (80' minimum, generally substantially more)	None Shown

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IX. IMPROVEMENTS NECESSARY TO ACHIEVE THE ROUTE CONCEPT

Improvements necessary to achieve the concept level of service on Route 199 would include the provision of additional passing lanes in segments which do not meet the concept level of service.

It is anticipated that such passing lane improvements will cost an estimated $3 million.

Safety and operational improvements should be considered as necessary.

X. COORDINATION WITH THE DISTRICT 1 LONG RANGE OPERATION PLAN

No operational improvements for Route 199 are proposed in the District 1 Long Range Operations Plan (October 1985).

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DOTP SUMMARY

DISTRICT 1 ROUTE 199
ROUTE CONCEPT REPORT SUMMARY
1-HUM-199-T0.5/36.4

		ROUTE CONCEPT		RIGHT OF WAY REQUIREMENTS	
RCR Segment	Post Mile	LOS	Facility	Ultimate Transportation Corridor	Local Master Plan
1	DN-199-T0.5/13.0	D	2-C with pass. ln.	Existing R/W (80' min.)	None Shown
2	DN-199-13.0/19.8	D	2-C with pass. ln.	Existing R/W (100'min., generally 150' or more)	None Shown
3	DN-199-19.8/27.1	D	2-C with pass. ln.	Existing R/W (generally R/W not described)	None Shown
4	DN-199-27.1/36.4	D	2-C with pass. ln.	Existing R/W (80' min., generally much greater)	None Shown

CONCEPT RATIONALE:

This concept was selected based on the Route's function as a Rural Principal Arterial, environmental and financial constraints, and competing priorities from other routes in the District.

AREAS OF CONCERN

Current (1988): None

Future (2010): PM DN-199-T0.0/13.0 LOS Concern

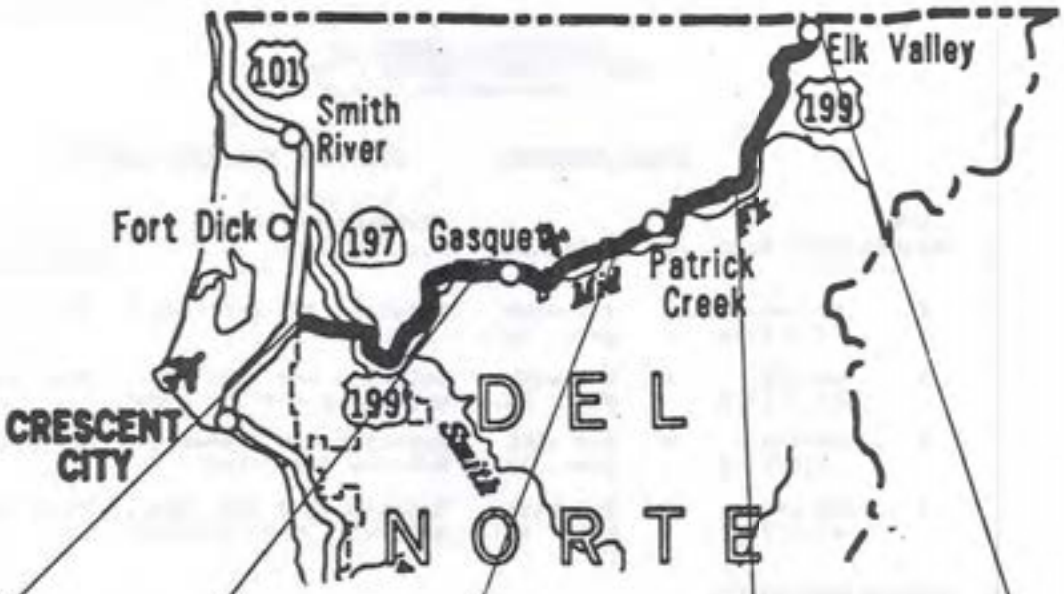
IMPROVEMENTS

It is anticipated that passing lanes costing an estimated $3 million, will be required to meet the Route Concept. However, concept LOS may not be maintained through the year 2010 by these improvements.

Safety and operational improvements should be considered as necessary.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 21

PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 199



DN-199-T0.5/13.0
Terrain: Mountainous
Gradeline: Rolling

Existing (1988)
2-lane Conventional
22'-02' Paved Width
2500-3100 AADT
"D" LOS
V/C: 0.28
Accident Rate:
less than 1.5 times
the statewide average

Future (2010)
4150-5250 AADT
"E" LOS
V/C: 0.45

DN-199-13.0/19.8
Terrain: Rolling
Gradeline: Rolling

Existing (1988)
2/4-lane Conventional
60' Paved Width
2450-2850 AADT
"A" LOS
V/C: 0.08
Accident Rate:
less than 1.5 times
the statewide average

Future (2010)
4050-4850 AADT
"A" LOS
V/C: 0.14

DN-199-19.8/27.1
Terrain: Mountainous
Gradeline: Rolling

Existing (1988)
2-lane Conventional
29'-40' Paved Width
2450-2600 AADT
"C" LOS
V/C: 0.26
Accident Rate:
less than 1.5 times
the statewide average

Future (2010)
4050-4200 AADT
"D" LOS
V/C: 0.43

DN-199-27.1/36.4
Terrain: Mountainous
Gradeline: Rolling

Existing (1988)
2-lane Conv./Expressway
26'-60' Paved Width
2450-2600 AADT
"C" LOS
V/C: 0.27
Accident Rate:
less than 1.5 times
the statewide average

Future (2010)
4050-4200 AADT
"D" LOS
V/C: 0.46

ROUTE CONCEPT

- o Route 199 should remain basically a 2-lane, conventional highway with passing lanes, maintained and rehabilitated as necessary. Widening should be considered in conjunction with future rehabilitation projects.
- o The concept level of service for this Route is "D".

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Att 22

ROUTE CONCEPT REPORT

ROUTE 197

1-DN-197-R0.0/7.1

All information in this Route Concept Report is subject to change as conditions change and new information is obtained.

I approve this Route Concept Report to guide today's route development decisions and/or recommendations.

Approval Recommended:

JERRY HAYNES Date
Deputy District Director
Office of Project Development
and Construction

Approval Recommended:

RICK KNAPP 9/25/89 Date
Deputy District Director
Office of Planning
and Programming

Approved:

E. F. POCH 9-29-89 Date
District Director
of Transportation
District 1

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

ROUTE CONCEPT REPORT

Statement of Planning Intent

The Route Concept Report (RCR) is a planning document which describes the Department's basic approach to development of a given route. Considering reasonable financial constraints and projected travel demand over a 20-year planning period, the RCR defines an appropriate type of facility and level of service for each route. The objective of the effort is to provide a better basis for the development of the State Transportation Improvement Program and for determination of the appropriate concept for future highway projects.

Route Concept Reports are prepared by District staff in cooperation with local and regional agencies. They will be updated as necessary as conditions change or new information is obtained.

Route Concept Reports are a preliminary planning phase that lead to subsequent programming and the project development process. As such, the specific nature of proposed improvements (i.e., roadway width, number of lanes, access control, etc.) may change in later project development stages, with final determinations made during the project report and design phases. Roadway widths, as discussed in Route Concept Reports, are used for the purpose of estimating improvement costs, and may change depending upon operating conditions and design standards at the time of actual project development.

Assumption

The following assumptions form the basis for the development of Route Concept Reports:

1. The relative importance of State highways in the District can generally be established based on the functional classification of the routes. In general, higher priorities will be given to major improvements on principal arterial routes as compared to minor arterials and collectors.

2. For routes the District can reasonably expect to improve (generally Principal Arterials), realistic concept LOS must be established for each route in order to have route concepts and route development plans which are possible to achieve, given a forecast of future revenues. A concept LOS is not established on routes which will only be rehabilitated and/or maintained.

3. Level of service and capacity calculations are based on the 1985 Highway Capacity Manual. Previous Route Concept Report level of service and capacity calculations were based on the 1965 Highway Capacity Manual.

4. The 1985 Highway Capacity Manual Chapter addressing two-lane highways does not set a maximum limit on the level of service attainable based on restricted design speed. District 1 uses the table in Chapter 5 page 15 to limit the level of service attainable due to restricted design speed. Further, District capacity calculations include a factor to increase capacity based on the length of passing lanes in two-lane segments.

5. Determinations of future LOS for the routes in District 1 are based in part upon Statewide and District forecasts of State highway travel developed by Caltrans.

6. Route concepts are generally uniform for an entire route, unless there is a major change in function along the route.

7. Major projects will be developed to meet standards acceptable to the Federal Highway Administration in order to receive Federal funding for projects. Otherwise, a "design exception" will be prepared during the project development process.

8. For all routes, safety projects will be pursued on an on-going basis in order to be responsive to safety problems as they are identified.

9. No planned or programmed improvements were assumed to be complete in analyzing present and future operating conditions. Section V of the Route Concept Report details programmed improvements in the 1988 STIP, with all costs in 1988 dollars.

10. An environmental document will not be required for Route Concept Reports. However, individual improvement projects identified in Route Concept Reports will follow the appropriate environmental process as required by law.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

SUMMARY

ROUTE CONCEPT REPORT FOR ROUTE 197

1-DN-197-R0.0/7.1

ROUTE DESCRIPTION

Route 197 connects Route 101 with Route 199, following the northeasterly side of the Smith River in northwestern Del Norte County. The Route is a Federal Aid Secondary Rural Major Collector, approximately 7 miles in length. This route functions as a connecting link between Route 101 and Route 199 for through traffic, and serves local residents living along the Route.

Route 197 is not included in the State's Freeway and Expressway System, however, it is eligible for designation as a Scenic Highway (but has not been officially designated).

The existing State highway facility is a 2-lane conventional highway with 12-foot wide lanes and 0- to 4-foot wide paved shoulders. Horizontal and vertical alignments are generally good, except between postmile R2.6 and 6.1 where there are several short radius curves. Traffic volumes range from 1,600 to 1,700 AADT, and truck volumes range from 8% to 9% of the AADT. Peak month average daily traffic is approximately 140% of the AADT.

OPERATING CONDITIONS

Route 197 currently operates at a "B" to "C" level of service. With projected traffic increases, level of service is expected to fall to "C" and "D" levels by the year 2010.

Accident rates on Route 197 are over twice the Statewide average (based on similar facilities) for a large portion of the Route (postmile R2.6/7.1). No chronic maintenance or road closure concerns have been identified on Route 197.

1

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ROUTE CONCEPT/RATIONALE

Route 197 should remain a 2-lane conventional highway, maintained as necessary at its existing width and on existing alignment.

Since the concept for Route 197 is maintain only, no concept level of service has been established. Further, it is anticipated that the Route will operate at or above a "D" level of service through the year 2010.

Operational improvements should be considered on an exception basis and safety improvements should be made as necessary.

This Route Concept for Route 197 was selected based on the Route's functional classification, generally high Route improvement costs, and competing priorities from other more important routes in the District.

CONCERNS

No level of service or maintenance concerns have been identified on Route 197. Safety is a concern on the postmile R2.6/7.1 segment.

IMPROVEMENTS NEEDED TO ACHIEVE ROUTE CONCEPT

No capacity improvements will be necessary to achieve the route concept (maintain only) for Route 197.

Safety improvements should be made as necessary and operational improvements should be considered on an exception basis.

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PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 197

DN-197-R2.6/7.1
Terrain: Rolling
Gradeline: Rolling

Existing (1988)
2-lane Conventional
24'-32' Paved Width
1,600-1,700 AADT
"C" LOS
V/C: 0.21
Accident Rate:
over 1.5 times the statewide average

Future (2010)
2,650-2,800 AADT
"D" LOS
V/C: 0.34

DN-197-0.0/R2.6
Terrain: Rolling
Gradeline: Flat

Existing (1988)
2-lane Conventional
32' Paved Width
1,600-1,700 AADT
"B" LOS
V/C: 0.14
Accident Rate:
less than 1.5 times the statewide average

Future (2010)
2,650-2,800 AADT
"C" LOS
V/C: 0.23

ROUTE CONCEPT

o Route 197 should remain a 2-lane, conventional highway maintained as necessary. Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

o No concept level of service has been established for this Route.

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ROUTE CONCEPT REPORT

ROUTE 197

I. ROUTE DESCRIPTION AND PURPOSE

Description

Route 197 (known as North Bank Road) originates at Route 199, near the community of Hiouchi, approximately 4 miles east of the Route 101/199 junction. The Route proceeds in a generally northwesterly direction, following the north bank of the Smith River to Route 101, approximately three miles south of the community of Smith River. The Route is approximately 7 miles long and is entirely within Del Norte County. The post mile description of the Route is 1-DN-197-R0.0/7.1.

Route Purpose

Route 197 is functionally classified as a Rural Major Collector, and is a part of the Federal Aid Secondary System.

The Route is not included in the State's Freeway and Expressway system, however it is not eligible for designation as a Scenic Highway (but has not been officially designated). Route 197 is not designated as a SHELL Route for use by trucks carrying extra legal loads and is not included in the national network for STAA trucks. Further, STAA trucks (kingpin to rear axle length of up to 40') are not allowed on the Route.

This Route functions as a connecting link between Route 101 and Route 199 for through traffic, generally making trips with origins or destinations in the vicinity of the community of Smith River or on the Southern Oregon Coast. In addition, Route 197 serves a number of local residents, including those living along the north bank of the Smith River. And, Route 197 also serves as a detour for westerly Route 199 (DN-199-T0.5/4.4) as necessary.

There are no cities or communites located along Route 197, and the Route experiences generally light non-motorized traffic.

II. Local & Regional Issues

Land Use

Land use adjacent to Route 197 is generally a combination of open space and rural residential. It is anticipated that these land uses will continue, with some additional rural residential development.

1

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Environmental Considerations

The Smith River is included in the Wild and Scenic River System, with a designation of recreational. The Smith and its tributaries are important salmon and steelhead spawning habitat.

In addition to water quality and visual impact concerns, the Route is archaeologically sensitive and vulnerable to flooding in low areas.

Regional Transportation Planning

The Action Element of the 1986 Del Norte County Regional Transportation Plan states the Del Norte Local Transportation Commission's concern that Route 197 should be functionally classified as a Minor Arterial rather than its present Major Collector classification. The Del Norte Local Transportation Commission feels that improvements to the postmile R2.6/6.1 segment could then be pursued.[1]

III. EXISTING FACILITIES

Route 197 is a two-lane conventional highway, with 0- to 4-foot wide paved shoulders. No passing lanes exist on Route 197. Actual lane, paved shoulder, and total paved width ranges are shown in the table below:

HIGHWAY WIDTH
ROUTE 197

Post Mile	Location	No. of Lanes Highway Type	Lane Width	Paved Shoulder Width	Total Paved Width
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	2-C	12'	4'	32'
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	2-C	12'	0'-4'	24'-32'

[1] 1986 Del Norte County Regional Transportation Plan, Action Element, Roads Section, page 30.

2

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Terrain traversed by Route 197 is generally rolling. Horizontal alignment is generally good, except between postmile R2.6 and postmile 6.1, where there are a number of short radius curves. Vertical alignment is generally good throughout the Route, with no sustained grades.

Right of way for Route 197 in District 1 is generally State owned or through easements for the postmile R0.0/R2.6 segment. Much of the right of way on the remainder of the route is through prescriptive right. Right of way widths vary throughout the route.

Route 197 is not served by public transit. No State-owned park and ride lot exists adjacent to this Route. No Railroad lines parallel or intersect Route 197. No airports are located adjacent to this Route.

Route 197 intersects with Route 199 near the community of Hiouchi, approximately 4 miles east of the Route 101/199 junction. Route 197 also intersects with Route 101 approximately three miles south of the community of Smith River. Route 101 is the north coast's primary highway access route.

IV. OPERATING CONDITIONS

Traffic Information

The table on the following page summarizes Annual Average Daily Traffic (AADT) volumes for the 1988 year, and includes projections of future AADTs for the year 2010 on the major segments of Route 197. Also included are 20-year growth factors, truck volumes expressed as percent of AADT, and peak hour volume to capacity (v/c) ratios.

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TRAFFIC DATA
ROUTE 197

Post Mile/ Location	AADT Present (1988)/ Future (2010)	Present Peak Hour Volume[2]	Percent Trucks In AADT[3]	Average V/C Present (1988)/ Future (2010)	20-Year Growth Factor
DN-197-R0.0/R2.6 (Route 199 to 0.4 mi. west of Low Divide)	1600-1700/ 2650-2800	300	8-9	.14/ .23	1.6
DN-197-R2.6/7.1 (0.4 mi. west of Low Divide to Route 101)	1600-1700/ 2650-2800	300	8-9	.21/ .34	1.6

Peak month average daily traffic volumes for this Route average approximately 140% of AADT. Peak hour volumes on Route 197 are approximately 18% of the AADT.

[2] Calculated based on preliminary data to be used in the preparation of "1988 Traffic Volumes on Califonria State Highways".

[3] From "1987 Annual Average Daily Truck Traffic on California State Highways".

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Level of Service

The following chart identifies the present and future levels of service for Route 197:

LEVEL OF SERVICE
ROUTE 197

Post Mile	Location	Present (1988)	Future (2010)
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	B	C
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	C	D

Accident Rates

For the period 6-30-85 through 6-30-88, actual reported accident statistics for Route 197 were compared with the expected Statewide average for similar facilities. One segment of Route 197 has an accident record which exceeds one and one-half times the expected Statewide average, based on similar facilities (a curve correction project in this segment is programmed in the 1988 State Transportation Improvement Program for DN-197-3.5/3.6). Additional specific locations may exist with poor accident experiences. The District has an established accident surveillance and monitoring process which investigates and recommends safety improvements for specific locations with historically poor accident records as they are identified.

Actual accident rates and expected Statewide average accident rates (both expressed as accidents per million vehicle miles) are shown in the table below:

ACCIDENT RATES
ROUTE 197

Post Mile	Location	Accident Rate	Statewide Average	Accident Rate As a Percent of Statewide Average
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	2.17	2.40	90%
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	5.52	2.42	228%

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Historic Maintenance and Road Closure Locations

No chronic maintenance or road closure locations have been identified on Route 197.

V. PROGRAMMED IMPROVEMENTS

One improvement on Route 197, the previously noted curve correction, is included in the 1988 State Transportation Improvement Program (STIP). It is estimated to cost approximately $0.6 million, and is programmed for the 1990/91 fiscal year. No new facility or capacity increasing operational improvement projects for Route 197 in District 1 are programmed in the 1988 STIP.

VI. ROUTE CONCEPT AND RATIONALE

Concept for Route Improvement

Route 197 is important as a connecting link between Route 101 and Route 199 for through traffic. Further, the Route serves a number of local residents, including those living along the north bank of the Smith River.

However, while Route 197 is important to the area, it cannot effectively compete for funds with other more important Routes in the District (generally Rural Principal Arterials).

Therefore, ROUTE 197 SHOULD REMAIN A 2-LANE CONVENTIONAL HIGHWAY ON ITS EXISTING ALIGNMENT.

Route 197 currently operates at a "B" to "C" level of service during peak hour periods. With projected traffic increases, the level of service on the Route is expected to fall to "C" and "D" levels of service by the year 2010. Although this is less than desirable, it is not considered sufficient justification to plan or program future capacity improvements in view of the competition for projected revenues from highways of greater significance than Route 197. Therefore, NO CONCEPT LEVEL OF SERVICE HAS BEEN ESTABLISHED FOR ROUTE 197.

Concept For Rehabilitation

Based on functional classification, traffic volumes, and maintenance service levels, ROUTE 197 SHOULD BE MAINTAINED AT ITS PRESENT WIDTH AND ON EXISTING ALIGNMENT (Portions of the Route may be rehabilitated on an exception basis, when maintaining the facility would be less cost effective than rehabilitating it).

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Safety and Operational Improvement Concepts

One segment of Route 197 has accident rates exceeding one and one-half times the Statewide average, based on similar facilities. A curve correction project has been programmed within this segment. Further, additional safety improvements at spot locations which are competitive in the safety program will be considered as necessary.

Bridge replacement and storm damage projects will also be considered as necessary, and operational improvement projects will be considered on an exception basis. These projects, in addition to safety projects, should be constructed to appropriate State and/or Federal standards (rather than to the present width concept).

Caltrans is currently barrier striping two-lane highways to comply with Federal standards. This will reduce the number of passing opportunities (and the level of service) on most two-lane highways (including Route 197). The impact of barrier striping is expected to be less severe on Route 197 than on some other Routes within the District, since relatively few passing opportunities existed prior to barrier striping. Further, while a number of barrier stripe mitigation projects have been identified within District 1, to date none have been identified on Route 197. Barrier stripe mitigation projects such as turnouts may be identified at spot locations on Route 197 at some time in the future.

Route Concept Function

This Route Concept will protect the State's investment in this Route while recognizing financial constraints which will not allow the programming of extensive improvements for all highways.

Alternative Concepts Considered

No alternative route concepts were considered fcr Route 197.

VII. Areas of Concern

The following considers areas of concern on Route 197 based on an analysis of level of service and accident history. A segment is considered to be an "area of concern" if:

1. The concept level of service will not be achieved under present or future traffic conditions, or the segment operates at capacity during peak hour.

2. The total accident rate exceeds one and one-half the Statewide average for similar facilities.

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

On the chart below, an "X" indicates a concern based on these criteria:

AREAS OF CONCERN
ROUTE 197

Post Mile	Location	Level of Service Present(1988)	Level of Service Future(2010)	Accident Rate
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	____	____	____
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	____	____	X

VIII. ULTIMATE TRANSPORTATION CORRIDOR

Since extensive development is not currently planned for the Route 197 corridor, it is anticipated that the Route will remain as it exists (a 2-lane conventional highway). No substantial long term right of way needs are anticipated, as shown on the following chart:

RIGHT OF WAY REQUIREMENTS
ROUTE 197

Post Mile	Ultimate Transportation Corridor	Local Master Plan
DN-197-R0.0/R2.6	Exist. R/W (generally 60' minimum width, and State-owned or easement)	None shown
DN-197-R2.6/7.1	Exist. R/W (generally through prescriptive right, with some State-owned near Route 101)	None shown

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

IX. IMPROVEMENTS NECESSARY TO ACHIEVE THE ROUTE CONCEPT

No new facility improvements are necessary to achieve the route concept (maintain only with some rehabilitation) through the year 2010.

Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

X. COORDINATION WITH THE DISTRICT 1 LONG RANGE OPERATION PLAN

No operational improvements for Route 197 are proposed in the District 1 Long Range Operation Plan (October 1985).

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

DOTP SUMMARY

DISTRICT 1 ROUTE 197
ROUTE CONCEPT REPORT SUMMARY
1-MEN-197-R0.0/7.1

		ROUTE CONCEPT		RIGHT OF WAY REQUIREMENTS	
RCR Segment	Post Mile	LOS	Facility	Ultimate Transportation Corridor	Local Master Plan
1	DN-197-R0.0/R2.6	None	2-C	Exist. R/W (generally 60' minimum width, and State owned or easement)	None shown
2	DN-197-R2.6/7.1	None	2-C	Exist. R/W (generally through prescriptive right, with some state owned near Route 101)	None shown

CONCEPT RATIONALE:

This Route Concept for Route 197 was selected based on the Route's functional classification, and competing priorities from other more important routes in the District.

AREAS OF CONCERN

Current (1988): 1-DN-197-R2.6/7.1 - Accident Rate 2.3 times Statewide average (a curve correction project is programmed in this segment in the 1989 STIP as DN-197-3.5/3.6).

Future (2010): None

IMPROVEMENTS

No new facility improvements are necessary to maintain the route concept (maintain only) through the year 2010.

Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 197

DN-197-R2.6/7.1
Terrain: Rolling
Gradeline: Rolling

Existing (1988)
2-lane Conventional
24'-32' Paved Width
1,600-1,700 AADT
"C" LOS
V/C: 0.21
Accident Rate:
over 1.5 times the statewide average

Future (2010)
2,650-2,800 AADT
"D" LOS
V/C: 0.34

DN-197-0.0/R2.6
Terrain: Rolling
Gradeline: Flat

Existing (1988)
2-lane Conventional
32' Paved Width
1,600-1,700 AADT
"B" LOS
V/C: 0.14
Accident Rate:
less than 1.5 times the statewide average

Future (2010)
2,650-2,800 AADT
"C" LOS
V/C: 0.23

ROUTE CONCEPT

o Route 197 should remain a 2-lane, conventional highway maintained as necessary. Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

o No concept level of service has been established for this Route.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 23

OUR MISSION

We believe

that wildness and the beauty of life on this planet in all its interconnected diversity are essential for the continued existence of the human race and all other species; that all species are deserving of respect and preservation; and that the Smith River, the Lake Earl Coastal Lagoon, our Ancient Forests, and Wild Coast are still some of the most pristine and superlative examples of wild lands left on earth.

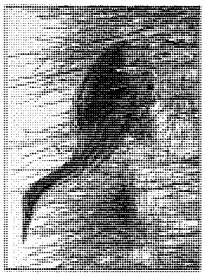
Western Trillium

We also believe

that without deliberate attention and care these great natural treasures will be compromised or degraded over time.

Therefore,

we who share these values have come together to provide a voice for these unique Wildlands, Waters, and Wildlife.



American Bittern

The Friends of Del Norte

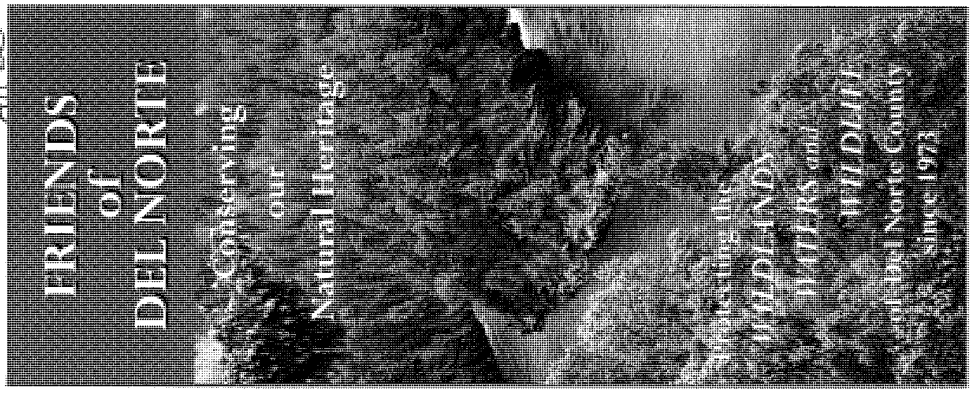
vow to strive earnestly to preserve and protect them so that they will not perish during our watch and that future generations will share in the richness of this most beautiful of Nature's bounty.

Exploring the shore

MEMBERSHIP

Humanity and Friends of the Redwoods Coastal Legal Foundation applaud the most recent conservation efforts, special interest groups, and individuals who are presently visiting our website or attending classes, seminars, and future interventions.

(707) 487-4300



MEMBERSHIP APPLICATION

( ) $15 Student ( ) $25 Member ( ) $50 Supporter ( ) $500 Life Membership

NAME: _____

ADDRESS: _____

E.MAIL: _____

There are 2 ways you can support the Friends. As a member and/or by giving a tax deductible donation.

( ) Check here for membership. Make your check payable to Friends of Del Norte .

( ) Check here for tax deductible donation. Make your check payable to FDN Conservation Council.

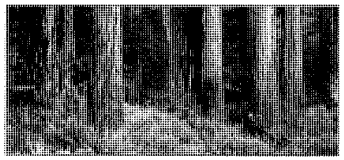
Friends of Del Norte
P.O. Box 229
Gasquet, CA 95543
(707) 487-4300

Friends of Del Norte (submitted by Eileen Cooper) Attachment 23

OUR ACCOMPLISHMENTS

We have been instrumental in the resolution of numerous environmental issues, successfully enhancing the quality of life for Del Norte County residents. A partial list of four decades of accomplishments.

1970 ▪ Supported the 40,000-acre expansion of Redwood National Park.



Redwood National Park expanded

▪ Maintained the health and scenic quality of the Smith River watershed and the Hwy199 corridor through successful appeals that prevented clear-cut logging.

1980 ▪ Lobbied successfully for Federal Wild & Scenic Rivers designation for the Smith River.

▪ Lobbied for the inclusion of the 200,000-acre Siskiyou Wilderness Area into the Federal Wilderness System.

▪ Protected the Myrtle Creek watershed from clear-cut logging and proposed historic design for the Myrtle Creek bridge.

▪ Protected the confluence at the iconic "Forks" of the Smith River from logging.

▪ Defeated the construction of a nickel and chromium strip mine on Gasquet Mountain.

1990 ▪ Lobbied for federal legislation that established the Smith River National Recreation Area.

▪ Supported increased levels of protection for fish and wildlife habitat in the Smith River and its tributaries.

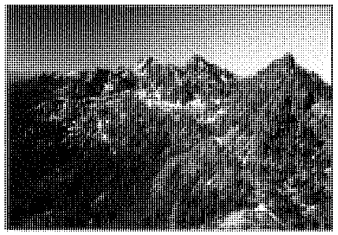
▪ Planned and worked with Caltrans to save old growth redwood trees bordering a Hwy101 realignment project.

2000 ▪ Conserved 90 acres of diverse coastal forest bordering the shore of Lake Earl Coastal Lagoon through state acquisition.

▪ Advocated for long-term protection of Point St. George Heritage Area through acquisition by Del Norte County.

▪ Advocated for successful public access and acquisition of the Mill Creek and Rock Creek watersheds.

▪ Laid groundwork research that saved rare shore pine forest threatened during Crescent City's airport design.



Wilderness Bill enacted

▪ Campaigned against and defeated the installation of a solid waste incinerator proposed for Del Norte County.

▪ Successfully lobbied for public support of Senator Mike Thompson's Wilderness Bill. Now law of the land.

▪ Submitted extensive research data and successfully lobbied in support of higher water levels for management of Lake Earl Coastal Lagoon, resulting in higher biodiversity.

▪ Participated at the stakeholder level to successfully promote the Marine Life Protection Act for Del Norte, Humboldt, and Mendocino Counties.

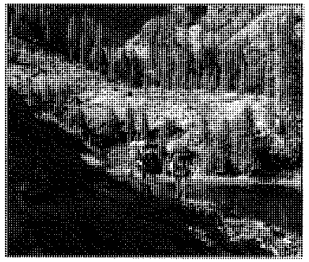
OUR COMMITMENT

We are the only local environmental activist group dedicated to the long-term protection and enhancement of all natural resources of Del Norte County and its surrounding bioregion.

We monitor, research, prepare comments, challenge and appeal local governmental actions that ignore environmental laws and degrade environmental quality. We encourage local, state and federal agencies to uphold all environmental laws.

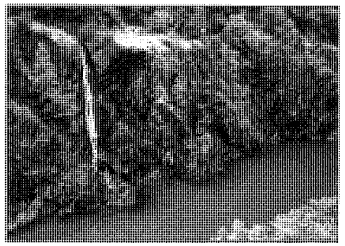
Point St. George Heritage Area

We continue our commitment to the integrity of the Smith River National Recreation Area, working with agencies and environmental groups to maintain the health and beauty of the Smith River watershed.



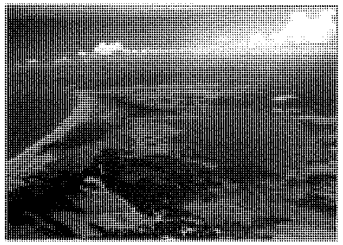
Smith River National Recreation Area

We advocate for strong regulations to protect the habitat of threatened species including our endangered native salmon and steelhead runs on the Smith and Klamath rivers.



South Fork Smith River

We work for the full protection and long-term restoration of the Lake Earl Coastal Lagoon. We defend high water levels as critical for the enhancement of vital wetlands which sustain the maximum biodiversity of the West's largest estuarine lagoon.



Lake Earl Coastal Lagoon

Responses to Friends of Del Norte (Eileen Cooper)

Response to Comment 1 through 23

The Department does not dispute the facts brought forth in these comments, and thus will not discuss them individually here. However, the Department reasoned to a different conclusion.

Frost Free Coastal Route:

This letter lays out an argument for additional impacts associated with diversion of traffic from I5 to a US 199/US 101 route due to winter weather closures at Siskiyou Pass. This phenomena likely already occurs for CA-Legal vehicles. However, this detour would add approximately 50-60 miles and approximately 2 hours of drive time to a trip between Oregon and the Bay Area. The additional miles are committing the truck driver to the narrow winding route of US 101 and US 199, a two lane conventional highway with occasional passing lanes, versus I 5 which is a Principal Arterial/Interstate four-lane freeway. The I 5 route will still be the preferable route for through traffic. The Department does not anticipate major changes in national transportation routes for through traffic between California's Bay Area and Oregon.

There is the potential for diversion of through traffic due to winter weather, road closures and chain restrictions. In addition to Siskiyou Pass, there are other passes I 5 north of Grants Pass which are subject to winter conditions. If a true frost free route is pursued it is likely that truck driver's will consider bypassing all the passes and heading to the coast from Eugene along ORE 126, then taking US 101, which would not increase traffic on US 199/SR 197. Thus if drivers were to bypass winter weather on a coastal route, US 199 would not be the most favorable bypass route. Even so, the additional traffic associated with a winter weather diversion would be an occasional event, occurring only a few times a year. While traffic levels would be increased during the event, based on approximations from Comment 14, this would only lead to an annual increase of approximately 1% above the current traffic levels. Overall maintenance costs would not increase based on a 1% increase in annual traffic.

Pavement Management System and Maintenance:

The comment also expresses concern that the Department is not meeting the standards of the Pavement Management System and that there will be additional maintenance costs associated with increased truck traffic on the roadway. The Department does not follow the Pavement Management System, but follows a similar system to calculate the structural and materials parameters of the roadway. The current specifications allow for a higher volume of traffic than what is estimated based on the traffic study.

Mara Feeney Comment Letter:

These comments stated concerns about the truck traffic analysis, economic analysis, safety, recreational resources and cumulative impacts. None of the comments in the letter were comments on the RDEIR/SEA. Please see Group Response #9 for traffic study errors, see Group Response #8 for safety concerns, see Group Response #5 for concerns about the Wild and Scenic River, see Group Response #2 for effects to tourism, and see Group Response #1 for a discussion of the purpose and need.

No revisions to the Draft EIR/EA were necessary.

Other Comments:

For safety concerns please see Group Response #8. It is difficult to make estimates about future collision rates along the route based on potential traffic volumes and road conditions (winter weather I 5 diversion). Any forecasts on collision rates would be speculative in nature.

Response to Comment 24

This comment states that the Traffic Study failed to survey through traffic for the route. The Department does not anticipate that the project would change major shipping routes, and that I 5 will remain the major north-south shipping route.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 25

This comment states concern for maintenance costs and design standards. The Department does not anticipate additional maintenance costs, see Form Letter 2012 #1 Comment #12. For concerns about traffic safety and design see both Group Response #8 and the response to the EPIC 2012 Smith Letter.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 26

This comment states concern for winter safety, please see the response to Form Letter 2012 #1 Comment #4.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 27

This comment states concern for safety, please see Group Response #8.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 28

This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #6.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 29

This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #5.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 30

This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #9.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 31

This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #5.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 32

This comment states concern for safety, please see Group Response #8.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 33

This comment states concern for the design exceptions. Please see the response to the EPIC 2012 Smith Letter.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 34

This comment states concern for geologic stability. Please see Group Response #10.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 35

This comment states concern for communities in Oregon. The DEIR/EA and RDEIR/EAS are both NEPA documents available to communities in Oregon along SR 199.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 36 and 37

This comment states concern for spills in the river. Please see the response to Vern Powers Comment #1.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 38

This comment states that pavement designs should consider impacts to trees. The Department is aware of the adverse impacts of roads and compaction on tree root systems. The Department has minimized impacts to tree roots where possible, as described in the PRDEIR/SEA and updated in the FEIR/EA Section 2.3.1.3.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 39

This comment states that the department failed to adequately disclose increased traffic levels to trustee agencies. The Department used the traffic volumes estimated in the 2010 Fehr and Peers

study as well as Department expertise to develop estimates of future traffic levels. The Department believes these estimates to be scientific and reasonable. Please see Group Response #9.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 40

This comment summarizes the arguments brought forth in the body of the letter. The Department does not anticipate major impacts from induced traffic from I 5, see the response to comments 1-23.

No revisions to the Draft EIR/EA were necessary.

4.3 Individuals

Following is the index to 21 individual written comments. All written comments submitted by the following individuals can be found in alphabetical order by last name.

- Bertrand, Wendy
- Bowman, Bill
- Bruce, Donald
- Bruce, Doreen
- Campbell, Bruce
- Cipolla, James
- Estefan, Lars
- Evermoore, Eileen
- Harestad, Patrick
- Hughes, Gary
- Hunt, Ann
- Johansen, Ralph
- Lips, Stu
- Lotus, Trisha (10/12/2012)
- Lotus, Trisha (10/25/2010)
- Moses, Todd
- Pappalardo, Sue
- Tays, Kimberly
- Zegart, Margaret Kettunen
- Zuehlke, John

Bertrand, Wendy

Comments to Caltrans for Recirculated Draft EIR/EA for construction projects on Hwy 199/197 specifically to encourage STAA truck access.

October 22, 2012 From:
Wendy Bertrand, Gasquet Resident
eyeonplace@gmail.com

Attention: Jason Meyer jason_meyer@dot.ca.gov
California Department of Transportation,
North Region Environmental, Unit E1 P.O. Box 3700 Eureka, Ca. 95502-3700

I am speaking as a citizen of California concerned about Caltrans spending increasing large truck traffic, and lack of quality environmental impact reports. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our heart felt and pertinent concerns. 1

The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County, however, STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit, particularly in winter. 2 3

The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public and the decision makers into believing that there will be insignificant increases in traffic (See an estimate re this increase at bottom of page) when there will be many significant impacts as stated below:

1. Safety hazards will greatly increase, particularly from the significant increased truck traffic during the very hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197. 4

2. Even with the proposed safety improvements, the rural winding canyon road following the Wild and Scenic Smith River remains a geography that is not appropriate for large trucks and the moving of oversized goods.

3. In this plan, safety is incomplete and therefore inadequate, because no improvements for Hwy 199 between Hiouchi and Gasquet which has the highest accident rate is addressed. 5

4. Speed management with lower speed limits is not addressed, yet many safety issues can be improved with lower speeds. This plan does not include speed management but needs to. 6

5. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway they should be addressed in comparison to the project being studied. 7

1

Bertrand, Wendy

Comments to Caltrans for Recirculated Draft EIR/EA for construction projects on Hwy 199/197 specifically to encourage STAA truck access.

6. Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and many other animals that are part of the ecology of the area including the only drinking water source for the human population Crescent City and most of Del Norte County. 8

7. The DEIR/EA has failed to resolve the project impact to visitors to the National Recreation Area, the Redwood National & State Parks and local businesses who will be unnecessarily endangered by traffic especially during the winter fishing season, and summer tourist season. Local residents, using these roads everyday, will suffer the most frequent and constant increased traffic hazard risks and the loss to the quality of rural life with increased noise, dirt and congestion. 9 10

8. Specific significant increased hazards will impact the many current residences with driveways directly accessing onto Hwy 197 due to increased truck traffic that will come from making changes that encourage STTA trucks and not quantitatively accounting for this in the DEIR/EA.

9. The DEIR/EA has failed to engage the communities along the Hwy 199/197 project boundaries as well as the communities in Oregon on the same route in spite of significant and planned negative impacts to their well being and concerns. 11

10. Maintenance of the existing infrastructure is the currently adopted California Transportation Policy Priority, so this project with its capital improvement is out of step with priorities and should be reviewed at higher levels and in the DEIR/EA. Significant acceleration in maintenance projects will also substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River and should be reviewed for accumulative environmental and cultural impacts. 12 13

11. There will be a significant, impractical and long term economic and social burden and endangerment of the public welfare in trying to enlarge Hwy 199, because heavy truck traffic combined with the geologically unstable Hwy 101 (Last Chance Grade) has cumulative impacts that have been ignored by Caltrans project developers and the DEIR/EA when it should be addressed fully and fairly to the people of California. 14

Sincerely requesting your attention to the above points when redoing this DEIR/EA

Wendy Bertrand
695 Gasquet Flat Road, Gasquet California 95543

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed. 15

2

Response to Wendy Bertrand

Response to Comment 1
This is not a comment on the RDEIR/EA.

Response to Comment 2
This comment states concern for the fiscal costs of the project, please see Grouped Response #2 for a discussion on costs and benefits. This comment states that there is negligible local economic benefit from the project. Please see Group Response #1 and #2 for discussions of the purpose and need, and the costs vs. benefits of the project.

Response to Comment 3
This comment states concern for increased traffic due to winter weather closures on I5 at Siskiyou Pass. While there may temporary spikes in traffic when the pass closes, these temporary high traffic periods will not lead to other significant impacts. This concern was addressed in detail in the response to Friends of Del Norte 2012 comment.

Response to Comment 4
This comment states concern for safety hazards associated with winter conditions, increased traffic (due to I5 winter weather closures), and larger trucks. The 197/199 route was evaluated for STAA truck access, and this project was initiated based on geometric deficiencies in the roadway. Upon completion of this project, STAA trucks will be able to safely navigate the route without crossing the center lane. Please see the response to EPIC/Smith Comment for a full discussion of the safety of large trucks along the route. Please see Group Response #8 for concerns about safety, and Friends of Del Norte 2012 for a discussion of the safety implications of increased traffic during diversions.

Response to Comment 5
This comments states concern over the lack of improvements between Hiouchi and Gasquet. Please see Grouped Response #8, and EPIC response #15 for discussions of how sites were selected for the project.

Response to Comment 6
This comment states speed management should be used. Please see Group Response #8 for a discussion of how speed limits are set.

Response to Comment 7
This comment states that collision rates on US 101 are higher than state averages. This is outside the project area, but the project does have the potential to affect travel volumes on US 101. The Department acknowledges the fact that the actual collision rates are higher than the statewide average collision rates south of Crescent City. This segment of highway 101 traverses through Redwood National and State Parks, coastal area, and a historic landscape district. The area is an environmentally sensitive and resource rich area, and thus creates numerous challenges for standard geometric improvements.

The Department has implemented a number of non-conventional strategies to reduce collisions and minimize impact on the areas resources. This balance of safety and resources has been

challenging. Although there has been a reduction in collisions, we strive to further decrease the number of collisions in the area.

Response to Comment 8

This comment states there will be potential water quality issues. Please see DEIR/EA and FEIR/EA Section 2.2.2 for water quality concerns. The project is not anticipated to increase the potential for spills. Please see Vern Powers Response 1 for concerns about spills.

Response to Comment 9

This comment states that there are unresolved issues with tourism. The Department consulted with the National Park Service, County Parks and the Forest Service for potential impacts to recreational resources. Please see FEIR/EA Section 4.3 for 4(f) consultations and concurrence letters. Potential effects were determined to be de minimus or temporary occupancy for all project locations.

Response to Comment 10

This comment states concern for public safety on SR 197 due to increased truck traffic. Please see Group Response #8 for a discussion of safety.

Response to Comment 11

This comment states concern for community cohesiveness and safety due to increased traffic and states that the DEIR/EA failed to engage the communities. Effects to communities were analyzed in the DEIR/EA 2.1.3 and determined to be less than substantial. Please see EPIC response #8 for additional discussion on community impacts. There was a public meeting on April 17, 2008 in Crescent City. There was an official Notice of Preparation and scoping meeting in 2008, a public hearing 2010 during the circulation of the full DEIR/EA, notices of availability were published in local papers for these meetings and the circulation of the DEIR/EA and Recirculated DEIR/EA. The department has followed the CEQA guidelines for notification and engagement of the public throughout this process.

Response to Comment 12

This comment states that the California Transportation Policy Priority is to maintain existing infrastructure rather than construct new projects. Please see Group Response #1 and #2 for discussions of purpose and need, and cost vs. benefits of the project.

Response to Comment 13

This comment states that there will be an increase in maintenance projects that will impact riparian vegetation. Caltrans does not anticipate an increase in maintenance due to this project. Maintenance projects to not generally cause additional impacts to riparian vegetation. This project is not anticipated to have effects on riparian vegetation other than the direct removal described in the DEIR/EA and FEIR/EA 2.3.1.

Response to Comment 14

This comment states that there will be an economic burden to maintain US 199 and US 101 due to the increased impacts from increased heavy truck traffic. The weight limit on STAA trucks is the same as the current California Legal trucks. The additional traffic is not anticipated to be

substantial. Thus the increased maintenance costs associated with the implementation of this project and opening the route to STAA trucks is not anticipated to be substantial.

Response to Comment 15

This comment states concern over the increased traffic volume due to diversion of traffic due to the closure of I5 at Siskiyou Summit. While there may a temporary increase in traffic volume during the event, the overall increase in annual volume will not be significant. Please see response to Friends of Del Norte 2012 response to comments 1-23 for a full discussion.

Bowman, Bill

260 Monument Drive
Crescent City, CA 95531
bowman260@charter.net
October 24, 2012

Jason Meyer
California Department of Transportation
North Region Environmental, Unit E1
P.O. Box 3700, Eureka, Ca. 95502

Rec'd 10-29-12

Dear Mr. Meyer

I live on Hwy 199 in Hiouchi. The picture below is at the top of my driveway as I enter Hwy 199. It is already extremely dangerous to enter or leave my driveway. If the planned STAA "improvements" are implemented, then this situation will go from bad to aweful! 1

That's not the only problem I see. The Hwy Patrol found the main cause of most accidents on Hwy 199 is because of SPEED. To straighten out a few corners and allow more and larger trucks on this road is only to invite more accidents. And just in case it has slipped your attention, there is a wild and scenic river that parallels Hwy 199 through most of the most dangerous areas of the road. 2

And WHY would you want to do this? 3

- There is limited or no economic benefit for Crescent City I can see. Your report even said so!
- It will tie up the road for years with for construction.
- During winter, it could invite hundreds of STAA trucks stuck on the high pass near Ashland to take a detour over to Hwy 101 using the Hwy 199 corridor. Can you imagine what that would do to our little community!!!!

Please don't waste precious tax dollars on something nobody wants!

Bill Bowman

Bill Bowman

Response to Bill Bowman

Response to Comment 1

This comment states concern for driveway access to US 199 near Hiouchi. The increase in traffic is not anticipated to significantly affect safety, please see Group Response #8.

Response to Comment 2

This comment states speed is the primary safety concern in this area. Please see Group Response #8 for a discussion of safety and setting speed limits. Please see Group Response #5 for a discussion of Wild and Scenic Rivers.

Response to Comment 3

This comment questions the purpose and need, construction time and potential for induced traffic from I 5 during winter weather. Please see Group Response #1 for a discussion of the purpose and need. Please see Groups Response #2 for a discussion of the costs and benefits, particularly disturbance from construction. Please see the response to Friends of Del Norte 2012 for a discussion of the potential effects of induced traffic from I 5 during winter weather.

Bruce, Donald

Donald Bruce
550 Sierra Wood Road
Gasquet, CA 95543
(707) 299-6423

November 3, 2012

Received 11-6-12

Jason Meyer
California Department of Transportation
North Region Environmental Unit 1
P. O. Box 3700
Eureka, CA 95502

Comments on the Recalculated Draft EIR Document dated September 2012 for the 197/199 Safe STAA Access Project

Dear Jason Meyer:

I support the no build alternative to the CalTrans 197/199 STAA Access Project The project will not make 197/199 safe enough for STAA trucks due to the long wheelbase of the truck tractor. Too many additional tight curves and short sight distances would remain even after the proposed project is completed 1

I note that none of my previous concerns were addressed in the Recirculated Draft report. Therefore, I am restating some of them here.

In a letter to Kimberly Hayler dated September 17, 2008 I pointed out that the highway between Hiouchi and Gasquet has many tight curves and narrow or no shoulders making it unsafe for STAA trucks. In fact, in the June 1998 study titled "Comprehensive Study of Routes 197 and 199 " by the California Department of Transportation, District 1, it states that one of the two areas of concern on Route 199 is "between Hiouchi and Gasquet." It stated that rock cut widening would be required at FIVE locations within this area. The other area of concern was from "south of Patrick Creek and south of Idlewild." So, why is the area between Hiouchi and Gasquet being ignored? Why wasn't the reason it's being ignored outlined in the DEIR of June 2010? The obvious areas of concern are at the following locations: The corner at Monument Drive at the North end of Hiouchi. It has an extremely sharp curve and a solid rock wall on one side with little or no shoulder on the riverside. Rockslides are also common here especially in the winter. This is simply a very dangerous spot in the best of circumstances. It's frightening to think of STAA trucks coming around this corner let alone meeting each other. The rock wall on one side and a straight drop to the river on the other continues until milepost (M. P.) 6.72. At M. P. 7.41 to 7.66 there is no guardrail on a narrow section of the road. Any over tracking of STAA trucks in this area will literally send you over the edge. At approximately M. P. 8.25 there is a very tight "S"shaped corner that STAA trucks will routinely over track on. M. P. 8.76 has no guardrail and drops directly to the river. Much of the road has little or no shoulder such as M. P. 8.84, which is also a sharp corner. M. P. 9.2 and 9.7 are dangerous curves. M. P. 10.28 has no guardrails and is a straight drop to the river. My wife and I have stopped to assist accident victims at least three times in this area. People speed here because it's a strnighter section of road. At about M. P. 11.56 there is no guardrail and no shoulder for about 100 to 150 yards. Any slight off tracking of STAA trucks will cause a collision with oncoming traffic or run them into the river. None of these dangerous areas were addressed in the DEIR of June 2010. Why? 2

Bruce, Donald

The DEIR of June 2010 did not address the concerns in a letter to Kimberly Hayler dated September 16, 2008 regarding the following: How residents on North Bank Road (HWY 197) will be able to safely ingress and egress 197 from their driveways. And how will the road accommodate pedestrians, bicycles, and school buses with STAA trucks moving swiftly through. Additionally, no guardrails are being placed on the section of 197 that drops straight to the river with no shoulders on either side. It is undercut bank and is questionable whether it can withstand the weight of STAA trucks. At the April 2008 CalTrans public meeting in Crescent City, Kevin Church, Project Manager, stated there would be no reduction of the speed limit anywhere upon completion of the project. A study on "sight distances" also needs to be done more thoroughly on 197 and 199, as there are many areas with very limited visibility. 3

The accident rate between Hiouchi and Gasquet is very high. That information was submitted with the September 16, 2008 letter to Kimberly Hayer. Why was this not taken into consideration and discussed in the DEIR of June 2010? What mitigating factors are present to ignore this? 4

The DEIR of June 2010 also did not address specifics on how emergency vehicles will be accommodated while the construction phase is taking place. The heavy traffic on 199 will result in long lines during construction making it a serious impediment for emergency vehicles. Also, what is the plan concerning the transportation of high security inmates from Pelican Bay State Prison? Level 4 and SHU inmates (the highest level of inmates in the State) are routinely transported to the Rogue Valley for medical appointments. Also the California Department of Corrections uses 199 to transport busloads of inmates to and from Pelican Bay State Prison from other California prisons. Will this practice continue? If so, what additional security measures will be implemented to protect the public during the construction phase? 5

In addition, the DEIR of 2010 does not address the effect the construction phase will have on tourist dollars to Del Norte County, which could last up to five years and possibly longer. The extensive length of time of construction as well as delays and closure periods may result in many people avoiding the area. Many people from the Rouge Valley that routinely visit Del Norte County may curtail their visits resulting in a loss of revenue. Why hasn't this been considered, especially when the reason touted for STAA trucks is for an economic benefit? 6

Another area of concern is the impact of increased STAA trucks using this route when the Siskiyou Summit has snowstorms. Many may take the "coastal route" to avoid the hazardous mountain conditions and to avoid "chaining up." 7

Lastly, a review of a supporting document used in the DEIR titled "Traffic Analysis Report," which recorded the responses of businesses, revealed that only three claimed any significant benefit to having a STAA route on 197/199. It appears this is a tax-subsidized project for a few select businesses. If not illegal, it is certainly inappropriate given that there is no compelling reason to have a STAA route on highways 197 or 199. 8

None of these concerns has been addressed. 9

Respectfully submitted,

Donald Bruce

Response to Donald Bruce

Response to Comment 1
This comment states support for the no project alternative and states concern over safety of STAA trucks on the route. Please see the response to EPIC/Smith letter for concerns over roadway geometry and safety of the route.

Response to Comment 2
This comment was addressed in Donald Bruce 2010 Comment 1.

Response to Comment 3
This comment was addressed in Donald Bruce 2010 Comment 2.

Response to Comment 4
This comment was addressed in Donald Bruce 2010 Comment 3.

Response to Comment 5
This comment was addressed in Donald Bruce 2010 Comment 4.

Response to Comment 6
This comment was addressed in Donald Bruce 2010 Comment 5.

Response to Comment 7
This comment states concern for increased traffic due to I 5 closing. Please see the response to Friends of Del Norte 2012.

Response to Comment 8
This comment was addressed in Donald Bruce 2010 Comment 6.

Bruce, Doreen

Doreen Bruce
550 Sierra Wood Road
Gasquet, CA 95543

Rec'd 11-6-12

Jason Meyer
California Department of Transportation
North Region Environmental Unit E1
PO Box 3700
Eureka CA 95502

November 3, 2012

COMMENTS ON THE SEPTEMBER 2012 RECIRCULATED DRAFT EIR/EA FOR THE 197/199 STAA TRUCK ACCESS PROJECT

Dear Jason Meyer,

I support the no build alternative to the CalTrans Hwy 199/197 STAA Access Project. The project has significant and cumulative negative impacts on the environment, and public health and safety. The DEIR/EA failed to identify and evaluate the cumulative impacts of increased STAA traffic diverted around the Siskiyou Summit in winter snow conditions, and it did not identify and evaluate the cumulative impacts of creating a permanent STAA truck loop over Hwy 199/197 and Hwy 101 south. The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic. The potential of toxic, illegal, unregulated, or non inspected materials hauled on STAA trucks traveling through Del Norte County, via this truck loop in bad weather and in route diversions, are of great concern. Present monitoring and response to commercial truck compliance, vehicular infractions and accidents already stretches the California Highway Patrol's resources too thin on Hwy 199/197. Also, the Agricultural Inspection Station at the Hwy 199 California/Oregon border is closed most of the time due to budget cuts, and whatever monitoring support they provide is very limited. 1

The DEIR/EA failed to address the concerns and questions I submitted during prior public comment periods. (Please refer to the enclosed letters to Kim Hayler dated August 20, 2010, September 17, 2008, September 16, 2008, and Attachments: (1) 199/197 STAA Truck Improvements, (1A) Collision date from 1/1/1998 to 12/31/2008, (1B) Mile Post Location Reference Sheet, (2) Changes Necessary for Public Safety If Highways 199 and 197 Becomes a STAA Truck Route. I am resubmitting all of these documents for inclusion into the Comments to CalTrans for RECIRCULATED Draft EIR/EA FOR STAA Truck access on Hwy 199/197. 2

Sincerely,

Doreen Bruce

Doreen Bruce

Bruce, Doreen

Doreen Bruce
550 SierraWood Road
Gasquet, CA 95543

Kim Hayler
California Department of Transportation
PO Box 3700
Eureka CA 95502

August 20, 2010

COMMENTS ON THE JUNE 2010 DEIR REGARDING THE 197/199 SAFE STAA TRUCK ACCESS PROJECT 3

Dear Kim Hayler,

After reviewing the 197/199 Safe STAA Access Project 2010 Draft Environmental Impact Report (DEIR), I have the following concerns, comments and questions:

The need for this project as promoted to the residents of Del Norte County is dubious. The DEIR and subsequent comments made to the Daily Triplicate by Kevin Church admit that economic gain and growth to Del Norte County would be minimal, and the cost of essential good to residents would be unaffected by this project. Who will profit most from this $26.5 million taxpayer funded project? In the DEIR, it appears the local lily bulb growers will. How is it that a public agency, California Department of Transportation, can embark on this hugely disruptive and costly project when the overwhelming benefactor is a private business? Isn't this illegal, or a conflict of interest? Why doesn't the public's **actual need and safety** take precedence in this project?

A review of the June 1998 CalTrans, Comprehensive Site Study of Routes 197 and 199 (a supporting document to the 2010 DEIR) states that safety, environmental issues, high improvement costs, storm damage/road closures, rock fall locations, hazardous spills, and lastly large (STAA) Truck restrictions as ongoing concerns with Route 199. "Most concerns on Route 199 exist in two general areas: between Hiouchi and Gasquet (MP6.20/12.87) and between south of Patrick Creek and south of Idlewild (PM20.04/27.50)" Why doesn't the DEIR address the documented roadway impediments between Hiouchi and Gasquet? The most recent STAA Truck off tracking trials conducted October 2005, validated the 12 previously identified areas needing improvement to accommodate STAA Trucks, yet the 2010 **DEIR ignored FIVE of these tight radius curves.** Why?

Why didn't the 2010 DEIR address the specific safety concerns raised by the public during the 2008 comment period? **_Hiouchi and Gasquet have many dangerous highway and road intersects.** As stated in the Executive Summary of Traffic Analysis Report (a supporting document of the 2010 DEIR) it was concluded, "due to the rural

Bruce, Doreen

nature of Hwy 197/199 actual analysis of intersection operations were not performed as part of this traffic analysis report." Why? 3 cont.

Due to poor sight visibility (V), high rates of vehicle speeds (S), pedestrian/bicycle use (P/B), and highway crossings (C) a traffic study needs to be conducted at the following intersection with Hwy 199:

MP 5.0 Redwood State (S, P/B,C)
Hiouchi Market/ business area (S, P/B,C)
MP 6.72 Monument Drive (S, V, C)
MP 7.0 South Fork Road (S, V, P/B, C)
MP 12.23 French Hill Road (S, V, P/B, C)
MP 12.99 Margie's River Access Forest Service wayside (S, V, P/B, C)
MP 13.0 Valley View Road and Gasquet Flat Road (S, V, P/B, C)
MP 13.4 Sierra Wood Road (S, V, P/B, C)
MP 13.66 Gasquet Mobil Home Park entrance (S, V, P/B, C)
MP 13.86 Fire House Road (S, V, P/B, C)
MP 14.2 Middle Fork Gasquet Road (S, P/B, C)
MP 14.8 Six Rivers Forest Service Head Quarters and French Hill Trail (S, P/B, C)

Excessive vehicular speeds through Gasquet and Hiouchi, compounded with the addition of larger, heavier STAA Trucks was raised as a safety concerns by residents during the 2008 public comment period. These concerns were not adequately addressed in the 2010 DEIR. The June 1998 CalTrans Comprehensive Study of Routes 197 and 199 states "Speed zones in the Hiouchi and Gasquet areas are an ongoing issue." So in light of this historical documentation and twelve more years of increased traffic, development, ingress and egresses onto the highway, more accidents/fatalities and near misses, why was this concern brushed off? Kevin Church stated in public prior to the 2010 DEIR that speeds on Hwy 197/199 could be, but will not be, reduced! Why? Is CalTrans priority fast transportation of the time sensitive lily bulbs instead of human safety? This defies public sentiment and common sense.

The Traffic Count data collected in September 2008 for this DEIR in Gasquet **did not capture a complete picture of the extremely dangerous situation** created by excessive vehicular speeds, poor sight visibility, vehicular cross traffic, and pedestrian and bicycle traffic along the highway and crossing the highway. The worst areas through Gasquet are between MP 13.0 and MP 14.2. The March 2006, DN-197/199 Corridor Extra-Legal Load and STAA Vehicle Accessibility Study (a supporting document of the 2010 DEIR) stated "Field observations indicated some bicycle travel on US 199 concentrated in Gasquet and pedestrian activity was only observed in urban areas and within Redwood Park." Was this "field observation" made on Google Earth? How could such an inaccurate assessment be used to make critically important decisions regarding safe speeds, appropriate signage, striping or other safety measures needed in Gasquet and Hiouchi, factoring in the added liability of STAA Trucks? It is interesting to note that Gasquet has signs and road striping for bicycles and Redwood Park has signs for pedestrian activity. Was this the basis of this field observation? As an eighteen year resident of Gasquet who lives along Hwy 199 and travels through Hiouchi into Crescent

Bruce, Doreen

City almost daily, I can testify to the fact that many residents in both communities walk/ jog and bicycle along the highway for a variety of reasons. Also tourists dash to cross the speeding highway traffic at Hiouchi Market. In Gasquet, our regular walkers, joggers, kids and bicyclists face real hazards along highway 199 when trying to cross to the opposite side. The most dangerous crossings are: (1) Gasquet Flat Road and Valley View Road, (2) Sierra Wood Road, and (3) Gasquet Mobil home Park. The traffic speeds along this straight stretch of highway in conjunction with the grading dips makes oncoming traffic become invisible to crossing pedestrians/bicyclists and other vehicles attempting to cross the highway. I have witnessed, as well as personally experienced, many frightening near miss accidents. **Please do a survey/study of real people living in Gasquet and Hiouchi to determining appropriate, and safe highway speeds through our communities?** 3 cont.

What are the Federal standards and mitigating requirements for nighttime noise emitted by commercial truck accelerating and directions in many areas. I continue to support the no build alternative for this project.

decelerating on highways running through residential areas, and how will the addition of STAA Trucks add to this existing problem, and how will it be mitigated? This was not adequately addressed in the 2010 DEIR.

The March 2006 STAA Truck trials on HWY 197 and 199 were conducted under CHP escort and at speeds lower then typical trucks travel. How low were these speeds and how did you factor that into actual truck speed? Faster moving STAA trucks will not negotiate corners as sharply. Many short sight distances exist. Was this closely looked at? The 2010 DEIR does not address this. Why not?

I am amazed and disheartened that so much time, money, and effort has gone into this CalTrans work project. The 2010 DEIR fails to provide a compelling need for this project, and any reasonable and prudent person would realize after driving highways 199 and 197, that they never will be safe for STAA Trucks meeting one another in opposite directions.

Sincerely,

Doreen Bruce

Doreen Bruce

Bruce, Doreen

Donald and Doreen Bruce
550 Sierra Wood Road
Gasquet, CA 95543
(707) 457-3078

September 17, 2008

Kim Hayler
P. O. Box 3700
Eureka, CA 95502

Regarding the proposed 197/199 Safe STAA Access Project

Dear Kim Hayler,

My wife and I are residents of Gasquet, California in Del Norte County and want to inform you we support the no build alternative number 2 as we are opposed to the proposed implementation of a STAA truck route on Highways 199/197 in Del Norte County. 4 We are not opposed to improvements on Hwy's 199 and 197, but believe the proposed road widening projects by Caltrans would not transform the Hwy's into suitable STAA routes. 5 Much of Hwy's 199/197 will remain narrow with no shoulders and there are many additional numerous tight curves. As you probably know, STAA trucks have longer wheelbases and need more room to maneuver. They can easily "over track" into other lanes on sharp curves. Other parts of the Hwy's 199/197 have no shoulders with a rock cliff or mountain on one side and the pristine Smith River on the other. The Caltrans study dated May of 2007 does not address any areas other than the few proposed project sites. 6 One proposed widening site (mile post 20.50) discussed in the Caltrans study states in part, "Widening will require excavating an approximately 100-foot-high slope face. This slope is comprised of unconsolidated boulders, coble and dirt. Excavation of the slope face will likely result in future perennial rock-fall and shedding, and is not recommended by Geotechnical and Maintenance staff."

We have talked to many people who are not in favor of having Hwy's 199/197 STAA accessible. 7 Residents on 197 are particularly concerned about accessing 197 from their residences as the visibility is very limited in most areas due to the curvy nature of the road. My wife and I visited some of these homes while gathering signatures for the petition and it was indeed very precarious and scary entering onto 197 from the driveways. 8 Caltrans has not addressed this issue at all. In fact, at the April 17 public hearing in Crescent City, project manager Kevin Church, when questioned about this, stated there was no plan to reduce the 55 mile per hour speed limit on 197 or to do anything else to mitigate the increased danger from more and larger trucks. School buses, R.V's, bicycles, pedestrians, and local residents use this rural road. Also, Brookings, Oregon residents use this route to access the Rogue Valley and I-5. Adding STAA trucks would certainly be a dangerous mix.

The residents we talked to in Gasquet have the same concerns. 9 Almost everyone agrees that an alternate route for STAA trucks is the only solution that makes sense as there far too many places on Hwy 199 that realistically cannot be altered to make it a safe route for residents and tourists. Yes, by widening some curves it may legally meet the minimal specifications for a STAA route, but 197 and 199 will remain incompatible for longer trucks. Additionally, many don't believe that a STAA truck route is compatible with the wild and scenic designation of the Smith River corridor. 10 Others have further pointed out

Bruce, Doreen

that Gasquet gets it's drinking water from the junction of the middle fork and north fork and Crescent City from the lower river. Hiouchi and the community of Smith River also use the Smith river as their drinking source. Increased truck traffic can only increase the odds that a spill of hazardous substances could end up in our drinking water. 11

The proposed Caltrans project appears to be for the benefit of the few businesses (Lily Growers Association, Hambro Forest Products, Dahlstrom, and the Watt Bulb Farm) cited in the "action plan" dated April 25, 2007 by the Del Norte Local Transportation Commission (DNLTC) titled *"Achieving STAA Route Status for the highway 197/199 corridor."* (Page 18 of the document under the heading "Impediments to growth) Also stated in this section is that "the growth of retail business is similarly impeded." "Home Depot opened a store in Crescent City in 2006 – along with Wal-Mart, the only big box store in the county – but it's trucks must re-load their cargo in Oregon from 70 to 45 foot trailers prior to traveling through Del Norte County." It's interesting to note that Home Depot and Wal-Mart chose to locate in Crescent City without a STAA route over 199/197. That doesn't make it appear that a lack of a STAA route over 199/197 impeded growth. (Wal-Mart does have STAA access from 101 north) Also, a price comparison between Wal-Mart, Crescent City, and STAA accessible Wal-Mart in Cottage Grove, Oregon (directly on I-5 20 miles south of Eugene, Oregon) shows that prices are identical for almost all items. (See enclosed *Report on Price Comparison by Two Residents of Del Norte County March 23, 2008).* The DNLTC study did not provide any studies or documentation that an STAA route would benefit the average citizen of Del Norte County. Nor did Caltrans or anyone else at the April 17 and September 16 Caltrans public meeting in Crescent City provide any documentation or figures that an STAA route on 197/199 would benefit the citizens of this county. Many we have talked believe it would actually hurt tourism in the long run because the reason people come here is for the beauty of the area, not to drive with huge trucks. 12 13 14

We have lived in Del Norte County for 20 years now and have observed steady slow growth. For many, that is the appeal of this county. Crescent City will no doubt continue to grow as it is one of the last towns of its size on the western coast that hasn't had it's quality of life diminished by urban sprawl. Contrary to what a few special interests in this county are saying, an STAA route, or the absence of, on 197/199 will not make or break the county. Please keep highways 197 and 199 safe for residents, tourists, school buses, and pedestrians and for the pristine Smith River. 15

Sincerely,

Donald Bruce

Doreen Bruce

Donald and Doreen Bruce

Bruce, Doreen

Donald and Doreen Bruce
550 Sierra Wood Road
Gasquet, CA 95543
(707) 457-3078

September 16, 2008

Kim Hayler
California Department of Transportation
P. O. Box 3700
Eureka, CA 95502

PROPOSED 197/199 SAFE STAA ACCESS

Dear Kim Hayler:

The proposed Caltrans 197/199 project has significant and cumulative negative impacts on the environment, and public health and safety. The following studies need to be completed to determine the feasibility of proceeding with this project: 16

Highway 197 has over 70 residential driveways and intersecting roads, which have very limited visibility and blind spots. (These areas are not within the proposed Ruby 1 and 2 project sites) 17
A study needs to be done to demonstrate how safe ingress and egress for the residents, school buses, pedestrians and bicycles can be accomplished.

A review of traffic collisions using statistics from the California Highway Patrol (Crescent City Area) from Jan. 1998 to Dec. 2008, reveals that **the majority of accidents on Highway 199 occur between the Hiouchi Bridge and Gasquet.** Studying the CHP report showed at least 390 accidents above and below the proposed Caltrans project area on Highway 199. (Hwy 197 was not counted for this report although there are additional accident numbers on that route) There were at least 300 accidents from Mile Post (MP) 4.5 at the Hiouchi Bridge to MP 20. There were approximately 203 accidents between MP 7 and MP 12 alone. From MP 20 to MP 27, in which small portions are proposed to be widened, in the project, approximately 201 accidents were noted in the statistics by the CHP. So, many of these accidents were probably not in the proposed project area as the project does not cover the entire road between MP 20 to MP 27. **In addition, a review of the CHP accident statistics reveals 2 accident deaths occurred within the proposed project area between Jan. 1998 and Dec. 2008 while 17 occurred outside the project area. In addition, the CHP report revealed that the number one cause of accidents on Hwy 199 was excessive speed.** Any prudent and reasonable person would understand that increased truck traffic, especially larger trucks, would exacerbate the hazards resulting in more accidents. 18
A study needs to be done to determine solutions on how to mitigate accidents on the vast majority of Hwy 199 that is not being "fixed" or addressed. 19

The Smith River will be adversely affected by the cumulative impact of increased truck traffic, which will cause additional contaminants – oil, diesel, tire, rubber antifreeze and other leaking contaminants and or toxic substances – to run off the road into the Smith River. ***A study needs to be done to ascertain the harmful effects on the health of the fish, other aquatic species, wildlife, plants, and human use and consumption of the river water.*** 20

Bruce, Doreen

The Smith River is the drinking source for Gasquet, Hiouchi, Crescent City, and Smith River. A study needs to reveal how these negative impacts will be eliminated or mitigated to the point of having no significant affect. 21

A study needs to be done to demonstrate how toxic substances can be transported safely along the river with a comprehensive plan to monitor and enforce the safe transportation of toxic substances. In addition a study needs to outline a spill response plan and how it will be financed. 22

The proposed project will span several years – therefore –
A disaster evacuation plan needs to be prepared detailing specifics on how the plan would be implemented, who is responsible for carrying out the plan, how the public will be informed and educated about the process, agencies involved, etc., and how the plan will be financed. This will require a specific study to address this issue. 23

Is the roadway, and the remaining bridges on Highway 199 and 197 currently built to withstand the increased weight load of STAA trucks? (Per page 2 of the "Notice of Preparation" by Caltrans) "The existing roadway of US 199 within the project limits was built in the early 1920's." 24
Heavier trucks will put greater stress and wear on the roads, bridges, and increase erosion into the river. A study needs to be done to determine these effects on future maintenance, repair, and construction costs, how it will be financed and who will pay for them. 25

Years of road construction, ***delays, congestion, and hassles along Highways 199 and 197 will detract from the wild and scenic appeal and destrability for tourists to visit Del Norte County. Additionally, once these highways are made into STAA truck routes, tourists will have to negotiate these roads with larger, heavier, and longer trucks will diminish visibility, enjoyment, and change the rural driving experience. A study examining these factors and how they negatively impact tourism needs to be conducted.*** 26

Crescent City already has STAA truck route access from Highway 101 North and South. Prices of basic food and household commodities are comparable to other towns of similar size and demographics (see "A Report on Price Comparisons by two Residents of Del Norte County", March 23, 2008). The Action Plan done by the Del Norte Local Transportation Committee, dated April 2007, inadequately addressed the economic benefit to the average resident of Del Norte County. Only a few businesses such as Hambro Forest Products, and Dahlstrom have publically supported the STAA project. Del Norte County has experienced an appreciable growth rate without having Highways 199 and 197 as STAA truck routes. 27
A study needs to be done showing specifically how, and who (residents, consumers, and businesses), and to what extent the economic advantage will benefit residents in Crescent City, Hiouchi, Gasquet, Klamath, and Smith River. 28

Sincerely,

Donald Bruce
Doreen Bruce

Donald and Doreen Bruce

Bruce, Doreen

197/199 STAA TRUCK IMPROVEMENTS

A review of the accident statistics provided by the California Highway Department for the dates **1/1/1998 to 12/31/2008** reveals the following:

The total number of accidents was 591.
Note: The actual total will be higher. Some were not counted yet as the actual location (mile post) was not known by this writer at the time of this report. (Example: Cable Rock Road; these will be added later when the mile post location is determined). This report covers the area from the Hiouchi Bridge on Highway 199 up to the Collier tunnel. It does not include Highway 197.

The total number of accidents that fell within the proposed STAA Truck Improvement areas was 49.

The number of accidents OUTSIDE the proposed STAA Truck Improvement areas was 542. This number will be slightly higher when other cross street mile post locations are identified.

The obvious **conclusion is that the STAA Truck improvements will not be helping the areas where the vast majority of accidents happen.**

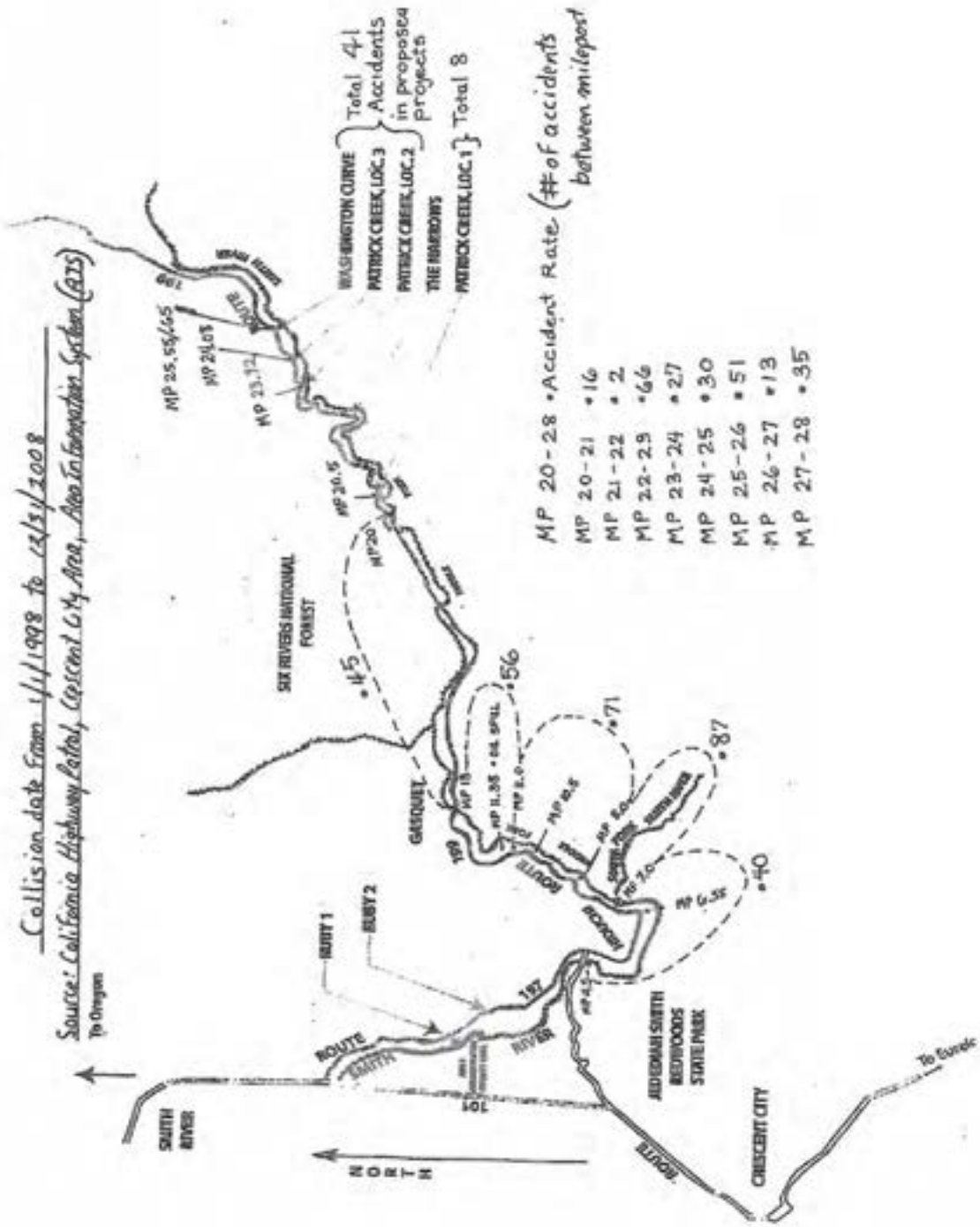
Further review of the California Highway Department accident report from 1998 to 2008 reveals **the top six causes of accidents on highway 199 were as follows:**

247 accidents were attributed to SPEEDING
110 accidents were attributed to UNSAFE TURNING MOVEMENT
74 accidents were attributed to DRIVING TO THE LEFT OF SOLID DOUBLE LINE
62 accidents were attributed to reasons OTHER THAN DRIVER
57 accidents were attributed to UNDER THE INFLUENCE
56 accidents were attributed to FAILURE TO MAINTAIN

The proposed Caltrans curve widening project for the (5) locations sited in the Project Study Report will allow the increased commercial truck traffic, the newly legal STAA (larger, longer, heavier) trucks, and the general motorist to negotiate these newly "fixed" curves at greater rates of speed. Since by far the greatest cause of accidents (247) are already due to excessive rates of speed, this Caltrans "fix" may actually increase the accident rates, and not make Highway 199 safer, however it will be STAA Truck Route accessible!

ATTACHMENT (1)

Bruce, Doreen



ATTACH (1A)

Bruce, Doreen

MILE POST LOCATION REFFERENCE SHEET

Hiouchi Bridge traveling East on Highway 199 to the Collier Tunnel

Mile Post #	Location/ landmark	Comments
4.5	Hiouchi Bridge	
5.0	Redwood State Park	Posted 50 MPH
5.5	Entering Hiouchi Hamlet	
6.18	Beginning Serpentine Slide	Posted 55 MPH
6.55	End of curve Serpentine Slide area	
7.0	South Fork Road	
8.0	Passing lane (old weigh station)	
8.68	Curves	
10.42	Long straight stretch close to river	
11.2	Bridge replacement Hard Scrabble Ck	
11.38	Diesel spill area	
11.81	17N49 Forest Service Road	OHV parking
12.23	French Hill Road	
12.5	Shaded area along river	Slippery in Winter
13.0	Valley View Rd & Gasquet Flat Rd	
14.5	Six Rivers NRA Forest Station	
15.0	Lado Del Rio Rd	
16.50	Pioneer Rd	
16.75	Panther Flat C.G.	
18.35 – 18.49	4 lane rock slide area	
19.0	Grassy Flat C.G.	
20.0	End of 4 lanes	
20.0	Howard Griffin Bridge	
20.71	Rock fall before Sandy Beach	
20.85 – 20.92	Sandy Beach	
22.0	Patrick Creek Rd	
23.0	Out rock out cropping	
24.08	Middle Fork Bridge	
24.75	Little Jones Creek	
25.3	Siskiyou Fork Rd	
25.96	Bar-O- Boys Ranch	
26.50	Very tight long curve	
27.3	Just past construction stop light	
28.11	Idlewild Maint. Station	
30.07	Knopki Creek Rd	
31.31	Oregon Mountain Rd	
32.4	Collier Tunnel	

ATTACH (18)

Bruce, Doreen

CHANGES NECESSARY FOR PUBLIC SAFETY IF HIGHWAY'S 199 AND 197 BECOME A STAA TRUCK ROUTE.

GASQUET

1. Reduce speed limit through Gasquet to 35 MPH from Mile Post 13.0 to Six Rivers NRA Forest Station Mile Post 14.5.
2. Provide crosswalks across Highway199 at the intersections of Gasquet Flat Road, Firehouse Road, and Middle Fork Road.
3. Caution signage for pedestrians, bicyclists, and congestion through Gasquet.
4. Caution light at the intersection of Gasquet Flat Road due to congestion, and the short sight distance to the north on Highway 199 making ingress and egress very dangerous.

NOISE ABATEMENT MEASURES

1. Erect sound barriers through residential areas through Gasquet.
2. Signage prohibiting engine compression braking through Gasquet.
3. Signage prohibiting unmuffled motorcycles through Gasquet.

WATER QUALITY SAFETY (The Smith River is the drinking water source for Gasquet, Hiouchi, Crescent City, and Smith River. In addition, the Smith River is critical habitat for Chinook and endangered Coho salmon)

1. Trucks carrying pesticides and other toxic chemical be prohibited along the proposed STAA truck route to prevent the possibility of contamination of the Smith River.
2. An enforcement plan needs to be in place to monitor any illegal transport of toxic chemicals.

OTHER

1. Need guard rails along all sections of the river that come near the highway.
2. Have Highway 197/199 designated as a one-way STAA route with the route being primarily on the non-river side.
3. Have additional California Highway Patrol Officer(s) assigned to Highway 199/197 for monitoring and enforcement..

ATTACHMENT (2)

Response to Doreen Bruce

Response to Comment 1
This comment states concern for induced traffic from I 5 during poor winter weather conditions. Please see the response to Friends of Del Norte 2012 response to comments 1-23 for a discussion of potential induced traffic.

Response to Comment 2
This comment states there are additional comments attached to the letter.

Response to Comment 3
This comment is the letter submitted during the circulation of the DEIR/EA, please see the response to Doreen Bruce 2010.

Response to Comment 4
This comment states support for the no project alternative.

Response to Comment 5
This comment states that the route will not be suitable to STAA trucks, even after completion of the project. The project was initiated and designed to be suitable for STAA vehicles. Please see the response to EPIC 2012/Smith for a discussion of the design parameters and suitability of the route for STAA vehicles.

Response to Comment 6
This comment states that the project does not address other areas of concern. Please see Grouped Response #8 and EPIC 2010 response to #14 and #15 for a discussion of why other areas were not included in this project. The comment also states that there is an unstable slope at mile post 20.50. Geotechnical recommendations were followed in the design decisions at this site. See FEIR/EA Section 2.2.3 for discussions of geotechnical information.

Response to Comment 7 and 8
This comment states concern for residential access along SR 197 after the project. Please see response to Donald Bruce 2010 comment #2.

Response to Comment 9
This comment states concern for public safety in Gasquet. Please see EPIC 2010 response #8 for a discussion of community impacts, and Group Response #8 for a discussion of safety.

Response to Comment 10
This comment states concern for the Wild and Scenic Smith River. Please see Group Response #5.

Response to Comment 11
This comment states concern about spills in the Smith River affecting the quality of downstream drinking water supplies. Please see Vern Power's comment #1 about spills.

Response to Comment 12, 13 and 14

This comment questions the purpose and need, and potential benefits of the project. Please see the Grouped Responses #1 and #2 for discussions of the purpose and need, and cost vs. benefits of the project.

Response to Comment 15

This comment addresses the purpose and need of the project. Please see Grouped Response #1 for a discussion of the purpose and need.

Response to Comment 16 through 28

These comments were submitted during the scoping period and were considered during the design and environmental analysis of the project. These are not comments on the Recirculated Draft EIR/EA.

Campbell, Bruce

Bruce Campbell
<madroneweb@aol.com>
11/05/2012 12:35 PM
Please respond to
<madroneweb@aol.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

First, I would like to compliment Caltrans for the work actually done thus far on the Smith River -- with the possible exception of excessive lanes northeast of Gasquet. Some curves have been dealt with, and the highway is absolutely perfect as is to go at a reasonable pace near the gleaming aquamarine jewel of the Smith River. 1

This project is dangerous to the environment and serves no purpose unless the goal is to get a swarm of many interstate trucks diverted from Hwy. 5 to Hwy. 101 (and then onto 197 and 199. There is already STAA truck access since the project to expand Hwy. 299 had been funded. 2

Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 3

I call for no more waste of taxpayer money, so please abandon this preposterous and disturbing project immediately! If Caltrans does not abandon the project, certainly an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. This project clearly will have a deleterious impact on many species and scenery for tourists. 4

An EIS must consider the impact of the proposed highway project (as well as ongoing use of the proposed expanded highway) on the "DESIGNATED OUTSTANDINGLY REMARKABLE ECOLOGICAL VALUES" of the Smith River relating to the National Wild and Scenic Rivers Act. 5

As I recall, there have already been serious truck accidents heading over the side into the Smith River -- sometimes with toxic chemical loads. The Smith River is already toxic enough downstream due mostly to the bulb farms, so we do not need additional risk threatening anadramous fisheries. Please discuss scenarios of how an STAA vehicle may or may not be able to be extracted from the Smith River. 6

Also, quit making ridiculous claims that there will not be increased truck traffic with the Smith River project. Admit that a substantial chunk of Bay Area to Northwest truck traffic would travel Hwy. 101 and then 197 and 199 and on to the Northwest, and dissect such in detail in your documents. 7

Your evaluation of anadramous fisheries must also consider the impact of erosion / sedimentation on its habitat, as well as the impact that the overall highway project may have on the prey for such fishes. 8

When considereding the state-endangered Marbled Murrelet, please consider whether the project interferes with nesting, social activity, or recovery potential for this sea and forest bird. There is too much fragmentation 9

Campbell, Bruce

already in highway and some campground areas going through ancient redwoods. Examine how further fragmentation can impact nesting, survival, social activity, and potential for recovery for the marbled murrelet. 9 cont.

In regards to the Northern Spotted Owl, please examine not only the Smith River plans, but other North Coast STAA-access plans which further eliminate flatter "turnout"-type areas which can serve as habitat for voles and mice and other prey for the northern spotted owl. 10

I am sick of Caltrans piece-mealing and acting like the STAA projects are unrelated. Quit cavalierly violating the law and seriously discuss currently proposed projects on murrelet and northern spotted owl! 11

This project would have significant negative impacts on: 12

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:

- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove). 13
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 14

Abandon this project and focus on maintaining the existing road infrastructure. If you maintain your stubborn bureaucratic ways, then you must do a full EIS on the series of currently proposed STAA-access projects. 15

If you don't appreciate the staggeringly beautiful Smith River and vicinity, then personally move out of this special area and trash the earth elsewhere! 16

Sincerely yours,

Bruce Campbell
3520 Overland Ave. # A 149
Overland Ave #A149
Los Angeles, CA 90034

Response to Bruce Campbell

Response to Comment 1
This comment expresses gratitude for the Departments maintenance of the highways along the Smith River. The Department appreciates the comment.

Response to Comment 2
This comment questions the purpose and need of the project. Please see Group Response #1 for a discussion of the purpose and need of the project.

Response to Comment 3
This comment states that it would be better for the Department to construct safety improvements. Please see Grouped Response #1 for a discussion of purpose and need.

Response to Comment 4
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Response to Comment 5
This comment states that the Department must consider impacts to the Wild and Scenic Smith River. Please see Grouped Response #5 for a discussion of the Wild and Scenic Smith River.

Response to Comment 6
This comment states concern about toxic chemical spills in the Smith River. Please see the response to Vern Powers Comment #1.

Response to Comment 7
This comment states there would be a substantial increase in truck traffic. There is no evidence that there would be a substantial change in routing patterns for the trucking industry. Overall mileage from the Bay Area to Portland, Oregon is approximately 699 miles along US 101/SR 197/US 199/I 5 and 633 miles along the I 80/I 5 route. The coastal US 101/US 199 route is longer and most of the route is curvy mountainous 2-lane highways, thus it is not likely to be the preferred route for through trucks, compared to the 4-lane interstate highway I 5.

Response to Comment 8
This comment states additional concerns over impacts to anadromous fish. The Department follows Clean Water Act regulations through the North Coast Regional Water Quality Board which ensure that no sediments or erosion from project enters waterways untreated. A small amount of riparian habitat will be removed at the Patrick Creek Narrows Location 2 bridge site, which would result in a small decrease in food availability to fish in the river. Impacts to anadromous fish were reviewed in consultation with the National Marine Fisheries Service and the agency concurred with the Departments finding that the project may affect, but it not likely to adversely affect Coho salmon or their critical habitat. There are minor temporary adverse impacts to Essential Fish Habitat (EFH), which are offset by measures included in the project, see Section 2.3.5.4.

Response to Comment 9

This comment states concern for marbled murrelet and forest fragmentation. Please see both DEIR/EA Section 2.3.5, the Biological Assessment and Biological Opinion for more information on Marbled Murrelet. The project is not likely to interfere with nesting activities because the stands within which the project is planned are not high quality nesting habitats. Construction activities have the potential to disturb murrelets using the river corridor to migrate between nesting sites and the ocean, and thus there are temporal restrictions on construction activities. The forests adjacent to the project activities are already fragmented and the project will not increase the level of fragmentation. The Biological Opinion from USFWS states that the project may affect, not likely to adversely affect marbled murrelet.

Response to Comment 10

This comment states concern for spotted owls and the removal of potential foraging habitat in turnouts. The flat turnouts adjacent to the roadway are not high quality foraging for owls, nor are they high quality habitat for prey of owls.

Response to Comment 11

This comment questions whether other STAA access projects are related, and expresses concern for marbled murrelet and northern spotted owl. STAA access projects along the north coast of California are related as the various routes do connect, and separated because the routes have specific termini. Thus access to the south on US 101 is a separate project than access to the north along SR 199/US 199. The cumulative impacts analysis and economic growth analysis did consider the other projects for overall impacts. Impacts to marbled murrelets and spotted owls were seriously discussed in the DEIR/EA Section 2.3.5 and in consultation with USFWS.

Response to Comment 12 through 15

These comments are from the Form Letter 2012 #2, please see the responses to that letter.

Response to Comment 16

This is not a comment on the RDEIR/EA.

Cipolla, James

Oso Lindo
<osolindo@rocketmail.com>
10/10/2012 08:25 PM
Please respond to
Oso Lindo
<osolindo@rocketmail.com>

To "jason_meyer@dot.ca.gov" <jason_meyer@dot.ca.gov>
cc
bcc
Subject STAA truck access on Hwy 199/197 and related parts of Hwy 101

Mr. Meyer,

Please assist in abolishing any plans to expand traffic on the above named highways to STAA trucks, or any other plan that would increase traffic through these dangerous routes of travel. These highways are already overtaxed with traffic that lead to a higher than average number of accidents. 1

Since the current plans have no plan to change the section between Hiouchi and Gasquet, the dangerous winding roads between these two areas will exacerbate the already precarious driving conditions that currently exist under normal traffic conditions. To even think to apply these additional-sized trucks during winter conditions would be a gross oversight in considering the safety of residents that need these roads for travel for day to day use. All in all, these mountainous areas are not conducive to STAA truck traffic regardless of measures thought to accommodate such traffic. The dangerous winding roads will remain regardless of any measure that is taken to allow STAA trucks to traverse these highways. Considering the plan to allow STAA trucks, no one can justifiably argue that adequate safety measure will be in place to prevent an increase in hazards to current forms of traffic in addition to the truckers that will drive the STAA trucks. 2

Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway. It is more eventual than hypothetical that travel of STAA trucks through these dangerous areas will prove to increase these accident statistics. 3

Hwy 199 follows the Smith River though out much of its length. Spilling of cargo during accidents on Hwy 199 would compromise water sources for residents and wildlife. A high volume spill could possibly render Crescent City's water supply as toxic. 4

Let's not think of Hwy 197 in terms as one would think of most other highways in California. Route 197 is a rural residential road with over 70 driveways directly entering onto the road. How many STAA trucks currently travel the State on residential roads?? 5

The fact that the State has little money, and due to the content 6

Cipolla, James

of the California Transportation Policy Priority, one cannot allow the spending of money to accommodate STAA trucking as a prudent venture. Those who control and endorse such use of tax money are not congruent with public interest. 6 cont.

My address and phone number are confidential data. However, if you require such to process this transmission for support of abolishing the plan, please return mail stating the need for such information and I will supply. 7

James Cipolla
Crescent City, CA.
osodelnully@hotmail.com

Response to James Cipolla

Response to Comment 1
This comment states opposition to the project and concern for safety. For safety concerns please see Group Response #8.

Response to Comment 2
This comment states concerns over safety, please see Group Response #8 for a discussion of safety.

Response to Comment 3
This comment states that there will be a safety concern on US 101 south of Crescent City due to STAA truck access. This area is currently open to STAA vehicles. Please see Group Response #8 for a discussion of how collision rates inform safety projects.

Response to Comment 4
This comment states concern for toxic chemical spills. Please see Vern Powers response to comment #1 for a discussion of spills.

Response to Comment 5
This comment states that SR 197 is a rural residential road. State Route 197 is defined in the route Concept Report as a 2-lane conventional highway, and classified as a Rural Minor Arterial.

Response to Comment 6
This comment questions the purpose and need of the project, please see Group Response #1.

Response to Comment 7
This is not a comment on the REIR/EA.

Estefan, Lars

Lars Estefan
<larsonest@gmail.com>
10/12/2012 11:40 AM
Please respond to
<larsonest@gmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

The project would have significant impacts on the Smith River, old-growth Redwoods and Douglas Fir trees, endangered species including Coho and Chinook Salmon and Steelhead, Marbled Murrelets, and Northern Spotted Owls. 2

Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park would be impacted. 3

There would be increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove). Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply. 4

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 5

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 6

Abandon this project and focus on maintaining the existing road infrastructure. 7

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

Sincerely,

Lars Estefan
24675 Moon Ave
Lomita, CA 90717

Response to Lars Estefan

Response to Comment 1
This comment states the project is unnecessary. Please see Group Response #1 for a discussion of purpose and need.

Response to Comment 2
This comment states there would be significant impacts to various resources. The DEIR/EA, RDEIR/EA, and FEIR/EA clearly state that all impacts were avoided, minimized or otherwise mitigated to less than significant levels. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species.

Response to Comment 3
This comment states there would be significant impacts to tourism and parks. Please see Group Response #2 for a discussion of impacts to tourism and parks. See also DEIR/EA Appendix B: Resources Evaluated Relative to the Requirements of Section 4(f) for an evaluation of effects to public resources.

Response to Comment 4
This comment states that there would be an increase in truck traffic from Grants Pass, Oregon to the Bay Area, and there would be safety hazards due to spills. Section 2.1.5 discusses the increase in truck traffic associated with this project. There is no anticipated safety hazard associated with the project. Please see Group Response #8 for safety concerns and Vern Powers Response #1 for a discussion of spills and water quality.

Response to Comment 5
This comment cites the Route Concept Reports for SR 197 and US 199. These routes will remain a “2-lane, conventional highway, with passing lanes” after the project. There are no plans for extensive upgrading of this facility to a 4-lane highway at this time.

Response to Comment 6
This comment states that STAA access already exists on other routes and questions the funding allocation. Please see Group Response #1 for a discussion of purpose and need, and Group Response #2 for a discussion of the cost vs. benefits of the project.

Response to Comment 7
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Evermoore, Eileen

Eileen Evermore
<eileenevermore@gmail.com
>
11/01/2012 05:02 PM

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject DEIR for proposed changes to Hwy 199/197 to accommodate longer trucks

Dear Sir

I have lived in Gasquet, CA and worked in Crescent City,CA. for 38 years. During that time, I have driven Hwys 199 and/or 197 at least twice a day, 4-6 days a week. I therefore consider myself to be well-qualified to comment on the inadequacy of the Draft Environmental Impact Report on the proposed changes to enable longer trucks on those two narrow winding canyon roads. 1

As it is, the current "shorter" trucks already are a safety hazard: they drift over the double line on a regular basis. To safely drive the Highways, you always have to keep an eye on on-coming truck traffic to give them room to negotiate the curves. This is a problem from the top of the canyon, "The Narrows," to the bottom of the canyon where 199 intersects 101. This includes areas not targeted for improvements. 2

I have had to stop and wait behind a "shorter" truck in front of me, because the driver knew he could not make the curve without running into on-coming traffic. While I applaud his caution, his stopping on the winding road is an equal hazard
without adequate warning to cars following him on blind curves. A car behind me almost slammed into my rear end while I was waiting for the truck, who was waiting for the oncoming traffic to clear.

If we are already experiencing safety problems with the "shorter" trucks. How much more risk are we facing with the "longer" ones? The DEIR does not tells us.

The DEIR fails to address these safety hazards in the following ways:

(1) fails to identify and evaluate the cumulative impact of diverting 15 truck traffic to 199-197. 3
(2) fails to address the increased safety hazards to winter weather when this 15 diversion will be heaviest 4
(3) fails to address these safety hazards in areas with highest accident rate (between Gasquet and Hiouchi) with no
improvements to mitigate the effects. 5
(4) fails to address the increased risk of truck cargo spills threatening the only water supply for Gasquet and Crescent
City--not to mention the pollution of the pristine Smith River, a Wild and Scenic River, protected as a National
Recreation Area, and one the last unobstructed Salmon runs in the Pacific North West. 6

The DEIR also fails to point-out that the Del Norte County local economy will have a negligible 7

Evermoore, Eileen

benefit to off-set the potential risks and hazards that the local residences and businesses will suffer as the result of these dangerous trucks using our pristine and protected canyon as a main thoroughfare to promote their businesses outside of our county. 7 cont.

This DEIR is yet another example of a few business men who are motivated solely by profit without any regard for law, safeguards, people, or the environment. 8

Eileen Evermore
P.O.Box 460
Gasquet, CA. 95543

Response to Eileen Evermoore

Response to Comment 1
This is not a comment on the RDEIR/EA.

Response to Comment 2
This comment states there is a current safety hazard with CA Legal trucks on the route. Please see Group Response #8 for a discussion of safety.

Response to Comment 3
This comment states that diverted traffic from I 5 was not evaluated. The DEIR/EA Section 2.1.5 discusses the project's impacts on traffic. Please see the response to Friends of Del Norte 2012.

Response to Comment 4
This comment states that increased traffic from I 5 during winter weather will be a safety hazard. Please see the response to Friends of Del Norte 2012.

Response to Comment 5
This comment states concern over the area between Hiouchi and Gasquet. Please see the response to EPIC 2010 Comment 14 and 15, as well as Group Response #8.

Response to Comment 6
This comment states concern for spills and water quality. Please see the response to Vern Powers Comment #1 for a discussion of spills.

Response to Comment 7
This comment states there would be negligible benefits to residents of Del Norte County. Please see Group Response #1 for a discussion of purpose and need, and Group Response #2 for a discussion of the cost vs. benefits of the project.

Response to Comment 8
This is not a comment on the RDEIR/EA.

Harestad, Patrick

Dear Ms. Meyer,

I am writing to you today concerning something very important to me. That is the environmentally distructive and region inappropriate plan to widen parts of Hwy 199. The Smith River is one of the last unspoiled Rivers in the contiguous U.S. It is more precious to me than any dollar amount I may save on goods due to "more effecient" trucking. 1 2

I do not live with my head buried in the sand, I know there are very powerful forces behind this push to widen everything. 3

Please realize that the majority of people in this country are waking up to the importance of wild and scenic rivers, and they will fight for them. 4

The River is more important than the goods you want bring in!!! 5

Leave the Smith alone.

Thank You

Patrick Harestad

Response to Patrick Harestad

Response to Comment 1 through 5

These comments express concern for the Smith River and general opposition to the project. This is not a comment on the RDEIR/EA.

Hunt, Ann

Ann Hunt
<ahuntca@sbcglobal.net>
10/19/2012 03:55 PM
Please respond to
<ahuntca@sbcglobal.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. 2

The project would have significant impacts on all the scenic and recreational positives of this route without adding significant advantages... Once lost these impacts can not be recovered. 3 It would appear from this request and the Richardson Grove project that they are more interested in providing for construction related paychecks than providing service to already existing roads and road beds... 4

It seems that everyone except our industrial (including CAl -trains) and business leaders recognize that our greatest assests now and into the future lie in working with our natural environment and not imposing our will upon it. 5 Abandon this project and focus on maintaining the existing road infrastructure. 6

Sincerely,

Ann Hunt
1610 3rd Street, #11
Eureka, CA 95501

Response to Ann Hunt

Response to Comment 1
This comment states that the project is not necessary. Please see Grouped Response #1 for a discussion of the purpose and need.

Response to Comment 2
This comment states that STAA access already exists for Crescent City. Please see Group Response #1 for a discussion of the purpose and need for the project. Please see Group Response #2 for a discussion of the cost vs. benefits of the project.

Response to Comment 3
This comment states that there would be significant impacts to scenic and recreational resources. Please see Group Response #2 for discussion of impacts to tourism and parks. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River.

Response to Comment 4
This comment questions the purpose and need for the project, please see Group Response #1.

Response to Comment 5
This is not a comment on the RDEIR/EA.

Response to Comment 6
This comment states that the project should be abandoned.

Johansen, Ralph

Ralph Johansen
<mdriscollrj@charter.net>
10/29/2012 09:02 PM

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject changes to 197 and 199

We on the coast neither want nor need this invasion of this historic route. Stop this nonsense.

Ralph Johansen

Response to Ralph Johansen

Response to Comment 1

This comment states general opposition to the project. This is not a comment on the RDEIR/EA.

Lips, Stu

stu lips
<stulips@hotmail.com>
09/28/2012 09:38 PM
Please respond to
<stulips@hotmail.com>

To <kimberly_hayler@dot.ca.gov>
cc
Subject Stop the Highway 199 widening now!

The "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should not be approved. 1

The project is unnecessary and only caters to a few large corporate interest groups.

Widening and realigning Highways 199 & 197 through a wild and scenic river corridor and through ancient redwood groves will damage the root and canopy structures of ancient redwood trees, and will negatively affect one of the last undammed rivers in the US. 2

The environmental assessment is too broad and includes too many locations to serve as the basis for a single environmental analysis. Please seek all of the different alternatives proposed in this project! 3

stu lips
dana
berkeley, CA 94705

Response to Stu Lips

Response to Comment 1 throught 3

These comments were from the 2010 Form Letter, please see the responses to the 2010 Form Letter in Section 3.5 of this volume.

Lotus, Trisha (October 12, 2012)

Trisha Lee
<trishale@sonic.net>
10/12/2012 01:12 AM
Please respond to
<trishale@sonic.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject No Build is safe for 197/199 Safe STAA Access Project

Here we go again. Caltrans needs to consider alternatives to harming old growth redwoods and all of the environment, they need to not harm endangered Marbled Murrelets, Northern Spotted Owls, and Caltrans needs to not harm the Scenic Smith River. This project should not happen. Just keep up the SR 199 and SR 197 to make it safe for everyone and the current large enough trucks. The largest over 65 feet STAA Big Rigs will have 299, they are already going through to the north and with exceptions they are already going through Richardson Grove State Park. Just keep the exceptions, and don't let this be an alternative to the I-5 ... a designated Interstate Highway. 1 2 3

These sensitive roads like 197/199 can not tolerate these larger and larger trucks, and we don't need them clogging Eureka and other cities that avoid bypassing as they know business will drop. 4

In addition, we need to develop alternatives such as short sea shipping on barges and just keep the same people employed. Larger Trucks equals fewer jobs, true or false? 5

Spend the $35 million keeping our Highway 101 and Highway 199 and 197 open and more safe for our current transportation and tourist travelers. Highway 299 is being opened to larger trucks, and maybe they can put a train over that way. 6

This is one of narrowest and steepest highways in California. Have you come to drive these amazing roads, through Richardson Grove State Park and through the Smith River Canyon? Or do you just love to harm the environment with your big money projects and Federal money you feel you must spend on these destructive projects. Have you not done enough damage? Can you leave one piece of paradise alone? You gain seekers need to jump in the river and slow down before you ruin the few beautiful spots in California that are left. 7

If Caltrans does not listen to reason and chose the no-build option and alternatives, then an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. The project would have significant impacts on the pristine Wild and Scenic Smith River, the Old Growth Redwoods and other trees, the endangered Northern Spotted Owls, and the fish we need to save like Chinook and Coho Salmon, and the trout fish. 8

The Smith River and Hiouchi areas are famous for Tourism and recreational opportunities to include the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park. 9

Please keep in mind, the steep and geologically unstable Smith River Canyons are crumbling. Increased weight in truck traffic will make these roads more subject to failure, and increase the risk of spills. This can put this most pristine river in more danger. The lily farmers are already harming the Smith River and that needs to stop too. 10

Isn't it true that Caltrans themselves conclude that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 11

Please focus on maintaining the existing road infrastructure. 12

Sincerely,

Lotus, Trisha (October 12, 2012)

Trisha Lotus

Trisha Lee
2425 C Street
Eureka, CA 95501

Response to Trisha Lotus (October 12, 2012)

Response to Comment 1
This comment states that alternatives to impacts to various resources. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species.

Response to Comment 2
This comment states general opposition to the project, and is not a comment on the RDEIR/EA.

Response to Comment 3
This comment states that there are alternative routes for STAA vehicles. Please see Group Response #1 for a discussion of the purpose and need for the project.

Response to Comment 4
This comment states concern for the roadway, traffic congestion and suggests short sea shipping as an alternative. Please see the response to EPIC's Smith letter for a discussion of the adequacy of the roadway. Please see DEIR/EA Section 2.1.5 for a discussion of how traffic congestion and Level of Service are not anticipated to change due to the project.

Response to Comment 5
This comment questions whether larger trucks will lead to fewer jobs. Please see Group Response #2 for a discussion of the economic costs and benefits of the project.

Response to Comment 6
This comment states that the funding should be used for maintenance and safety projects. Please see Group Response #1 purpose and need.

Response to Comment 7
This is not a comment on the RDEIR/EA.

Response to Comment 8
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

This comment also states that the project would have significant impacts on various resources. The DEIR/EA, RDEIR/EA, and FEIR/EA clearly state that all impacts were avoided, minimized or otherwise mitigated to less than significant levels. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species. Please see Group Response #2 for discussion of impacts to tourism and parks. Please see Group Response #10 for a discussion of geological issues.

Response to Comment 9

This comment expresses concern for tourism and recreation. Please see Group Response #2 for a discussion of impacts to tourism and parks.

Response to Comment 10

This comment states concern for geologic instability, potential spills and lily farmers. Please see Group Response #10 for geologic stability concerns. Please see the response to Vern Powers Comment #1 for a discussion of spills. Concerns about lily farming techniques are not a comment on the RDEIR/EA.

Response to Comment 11

This comment cites the Route Concept Reports for SR 197 and US 199. These routes will remain a “2-lane, conventional highway, with passing lanes” after the project. There are no plans for extensive upgrading of this facility to a 4-lane highway at this time.

Response to Comment 12

This comment requests maintenance of existing facilities. This is not a comment on the RDEIR/EA.

Lotus, Trisha (October 25, 2012)

Attention: Jason Meyer, CA Department of Transportation
North Region Environmental, Unit E1
PO Box 3700
Eureka, CA 95502-3700

Page 1 of 2 Trisha Lotus

RUD
10.29.12

October 25, 2012

RE: Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am writing to express my many concerns over the Caltrans Smith River SR 199/197 project. After reading the EIR and the re-circulated Environmental Impact Report, I am urging you to choose the no-build alternative so that no harm will come to the old growth redwood and other trees, the habitat, the endangered species and plants, and so no further harm will come to the Wild and Scenic Smith River. 1

Even the re-circulated EIR shows this project will be destructive in so many ways, it should not be allowed to proceed or it will cause harm beyond measure. The public does not realize the amount of irreversible damage this project will cause in harm to the environment, increase heavy truck damage to roads, harm to the marbled Murrelet's in their nesting patterns, harm to the already endangered Northern Spotted Owls (to name just a few) and it will take away from the peaceful experience of traveling this amazing Scenic Smith River route to Oregon, which I travel frequently. 2

The Lily farmers with their pesticides need to stop polluting the Smith River, and this project needs not to start. The protected riparian vegetation and aesthetics along the Wild and Scenic Smith River are second to none, and they need to be protected, not removed with the promise of buying up some other private land somewhere. Nothing can replace this passage. The old growth trees hold the mountain together. Further logging will cause more instability, and further environmental damage, as even the EIR admits. Any further damage is unacceptable. 3 4

Just keeping Highway 101 and SR 199 and 197 open during the storms, will take a lot of money and keep Caltrans busy from now until doomsday, unless they are allowed to hurry doomsday along by ruining our treasures for the material gain of a few already wealthy business people. There will be no trickle down or gain to the people, and only loss to the people who know this place is sacred. 5

Have you consulted the Native American people with the full disclosure, giving them time to understand? They will tell you of their sacred places. I have seen one sacred place, where waterfalls flow off the mountainsides, and the boulders so large and water so clean and deep to dive into. I have seen where the Native American peoples have lived in the summer months. The old campfires are still there. You have to dig down but they are still there. These are sacred grounds you are intending to mess with, and these are places that can't be replaced, ever. 6

The Wild and Scenic Smith River, is the only untapped river in California that is not completely degraded, and I feel shocked this plan has gone this far without the public really knowing. Caltrans is very good and strategic about issuing the EIR's all at once, keeping things out of the news, or issuing the Draft EIRS and Final EIRS when people are involved, notices in mid-week papers; it feels calculated to the point of feeling like corruption to me. This is a very narrow, winding canyon road in a very rural area with breath-taking beauty. The people come from all over the world to see the magnificent beauty of this little piece of paradise, still pristine, and unlike any other place on earth. I will not sit by and do nothing. Anyone knowing the truth and having a love for this area like I do, would not allow this project to continue. 7 8

Lotus, Trisha (October 25, 2012)

To log all the old growth listed in the EIR, and numerous other old growth trees, and all the other trees (all depending on each other through their root structures) will cause harm beyond measure. This project will cause native plants to be killed. Cutting into the steep and narrow passage ways will cause more run off into the Wild and Scenic Smith River, already threatened by the Lily Farmers. 9

This is a Scenic State Route and not meant for more and more of these larger and larger trucks to pass. STAA heavy truck traffic will increase when the STAA trucks choose Highway 101 to 199 when it is snowing on the Siskiyou Summit on I-5. Increase in spills will also be a tragic result. 10

The communities all along this SR 199 have not been engaged in what will result if this project is allowed to go ahead. Geologically this is very unstable territory. It is very discouraging that Caltrans continues to ignore our attempts for the EIR to address the cumulative impacts, and the public is still not being properly informed. To only re- issue part of the Environmental Impact Report, is yet another way of keeping the truth from people and another way to confuse people who are trying to understand how it all fits. 11

Let's get moving with the short sea shipping on barges, you have Highway 299 to destroy as you wish. Hey, why not build a railroad to the east and ruin all those old growth redwoods there. Either way, landslides are going to happen as a result. However, you already have Highway 299, and you can't stop with that? 12

I am not trying to stop commerce, but let's get smart about transportation. Times are changing, and we need to change with the times and get the trucks off the roads utilizing the short sea shipping and keep the CA Legal Trucks and the jobs. Aren't those jobs important? For every STAA, you take away jobs from local trucking firms. 13

Nothing short of an EIS is acceptable, due to the irreparable harm this project promises to create. If it is working, don't fix it. Under the National Environmental Policy Act (NEPA), and EIS must be prepared when a project "may" have a significant impact on the environment. Your document clearly states there will be significant impacts on the environment. 14

Please just keep the existing road up and running in the storms that promise to throw boulders off the cliffs in the Smith River Canyon narrow stretches. Just the current truck traffic is damaging, and more and larger trucks will only cause more safety issues and more damage. 15

Thank you for considering my opinion,

Trisha Lotus

Trisha Lotus
2425 C Street
Eureka, CA 95501
trishale@sonic.net

Response to Trisha Lotus (October 25, 2012)

Response to Comment 1
This comment states support for the no project alternative. This would not meet the purpose and need of the project, please see Group Response #1.

Response to Comment 2
This comment states concern for the roadway, marbled murrelets, spotted owls and the scenic route. The STAA vehicles, while slightly longer, are not heavier than CA Legal vehicles. Increased truck traffic is not anticipated to be significant. Thus no additional impacts to the roadway are anticipated. Impacts to marbled murrelets and spotted owls were addressed in the DEIR/EA Section 2.3.5, as well as the Biological Assessment, and Biological Opinion from USFWS. The anticipated increase in traffic is not expected to be substantial enough to affect the visitor experience of the scenic area.

Response to Comment 3
This comment states concern for pesticides, water quality in the Smith River, riparian vegetation and old growth trees. Pesticide use by lily farmers is not within the scope of this RDEIR/EA. Impacts to riparian vegetation are discussed in DEIR/EA Section 2.3.1, and determined to be less than significant. Please see Group Response #3 for a discussion of visual impacts.

Response to Comment 4
This comment states that old growth trees provide geologic stability. Please see Group Response #4 for concerns about large trees and Group Response #10 for concerns about geologic stability.

Response to Comment 5
This comment states concern for maintenance and lack of benefits of the project. This project is not anticipated to cause an increase in maintenance. For concerns about benefits, please see Group Response #2 cost vs. benefits.

Response to Comment 6
This comment states concern for cultural resources. DERI/EA Section 2.1.7 discusses impacts to cultural resources and Native American Consultation. No cultural resources were identified within the Area of Potential Effects.

Response to Comment 7
This comment states there was not full disclosure in the NEPA and CEQA processes. Initial scoping meetings were held in 2008, the DEIR/EA was circulated in 2010 and there was a public meeting during the circulation. A Notices of Preparation was filed and Notices of Availability were published. Please see FEIR/EA Section 4 for descriptions of the public participation process. The Department releases environmental documents when they are determined to be complete, and according the regulations within NEPA and CEQA.

Response to Comment 8
This comment reiterates the scenic and tourism value of the area. This is not a comment on the RDEIR/EA.

Response to Comment 9
This comment states concerns over large old trees, please see Group Response #4.

Response to Comment 10
This comment states that the route is a Scenic State Route not meant for large trucks and that traffic will increase due to redirected traffic from I 5 during winter weather. The route is eligible for designation as a State Scenic Highway, however this designation does not restrict use by large trucks for goods movement. Please see the response to Friends of Del Norte 2012 for a discussion of induced traffic from I 5 during winter weather.

Response to Comment 11
This comment states concern for public involvement, geologic stability, and cumulative impacts. This project has conducted full public involvement, please see the response to 2012 From Letter #1 comment #10. For concerns about geologic stability, please see Group Response #10. Cumulative impacts were analyzed in the DEIR/EA Section 2.5. The proposed project would not result in significant cumulative impacts to any resources under the preferred alternatives.

Response to Comment 12
This comment proposes short sea shipping and a railroad as alternatives to meet the purpose and need of the project. Alternative shipping technologies are speculative and not a reasonably foreseeable alternative to this project.

Response to Comment 13
This comment questions the economic cost and benefit in local trucking jobs. Job losses for local truck driver does not appear to be great, and overall, the project is expected to provide a small amount of economic growth for the county. Please see the DEIR/EA and FEIR/EA Section 2.1.3.1 for a discussion of potential economic impacts.

Response to Comment 14
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Response to Comment 15
This comment states that the increased truck traffic will damage the roadway. The STAA vehicles, while slightly longer, are not heavier than CA Legal vehicles. Increased truck traffic is not anticipated to be significant. Thus no additional impacts to the roadway are anticipated.

Moses, Todd

Todd Moses
<tmoses@eventlink.com>
10/15/2012 11:13 AM
Please respond to
<tmoses@eventlink.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I may now live in Pennsylvania but I was born and raised in northern California and I know this road well, having last traveled it only two years ago. I am 63 years old now and my family goes back in California well over a hundred years. I plan to return to this part of California when I retire. 1

Please leave this road alone and spend scarce funds to maintain it and the river and the redwoods for future generations. Not everything for commerce please. 2

Sincerely,

Todd Moses
Californian

Todd Moses
1327 Pelham Road
Harrisburg, PA 17110

Response to Todd Moses

Response to Comment 1

This comment is not a comment on the RDEIR/EA.

Response to Comment 2

This comment states general opposition to the project.

Pappalardo, Sue

Robin Byrd
<robinbyrd2@yahoo.com>
11/01/2012 02:29 PM

Please respond to
Robin Byrd
<robinbyrd2@yahoo.com>

To "jason_meyer@dot.ca.gov" <jason_meyer@dot.ca.gov>
cc
bcc
Subject 197/199 Safe STAA Access Project

Jason Meyer:

I am opposed to the 197/199 Safe STAA Access Project. These highways traverse a wild, scenic, and pristine area. Redwood State and National Parks is one of the few World Heritage sites. The Smith River is exceptionally clean and a world class fishery. The project activities and the ensuing increase in truck traffic will cause environmental damage to these areas and disturb their peace and tranquility. We should not risk damage to them for an unnecessary project such as 197/199 Safe STAA Access Project. Please abandon this project. 1

Thank you,
Sincerely,

Sue Pappalardo
Gasquet, CA
robinbyrd2@yahoo.com

Response to Sue Pappalardo

Response to Comment 1

This comment states that the project would cause environmental damage. The Department appreciates the public input and involvement on this project. Please see the DEIR/EA, PRDEIR/SEA and FEIR/EA (available at: http://www.dot.ca.gov/dist1/d1projects/197-199_staa/) for extensive discussion of potential environmental damage.

Tays, Kimberly

Kimberly Tays
<ktays@suddenlink.net>
10/23/2012 06:46 PM
Please respond to
<ktays@suddenlink.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I do not support this project, as I believe the environmental impacts will be too great on this magical stretch of road with its scenic river beauty and old-growth redwood trees. Some places are too precious to tamper with, and this stretch of highway is one of them. 1

If smaller trucks need to use this stretch of highway, then so be it; the reality is that certain places are going to be difficult to get into and out of. Many of us like it this way; that we live in this remarkable, hard-to-reach area--it feels like you are somewhere different when you enter Del Norte and Humboldt County--we don't want to look like everywhere else--we want to remain rural and scenic and beautiful.

Opening up this area to more STAA truck traffic will negatively impact our communities and quality of life. 2 CA Legal trucks are perfectly adequate to move goods in and out of this region in conjunction with the STAA trucks that can travel on Hwy 299 and Hwy 101 (from Oregon). There is nothing in the law that requires that STAA trucks must have perfect access to a region; only that they have access to a main terminal, and they currently have that. 3

Again, I am asking Caltrans to abandon this horribly destructive project and respect the wishes of the public, for once. 4

Sincerely,
Kimberly Tays

Kimberly Tays
P.O. Box 75
Trinidad, CA 95570

Response to Kimberly Tays

Response to Comment 1

This comment states concern for environmental impacts and general opposition to the proposed project. This is not a comment on the RDEIR/EA.

Response to Comment 2

This comment states the project would negatively affect communities and way of life. Community impacts are anticipated to less than significant, please see DEIR/EA and FEIR/EA Section 2.1.3.

Response to Comment 3

This comment states STAA access is not legally required. Please see Group Response #1 for a discussion of the purpose and need of the project.

Response to Comment 4

This comment requests that the Department abandon the project.

Zegart, Margaret Kettunen

Katt Kettunen Zegart
<kattz@aol.com>
11/06/2012 12:24 PM

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Recirculed Draft EIR/ EA

Dear Mr. Meyer: A tragedy! I just opened by mail and found that this letter had mis-typed address and did not reach you. yesteray. Hopefully my comments can be included on the
Margaret Kettunen Zegart

November 5, 2012
Jason Meyer
California Department of Transportation, North Coast Environmental Unit E1
P. O. Box 3700
Eureka, CA 95502-3700

Dear Mr. Meyer

Once again I write to remind CAL Trans that the Smith River is a federal Scenic River, a special space that draws visitors, seasonal fisher people who now provide the economic life blood for Del Norte, long suffering the loss of lumbering and a fishing industry; port activities on a small to serve the community. The required set back for future construction from the top of the river bank would not allow permit for any necessary, even minimum widening. 1

This plan for STAA truck access on Highway 199/197is not well conceived. 2

This plan to have a 199-197 project that would allow large truck traffic adversely affects all of Del Norte and especially the residents along 199 in small communities like Gasquet and Hicuchi Hamlet and Douglas Park 3
Even the noise adverse impact of the trucks today as the grade changes or they slow to maneuver the curves is detrimental. There is a specific impact to the camp grounds on the Smith River National Forest ... and the impact to wildlife has not been noted. Endangered species habitat and construction traffic 4
"mud" would affect the spore transmittal of sudden oak syndrome (soon to spread into Del Norte) as well as the intrusive Port Orford Cedar blight. 5

River quality is a significant impact that can not be mitigated. Non-point pollution from increased road surface (especially during rain season.) Salmon habitat on the remaining wild river is adversely impacted. Hiouchi, the Pelican Bay Prison and the town of Crescent City and some rural residences use this river as its only direct potable water source. 6

I recall when a copper/nickel mining project was evaluated in Gasquet that winter there was 256" " of rain. Climate change anticipates more sustained storms that not only will increase slides and impacted water quality but on the "stretches" of 197 and from Crescent City South along the shore, inundation, more tsunami impacts that will deface the road itself. Seasonally, winter and severe rain storm closures affect any consistent truck traffic. Climate change shall increase severe storm events. 7

This Highway 199 is not an arterial for commercial traffic link, nor can it successfully be one. This, in fact is a rural road, a connector with 72 driveways entering the road. It cannot be re-designed for safety necessary to avoid road hazards., because of the river contours, the unstable geological cliffs and, for example, the Serpentine Cliffs. 8

Zegart, Margaret Kettunen

Historically, two scouts from Jedediah Smith's party in 1826 crossed the (Hawkins) now Hiochi flats and viewed from te Serpentine Cliff the south fork entrance into the middle fork - and determined to go northward along Myrtle Creek - just beyond this formidable rock formation. 9

State and National Redwood Redwood Parks and the Ocean shore / beach access and especially the Six Rivers Nation National Recreation Area will have significant impacts that cannot be corrected. 10

An alternative may be to construct a connection in Oregon, or return to the mid-twentieth century bi-pass and use the High Road avoiding a road use along a Scenic River.(Once a road mapped and accepted for transit, it can be legally retrieved as such I have been told). 11

Certainly, though, before any conceptual connection between Highway 5 and Highway 101 is even considered, the Envionmental Impact Reports should evaluate the 8 plus times severe injury and accident rate of Highway 101 south of Crescent City and the ratio of accidents per vehicle use on the dangerous 199. 12

Ongoing rock slides, significant trees or groves of trees removal (Richardson Grove evaluation is a parallel to Redwood, Port Orford cutting impacts) are an inpass. 13

There is no actual benefit to economic well being of the community - it is pass through from Highway 5 / Grants Pass to Eureka; at best a quick meal at a fast food restaurant and its "pit" stop respite, 14

I am sure you have heard from many that the accident rate here - with deaths and severe injuries. 15

There is no time line for repairs. In the late 1960's the alternate route to connect 101 with Highway 5 - on the opposite of Bar O Ranch juvenile faciity and crossing to the northerly side and along the high areas north or Serpentine Cliff and access along Ashford was a right of way you sold to private parties. In the future a connection would be better from 16

Highway 101 between Crescent City and Trinidad has many hazardous curves; portions of the road that require closures during winter season - and climate change anticipates more severe storm surges and resulting increased slides. There is no alternate detour. Highway 199 has extreme safety hazards on this narrow winding canyon road.

Thank you and sincerely,

Margaret Kettunen Zegart
kettz@aol.com
378 Douglas Park Drive
Crescent City, CA

Response to Margaret Kettunen Zegart

Response to Comment 1

This comment states concern over the Scenic River and tourism. Please see Group Response #5 for concerns about the Wild and Scenic Smith River. Please see Group Response #2 for concerns about the potential impacts to tourism.

Response to Comment 2

This comment states concern for residents and the community. Please see EPIC 2010 Comment response #8 for community impacts, and Group Response #8 for the safety aspect of traffic impacts to the community.

Response to Comment 3

This comment states that there are noise impacts. Traffic levels are not anticipated to increase due to the project, thus there are no anticipated increases in noise levels associated with the project. The DEIR/EA and FEIR/EA Section 2.2.6 and 2.4.11 discuss noise impacts and minimization measures.

Response to Comment 4

This comment states that there is an impact to Forest Service campgrounds. Noise impacts to Patrick Creek Campground from the Patrick Creek Narrows Location 2 site are discussed in Appendix B: Resources Evaluated Relative to the Requirements of Section 4(f) Section B.4.2.2. These impacts are temporary disturbance due to blasting, and would occur a few times per day, during daylight hours. These impacts were determined to be temporary and less than significant.

Response to Comment 5

This comment states there would be impacts to wildlife, endangered species habitat, and spread of sudden oak syndrome and Port Orford Cedar blight. The DEIR/EA and FEIR/EA Section 2.3.4 and 2.3.5 discuss potential impacts to wildlife and endangered species. For effects to endangered species see the DEIR/EA and FEIR/EA Section 2.3.5, and Chapter 4 of the FEIR/EA for consultations with USFWS and NMFS. Spread of Sudden Oak Death and Port Orford Cedar root disease are addressed in the Natural Environment Study (Caltrans 2010) Section 4.6. Best Management Practices included in Appendix E: Minimization and/or Mitigation Summary include the following: washing heavy equipment before and after ground disturbing activities, removing Port Orford Cedar from road areas, directing water runoff away from Port Orford Cedar areas, and using pathogen free water for dust control.

Response to Comment 6

This comment states that there will be significant impacts to water quality and salmonids. The DEIR/EA and FEIR/EA Section 2.2.2 and 2.3.2 discuss impacts to and minimization and avoidance measures for water quality, stormwater run-off and waters. These impacts were determined to be less than significant. Potential impacts to and minimization and avoidance measures for salmonids were addressed in the DEIR/EA and FEIR/EA Section 2.3.4 and 2.3.5 as well as the Biological Assessment and Letter of Concurrence from the National Marine Fisheries Service.

Response to Comment 7
This comment states concern about climate changes, increasing rainfall and tsunami effects. The project areas are outside of the tsunami zone and sea level rise zones. Potential effects on the hydrology of the Smith River are discussed in DEIR/EA and FEIR/EA Section 2.2.1.

Response to Comment 8
This comment states that the route is not suitably for commercial truck traffic. Both SR 197 and US 199 are currently in use for commercial truck traffic. The Route Concept Reports list these routes as 2-lane conventional highways. After implementation of this project, the routes will meet the necessary specifications of for designation as STAA accessible. For as a discussion of highway design see the response to the EPIC 2012 Smith letter. Please see Group Response #10 for a discussion of geologic stability.

Response to Comment 9
This comment is not a comment on the RDEIR/EA.

Response to Comment 10
This comment states that various parks will have significant impacts. There will be no permanent impacts to parks. There may be temporary impacts to accessibility of parks during construction due to traffic delays and construction at Ruby Van Deventer County Park. The temporary impacts were determined to be less than significant. Please see the DEIR/EA and FEIR/EA Section 2.1.1.4 and 2.4.2.3 for more information on potential impacts to parks.

Response to Comment 11
This comment states that the Department should construct access along an alternate route. Please see Group Response #6 for a discussion of alternate routes.

Response to Comment 12
This comment states concern for safety on US 101 south of Crescent City. This area is outside the project area. Please see the response to Form Letter 2012 #1 Comment #6.

Response to Comment 13
This comment states concern about rock slides and large trees. Please see Group Response #4 for concerns about large trees, and Group Response #10 for concerns about geologic stability.

Response to Comment 14
This comment states that there will be little economic benefit to the local community. Please see Group Response #2 for a discussion of costs vs. benefits.

Response to Comment 15
This comment states concern for safety. Please see Group Response #8 for a discussion of safety concerns.

Response to Comment 16
This comment discusses alternative routes. Please see Group Response #6 for a discussion of alternative routes.

Zuehlke, John

Received
11.6.12

01 November 2012

Mr. Jason Meyer, Environmental Coordinator
California Department of Transportation,
North Region Environmental, Unit E1
P. O. Box 3700
Eureka California 95502
Email: jason_meyer@dot.ca.gov

Re: Comments on the 197/199 Safe STAA Access Project and Supplement

Dear Mr. Meyer:

The "Draft Environmental Impact Report" for the "197/199 Safe STAA Access Project" (hereinafter "Original DEIR") released by the California Department of Transportation (hereinafter "CalTrans") is egregiously deficient in addressing the major safety, economic, and environmental deficiencies of the planned projects. Furthermore, the instant "Partial Recirculation of Draft Environmental Impact Report / Supplemental Environmental Assessment" (hereinafter "Supplement") fails to address most of the objections officially filed by the public with regard to the "Original DEIR." 1 2

The important issues which CalTrans ignores include, but are not limited to, the following:

I. Negative Economic Impact of Proposed Projects on Crescent City and Del Norte County:

In promoting these projects designed to bring STAA trucks into Del Norte County, CalTrans alleges that their completion would prove beneficial to the economy of the county, and specifically, to Crescent City. CalTrans further stated that, by allowing STAA trucks into the County, economies would result from the elimination of the need to transfer cargo between the STAA trucks and smaller, California-legal vehicles. 3

That is not in fact the case. Since STAA trucks are banned from operating along all except a very small number of specially-designated highways, cargo shipped or delivered via STAA trucks would have to be transferred to and/or from standard California-legal trucks to reach most locations in Crescent City.

1

Zuehlke, John

CalTrans must correct this serious misstatement of fact in their draft EIRs and specifically identify which of the businesses that are located on STAA-accessible highways intend to utilize, and will benefit from the utilization of, STAA trucks. 4

Moreover, CalTrans must also figure into their economic calculations the increased costs to Del Norte County for the additional maintenance which will be required to maintain these roads in view of the increased heavy-truck traffic. 5

II. Negative Impact of the Proposed Projects on Safety in Crescent City and the Smith River:

An important maxim of good engineering practice is that major truck traffic SHOULD NEVER be allowed alongside an important river because of the catastrophic consequences that a spill, whether due to accident or malice, could have on the river. The Smith River absolutely qualifies as an important river, not only because of (1) its scenic beauty as the last wild river system in California and (2) the importance its fish play in the local economy and tourism business, but also because (3) its pristine waters supply the municipal water to Crescent City. 6

Patently, by attempting to make the narrow mountain road designated as US199 and the winding two-lane country road designated as SR197 (North Bank Road), both of which run alongside or very near to the Smith River, into a major east-west connector for STAA trucking, CalTrans is cavalierly violating good engineering practice!

CalTrans' egregious and unconscionable disregard for the safety of Crescent City and the Smith River is clearly demonstrated by the following facts:

1) None of the CalTrans proposals provide for a wall or a very heavy duty guard rail to prevent out-of-control trucks (up to and including the STAA behemoths) from leaving the highway and crashing down the slopes toward the river and/or its tributaries. 7

2) Furthermore, none of the CalTrans proposals require that the entire roadway and shoulders be fully paved, sealed, and shaped so that they will contain any spills and to prevent said spills from leaching into the soil near the river. All access points, such as connecting roads and driveways, must be designed so as not to breach that containment. 8

3) Moreover, none of the CalTrans proposals ban the transport of significant quantities of hazardous materials. 9

4) Most significantly, none of the CalTrans proposals outline any contingency plans to protect Crescent City, the Prison, and the residents living near the road in the event that toxic material(s) do escape into the river or near-by lands. 10

2

Zuehlke, John

III. Negative Impact of the Proposed Projects on Vehicular and Pedestrian Safety of the Residents Living along North Bank Road near the "Ruby 2" site:

Thankfully, to the present date there have been no fatal accidents recorded along North Bank Road, but the proposed projects will tend to increase both the speed and the volume of traffic along this winding two-lane road. The introduction of "extra legal" STAA trucks trying to negotiate the curves of this road contributes an additional safety hazard. CalTrans itself asserts that "Large trucks are involved in a disproportionate percentage of fatal collisions." 11

Remarkably, while CalTrans insists that their projects would increase the safety of the people living near the site they designate as "Ruby 2, DN 197-PM 3.2-4.0 (01-454900)" (hereinafter "Ruby 2"), at least one of their proposals clearly demonstrates that CalTrans knows that their assertion is not true. To wit, in at least one of their proposals, they indicate that all of the residents' mail boxes are to be relocated to a point beyond the group of houses located near "Ruby 2." Apparently, after the CalTrans construction project is completed, it will be too dangerous for mail delivery vehicles to stop at mail boxes located alongside the resident's driveways! To make matters worse, the residents then will be forced to walk up to about one-quarter of a mile along this newly hazardous road to retrieve their daily mail! This does not bode well for some senior and/or disabled residents. 12

IV. Negative Impact on the Forest:

CalTrans tries to represent their projects as having negligible impact on the trees and the wild life that depends on the trees. All three of CalTran's proposale for the "Ruby 2" site purport to be relatively minor changes to the roadway, and CalTrans has indicated that all of the land that they are requiring for "construction easements" would, after completion of construction, be returned to its original condition. 13

However, hidden in each of the alternative proposals are Trojan horses: CalTrans proposes to seize a large swath of land from the residents along North Bank Road as a "right-of-way." At the "Ruby 2" site this land appears to entail the seizure of at least one ancient "old-growth" redwood tree. This seizure extends far beyond the roadway and the "temporary construction easements" proposed for any of CalTrans' currently proposed projects. CalTrans provides no explanation nor justification for this massive and exorbitant confiscation of property. 14

3

Zuehlke, John

Conclusions:

The proposed "Safe STAA Access Project" along US199 and North Bank Road are poorly engineered, very unsafe for both the near-by residents and Crescent City, and are economically unjustified. CalTrans' "Original EIR," both originally and as amended, are grossly deficient in evaluating the potential adverse impacts that this project can have on Crescent City and the surrounding area. 15

This fatally flawed project should be abandoned, or, at a minimum, completely re-engineered and analyzed with a completely new Environmental Impact Study and Report. 16

Respectfully submitted by:

John Zuehlke

John Zuehlke, Trustee

The Zuehlke Family Trusts
5526 Murietta Avenue
Sherman Oaks, California
91401-5709

Hebe Barrera

Hebe Barrera, Attorney at Law

4

Response to John Zuehlke

Response to Comment 1
This comment states the DEIR/EA is deficient. Individual issues are listed and discussed below.

Response to Comment 2
This comment states the RDEIR/SEA failed to address comments on the DEIR/EA. The RDEIR/SEA was produced and circulated to the public to disclose new information the Department had collected in regards to impacts to trees and plants. The Department does not have additional information to circulate to the public and has prepared responses to comments in this document.

Response to Comment 3
This comment states concerns about the economic and physical need for STAA access. Please see Group Response #1 for a discussion of the purpose and need.

Response to Comment 4
This comment states individual businesses should be listed in the DEIR/EA. Please see Group Response #1 for a discussion of the purpose and need for the project.

Response to Comment 5
This comment states that increased maintenance costs should be considered. There are no increased maintenance costs associated with this project, because STAA vehicles have the same weight limits as CA Legal vehicles and the anticipated increase in truck traffic is not substantial enough to affect maintenance costs.

Response to Comment 6
This comment states an opinion about “good engineering practice”. Many highways across the state and nation are alongside rivers. Please see Group Response #5 for concerns about the Wild and Scenic River, DEIR/EA and FEIR/EA Section 2.3.4 and 2.3.5 for concerns about salmonids, and the response to Vern Power’s Comment #1 for concerns about spills. These routes are designated as conventional 2-lane highways.

Response to Comment 7
This comment states that there should be walls to prevent vehicles from leaving the highway and falling into the river. The project implements metal beam guard rails where appropriate to ensure vehicles remain on the roadway. The project will also provide improved sight distance and improved shoulder widths in areas to enhance safety.

Response to Comment 8
This comment states the roadway should be designed to contain any spills. Please see the response to Zuehlke 2010 comment #6.

Response to Comment 9
This comment states that Caltrans does not ban the transport of hazardous materials. This is correct, this project does not change the status of Hazardous Materials transportation routes currently approved.

Response to Comment 10
This comment states that there is no contingency plan for a spill response. Please see the response to Transcribed Comment 8-1 for a discussion of spill response. The Department's District 1 Spill Contingency Plan is available at the District 1 Office at 1656 Union Street in Eureka.

Response to Comment 11
This comment states concern for safety along SR 197. Please see Group Response #8 for a discussion of safety.

Response to Comment 12
This comment states concern for safety along SR 197 and residential mailbox access. Caltrans coordinated with the Post Office to find reasonable, safe and convenient locations for the mailboxes.

Response to Comment 13
This comment states concern for the Right of Way construction easements. For an explanation of Right of Way and construction easements please see EPIC 2010 Comment #8 and Zeuhlke 2010 Comment #7.

Response to Comment 14
This comment states concern for large redwoods within the Right of Way. Please see Group Response #4 for concerns about large trees.

Response to Comment 15
This comment reiterates the above comments on engineering, safety, economic justification and deficiency of the DEIR/EA and RDEIR/SEA. These comments were addressed by the responses above.

Response to Comment 16
This comment states that the project should be abandoned or redesigned. The Department is satisfied with the current design and environmental analysis.

4.4 Form Letters

4.4.1 Form Letter #1

A total of 16 form letters #1 were received, five of which were modified from the original form letter. One representative copy of the form letter is presented below along with each modified copy of the form letter that contained additional, unique comments.

- Brown, Scott
- Brown, Susan
- Dahlhoff, Patricia
- Griffin, Judith
- Kennedy, Barbara
- Olsen, Donna (Tri-City Ecology Center)
- Pieffer, Gordon
- Powers, Nancy
- Reynolds, Stephanie
- Roope, G
- Souza, Ted

Form Letters with Additional Commentary

- Boyer, Tracy +
- Castor, Inez +
- Cooper, Eileen +
- Quigley, April +
- Rhodes, Joanne +

Form Letter #1

I-5 at Ashland, Siskiyou Summit chain up area

Updated: Jan 5 2008 3:25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

Liberty

Return Address:
Scott Brown
16429 Hwy 101 South
Brookings, OR 97415

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

21-15-01

Form Letter #1

DATE:

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County. 2

2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)* 3

This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197. 4

4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.

5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate. 5

6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway. 6

7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity. 7

8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season. 8

9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic. 9

10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.** 10

11. The currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as the state has little money and an overload of maintenance projects. 11

12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR. 12

13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River. 13

Sincerely,

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed. 14

Responses to Form Letter Commenters

Response to Comment 1

This comment expresses concern for safety and old growth trees. Please see Group Response #4 for concerns about trees and Group Response #8 for a discussion about safety.

Response to Comment 2

This comment states that there is negligible economic benefit to Del Norte County from this project. Please see Group Response #1 and #2 for discussions of the purpose and need, and the costs vs. benefits of the project.

Response to Comment 3

This comment states that there will be an increase in traffic due to diversion of traffic around Siskiyou summit during winter conditions. The Department does not anticipate significant effects due to traffic diversion, please see the response to Friends of Del Norte 2012 for a discussion on the potential amount and effects of diverted traffic.

Response to Comment 4

This comment states concern for safety hazards associated with winter conditions, increased traffic (due to I5 winter weather closures), and larger trucks. The 197/199 route was evaluated for STAA truck access, and this project was initiated based on geometric deficiencies in the roadway. Upon completion of this project, STAA trucks will be able to safely navigate the route without crossing the center lane. Please see the response to EPIC/Smith Comment for a full discussion of the safety of large trucks along the route. Please see Group Response #8 for concerns about safety, and Friends of Del Norte 2012 for a discussion of the safety implications of increased traffic during diversions.

Response to Comment 5

This comments states concern over the lack of improvements between Hiouchi and Gasquet. Please see Grouped Response #8, and EPIC response #15 for discussions of how sites were selected for the project.

Response to Comment 6

This comment states that collision rates on US 101 are higher than state averages. This is outside the project area, but the project does have the potential to affect travel volumes on US 101. The Department acknowledges the fact that the actual collision rates are higher than the statewide average collision rates south of Crescent City. This segment of highway 101 traverses through Redwood National and State Parks, coastal area, and a historic landscape district. The area is an environmentally sensitive and resource rich area, and thus creates numerous challenges for standard geometric improvements.

The Department has implemented a number of non-conventional strategies to reduce collisions and minimize impact on the areas resources. This balance of safety and resources has been challenging. Although there has been a reduction in collisions, we strive to further decrease the number of collisions in the area.

Response to Comment 7
This comment states concern for water quality through the potential for spills of hazardous chemicals. The project is not anticipated to increase the potential for spills. Please see Vern Powers response #1 for a discussion.

Response to Comment 8
This comment states concern for public safety. Please see Grouped Response #8 for a discussion of safety.

Response to Comment 9
This comment states concern for public safety on SR 197 due to increased truck traffic. Please see Group Response #8 for a discussion of safety.

Response to Comment 10
This comment states concern for community cohesiveness and safety due to increased traffic and states that the DEIR/EA failed to engage the communities. Effects to communities were analyzed in the DEIR/EA 2.1.3 and determined to be less than substantial. Please see EPIC response #8 for additional discussion on community impacts. There was a public meeting on April 17, 2008 in Crescent City. There was an official Notice of Preparation and scoping meeting in 2008, a public hearing 2010 during the circulation of the full DEIR/EA, notices of availability were published in local papers for these meetings and the circulation of the DEIR/EA and Recirculated DEIR/EA. The department has followed the CEQA guidelines for notification and engagement of the public throughout this process.

Response to Comment 11
This comment states that the California Transportation Policy Priority is to maintain existing infrastructure rather than construct new projects. Please see Group Response #1 and #2 for discussions of purpose and need, and cost vs. benefits of the project.

Response to Comment 12
This comment states that there will be an economic burden to maintain US 199 and US 101 due to the increased impacts from increased heavy truck traffic. The weight limit on STAA trucks is the same as the current California Legal trucks. The additional traffic is not anticipated to be substantial. Thus the increased maintenance costs associated with the implementation of this project and opening the route to STAA trucks is not anticipated to be substantial.

Response to Comment 13
This comment states that there will be an increase in maintenance projects that will impact riparian vegetation. Caltrans does not anticipate an increase in maintenance due to this project. Maintenance projects to not generally cause additional impacts to riparian vegetation. This project is not anticipated to have effects on riparian vegetation other than the direct removal described in the DEIR/EA and FEIR/EA 2.3.1.

Response to Comment 14
This comment states concern over the increased traffic volume due to diversion of traffic due to the closure of I5 at Siskiyou Summit. While there may a temporary increase in traffic volume

during the event, the overall increase in annual volume will not be significant. Please see response to Friends of Del Norte 2012 for a full discussion.

Boyer, Tracy

I-5 at Ashland, Siskiyou Summit chain up area

Updated Jan 5 2008 3:25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

Return Address:

Tracy Boyer
21827 Boomsborough Drive
Bend, OR 97701-8820

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Boyer, Tracy

DATE: 10/22/12

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County. 1 cont.

2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*
This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.

4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.

5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate.

6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.

7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.

8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.

9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.

10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**

11. The currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as the state has little money and an overload of maintenance projects.

12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR.

13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

Sincerely,

Tracy Boyer

We have a Vacation Home on South Bank Rd in Crescent City - this is 2

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed. 1 cont.

is Very important to us. 2 cont.

Responses to Tracy Boyer

Response to Comment 1

This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2

This comment states that they have a vacation home on in the area. This is not a comment on the RDEIR/EA.

Castor, Inez

I-5 at Ashland, Siskiyou Summit chain up area

Updated: Jan 5 2008 3:25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

Return Address:

Inez Castor
1450 Hancock Ln
Crescent City CA 95531

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Castor, Inez

RUD
10-30-12

DATE:

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.

2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*
This is of great significance for the following reasons: 1 cont

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.

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6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.

7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.

8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.

9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.

10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**

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12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR.

13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

Sincerely,

Inez Castor

Inez Castor
1450 Hancock Ln
Crescent City CA 95531

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Castor, Inez

10/27/12 RCVD 10-30-12

To Those who make choices:

Please remember who has to live with the choices you make — like me and the Smith River. I was learning to drive when the Collier tunnel was built. I drive that road to see friends in the valley, for Costco, for medical care. 2

Years ago I was involved with shipping lily bulbs out of this area and know that drivers of even short trucks don't belong on that road, especially if they come from "the flat lands." 3

They could only hit and kill me once, and I'm too damned old to be useful any way, but what a spill of toxic material could do to the world's most beautiful river — it doesn't bear thinking about. 4

Please don't try to do this. You know the money isn't there to do it right!! You simply can't create a safe way to bring "big trucks" down 199. And 101 at Wilson Creek? You've got to be kidding! Please tell me you don't intend to attempt this impossibility. 5

Inez Castor

Inez Castor
1450 Hancock Ln
Crescent City CA 95531

Responses to Inez Castor

Response to Comment 1
This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2
This comment states that the area is important to the commenter and is not a comment on the RDEIR/EA.

Response to Comment 3
This comment states that the lily farm trucks should not be on this road. These trucks are currently using this road, and the improvements proposed will make the road safer for these trucks. Please see Group Response #8 for a discussion of safety.

Response to Comment 4
This comment states concern for toxic spills in the Smith River. Please see Vern Powers Response #1 for a discussion of potential spills in the river.

Response to Comment 5
This comment states concern over funding and safety of big trucks on the route. Please see Grouped Response #1 for purpose and need, Grouped Response #2 for cost vs. benefits, and Grouped Response #8 for Safety.

Cooper, Eileen

I-5 at Ashland, Siskiyou Summit chain up area

Updated: Jan 5 2008 3:25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

Most recent 2

Del Norte Triplicate — Saturday, November 3, 2012 — A3

One more spill of Cargo on 199 for the record

Hwy. 199 closed by truck rollover

The northbound lane of U.S. Highway 199 near the Oregon border was closed for nearly a day as a result of a semi-truck rolling over.

- Juan Calles, 40, of Happy Valley, Ore., was heading north in a truck loaded with frozen seafood around 5:30 p.m. Wednesday when he lost control of the truck going around a curve, according to the California Highway Patrol.

The truck overturned, blocking the northbound lane. It remained closed until noon Thursday.

— *Del Norte Triplicate*

Return Address:
Eileen Cooper
2644 Roy Ave
Crescent City CA 95531

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Cooper, Eileen

DATE: Nov 5 2012

RECEIVED
NOV 05 2012

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.

2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*

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9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.

10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**

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Sincerely,

Eileen Cooper

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed.

1 cont.

Cooper, Eileen

ATTACHMENT: Explanation of approximate estimate of induced traffic from I-5 diversions: 3

Fehr and Peers, Figure 9, current average daily heavy truck traffic data:

Hwy 197 carries (1800 x .15) = 270
Hwy 199 carries (2800 x .17) = 476
Hwy 101 south carries (4200 x .13) = 546
Hwy I-5 south of Grants Pass carries (35200 x .21) = 7392
Hwy I-5 north of Grants Pass carries (25400 x.26) = 6604

If only 10% of Hwy I-5 daily heavy truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of:

Hwy 197: ~ 270% increase
(between 740/270 = 2.74 or a 274% increase, **and** 660/270 = 2.44 or a 244% increase;
adding latent demand identified by Fehr and Peers local users results in slightly greater increases)

Hwy 199: ~ 150% increase
(between 740/476 = 1.55 or a 155% increase **and** 660/270 = 1.39 or a 140% increase;
adding latent demand identified by Fehr and Peers local users results in slightly greater increases)

Hwy 101south: ~ 130% increase
(between 740/546 or a 136% increase **and** 660/546 = 1.21 or a 121% increase;
adding latent demand identified by Fehr and Peers local users results in slightly greater increases)

Responses to Eileen Cooper

Response to Comment 1

This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2

This comment states that there was a recent spill on US 199. This is not a comment on the RDEIR/EA. For concerns about spills see Vern Powers Response #1.

Response to Comment 3

This comment states concern over induced traffic from I 5 due to winter weather at Siskiyou Pass. This concern is addressed in the response to Friends of Del Norte 2012 comment letter.

Quigley, April

I-5 at Ashland, Siskiyou Summit chain up area

Updated Jan 5 2008 3:25PM Looking South

Elevation 2080 **TripCheck.com** Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

Return Address:

April Quigley
3600 Lake Earl Dr.
Crescent City, CA 95531

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Quigley, April

DATE: 10-18-12

Dear Mr. Troyer —

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.

2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*

This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.

4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.

5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate.

6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.

7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.

8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.

9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.

10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**

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13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

Sincerely,

April Quigley

April Quigley
3900 Lake Earl Dr.
Crescent City, CA 95531

Del Norte's section of Hwy 101 is not suitable for this kind of traffic.

2

1 cont.

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed.

Responses to April Quigley

Response to Comment 1

This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2

This comment states that US 101 would not support the increased traffic associated with this project. The increase in traffic due to this project is not anticipated to be substantial. The STAA trucks have the same maximum weight limitations as the CA Legal trucks and thus there are no additional impacts per truck on the roadway. The small increase in truck volume is not substantial enough to cause additional impacts on the roadway.

Rhodes, Joanne

I-5 at Ashland, Siskiyou Summit chain up area

Updated: Jan 5 2008 3:25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

WILMINGTON DE 197
30 OCT 2012 PM 1 L

Joanne E. Rhodes
109 Pine Dr
Milton, DE 19968-9786

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

95502#3700 B012

Rhodes, Joanne

DATE: 10/29/12

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County. 1 cont.

2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*
This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.

4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.

5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate.

6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.

7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.

8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.

9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.

10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**

11. The currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as the state has little money and an overload of maintenance projects.

12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR.

13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

Sincerely, Joanne E Rhodes Longterm Resident DNC (25 years)

Extra long trucks on 101 south of C.C and 199 along the windy dangerous SR corridor is ludicrous & absurd & totally not cost effective. Think of the long term damage to these roads & expense to fix!! 2

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed. 1 cont.

Leave DNC out of this loop.!! How could truckers possibly save gas $$ by making such a huge loop – on time?? This could destroy the Wild & Scenic DNC we love !! 3

Responses to Joanne Rhodes

Response to Comment 1

This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2

This comment states that allowing STAA trucks on US 199 and US 101 is not cost effective or safe. Please see Group Response #1 for purpose and need, Group Response #8 for safety concerns and the response to EPIC's 2012 Smith Letter for the suitability of the route for STAA vehicles.

Response to Comment 3

This comment questions the purpose and need for the project, please see Group Response #1 for a discussion. This comment also states concern for the Wild and Scenic River, please see Group Response #5.

4.4.2 Form Letter #2

A total of 358 Form Letter #2 were received, 10 of which were modified from the original or contained additional comments. One representative copy of the form letter is presented below along with each modified copy of the form letter that contained additional, unique comments.

- Hughes, Gary
- Absher, Jonathan
- Adkins, Julia
- Alarie, Angélique
- Alexander, Joshua W
- Allaway, Theresa
- Allen, Beth
- Allenstein, Gudrun
- Allison, Bill
- Anderson, Christeen
- Anderson, Mary Ella
- Anderson, Wayne
- Angulo, Kathleen
- Armin-Hoiland, Joel
- Armstrong, Rebecca
- Ausman, Candi
- Bailey, Gary
- Barsotti, Susy
- Beard, David
- Beauchamp, S
- Bechmann, Elisabeth
- Becker, Carol
- Beinlich, Brian
- Bell, Stacey
- Betz, Erik
- Bien, Michael

- Binnie, Stanley
- Bodine, Josh
- Bohn, Jennifer
- Borges, Maria
- Borrege, Sharon
- Bottorff, Ron
- Brandtner, Jamie
- Brown, Ashley
- Brown, Joanne
- Bryant, Ellen
- Bsh, Sakina
- Burtis, David
- Burton, Julia
- Buslot, Chantal
- Butterfield, Lisa
- Cain, Constance E
- Carlson, Warren
- Carpenter, Gary
- Carro, Lina
- Chague, Stephenie
- Chandler, Daniel
- Christopher, Stephanie
- Churchill, Holly
- Ciancutti, Francesca
- Claudine, Bos
- Cole, Corrine
- Collins, Brenda
- Connors, Chuck
- Corbett, Craig
- Cornelis, Chantal

- Corviday, Morgan
- Cowan, Jodie
- Curtis, James
- Daniel, Donna
- Daniels, Patricia
- Darling, Dawson
- Davidson, Laura
- Davie, Dennis
- Davies, Sue
- De Rooy, Sylvia
- DeJac, Loreli
- Denton, Valerie
- Derden, Jim
- Dietrich, Beate
- Diggs, Linelle
- Dombrowski, Bonnie
- Dreyer, Sharyn
- Durant, Monica
- Durchslag, Jimmy
- Durkee, Carrie
- Durston, Robin
- Dyche, Norman
- Edison, Miranda
- Edwards, Bruce A.
- Edwards, Virginia
- Eis, Tamara
- Elerick, Paul
- Elkhart, Rio
- Ellis, Rhea
- Elvine-Kreis, Brenda

- Erdman, Barbara
- Eschelbach, Claire
- Evans, Simon J
- Farmer, Tim
- Fast, Yvonne
- Felter, Bob
- Felter, Virginia
- Fergus, Jeri
- Filipelli, Deborah
- Flewelling, Tim
- Flowers, Bobbie
- Flowing, Flo
- Foot, Susie and Jimmy
- Force, Tom
- France, Jeanne
- Frazee, Cary
- Frediani, Jodi
- Freedom, Rea
- Freiman, Howard
- Gingrich, Nancy
- Gladstone, Jean
- Glavic, Danijela
- Goff, Paul
- Goodell, Barbara
- Grant, David
- Grant, John
- Graves, Caryn
- Green, Jacqueline
- Green, Jason
- Grobe, Nicola

- Gross, Margo
- Groth, Nancy
- Grove, Alyssa
- Guerreiro, Mike
- Guldin, Laura
- Gustafson, Amberlee
- Gutierrez, Freddy
- Haje, Paul
- Halbe, Denise
- Halliday, Janice
- Hanna, Franchesca
- Harrington, Roxie
- Harris, Karen
- Harvey, Rob
- Hatton, Ayris
- Hayes, Tim
- Haywood, Russell
- Helsel, Daniel
- Herbelin, Margaret
- Hergenrather, Harry
- Herr, Jeff
- Hertz, Cade
- Hill, Joe
- Hinant, Susanna
- Hire, Kathleen
- Hoffman, Laurel
- Holt, Jennifer
- Hoppenbrouwers, Bart
- Hostetter, Paul
- Houston, Joyce

- Howard, Tim
- Hrusa, Fred
- Hughes, Heidi
- Iodice, BellaDonna
- Jackson, Dennis
- Jarocki, Gail
- Jarocki, Paul
- Jochimsen, Travis
- Johnson, Debbie
- Jones, Bradley
- Jurkowski, Julie
- Karaba, Kelly
- Karno, Rachel
- Kavoyianni, Sandy
- Kay, Rena
- Kegler, John
- Kegler, Lori
- Kegler, Robin
- Kegler, Tyler
- Keisner, Cheri
- Kellogg, Marlena
- Kennedy, Barbara
- Kessler, D
- Kirk, Kristin
- Kisio, Michal
- Koessel, Karl
- Kohr, Chery
- Kowalak, Amy
- Krause, Debra
- Kreider, Philip

- Laiti, Jared
- Landis, Linda
- Lapointe, Jocelyn
- Lasko, Angelina
- Latham, Peggy
- Laurence, Henot
- Lautaro, Gabriel
- Ledden, Dennis
- Lee, Carol
- Lee, Ryan
- Lennard, S
- Lerner, Shaina
- Letton, Frank
- Lieb, Louise
- Lieber, Jean
- Lieber, Robert
- Lind, Pat
- Lindemann, Stephen
- Lips, Stu
- Little, Judith
- Little, Sandra
- Loberg, Neville
- Logan, Theresa
- Louchard, O' Neill
- Low, Grant
- Luna, Jaclyn
- Luther, Steve
- MacLeod, Nancy
- Madrone, Rose
- Manela, Sara Prentice

- Mangels, Francis
- March, Sara
- Marie, Lynne
- Marseille, Tanya
- Marshall, Aquaea
- Martinson, Tim
- McCain, Rachael
- McCann-Sayles, Alan
- McCann-Sayles, Daniel
- McEwen, Eric
- McGee, Eileen
- Mcguire, Will
- McLaughlin, Michael
- Mcsweeney, Charles Otter
- Mefford-Hemauer, Apryl
- Melerzanov, Vadim
- Merriman, Joan
- Metz, Ellen
- Mikalson, Amanda
- Mikasi, Ayani
- Miller-Wolf, Lorraine
- Moller, Jay
- Mone, Carol
- Moore, Melissa
- Morey, Patricia
- Morgan, Linda
- Morison, Mariel
- Morris, Teresa
- Morton, Margaret
- Mountjoy, Bob and Jan

- Murnig, Guido
- Murnig, Guy
- Murnig, Lacey
- Nayyar, Rena
- Nelson, Bill
- Nelson, Christine
- Nelson, Kevin
- Oberweiser, Ed
- Oliver, Lauren
- Ornelas, Bob and Susan
- Owen, Chris
- Pace, Felice
- Patton, Gary
- Patton, Jason
- Penfield, Ralph
- Perricelli, Claire
- Peterson, Davin
- Petrone, Mary
- Pollock, Janelle
- Preston, Patricia
- Quesnel, Nathalie
- Ragland, Hannah
- Rashall, Rosa
- Ratcliff, Philip
- Ratzlaff, Karen
- Raybee, Elizabeth
- Reese, Heather
- Rennacker, Ann
- Rich, Barbara
- Richardson, Matt

- Rinne, Fred
- Ristow, Barbara
- Roach, Gabrielle
- Roche, Maureen
- Rosati, Allison
- Schaefer, John
- Scher, Sarah
- Schillo, Noah
- Schneider, Sarah
- Schümmer, Sue
- Scott, Celia
- Scott, Peter
- Shearer, Robert
- Sheidler, Richard
- Sherman, Lauryn
- Shomer, Forest
- Silvernale, Dana
- Simpson, David
- Slotnick, Scott
- Smith, Donald
- Smith, Doug
- Smith, Phillip
- Smith, Suzanne
- Smits, Josine
- Snow, Annette
- Sorensen, Anna
- Spenger, Constance
- Spitz, Jon
- Spitzer, Mandy
- Sreiber, Andrea

- Stansfield, Lesley
- Stebbings, Barrie
- Stenberg, Anna Marie
- Stender, Bill
- Stephanos, Marika
- Stewart, Billie
- Stewart, John
- Stewart, Tyler
- Stuchlikova, Kristyna
- Sunstein, Sara
- Taylor, Jennifer
- Teitelbaum, Geraldine
- Tellez, Kim
- Terry, Patricia
- Thiel-Silver, Judi
- Thompson, Ann
- Thompson, Donna
- Thompson, Jon
- Tomcak, Clay
- Tonn, David
- Tonsing, Timothy
- Van Rijn, Gerda
- Vandegriff, James
- Vanderbroek, Laura
- Vanderbush, Terry
- Vega, Elizabeth
- Velasco, Stephane
- Wadsworth, Myndy
- Walker, James
- Ward, Pamela

- Waters, Michelle
- Weber, Nicole
- Weil, Helene
- Welling, Anne
- Werner, Elizabeth
- West, Barbara J.
- West, Paul
- White, Ann
- White, Katherine
- Wieland, Leslie
- Wilke, Lorraine Devon
- Williams, F
- Williams, Joseph and Diane
- Williams, Lawrence
- Wilson, Jane
- Wilson, Kelpie
- Winkler, Mark
- Wojcik-Tremblay, Kassi
- Wolter, Manuela
- Womack, Kristin
- Wood, Wendell
- Zimmer, Judy
- Zuehlke, John

Form Letters with Additional Commentary

- Akerman, Fred +
- Anaya, Zachary +
- Gardiner, John +
- Hall, Daniel +
- Livingston, John +
- Macy, Nancy and Ken +

- McCombs, Robert +
- Pappalardo, Sue +
- Raymer, Terry +
- Thomas, Julia +

Form Letter #2

Gary Hughes
<gary@wildcalifornia.org>
10/11/2012 12:26 PM
Please respond to
<gary@wildcalifornia.org>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. 3

The project would have significant impacts on: 4

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be: 5

- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 6

Abandon this project and focus on maintaining the existing road infrastructure. 7

Sincerely,

Gary Hughes
145 G St.
Suite A

Response to Gary Hughes

Response to Comment 1
This comment states that the project is not necessary. Please see Grouped Response #1 for a discussion of the purpose and need.

Response to Comment 2
This comment states that STAA access already exists for Crescent City and questions the funding decisions in regards to safety. Please see Group Response #1 for a discussion of the purpose and need for the project. Please see Group Response #2 for a discussion of the cost vs. benefits of the project. The proposed improvements will provide safety enhancing features for all drivers.

Response to Comment 3
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Response to Comment 4
This comment states that the project would have significant impacts on various resources. The DEIR/EA, RDEIR/EA, and FEIR/EA clearly state that all impacts were avoided, minimized or otherwise mitigated to less than significant levels. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species. Please see Group Response #2 for a discussion of impacts to tourism and parks. Please see Group Response #10 for a discussion of geological issues.

Response to Comment 5
This comment states that there will be increases in truck traffic and safety hazards. Section 2.1.5 discusses the increase in truck traffic associated with this project. There is no anticipated safety hazard associated with the project. Please see Group Response #8 for safety concerns and Vern Powers Response #1 for a discussion of spills and water quality.

Response to Comment 6
This comment cites the Route Concept Reports for SR 197 and US 199. These routes will remain a “2-lane, conventional highway, with passing lanes” after the project. There are no plans for extensive upgrading of this facility to a 4-lane highway at this time.

Response to Comment 7
This comment states that the project should be abandoned in favor of maintenance. This is not a comment on the RDEIR/EA.

Ackerman, Frank

Frank Ackerman
<ackermanjay@juno.com>
10/11/2012 07:41 PM
Please respond to
<ackermanjay@juno.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

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If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

We don't need a highway for a few big trucks that are paid for by the rest of us and destroys the beauty we enjoy. It is so easy to destroy and so hard to protect what makes life a joy. 2

Abandon this project and focus on maintaining the existing road infrastructure. 1 cont.

Sincerely,

Frank Ackerman
1325 Henry St.
Berkeley, CA 94709

Response to Frank Ackerman

Response to Comment 1

These comments were addressed in detail in the Form Letter #2 responses.

Response to Comment 2

This comment questions the purpose and need, please see Grouped Response #1.

Anaya, Zachary

Zachary Anaya
<za7@humboldt.edu>
10/11/2012 08:26 PM
Please respond to
<za7@humboldt.edu>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

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- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
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- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure. Please refrain from undermining the ecological integrity of the Smith River basin. We truly should focus investment on structures that are already in place and oppose spending when losses expand widely with little long-term return. 2

Sincerely,

Zachary Anaya
3216
Alliance Rd
Arcata, CA 95521

Response to Zachary Anaya

Response to Comment 1

These comments were addressed in detail in the Form Letter #2 responses.

Response to Comment 2

This comment states that the project should be abandoned in favor of maintenance. This is not a comment on the RDEIR/EA.

Gardiner, John

John Gardiner
<john.l.gardiner@gmail.com>
10/11/2012 10:02 PM
Please respond to
<john.l.gardiner@gmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I'm a 66-yr old Professional Engineer with a lifelong career in River basin Management. I live in Cave Junction, and have traveled this road many, many times indeed in perfect safety. As a PE, I can readily assess the damage that widening this road will do to the landscape. This project is dangerous to the environment, particularly the last really pristine river, the Smith, and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through the treasured Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure; such will be the outcry that it will never get built and you will have completely wasted taxpayers' money on years of abortive work. 3

Sincerely,

John Gardiner
PO Box 2451
327 Millie Street
Cave Junction, OR 97523

Response to John Gardiner

Response to Comment 1

This comment generally states that the project is dangerous to the environment. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments were addressed in detail in the Form Letter #2 responses.

Response to Comment 3

This comment states that the project should be abandoned in favor of maintenance. This is not a comment on the RDEIR/EA.

Hall, Daniel

Daniel Hall
<danielhall333@gmail.com>
10/15/2012 10:28 AM
Please respond to
<danielhall333@gmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Cancel 97/199 Safe STAA Access Project

This project is very likely to harm important economic, social, and environmental values, and is also completely unnecessary. 1

It is my understanding that STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Thus the project is not only unnecessary, but will also divert funding away from other potential uses that will actually offer real economic, social, and environmental benefits. The opportunity cost of using $35 million on the unnecessary 97/199 STAA project should be assessed as part of the NEPA analysis before the project moves forward. 2

The NEPA analysis should also examine the project's cumulative impacts, including on climate change and values affected by climate change, due to potentially increased truck traffic and associated greenhouse gas emissions. 3

Likewise, the NEPA analysis needs to examine the likely impacts on: 2

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

The likely impacts on tourism and related social values should be examined thoroughly. The Smith River corridor is a significant scenic attraction, and the current highway's narrow, winding character makes it attractive to motorcyclists and other motorists who enjoy driving on scenic roads, and who surely contribute substantially to the local economy. Straightening and widening the highway, and increasing large truck traffic on the highway will make the route substantially less attractive to motorists and tourists, and thus likely significantly harm local tourism based businesses and economies. 4

As a fifth generation Californian (currently living out of state, but who regularly returns to visit) and someone who greatly values the Smith River highway corridor for its current character, and would find that character to be seriously harmed by projects that widen and straighten the road, I urge you to abandon this project -- and the implicit assumption that bigger, wider, and straighter is better. One needs only look at the freeway system in Southern California -- and how utterly unlivable that landscape is -- to see the fallacy in that assumption. 5

Sincerely,

Daniel Hall
6857 N Michigan
Portland, OR 97217

Response to Daniel Hall

Response to Comment 1
This comment questions the purpose and need of the project, please see Group Response #1.

Response to Comment 2
These comments are addressed in the Form Letter #2 responses.

Response to Comment 3
This comment states that the document should evaluate cumulative impacts and greenhouse gases. Please see DEIR/EA and FEIR/EA Section 2.5 for a discussion of cumulative impacts. Please see DEIR/EA and FEIR/EA Section 3.2.4 for a discussion of greenhouse gases and climate change.

Response to Comment 4
This comment states that the project will have negative impacts on tourism and scenic values. Please Group Response #2 for a discussion of impacts to tourism. See DEIR/EA and FEIR/EA Section 2.1.6 for discussion of visual impacts.

Response to Comment 5
This comment states concern over the character of the route. The current character of the route will remain largely unchanged after the project is implemented. See DEIR/EA and FEIR/EA Section 2.1.6 for discussion of visual impacts.

Livingston, John

John Livingston
<Livingstonjohn@att.net>
10/11/2012 09:11 PM
Please respond to
<Livingstonjohn@att.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I grew up in Eureka and have travelled along the Smith River probably 15 times. I am a retired licensed geotechnical engineer with 37 years of experience in California. This project is dangerous to the environment and is completely unnecessary. We do not need to expand our infrastructure, damage our environment, and create maintenance and expenses for future people to fund. Please leave this highway alone. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

John Livingston
2378 Waldon Street
Redding, CA 96001

Response to John Livingston

Response to Comment 1

This comment generally states that the project is dangerous to the environment. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Macy, Nancy and Ken

Nancy & Ken Macy
<nbbm@cruzio.com>
10/29/2012 02:09 PM
Please respond to
<nbbm@cruzio.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. We LOVE that winding road through that remote area and it would be a travesty to destroy the beauty of the route, and devastate the Smith River and ancient redwoods along with it. We travel it regularly and feel the changes would be both stupid and wrong. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

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Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Nancy & Ken Macy
15485 Bear Creek Rd.
Boulder Creek, CA 95006

Response to Nancy and Ken Macy

Response to Comment 1

This comment generally states disapproval of the project. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

McCombs, Robert

Robert McCombs
<bobmcc@humboldt1.com>
10/18/2012 10:52 PM
Please respond to
<bobmcc@humboldt1.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

We don't need or want your "improvements" and it's a complete waste of taxpayer dollars. 1

This project is dangerous to the environment and is completely unnecessary. 2

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers.

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Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Robert McCombs
PO Box 4175
164 Deer Fern Ln. Bayside (NO MAIL!)
Arcata, CA 95518

Response to Robert McCombs

Response to Comment 1

This comment generally states opposition to the project. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Pappalardo, Sue

Sue Pappalardo
<robinbyrd2@yahoo.com>
10/13/2012 08:30 PM
Please respond to
<robinbyrd2@yahoo.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I live in Gasquet, near Highway 199. I do not want increased truck traffic in the area. It would create more hazardous road conditions, generate more noise pollution and environmental pollution, and degrade the beauty and serenity of the area. Additionally, I do not want old-growth trees to be harmed. 1

This project is dangerous to the environment and is completely unnecessary. 2

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers.

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Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Sue Pappalardo
P.O. Box 313
Crescent City, CA 95531

Response to Sue Pappalardo

Response to Comment 1

This comment states concern for increased truck traffic, noise and air pollution, safety hazards and impacts to large trees. Truck volume increases are expected to be small and not significant, see DEIR/EA and FEIR/EA Section 2.1.5. Please see DEIR/EA and FEIR/EA Section 2.2.5 Air Quality and 2.2.6 Noise and Vibration for associated concerns. Please see Group Response #4 for concerns about large trees.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Raymer, Terry

Terry Raymer
<twraymer@hotmail.com>
10/14/2012 06:23 PM
Please respond to
<twraymer@hotmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I travel this road numerous times per year (6-12, more some years). This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

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Abandon this project and focus on maintaining the existing road infrastructure. thabk you for your consideration of this letter.

Sincerely,

Terry Raymer
2146 Tina Court

Arcata, CA 95521

Response to Terry Raymer

Response to Comment 1

This comment generally states that the project is dangerous to the environment. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Thomas, Julia

Julia Thomas
<jthmosaic@aol.com>
10/12/2012 02:56 PM
Please respond to
<jthmosaic@aol.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

CALIFORNIA CAN NOT AFFORD THIS RIDICULOUS PROJECT!!!!!!!! WE ARE CUTTING FOOD PROGRAMS, HOSPITALS AND EVERYTHING ELSE THAT PEOPLE NEED TO SURVIVE. WE DO NOT NEED CALTRANS OFFICIALS TO MAKE MORE MONEY DESTROYING OUR ENVIRONMENT. WE CANNOT AFFORD CALTRANS OFFICIALS WHO CREATE PROJECTS LIKE THIS!!!!! 1
This project is dangerous to the environment and is completely unnecessary.

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

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Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Julia Thomas
375 Alabama
San Francisco, CA 94110

Response to Julia Thomas

Response to Comment 1

This comment questions the purpose and need for this project. Please see Group Response #1 for a discussion of why this project is necessary.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.