

COMMENTS FROM

LOCAL GOVERNMENT AGENCIES

- 9 City of Willits**
- 10 City of Willits Police Department**
- 11 Brooktrails Township CSD**
- 12 Brooktrails Township CSD**
- 13 Brooktrails Township Fire Department**
- 14 Coastal Valley EMS Agency**
- 15 Fort Bragg Planning Commission**
- 16 Little Lake Fire District**
- 17 Willits Unified School District**

9 City of Willits Mayor's Office

9-1 (Item 1) Caltrans and FHWA are sensitive to the desire of the Willits community to maintain its unique character. One of the major factors for eliminating Alternative TSM from consideration was its potentially devastating impact to local citizens and community character. The Modified Alternative J1T (the Preferred Alternative) avoids community resources that are important to maintaining the unique character of the community.

(Item 2a) Caltrans and FHWA do not disagree with this comment. Removing U.S. 101 from Main Street will improve residents' and visitors' experience of Willits.

(Item 2b) Regarding the project's relationship to south Main Street, see response to Comment 9-2, below.

(Item 2c) Caltrans and FHWA acknowledge the City's concerns regarding the relinquishment of Main Street to the City. The DEIS/EIR (Section 3.3.3, pages 3.8- 3.9) explains the relinquishment process. Prior to execution of a Freeway Agreement, Caltrans will disclose environmental impacts including the potential interregional traffic use of Main Street prior to and after relinquishment of the route to the City. An approval of a Freeway Agreement by the California Transportation Commission is a separate action. A traffic analysis of interregional traffic use of Main Street at this time is premature, since the terms and conditions of the Freeway Agreement are not known at this time. Coordination meetings with the City and County will occur. Once the preliminary terms and conditions of the Freeway Agreement are drafted, then the scope of work can be developed and environmental review completed to relinquish old U.S. 101 to the City and County.

(Item 2d) See General Response 1.6 regarding Brooktrails second access road.



CITY OF WILLITS

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August 7, 2002

CHER DANIELS
OFFICE OF ENVIRONMENTAL MANAGEMENT
CALTRANS DISTRICT 3
2389 GATEWAY OAKS DRIVE
SACRAMENTO, CA 95833

ATTN: NANCY MACKENZIE

SUBJECT: City of Willits Comments to Willits Bypass Draft EIS/EIR

Dear Ms. MacKenzie,

The City of Willits would like to thank Caltrans for working with the community to produce this DEIS/DEIR and for making copies available for review by City Council, City staff and members of the public. The City recognizes and appreciates all of the long hours and hard work that have gone into the production of this document. In response to the document, at its meeting of August 7, 2002, the Council unanimously adopted the following comments, which we have separated into two categories, "General" and "Specific."

GENERAL COMMENTS:

- 9-1
1. The City is strongly supportive of the concept of a Highway 101 Bypass around the City for numerous reasons which have been articulated previously many times, going back as far as 1954. In various citizen surveys conducted during the process of completing an update to the City's General Plan (1991-1992), and subsequent to that time, the most important issue consistently cited by the citizens has been traffic congestion in the City and the Highway 101 Bypass.

In supporting a bypass, the City must emphasize the need to insure that any adverse project impacts to the City are mitigated and that the peace, comfort, health and welfare of our citizens and the special character of our community are protected.
 2. While the City understands Caltrans' need to focus on issues of interregional transportation, the City urges Caltrans to not lose sight of community perspectives regarding local transportation conditions and needs in preparing for relinquishment of portions of Highway 101, our Main Street, and in future alignment of Highway 20.
 - a. Main Street is vitally important to the continued health and character of this community and needs to serve the citizens in a manner which is safe, efficient and attractive.
 - b. Future planning for Highway 20, if left to follow the old Highway 101 alignment southward, needs to address these same community needs and desires for a street

9-2 S.R. 20 traffic traveling east will still have to travel through Willits on south Main Street to access U.S. 101; however, without the bypass, traffic on Main Street would increase by 34% in 2028. With the bypass in 2028, traffic volumes will be similar to what they are today. This information is illustrated in the Willits Bypass Traffic Study, Figures 4 through 15. Availability of the Traffic Study, as well as other technical studies for this project, is included on page 1-8 (DEIS/EIR). General Response 1.9 discusses why a center valley interchange is not being considered for this project.

The proposed location of the southern interchange at Haehl Creek, on the valley alternatives, is a logical location as this is where the alternatives diverge from old U.S. 101/Main Street. The Haehl Creek Interchange is the same for all the valley alternatives and does not alter the identification of the LEDPA/preferred alternative.

Regarding Brooktrails traffic and the High School, comment is noted. See General Responses 1.7 and 1.8. See also General Response 1.6 regarding Brooktrails Township second access road.

9-3 Coordination with our local partners, which has been ongoing throughout identification of the preferred alternative, will continue during final design, as well as the development, adoption, and implementation of mitigation measures to avoid conflict with local goals and policies. The comment is correct that some mitigation measures proposed in the DEIS/EIR are not feasible, and other mitigation measures were proposed that were not included in the DEIS/EIR. This is a natural outcome of the public review process. Once the Modified Alternative JIT was identified as the LEDPA, Caltrans began working on alignment-specific mitigation measures to reduce project impacts. See General Response 1.14 regarding project mitigation.

Additional future studies are not anticipated and have not been requested by the regulatory agencies. Therefore, Caltrans does not anticipate preparing an addendum to the EIS/EIR. If during the final design phase, there were substantial changes proposed for the project that yielded new significant environmental effects or a substantial increase in the severity of previously identified significant effects, then Caltrans and FHWA would consider preparation of a supplemental document.

that is as safe and attractive for local residents as it is functional for interregional traffic movement.

- c. A more thorough discussion of potential interregional traffic use of North Main Street after relinquishment of North Main Street to the City and conversion of South Main Street to Highway 20 needs to be provided.
- d. While it may not be the "responsibility" of Caltrans to plan for a second access to Brooktrails, the City believes that Brooktrails traffic is of interregional as well as local significance and potential points of access should be considered and analyzed in the DEIS/DEIR.

3. In light of the discussion in #2 above, to provide a more efficient route for interregional traffic (including trucks) using Highway 20, and promoting the community values of South Main Street, the City urges Caltrans to address the potential alignment of a Highway 20 interchange in the Valley.

9-2

Relative to this issue, the DEIS/DEIR should discuss projected traffic patterns from people using the northerly interchange. Being so far out of the way, the City is concerned that southbound traffic for Highway 20 will use the northerly interchange and go down Main Street through Willits. Also, Brooktrails traffic will choose the shortest route and use the northerly interchange, potentially creating some difficult turning movements and traffic flow and safety problems right in front of the High School. Traffic returning home to Brooktrails would be forced to make a hairpin turn onto Sherwood where traffic volumes would be expected to stack up in a queue.

Additionally, the City is concerned that there is no discussion of when or why the Highway 20 interchange was dropped from consideration. The City is aware of a long-standing contract between Caltrans and the Schmidbauer family involving land in the area of the proposed Haehl Creek interchange. This contract was not disclosed in the DEIS/DEIR and the City is concerned that this contract may have created a bias in the evaluation and selection/rejection of alternative (i.e., Highway 20) interchange locations.

A Highway 20 interchange would provide a more efficient route to the Bypass for truck traffic, thereby, greatly reducing truck traffic on Main Street. This would enhance the safety and other community values of Main Street (particularly South Main Street). Additionally, a Highway 20 interchange would provide easier access for travelers to downtown businesses, helping to mitigate potential adverse economic impacts to the Willits business community. The construction of a Highway 20 interchange would allow for the Haehl Creek interchange to be redesigned to provide a smaller, slower speed (below 65 mph) "trumpet" type of interchange that would have less impact on the land and would provide increased traffic safety in the area of Walker Road and Hollands Lane intersections. The City is strongly supportive of a Highway 20 interchange.

4. Numerous areas in the DEIS/DEIR refer to designs that will be completed after the route alternative has been selected, issues that may be identified during subsequent processes (i.e., ACOE 404 process) and mitigation measures that will be identified in a Mitigation

9-3

9-4 See General Response 1.12 regarding “growth at interchanges.”

9-5 See General Response 1.3 regarding Alternative L/C.

(a-d) See General Responses 1.4 and 1.5.

(e) It is not clear what the writer is suggesting by impacts to future growth.

(f) Comment noted. The adverse environmental impacts that would result from Alternative C1T far outweigh the slightly smaller amount of borrow material the alternative would require.

(g) Comment noted.

and Monitoring Plan. The City is concerned that these efforts might amount to “future studies” that could involve substantial issues which would be decided outside of the public review process. Will there be a formal document (i.e., Addendum to the EIS/EIR) that will incorporate these issues? The City emphatically requests that full public participation be allowed. An analysis or prediction of the costs of the various mitigation measures is not included in the DEIS/DEIR and the City is concerned that some measures may not be economically feasible.

9-4 5. Future development at interchanges is a substantial issue for the City. The City believes, from investigating scenarios with projects in other cities, that interchanges have growth inducement consequences that could threaten the economic viability of businesses in the downtown area of Willits. Options for controlling such growth should be investigated in the EIS/EIR, not just left for the City to negotiate with the County. Some ideas could include Caltrans negotiating open space or agriculture conservation easements with surrounding landowners at interchanges. Possibly the land could be used for replacement wetlands, replacement oak woodland habitat, etc.

9-5 6. With appropriate mitigation, the City continues to support the hybrid alternative which incorporates the southerly segment of LT and the northerly segment of C1T along with the merger of Mill/Willits Creek (hereafter, “Mill Creek”) with Outlet creek just downstream (north) of the proposed viaduct. The City believes that this alignment would best provide for both the needs of interregional traffic and the desires of the City to protect our “small-town” community character, commercial viability of existing businesses, and safe and attractive City streets for all modes of transportation. Additional reasons for supporting this option are as follows:

- a. Outlet Creek currently occupies a channel to the east of the C1T alignment. The construction of a 600+- foot channel connecting Mill Creek with Outlet Creek would eliminate the need to relocate 5,000+- feet of Mill Creek along the railroad thereby significantly reducing related environmental impacts.
- b. Connecting the two streams would provide increased flows for improved fish passage and habitat.
- c. The increased flows from connecting the two streams would provide long term benefit for the City and Brooktrails wastewater discharge.
- d. Connecting the two streams would make the northerly C1T alignment less expensive to construct.
- e. The LT/C1T alignment would impact future growth of the City to a lesser extent than other “valley” options.
- f. The northerly C1T alignment would require less borrow material to construct.
- g. The northerly C1T alignment would result in less impact to prime agricultural lands.

(h) Alternative L/C would result in the fewest residential relocations (2), while Alternative E3 would have the greatest residential relocation impact (114). The other valley alternatives would have low residential relocation impacts (Alternative CIT: 3; Alternative LT: 7; Alternative JIT: 13; and Modified Alternative JIT: 14). There is sufficient equivalent housing in Willits for relocations required by any of the valley alternatives.

(i) Comment noted.

(j) See General Response 1.7 for a discussion of the Quail Meadows Interchange and Caltrans coordination with local emergency services providers.

9-6 (a – c) See General Response 1.3 and Appendix G (FEIS/EIR) regarding the development of Modified Alternative JIT as the LEDPA. See Chapter 5 (FEIS/EIR) for a discussion of the coordination that was performed among Caltrans, FHWA, the NEPA 404 resource agencies, and Local Partners to introduce modifications to the project that would avoid key community resources and respond to other local concerns.

9-7 Caltrans Standard Specifications Section 7-1.13 is included in all construction contracts. Section 7-1.13 specifies that the contractor shall dispose of materials outside the right of way only after making arrangements and will pay all costs involved.

9-8 See Section 2.4 (FEIS/EIR) for a discussion of how the project could be constructed, and Section 2.4.2, in particular, for a discussion of the transport of borrow material.

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	h. The northerly CIT alignment would impact fewer residences and businesses.
	i. The northerly CIT alignment would not involve a railroad crossing.
	j. The City's emergency service providers have expressed concern for the proposed Quail Meadows interchange location in terms of continued congestion and unsafe traffic movements at the Sherwood Road intersection with interchange ingress and egress added to traffic from Brooktrails, the High School, and general City traffic. Because of the serious existing traffic problems facing Brooktrails and the Sherwood Road corridor, which would be exacerbated by the construction of the Quail Meadows interchange, before any further consideration can be given to the Quail Meadows interchange, there must be a mitigation plan which incorporates a safe realignment of Sherwood Road and its intersection with Main Street.
	7. The City does not support the proposed JIT alignment for the following reasons:
9-6	a. JIT would create adverse impacts related to noise, aesthetics, and the functionality and future planning of our community.
	b. JIT would divide portions of the City and be disruptive to the provision of services (i.e., separating our wastewater treatment facility from the rest of the City, taking land essential for the revised design of the new wastewater facility, going right through our proposed new ball fields and skate park, and forcing the relocation of our new industrial park on San Hedrin Circle).
	c. JIT would detract from the primary recreational corridor of the City along East Commercial Street and from the many improvements that are being planned for construction in the short-term for that corridor. We would note that, in addition to existing facilities at Recreation Grove, the museum, the library, Roots of Motive Power, rodeo grounds and little league fields, major improvements are currently underway or in the final design stages for pedestrian, bicycle and parking facilities along East Commercial Street, new ball fields, new skate park and renovation of the Skunk Depot and parking lot (these new improvements should be reflected in various places in the document where improvements in this area are referenced).
	8. The City did not find an analysis of how much debris would be generated by project construction and where such debris would be disposed of. The City is concerned that disposal of debris could adversely affect the City's waste diversion volumes at the solid waste transfer station.
9-7	
	9. The City did not find any discussion of the planned routes of truck traffic between the borrow site and the project site. We anticipate significant numbers of large trucks hauling material (3,000,000 cubic yards) from the borrow site and would request analysis of potential routes and related impacts upon City streets. Such analysis should include a discussion and recommended measures to reimburse the City for any damage to City
9-8	

9-9 The proposed project is estimated to require between 100 and 225 workers (including Caltrans staff) at any given time. Different stages of construction will require different kinds of workers, from those with general skills who may be hired from the local labor pool, to those with specialized skills who will be recruited from throughout the region.

Temporary impacts to the City would occur in the event that large numbers of workers were recruited from outside commuting distance for long periods of time. These workers would be interested in finding inexpensive housing for weeks or months, adding consumers to an already tight Willits housing market.

Caltrans' past experience indicates that workers' demand for rental housing would exceed Willits' supply. Approximately 33 percent of the workforce coming in from outside this region would likely be interested in renting housing in Willits at any given time. Assuming that 150 workers were present, on average, approximately 50 of these workers would attempt to find a home or apartment in this area for rent. At the time of the 2000 U.S. Census, there were 24 vacant rental units in Willits. Since all of the workers potentially interested in renting cannot be expected to find compatible roommates and given the probability that some rental units will be too expensive or not available for short-term occupants, some workers are likely to look elsewhere for housing.

Workers would be most likely to seek temporary housing in hotel and motel rooms in Willits in the first months of construction, when no housing routine has been established for workers. The proportion of workers who would be likely to live in motel or hotel rooms during their time in Willits is estimated to be less than 40 percent. A survey of hotels and motels in this area in 2002 indicated the presence of more than 230 available rooms, suggesting that the influx of workers would not overwhelm the supply of available rooms. Because the majority of workers would not be likely to stay in Willits during weekends while work is stopped, most hotel and motel rooms would be available during the peak periods of recreational traffic.

The least expensive and most plentiful source of housing is likely to be in campgrounds and recreational vehicle parks. Some contractors have their own travel trailers for workers, and some workers are equipped for stays in these parks. There are an estimated 200 spaces for recreational vehicles in Willits, and many more within a 20-mile radius.

Experience on past highway construction projects indicates that it is highly improbable that any construction workers will purchase homes in Willits during construction. It is unusual for members of construction crews to seek homeownership. The persistent scarcity of vacant owner-occupied housing in this area further reduces the likelihood that workers will buy homes.

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	streets resulting from heavy construction vehicles.
9-9	10. The City could not find any discussion of potential impacts due to the influx of project workers (number of workers?) on housing stocks, traffic and related subjects. The DEIS/DEIR did not contain an analysis of how traffic from the influx of construction workers would affect local traffic conditions or physical conditions of City Streets. The City would request that Caltrans consider mitigating the impacts caused by additional traffic by contributing to the design and construction of an alternative (to Main Street) north-south arterial through town.
9-10	11. The City is concerned for potential devaluation of property which might be adversely affected by the alignment of the new highway. While we understand that there are mechanisms for compensating property owners whose properties are devalued by the physical location of the highway in close proximity to their properties, is there any compensation for property owners whose properties might be devalued by visual or noise impacts?
9-11	12. The City is concerned for the agricultural operations, businesses, residential properties and civic properties that would be bisected by the bypass, and would request that adequate access be provided to insure that the function and viability of any properties so affected is adequately protected.
9-12	13. The City Council would express concern on behalf of the County and School District for the additional land that would be taken off the tax roles and related potential negative impacts that could accrue to the City from any diminished County and School District services that might result from a reduced tax base.
SPECIFIC COMMENTS (listed according to page):	
9-13	<u>S-2, third paragraph</u> : there should not be a comma after "Under."
9-14	<u>2-4, second paragraph</u> : Reference to traffic queues to Holly Street should be updated as traffic is frequently observed to queue to the car wash or even farther south.
9-15	<u>2-4 & 2.9</u> : References are made to a Holly Street signal in the "near future," but other references are made that no new improvements are planned. The City is interested in ensuring that planned Holly Street signal improvements will be completed
9-16	<u>2-10, Section 2.4.2</u> : The history of the Highway 20 interchange being dropped from the list of potential interchange alternatives should be included in this section.
9-17	<u>3-6, paragraph 3.3.1.2</u> : What are alternatives for reducing the median width which might result in a corresponding reduction in impacts to wetlands, etc.?
9-18	<u>3-9, second paragraph</u> : While the City recognizes that "major reconstruction" would not be authorized, the City would request that "rehabilitation" be included in the list of activities that would be allowed under the heading of, "... placing the highway in a state of good repair."

The vacancy rate in Ukiah, which is a commutable distance from Willits, was even lower than Willits' in 2000. Because Ukiah's housing market is larger, this translates into a larger supply of potential temporary workers' residences. In 2000, there were 54 vacant rental units in Ukiah.

Since the bypass will reduce both interregional traffic and to some extent local traffic on Main Street, mitigation is not warranted. The City of Willits has prepared a study of alternative transportation corridors in the city limits to help relieve local traffic congestion. The study (Baechtel Road/Railroad Avenue Corridor Community Design Study, 2003) will be used to obtain funding for planning and design of a preferred alternative.

9-10 When the NEPA and CEQA environmental review process is complete and final detailed design drawings have been prepared, Caltrans right of way staff will coordinate with landowners on a case-by-case basis to determine compensation where properties are devalued by visual, noise, or other impacts.

9-11 Caltrans will coordinate with property owners whose properties would be bisected by the bypass. Options could include providing adequate access or providing relocation assistance.

9-12 None of the proposed alternatives would diminish revenues by more than half of a percent of total Mendocino County property tax revenues. The table below shows the estimated proportion of total property tax revenues in the County in the year 2000 required by each alternative.

Property Tax Payments of Properties to be Displaced

Alternative / Segment	Property Tax Paid by Properties to be Displaced	Percent of Countywide Property Taxes ¹
C1T	\$ 7,233	0.04%
E3	\$ 79,639	0.45%
J1T	\$ 36,859	0.21%
Modified J1T	\$25,000	0.16%
LT	\$ 10,015	0.06%

Source: Mendocino County Assessor's Data

As Tabel 5-6 in the DEIS/EIR indicates, the resulting impacts to the Willits Unified School District, Mendocino County, and the City of Willits would be minor, relative to these agencies' total revenues.

9-13 Comment noted. As this is not a substantive comment per NEPA or CEQA, no revision is necessary.

9-14 Caltrans acknowledges and understands this comment; however, the requested revision would not affect the results and conclusions of the traffic study.

9-15 A signal at Holly Street was constructed and opened to traffic in 2003.

9-16 See response to Comment 9-2 and General Response 1.9, which discuss why a center valley interchange is not being considered for this project.

9-17 See General Response 1.13 for a discussion of median width.

9-18 Rehabilitation work proposed as a condition of relinquishment must be justified. This includes corrective work (if any) on bridges, culverts, curbs, drains, pavement, pedestrian facilities, or other facilities that are part of the highway in order to place the facility into a maintainable condition. In no case is the pavement rehabilitation design life to exceed 10 years. See also response to Comment 9-1(Item 2c) regarding relinquishment.

¹ According to information from the California Department of Finance, total revenues from property taxes were \$16 million in Mendocino County in the 1996-1997 fiscal year.

9-19 The vertical axis of Figure 3-6, p.3-23 of the DEIS/EIR is mislabeled. The vertical axis is labeled “Speed”, should read “Hours”. The corrected table is included in Volume 3 (FEIS/EIR) Text Changes to the Draft EIS/EIR.

9-20 The Willits Traffic Study contains Table 9 Peak Hour Volumes on Existing Route 101 (Main Street) with and without Bypass Alternatives, which shows North Main Street volumes. Page 1-8 (DEIS/EIR) lists the locations where technical studies are available to the public.

9-21 See Volume 3 (FEIS/EIR) for suggested text change.

9-22 The comment refers to existing congestion on U.S. 101/Main Street at the high school and at the Sherwood Road intersection. See General Response 1.8.

9-23 At the time the DEIS/EIR was being prepared, plans for the skate park and other improvements along Commercial Street were not communicated to Caltrans. These additional components do not change the conclusions reported in the DEIS/EIR and no change to the document is required. Since circulation of the DEIS/EIR, Caltrans has worked closely with the City on measures to minimize impacts to these community resources. The Modified J1T, which places the alignment away from the park behind a dense, tall stand of riparian vegetation, resulted from these efforts. See Chapter 2 (FEIS/EIR) for a description of Modified J1T, the preferred alternative for this project.

9-24 Comment noted.

9-25 3-19 More recent census information, including Year 2000 census data and 2004 Department of Finance data, do not indicate any major demographic shifts or other changes that would alter conclusions made at the time the Draft EIS/EIR was circulated. See Volume 3 (FEIS/EIR) Text Changes to the Draft EIS/EIR, which updates the demographic information in Section 4.5.2 of the DEIS/EIR.

9-26 See Volume 3 (FEIS/EIR) for suggested text changes.

9-27 Comment noted. The referenced information originated from a consultant report (1985, Larry Seeman and Associates) for the “Willits S.E. Annexation Draft EIR.”

9-28 Comment noted. The statement regarding sediment sources refers to land uses within the Eel River watershed. There are no vineyards in the project area.

9-29 See responses to Comments 26-1, 26-2, 26-3, and 26-4 (California Oak Foundation).

9-30 The reference to “sensitive” and “naturally rare” in this section refers to plant communities and habitats, and not to special-status plant and animal species. Naturally rare and sensitive plant communities are those communities, such as vernal pools and valley oak riparian woodland, that are naturally very limited in their distribution, or are declining in acreage due to man-made and other disturbances. Page 4-26, paragraph 4

9-19	3-23, Figure 3-6: Values for X-axis do not make sense.
9-20	3-24, Table 3-4: It would be helpful to provide a breakdown of traffic volumes on North Main Street and South Main Street to compare volumes before and after alternative scenarios.
9-21	4-6, third paragraph: This paragraph should be amended to state that there are older historic residential neighborhoods on the west side of town, including some of the oldest structures in Willits, as well as the east side of town.
9-22	4-7, first paragraph: The City would note that Quail Meadows is an area where the urban uses start to transition to more rural uses, however, the compatibility of an interchange in such proximity to traffic associated with urban uses such as the High School and the intersection of Sherwood Road is highly questionable.
9-23	4-8: As mentioned in General Comment #6, several new projects on East Commercial Street which are currently in the design phase or for which grant funding has been awarded, should be identified, including the ball fields, skate park, improvements to East Commercial Street, and renovation of the Skunk Depot and parking lot.
9-24	4-10, first paragraph: The foothills west of Willits are not exclusively used for rangeland. Much of the area is forested or developed as residential parcels.
9-25	4-13, Table 4-6: This table should be updated to reflect 2000 Census data showing Willits with a population of 5073.
9-26	4-17 (fifth paragraph) & 6-9 (first paragraph): While zoning might theoretically allow for a maximum of 1,631 new units, it has been demonstrated that development of some of the lands, particularly the largest tract of undeveloped land in the City, is highly constrained because of geotechnical and flood hazard, therefore maximum theoretical buildout should be qualified. Additionally, in this section on housing, the proposed “Gateway Village” 54-unit residential development at the southeast corner of the City should be identified.
9-27	4-22, last paragraph: The City is unaware of any “drawdown ordinance” relative to the Little Lake Water District, which has long ceased to exist as an entity since the City purchased the watershed.
9-28	4-23, second paragraph: The City is not aware of any significant vineyard development in the City or surrounding area.
9-29	4-26, third paragraph: While individual specimens and small stands of these oaks are relatively common, the City would note that large tracts of these oak woodlands are no longer common to the valley floor. The habitat value of larger tracts of oak woodlands might be perceived to be diminished by the classification as “common.”
9-30	4-26 & Section 4.9 in general: Classifications for plant and animal species such as “sensitive,” and naturally rare” should be checked for consistency with officially recognized classifications (i.e., is a “naturally rare” species a state or federally listed species?).

(DEIS/EIR) identifies those plant communities occurring in the Willits area that the resources agencies consider sensitive. The listing status of special-status plant and animal species is summarized separately in Tables 4-15 and 4-16, pages 4-30 and 4-32 (DEIS/EIR).

9-31 Comment noted. All future references will be to Muir Mill Road.

9-32 Comment noted.

9-33 Receptor 62 represents the Willits High School and Receptor 63 represents the Quail Meadows Campground. Table M-1 (Appendix M, DEIS/EIR) shows existing noise levels at the high school and the campground and the results of noise modeling for the future build condition under each project alternative. Noise levels under the build condition for these receptors would not approach or exceed the federal Noise Abatement Criteria or result in an increase in existing noise levels by 12 dBA, Leq(h).

9-34 Table 4-21 is intended to be a listing of existing, not future, facilities and no change is necessary.

9-35 Comment noted. See Volume 3 (FEIS/EIR) for corrected text.

9-36 The text states that the alternatives will have varying levels of impact to community character. Caltrans and FHWA have coordinated closely with the City on the project. The City's input was critical to the development of the Preferred Alternative (Modified Alternative J1T). Caltrans and FHWA will continue to work closely with the City during project construction, road relinquishment, and other project-related issues.

9-37 COM-2 is not required. Modified Alternative J1T would not result in the need for rezoning to accommodate the relocation efforts.

9-38 Comment noted. Caltrans will work with potential displaced residents through the Relocation Assistance Program to provide displaced residents with the greatest possible use of relocation benefits and Last Resort Payments. These residents have the option to relocate to a location of their choosing, and that choice is based on the resident's own best interest. Additionally, Modified Alternative J1T would not have large-scale relocation impacts that would impact the larger community; therefore, a public meeting is not appropriate.

9-39 The Preferred Alternative, Modified Alternative J1T, does not impact any mobile home parks.

9-40 The hybrid Alternatives L/C would result in two residential relocations, neither of these being low-income or minority.

9-41 Caltrans recognizes that the proposed mitigation measures cannot compensate residents for the emotional and/or psychological losses associated with relocation. Mitigation Measure COM-4 will provide displaced residents with the opportunity to leverage the maximum degree of control over where they are relocated. This measure will

- 9-31 4-52, first paragraph under 4.12.2: Muir Canyon Road should be identified as Muir Mill Road.
- 9-32 4-52, last paragraph: The list of major public facilities should include the Noyo Theater, Willits High School, Willits Center for the Arts, and the recreational complex and parking areas at the east end of East Commercial Street.
- 9-33 4-54 and Map 24: The location of noise receptors which were analyzed is not clear. Were the High School and Quail Meadows Campground identified as receptors which could be potentially impacted by highway/interchange noise?
- 9-34 4-56, Table 4-21: Again, the new ball fields and skate park on the north side of East Commercial Street should be identified.
- 9-35 5-1, Section 5.1: Alternative CIT should be included in this section since the document also concludes that alternative CIT has no significant geotechnical problems and does not cross the Alquist-Priolo Earthquake Fault Zone.
- 9-36 5-6, Section 5.2: The City whole-heartedly agrees with the last sentence in this section, that any of the build alternatives will impact the community character, and the City would emphasize the need for Caltrans to work closely with the City to ensure that such things as the locations of interchanges and the condition of relinquished roadway do not adversely affect community values and character.
- 9-37 5-9, COM-2: The rezoning of parcels in the City requires discretionary approval by the Willits City Council. It should not be presumed that such rezoning will be an automatic process and it is not appropriate to mandate such action by the City.
- 9-38 5-9, COM-4: The City would request that any Relocation Plan be subject to review at a public hearing to be held in the City of Willits.
- 9-39 5-9, COM-5 & COM-6: The City questions where such residents would be relocated. The City does not know of any mobile home parks in the project area that would be suitable for such relocation.
- 9-40 5-11, Table 5-2 & 5-13, Table 5-3: The City would note that the LT-CIT hybrid supported by the City would have the least impact on residential displacement (total of 2) and upon low-income and minority populations (2) as compared to the other alternatives.
- 9-41 5-12, third paragraph: While mitigation measures COM-1 through COM-4 may reduce impacts from residential relocation, these impacts will still occur to some degree, which may be significant for some alternatives.
- 9-42 5-16, first paragraph in Section 5.2.5.5: Impacts from reduced through traffic, especially from the tourist public, could adversely affect commercial enterprises and the impacts of business slowdown or failure could be significant.

reduce the level of impact to a less-than-significant level under CEQA. Also, see response to Comment 201-1 (Clifford Tichenor).

9-42 During and after the completion of the bypass, motorists will still have access to downtown Willits. Impacts to most businesses will be short term and many businesses will benefit from a revitalized downtown area. Some inconvenience during construction is generally unavoidable. Business failure could be due to a number of factors unrelated to a bypass. See also responses to Comment 9-55 and to Comment 159-7 (Gary Owen).

9-43 Modified Alternative J1T, the Preferred Alternative, was developed to avoid community resources including the San Hedrin Circle industrial park. The State pays eligible business relocation benefits to displaced businesses. Caltrans would make every effort to find suitable relocation sites within the City of Willits, however the selection of relocation sites would ultimately be made by the owners of the businesses. See Business and Farm Relocation Assistance Program under Appendix J, Relocation Assistance Advisory Service of the DEIS/EIR.

9-44 See General Response 1.12 regarding “growth at interchanges.”

9-45 See Volume 3 (FEIS/EIR) for a revision to Table 5-6 that shows both the proportional and estimated dollar impacts to local agencies’ revenues as a result of the removal of some properties’ taxes from the local tax base. Regarding relocation of mobile home park residents, see response to Comment 9-39.

9-46 Comment noted. See Volume 3 (FEIS/EIR) for revisions to Section 5.2.5.8 Business Impacts (DEIS/EIR).

9-47 Caltrans will work with the City to provide a generic museum sign on U.S. 101 informing motorists of the museum. The City would install "follow up" signs to guide visitors from U.S. 101 to the museum.

9-48 Please see response to Comment 9-1 (Item 2c).

9-49 Caltrans will work closely with the City throughout the remaining phases of the bypass development and construction. The comment references Section 5.3.2.2 in the DEIS/EIR that discusses “accommodation of protesting parties’ requests”. The passage was included to make the City and County aware that there is an established procedure they can use to advocate their position (or “protest”) in the event that mutually acceptable agreements are not reached through normal relinquishment negotiations.

9-50 Comment noted.

9-51 Comment noted. Improvements to the existing U.S. 101/S.R. 20 intersection are beyond the scope of the proposed bypass project.

9-43 5-17, second paragraph: When the industrial park on San Hedrin Circle was approved by the City, the remainder of the property was intentionally designated Open Space to accommodate any potential future highway alignment without impacting the industrial park. The City is very concerned that there would be great difficulty in relocating those businesses as there are no comparable properties in the City. Who would pay for such relocation? Additionally, we would note that CDBG grant monies were used for construction of the roadway for the industrial park.

9-44 5-17, third paragraph: The City strongly disagrees that large scale commercial development would be unlikely around the interchanges. Examples of pressures for commercial development at interchanges are common and, given that the City does not control land use (County jurisdiction) in the areas of the interchanges, the City is very concerned about the possibilities of commercial development which could detract from the downtown business community.

9-45 5-20, Section 5.2.5.8: In estimating property tax losses to government due to the bypass, estimates are given in percentage form. It would be helpful if this loss to various entities were expressed in actual dollars. Additionally, development of mobile home parks involves a highly complex process dependent upon many variables including availability of land, financing, and infrastructure, public sentiment, and potential environmental impacts. The process requires approvals by, and is subject to standards of, the City and various State agencies.

9-46 5-21, first paragraph: Similar to the comment for page 5-16, the first sentence should be reworded to read, “The failure of businesses oriented toward through traffic will have a short-term negative impact upon the Willits community as a whole.” It is unrealistic to think there will be no impact. If a few tourist-serving businesses fail, that means a few more vacant commercial properties and that creates an impact. Economic impacts including potential positive and negative impacts upon property values should be more completely evaluated.

9-47 5-22, third paragraph: The City believes that the 200,000 minimum attendance threshold is much too high given the small city character of Willits. While we do not have a formula for a number at this time, we would suggest that an attendance more consistent with our community size and character would be appropriate.

9-48 5-22, first paragraph in Section 5.3.2.2: Although the portion of Main Street that might be relinquished may be “minor” as compared with total County road miles, because of its size and traffic volumes, it is a major street as compared to other City streets (only 19.58 total miles) and in terms of our Public Works maintenance budget.

9-49 5-23, second paragraph: The City is hopeful that Caltrans will be responsive to the City’s concerns and that we will work cooperatively together, without any need to operate in a “protest” mode.

9-50 5-24, first paragraph and 6.12, Section 6.2.2.4: The City would note that the railroad traffic and services would not be “increased” or “expanded,” but, more appropriately, “reestablished” or “resumed,” as they are not presently existent and have not been for some time.

9-51 5-25, Section 5.4.1.1: The City would point out that the Circulation Element of the County’s General Plan also recommends improvements to the Highway 20 intersection. Additionally,

9-52 Section 5.10.4 of the Draft EIR/EIS specifies the landscaping and other mitigation measures for impacts to visual resources that would be incorporated into the proposed bypass.

9-53 A U.S. 101 bypass of the City of Willits along the alignments currently under consideration would complement local circulation by removing through traffic from local streets. Willits residents would benefit from reduced traffic levels, especially in the area north of the existing U.S. 101/S.R. 20 intersection.

Any bypass situated along the edge of the City of Willits would be likely to involve some harm to agricultural land use patterns, because most of the land outside the city's limits is used for agricultural purposes. However, Alternatives JIT and Modified JIT would run fairly close to the edge of the City's urbanized area, enhancing the division between these land uses. The alignments of Alternatives C1T, LT, and E3 would divide agricultural parcels to a greater extent.

9-54 Please see General Response 1.12 regarding "growth at interchanges."

9-55 The comment regarding the City of Willits' General Plan recommendation for a linear park along S.R. 20 is noted. The proposed project would not affect plans to develop such a park.

The comment is noted that Section 1.450 of the City's General Plan states that "An east side bypass with an interchange leading to an east side 'gateway' to Willits appears to offer the strongest potential from the standpoint of downtown economic development." The General Plan further notes Caltrans' plans not to include an east side interchange and states that this would "have an extremely adverse impact on downtown retail sales."

Caltrans economic analysis of the proposed project concludes that this is not the case. The proposed alternatives would support the City's goals for economic development by diverting through traffic away from the City and limiting opportunities for urban sprawl. See General Response 1.9 for a discussion of a center valley interchange, which is beyond the scope of the Willits Bypass project. Any of the valley alternatives could accommodate a future center valley interchange. See General Response 1.12 regarding "growth at interchanges."

9-56 The comment is correct that there are other uses in the area, that form a museum and recreation complex on Commercial Street. The paragraph noted in the comment refers readers to Section 5.14, which provides more discussion of Alternative JIT's potential impacts to the recreation area and the additional recreational uses in the

Circulation Element Policies 8 and 9 (page III-36) support the City's position that the selected alignment be responsive to the future planning and circulation needs of the City as follows:

9-52

8. "All traffic corridor development plans should incorporate landscaping as part of any improvements."

9-53

9. "Related to Route 101: Inasmuch as Route 101 is important to the local movement of goods, as it is improved it should be located:

- a. To complement circulation of adjacent cities, communities and employment centers.
- b. To minimize the breakdown of agricultural and urban land use patterns."

9-54

Also, this section does not include a reference to the County General Plan Scenic Resources Policy "d" which states, "Discourage commercial strip development and urban sprawl." We believe that commercial development at interchanges would conflict with this policy.

9-55

The City of Willits General Plan contains numerous references to making "gateways" to Willits and City streets attractive and safe for pedestrians and bicyclists as well as motorists (Land Use Policy 1.250, and Circulation Policies 2.260 and 2.270). Paragraphs 1.450 and 1.514 of the Economic Analysis Section emphasize the City's position that an interchange leading to an "east side gateway" would be very important to the economic vitality of Willits, although caution is expressed regarding commercial development around the interchanges. Paragraph 2.270 of the Summary of Issues and Suggested Planning Approach section strongly advocates for a Highway 20 interchange. Lastly, Map Figure 8-1 identifies a recommended linear park along Highway 20 extending west from its present intersection with Main Street. These items should be referenced and discussed in the FEIS/FEIR.

9-56

5.26, second paragraph: It should also be noted that JIT would pass in close proximity to the rodeo grounds, Recreation Grove Park, the site of the proposed new ball fields and the proposed new skate park.

9-57

5-29, FRM-1: As noted previously, the concept of establishing agricultural conservation or open space easements to limit potential development around interchanges should be explored.

9-58

5-29, FRM-3: The City did not find any information to substantiate the statement that a continuous viaduct would triple the cost of each alternative. Is this measure intended to mean that, in order to adequately mitigate agricultural impacts, each of the valley alternatives must incorporate a continuous viaduct? Would the cost of such viaduct make all the alternatives prohibitively expensive to build, thereby ruling out all of the alternatives?

9-59

5-30, Table 5-7: The City would question if the acreage of prime farmland that would be converted includes those areas which are also largely wetlands and unsuitable for farming for a good portion of the year. For example, Map 13 identifies a large block of "Prime Agricultural Preserve Parcel" along the northerly extension of C1T. That area is also identified on Map 18 as

area. Revisions were made to Alternative J1T to avoid this community resource, yielding the Modified Alternative J1T (the Preferred Alternative).

9-57 See General Response 1.12 regarding “growth at interchanges.”

9-58 See responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning), respectively, regarding feasibility of mitigation measures and discussion of viaduct.

9-59 The term “Prime Farmland” is used by Natural Resources Conservation Services (NRCS) as soils that have the physical characteristics such as permeability, water retention capability, soil depth, soil texture and surface relief to sustain intensive agricultural use. Although areas with “Prime Farmland” (soils) may not be intensively cultivated or have a high water table, NRCS still deem them the highest quality soils, which require close coordination and the completion of a “Farmland Conversion Impact Rating” form (Form AD 1006) (Appendix L, DEIS/EIR, and Appendix E, FEIS/EIR).

9-60 Deep pools are an important habitat component for adult and juvenile salmonids. The concept of potentially constructing deep pools was developed through consultation with CDFG and NOAA Fisheries fisheries biologists as habitat components for any stream reaches that may be realigned. See response to Comment 8-5 (RWQCB) regarding proposed restoration of the Haehl Creek channel reach (at the southern interchange) to its normal configuration and gradient, which would improve essential fish habitat in Haehl Creek and other creeks downstream of Haehl Creek. Comment 8-5 (RWQCB) also addresses realignment of an ephemeral stream, as a result of Modified Alternative J1T, which would not result in fisheries impacts.

9-61 See responses to Comments 9-5 and 9-60.

9-62 The FEIS/EIR with mitigation plan is made available for public review. Coordination on the project with local agencies has been ongoing and will continue through final project design, implementation and monitoring of mitigation measures, and operation of the facility.

9-63 See General Response 1.12 regarding “growth at interchanges.” Regarding success of oak tree mitigation, see responses to Comments 26-3 (California Oak Foundation) and 27-3 (California Native Plant Society).

9-64 See response to Comment 27-4 (California Native Plant Society).

9-65 Please refer to responses to Comments 5-1 and 5-2 (CDFG). For wetlands and other waters directly affected by the project, the federal Clean Water Act (CWA) requires the creation of wetlands and other waters similar to those impacted, usually at a minimum ratio of 1:1 (one-acre created for each acre affected). The CWA also require the created wetlands and other waters have functions and values similar to those impacted.

9-66 Terms and conditions of the USFWS and NOAA Fisheries Biological Opinions (Section 7) are included in the FEIS/EIR (Appendix D). See response to Comment 9-62. In addition, under Section 404 of the Clean Water Act, the project applications, which include proposed mitigation measures, are made available by the Corps to the public for review prior to issuing permits for construction.

9-67 See response to Comment 9-62.

being largely wetland and observations of that area from long-time residents find that the agricultural potential of the area is diminished by the wet conditions. Testimony from the rancher with the most experience in farming that portion of the valley indicates that the land west of the railroad tracks has a much higher agricultural value, and a higher concentration of Baker’s meadowfoam than the land east of the tracks, therefore, in terms of impacts to agricultural lands and rare plants, the northerly alignment of alternative CIT would be preferable to the other valley alternatives.

9-60 5-42, WQ-5: The City would question the practicality and long term viability of constructing and maintaining deep pools in a dynamic stream system. Again, the City would express support for the idea of combining Mill and Outlet creeks which would result in deeper stream flows and help to accomplish the same purpose as this proposed mitigation measure.

9-61 5-53, last two paragraphs: Refer to earlier comments regarding the City’s support for joining Mill and Outlet Creeks which will greatly reduce the need for channelization of Mill Creek and bridge construction.

9-62 5-67, third paragraph and BIO-3: As expressed in General Comment #4, the City is concerned that development of a final design and a final mitigation plan would occur outside of any process that would allow review and input from the Willits community. We strongly advocate for full public access to this process.

9-63 5-68, BIO-8: Areas around interchanges could be preserved with conservation easements and planted to oak woodland. This would serve to mitigate impacts on oak woodlands and provide insurance against future commercial development at the interchanges. The City questions the adequacy of replacing oak trees with acorns given the poor history of success for such plantings, and would urge the planting of seedlings of adequate size instead of acorns. Caltrans should commit to monitor and insure the survival of all plantings for a minimum of 5 years (equivalent to Department of Forestry standards for THP’s).

9-64 5-70 & 5-71, BIO -15 through BIO-17: Should the borrow site be determined to contain valuable spotted owl habitat, suggested mitigation measures for reestablishing mature north-slope forest habitat are so long-term as to be ineffective.

9-65 5-75, Figure 5-2, and 5-85, Figure 5-5: The City would argue that connecting Mill Creek with Outlet Creek and employing measures to preserve the existing wetlands (i.e., constricting the downstream outflow from Up Creek), impacts from alternative CIT would be reduced to less than significant, or minimal, and the fish passage in the combined creeks would be enhanced.

9-66 5-97, fourth paragraph: As with similar comments, the City is concerned that mitigation measures will be developed without the benefit of public participation in the process. Will the measures developed for the Section 7 process be incorporated into the Final Mitigation Plan?

9-67 5-115, first paragraph and 5-117, VIS-8: Will the development of visual elements include an opportunity for public participation. How does Caltrans envision this process working?

9-68 Planting of redwood trees as a screen between Alternative JIT and the ball fields was proposed after consultation with the City. Redwood trees are compatible with the local theme of ‘Gateway to the Redwoods.’ See Section 5.10 (DEIS/EIR) for mitigation measures to lessen visual impacts. However, because of concerns about Alternative JIT’s impacts to the park/recreation complex (including the ball fields), the alternative was moved to the east behind an existing stand of dense tall riparian vegetation. See Chapter 2 (FEIS/EIR) for a description of Modified Alternative JIT, the preferred alternative for this project.

9-69 Scenic Highways contain unique natural resource qualities visible to the traveler. A local agency may request a scenic designation for a highway. If granted, the unique qualities, which were instrumental in obtaining a scenic designation, must be kept or enhanced by all future developments. For example, special controls may be set to influence grading, signage, undergrounding of utility lines and the like.

Achieving a scenic designation will not qualify for more planting, nor will it preclude future highways or development, however, it will help maintain the visual resources of an area enjoyed by highway travelers.

California’s Scenic Highway Program was created by the legislature in 1963 to protect scenic highway corridors from change that would diminish their aesthetic value. A highway may be designated scenic depending upon how much of the landscape can be seen by travelers, its scenic quality, and the extent to which development intrudes upon the traveler’s enjoyment of the view.

Local agencies nominate highways for official designation identifying and defining the scenic corridor and adopting ordinances to preserve scenic quality. A scenic corridor is the land generally visible from a motorist’s line of vision; if the view extends to the horizon, a city or county may select a reasonable boundary.

Minimum requirements for scenic corridor protection include regulation of land use and density of development; land and site planning; control of outdoor advertising, earthmoving and landscaping; and attention to design and appearance of structures and equipment.

A city or county with jurisdiction over lands next to the highway must inspect and evaluate the route to determine if it meets current criteria. It then adopts a protection program and submits a resolution to the Departmental Transportation Advisory Committee through an appropriate Caltrans district office. After review, the committee can recommend that the Caltrans district director designate the highway as scenic.

Caltrans places the colorful “poppy” sign, the logo of the scenic highway program, along the route. The poppy logo identifies scenic highways on travel maps, and others produced by the State Division of Tourism.

Official scenic highway status does not restrict highway improvements. However, Caltrans works with appropriate agencies to coordinate transportation proposals and maintenance activities to protect the corridor as much as

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9-68	<u>5-115, Section 5.10.1 and 5-134, Figure 5-11</u> : The City would reiterate our concerns for the visual impacts of alternative JIT on important recreation facilities.
9-69	<u>5-116, first paragraph</u> : Are there any advantages or disadvantages for the City of Willits in having U.S. 101 designated as a scenic highway? What are they? Would we be eligible for more landscaping or other visual mitigation? What is the process for achieving such designation?
9-70	<u>5-129, first paragraph</u> : The fourth sentence should read, “Some of the homes on Ridgewood Road and Hilltop Drive would see have views of this interchange.”
9-71	<u>5-134, Figure 5-11</u> : In addition to the photo simulation depicting the view of the viaduct with the existing ball fields, there should be a simulation depicting the new ball fields and skate park.
9-72	<u>5-136, Figure 5-12</u> : The simulations provided do not present a complete view for making a judgment of visual impact. A rendering of the full interchange at Quail Meadows would be more helpful. Also, the simulation showing the proposed condition does not include the power lines. Would they be placed underground as part of the project?
9-73	<u>5-141, Section 5.11.4.2</u> : There is confusion as to what are the reasonableness criteria. Although the tables in Appendix M list receptors for which sound walls do not meet reasonableness criteria, we were unable to determine exactly what those criteria were. We are concerned that some of our citizens including schools would be subjected to excessive noise from the project without adequate mitigation. Does the DEIS/DEIR conclude that significant adverse impacts will occur which will not be mitigated? We are especially concerned that the area of the Seventh Day Adventist School on East Valley Street/Center Valley Road would be subject to excessive noise and dust generation during the 2+ years of project construction without adequate mitigation. Additionally, any sound walls or other noise attenuation structures needs to incorporate vegetation or other visual mitigation to protect the visual quality of the area.
9-74	<u>5-157, Table 5-30</u> : This is another example of where the locations for the proposed new ball fields and skate park should be identified and examined.
9-75	<u>5-159, Figure 5-14</u> : The City would reiterate our concern for the alignment of JIT bisecting the parcel which has been identified in revised plans emanating from the DEIR for the City’s Wastewater Treatment Facility Project as being necessary for development of the treatment facility project. On the map, the parcel is located just north of the Redwood Empire Railroad Project and west of the symbols denoting the location of the existing treatment plant.
9-76	<u>6-3, Section 6.1.3.2</u> : Again, the City would emphasize that the County has zoning jurisdiction around the interchanges and, without some mechanisms such as conservation easements implemented as part of the project, the City has no control over opportunities for development around the interchanges.
9-77	<u>6-11, Figure 6-1</u> : The East Commercial Street improvements, new ball fields and skate park projects should be added to this list.

possible. While designation does not preclude development, the program encourages development that does not degrade a corridor's scenic value.

Caltrans checks scenic highways at least every five years to assure that they remain scenic and may revoke the designation if local agencies cease to protect them. In addition, a city or county may request revocation if it no longer wishes to be part of the program.

9-70 Comment noted. The comment does not change the reports substantive content; therefore, no change to the DEIS/EIR is required.

9-71 When the Visual Impact Assessment report was prepared there were no plans available for the ball fields. When the DEIS/EIR was circulated, the City did not inform Caltrans of plans for the skate park, so this park feature was not addressed in the DEIS/EIR. Since circulation of the DEIS/EIR, Caltrans has worked closely with the city on measures to minimize impacts to these community resources. The Modified JIT, which places the alignment away from the park behind a dense, tall stand of riparian vegetation, resulted from these efforts. See Chapter 2 (FEIS/EIR) for a description of Modified JIT, the preferred alternative for this project.

9-72 Where the bypass crosses local roads, utilities could be undergrounded in localized areas; however, undergrounding these utility lines would be at the discretion of the utility companies. Providing a visual simulation from all angles is desirable, however, from a practical standpoint, the visual impact analysis included the worst case views to depict each impact.

9-73 The Noise Report (available for review at the Willits Library, as noted on page 1-8, DEIS/EIR) outlines reasonableness criteria, which is also defined in the Glossary (Appendix A, DEIS/EIR) and in Appendix M (DEIS/EIR). To determine reasonableness, the individual circumstances of each project and consideration of borderline cases are part of the overall decision making process. Noise abatement is only considered where noise impacts are predicted and where frequent human use occurs and a lowered noise level would be of benefit. Primary consideration is given to exterior areas. The overall reasonableness considers a multitude of factors including but not necessarily limited to: cost of abatement, absolute noise levels, change in noise levels, noise abatement benefits, date of development long the highway, life cycle of abatement measures, environmental impacts of abatement construction, opinions of impacted residents, input from public and local agencies, and social, economic, environmental, legal, and technological factors. This input is used as a preliminary noise abatement decision.

The draft environmental document serves as a starting point in the final noise abatement decision. After public circulation of the DEIS/EIR, Caltrans has an obligation to balance a variety of public objectives. These include specific economic, environmental, social, legal, and technological factors as well as other public opinions and the views of the impacted residents. The final noise abatement decision is a product of public input as well as the preliminary noise abatement decision.

9-74 Soundwalls are evaluated in areas where there are identified noise impacts. Soundwalls are generally only considered in areas of frequent human usage that would benefit from a lower noise level. The area of the baseball field did not approach the Noise Abatement Criteria of Leq (h) 67 dBA, so soundwalls were not evaluated.

9-75 Caltrans is working with the City to jointly coordinate our two projects and to minimize impacts to the wastewater treatment plant.

9-76 See General Response 1.12 regarding "growth at interchanges."

9-77 The ball fields and skate park are elements of the park/recreation complex that is alluded to in the listed item "expansion of Mendocino County Museum on Commercial Street." The omission of each component such as ball fields and skate park does not affect the analysis of cumulative and growth inducing impacts. No change to the DEIS/EIR is required.

9-78 Section 1.2 of the Willits Wastewater Treatment/Water Reclamation Project Draft EIR states that one of the goals of the project is to “Provide wastewater treatment and disposal to accommodate 20 years of expected growth in the City of Willits service area”. See Volume 3 (FEIS/EIR), which correctly references the goals of Willits Wastewater Treatment/Water Reclamation Project.

9-79 Comment noted.

9-80 Comment noted. See General Response 1.12 regarding “growth at interchanges.”

9-81 See response to Comment 9-62.

9-82 Pursuant to the Clean Water Act Section 404(b)(1), mitigation for impacts to wetlands and other waters of the U.S. are not considered in determining the LEDPA. The magnitude of significant adverse impacts resulting from Alternatives C1T and L/C have eliminated both from consideration for construction. The NEPA/404 resource agencies concur that even with mitigation, the impacts from these alternatives to aquatic resources and federally listed species would remain significant and adverse.

9-83 Caltrans conducted a reasonable public participation effort throughout the bypass planning process and is confident in the adequacy of the technical studies and EIS/EIR prepared for this project. See Section 2.6 (Draft EIS/EIR) for information on support for the bypass project.

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Page 12

- 9-78 6-11, Figure 6-1 and 6-12, Section 6.2.2.2: We would note that the improvements contemplated at the wastewater facility will improve operating efficiencies and maintenance and reliability aspects of the plant but will not increase the hydraulic capacity of the plant. They are not being designed with the intent to accommodate future growth.
- 9-79 6.12, Section 6.2.2.3: The three acres of wetland were created by the City, not the County.
- 9-80 6.12, Section 6.2.2.5: As in previous comments, the City does not agree that the potential for growth inducement and commercial development around the interchanges is minimal.
- 9-81 Appendix C: It is our understanding that the list of mitigation measures included in this appendix may be subject to modification at the time a Final Mitigation Plan is developed. The City is concerned that the final mitigation measures may not reflect the measures contained in this DEIS/DEIR and that the public will not have a chance to review and provide comments to these changes.
- 9-82 Appendix H, page H-25: The City would suggest that measures supported by the City for connecting Mill and Outlet creeks and maintaining the wetlands would result in a conclusion that alternative C1T is not considered an adverse impact.
- 9-83 This concludes the comments that the City of Willits offers with respect to the DEIS/DEIR. Again, we would express our appreciation to all of the Caltrans personnel who have worked on this document, particularly Rick Knapp and his staff at District 1, for all of their assistance throughout this long and complex process. After all the hard work, data collection and public involvement that have gone into the crafting of this document, it is regrettable that such a large credibility problem exists with the public’s perception of the document and the process. The City is hopeful that our comments will be received as helpful, in the spirit of completing an adequate environmental document which can be used in moving this project forward.

Sincerely,



Bruce Burton
Mayor

Cc: Rick Knapp, District 1 Director
Lena Ashley, Project Manager

10 City of Willits Police Department

10-1 This letter was submitted by Hal Wagenet to Caltrans during the public circulation of the DEIS/EIR.

10-2 See General Response 1.3 regarding Alternative L/C with Truck Scales Interchange.

10-3 See General Response 1.6 regarding Brooktrails second access and General Response 1.8 regarding traffic operations at the Sherwood Road/Main Street intersection.

10-4 See General Response 1.3 regarding Alternative L/C.

52



CITY OF WILLITS
CITY HALL - 111 East Commercial Street, (707) 459-4601 • Fax (707) 459-1562
POLICE DEPARTMENT - 125 E. Commercial St., (707) 459-6122 • Fax (707) 459-0405
Willits, CA 95490

July 23, 2002

10-1 Mr. Hal Wagenet
P.O. Box 422
Willits, CA 95490

Dear Mr. Wagenet,

10-2 I would like to add my voice to those from throughout the City of Willits in advocating for the 'Truck Scales Interchange'. (ELSIE/Wild Oat Canyon)

10-3 For emergency access and for potential evacuation of the Brooktrails Area this plan just makes common sense.

Access to the Brooktrails area via Sherwood Road currently is congested and difficult to traverse as it is. The 'Quail Meadows Interchange' would concentrate traffic at the worst possible location, the Willits High School, that emergency vehicles would have to get through in the event of an emergency west of Willits.

10-4 As far as the Willits Police Department is concerned the only viable bypass route would include the 'Truck Scales Interchange', i.e. the ELSIE option.

Count me in as an enthusiastic supporter of this plan, if I can be of any assistance please do not hesitate to contact me.

Sincerely,


Ronald Caudillo, Chief of Police
Willits Police Department.

**11 Brooktrails Township
Community Services District**

11-1 See General Response
1.6 (FEIS/EIR) regarding
Brooktrails second access
road.



BROOKTRAILS TOWNSHIP

COMMUNITY SERVICES DISTRICT
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June 26, 2002

Ms. Lena Ashley Project Manager
Caltrans, District 1
P.O. Box 3700
Eureka, CA 95502-3700

Re: Brooktrails second access road

Dear Ms. Ashley:

We recently received the Willits Bypass draft Environmental Impact Statement / Environmental Impact Report (EIR), and have until August 10, 2002 in which to make comment. It should be noted that recently the California Transportation Commission postponed the funding for Brooktrails second access road for one year. The elimination of this money for fiscal year 2002/2003 only compounds our need to act fast and unilaterally to regain funding for this much needed access road project.

The Brooktrails Township Specific Plan, adopted by the Mendocino County Board of Supervisors in 1997, emphasizes under the Transportation and Circulation Goal FS-7.1.1, the importance of having a second access/egress into this area. Our community of 3,700 people, as well as those living beyond Brooktrails on Sherwood Road, have long awaited the opportunity, since 1960, to have a second emergency access road to intersect Highway 101. Besides safety, this second access road would also help alleviate the everyday traffic congestion created at the bottom of Sherwood Road.

Since the Willits Bypass and the Brooktrails Second Access define the transportation grid for the double community of Brooktrails and Willits, they should be considered concurrently. Lacking a definite plan from the County Department of Transportation, CalTrans is not required to consider the plight of Brooktrails residents.

11-1

Therefore, we have requested that the County Department of Transportation officially prepare comments for the EIR specific to the Brooktrails second access road. We have asked Gene Calvert, Director of the County Department of Transportation, and Phil Dow, Executive Director of the Mendocino Council of Governments, to attend our July 23, 2002 Board meeting to present their comments to our Board. This will allow us to submit our comments prior to the August 10th deadline.

Yours truly,


George Skezas,
President

cc: File

“A California General Law Local Government”

12 Brooktrails Township Community Services District



BROOKTRAILS TOWNSHIP

COMMUNITY SERVICES DISTRICT
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August 7, 2002

Nancy MacKenzie, Environmental Coordinator
Cher Daniels, Chief
Caltrans Office of Environmental Management S-1
2389 Gateway Oaks Drive
Sacramento, CA 95833

Re: Willits Bypass & Brooktrails Second Access Road

Dear Ms. MacKenzie & Ms. Daniels:

The Brooktrails Township Community Services District, a rural community of 3,700 people adjacent the City of Willits, is pleased to have received the Draft Willits Bypass Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We welcome this opportunity to forward Resolution No. 2002-28, which includes our general and specific comments for the record and for your attention and review.

We commend the Caltrans Willits Bypass Project Development Team members for their efforts to offer this draft proposal in a form that allows for a hybrid alternative.

The Brooktrails Township CSD has worked with Caltrans on the Project Development Team over the past decade, as well as with the California Legislature, the County of Mendocino, our Township citizens, and the Sherwood Road community of interest, to prepare ourselves to respond to this Draft EIS/EIR.

By act of the State Legislature, the Township was granted special planning powers to prepare a Brooktrails Township Specific Plan, to be submitted to the County of Mendocino for inclusion in the County's General Plan. Having done so, the Board of Supervisors in 1997 approved the Specific Plan as an integral part of the General Plan.

Missing from the Draft EIS/EIR are the General plan's Goals & Policies specific to the Brooktrails Township and to the Willits Bypass project. Included in our comments, Exhibit B of Resolution No. 2002-28, are the relevant Goals & Policies.

"A California General Law Local Government"

We request proper treatment of the community that, according to the General Plan, at buildout "... will be one of the largest communities in Mendocino County. Almost all traffic destined to or coming from Brooktrails will travel through Willits unless the U.S. 101 Bypass is constructed. While some shopping trips will be reduced by the presence of commercial land uses within the Township, virtually all other work related and discretionary trips will be via U.S. 101 and State Route 20. Coordination of improvements between Brooktrails and Willits is critical. Without improvements in Willits and the County, Brooktrails will not be able to reasonably accommodate future growth."

Please consider the comments adopted by our Board of Directors in this important transportation project affecting our community.

Yours truly,


George Skezas,
President of the Board of Directors

Enc: Resolution No. 2002-28, with attachments

RESOLUTION NO. 2002-28
A RESOLUTION FOR CALTRANS TO INCLUDE
A FOUR-LANE WILLITS BYPASS AND NECESSARY INTERCHANGES TO
ACCOMMODATE A SECOND ACCESS ROAD TO
BROOKTRAILS TOWNSHIP COMMUNITY SERVICES DISTRICT

WHEREAS, The Willits Bypass Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR) has been forward for our comment and review; and,

WHEREAS, Brooktrails Township is a responsible implementing agency, as assigned by the Mendocino County General Plan / Brooktrails Specific Plan element, and is so required to make comments to comply with the Policy and Goals therein on this Draft EIS/EIR for the Willits Bypass project; and,

WHEREAS, Brooktrails Township supported the allocation of \$17.3 million dollars by the Mendocino Council of Governments (MCOG) as allowed under Senate Bill 45 for the Willits Bypass; and,

WHEREAS, Brooktrails Township has coordinated with the MCOG and the County of Mendocino to program funding for a Project Study Report on its required county road connection between U.S. 101 and Brooktrails Township, (Brooktrails Second Access Road); and,

WHEREAS, Brooktrails Township is a local agency which has transportation facilities within its boundaries that will be affected by the proposed inter-regional project; and,

WHEREAS, the Mendocino County General Plan expressly requires Brooktrails Township to coordinate with each responsible agency to provide a second access/egress from a Willits Bypass Project into this community for public safety purposes and to allow for the continued availability of Brooktrails Township, with its current population of 3,700 people, to accommodate future growth as planned by the Brooktrails Specific Plan element of the Mendocino County General Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE BROOKTRAILS TOWNSHIP COMMUNITY SERVICES DISTRICT does hereby:

1. Repeal Resolution No. 2000-20.
2. Strongly recommend that CALTRANS prepare a supplemental Draft EIS/EIR that describes the L/C Hybrid Alternative as shown in "Exhibit A" attached hereto, for further comment and review. (Also known as ELSIE).
3. Request that CALTRANS include the truck scale interchange of the L/C Hybrid Alternative so as to demonstrate a seamless gateway interchange as required by the Mendocino County General Plan / Brooktrails Specific Plan element. Senate Bill 45 encourages integration between regional backbone circulation projects as corridor projects. The Mendocino County 2001 Regional Transportation Plan is currently under its California Environmental Quality Act (CEQA) review program and will be adopted prior to the final preparation of the Willits Bypass EIS / EIR.
4. Recommend, as an environmental mitigation measure, CALTRANS should include the Willits Creek Restoration Project as part of the Willits Bypass Project to improve the value of the local fisheries and to interface with the City of Willits Sewer Plant Draft EIS/EIR with its stated need for increased flows in Willits Creek. Brooktrails Township has a contractual right to dispose its sewage to the Willits Sewer Plant and is responsible to pay its operational share of this critical facility.

5. Request that CALTRANS use its best efforts to help restore California Transportation Commission funding of \$350,000.00 in this year's allocations for the County of Mendocino's Brooktrails Second Access Program Study Report to allow for the required coordination as per the Mendocino County General Plan.
6. Request that CALTRANS review Brooktrails comments on the Draft Willits Bypass EIS/EIR attached hereto as "Exhibit B."

INTRODUCED and ADOPTED this 6th day of August, 2002 at a special meeting of the Board of Directors of Brooktrails Township Community Services District by the following vote:

AYES:	Directors:	Pohlson, Horrick, Orth, Skezas
NOES:	Directors:	None
ABSENT:	Directors:	Venturi


GEORGE SKEZAS, President

ATTEST:


MIKE CHAPMAN, Secretary

12-1 The DEIS/EIR is a combined NEPA/CEQA document. The public circulation of the document during the summer of 2002 served both CEQA and NEPA public review requirements.

12-2 The DEIS/EIR examined Alternatives LT and C1T using a nodal, or segmental, analysis (DEIS/EIR page 1-6). Because these alternatives were examined at an equal level of detail as the other alternatives, it stands to reason that any hybrid alternative was examined sufficiently. See General Response 1.3 regarding Alternative L/C. No change to the DEIS/EIR or circulation of a supplemental EIS/EIR is required.

12-3 As a rule, only the lead and responsible agencies participate in reviewing comments received during the public circulation period of the draft document. Under CEQA, the lead agency will send out written proposed responses to public agencies who commented on the DEIR, at least 10 days before certifying the EIR (CEQA Section 15088). After the close of the public review period, Caltrans and FHWA provided a summary of comments to all members of the PDT. The summary included a review of numbers and types of comments received on the DEIS/EIR. In addition, a conceptual mitigation plan is included in Appendix A (FEIS/EIR) and the terms and conditions of the USFWS and NOAA Fisheries Biological Opinions are included in Appendix D (FEIS/EIR). The FEIS/EIR is available for public review. Also, under Section 404 of the Clean Water Act, the project applications, which include proposed mitigation measures, are made available by the Corps to the public for review prior to issuing permits for construction.

12-4 See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails second access road.

12-5 See response to Comment 12-2.

<p>Brooktrails Township Community Services District Comments on the Draft Willits Bypass Environmental Impact Statement/Environmental Impact Report (EIS/EIR) August 6, 2002</p>	
<p>Chapter 1</p>	
12-1	<p>1.1 <u>CEQA and NEPA</u>. This Draft EIS/EIR is a streamlined treatment of both CEQA and NEPA, and we understand that NEPA would require a secondary treatment by Caltrans once a preferred U.S. 101 Willits bypass is selected, so as to allow full citizen comment and review. We note that Section 1.1 lacks disclosure of the trigger requirements that would cause a secondary draft to be distributed as allowed by CEQA and required by NEPA. Brooktrails Township has requested such a secondary treatment for the "L-C" Hybrid Alternative route, to allow for full disclosure and the public's ability to participate in the decision making process with review and comments.</p>
12-2	<p>1.2 <u>Purpose of this Draft EIS/EIR</u>. This Draft EIS/EIR will not be used to demonstrate a "preferred" alternative, yet it assumes that a sufficient level of information is presented for the public to evaluate the proposed project. Brooktrails Township believes that the information presented is sufficient only so as to allow the public, and government agencies, to comment on a recommended "preferred" alternative. There is insufficient information to evaluate the L-C Hybrid Alternative, which needs to be further studied and described in terms of its elements and the mitigation plans required by CEQA and/or NEPA.</p>
12-3	<p>1.3 <u>Project Decision Making</u>. Brooktrails Township C.S.D., as a member of the Project Development Team (PDT), looks forward to the critical meeting in which a review that includes an evaluation of all comments received in this 60-day comment period will be available. Our comment on 1.1 should allow for a discussion of several options on the next treatment in this critical phase of CEQA and/or NEPA process.</p>
12-4	<p>1.5 <u>Nodal Analysis</u>. As a member of the PDT, Brooktrails Township accepted the nodal analysis treatment for this Draft EIS/EIR. Using this approach has allowed the Township, in its review and with these comments, to recommend the L-C Hybrid Alternative as the best of the nodes proposed by Caltrans, that could meet the needs of Brooktrails for a seamless connection to the U.S. 101 Bypass as described in this Draft EIS/EIR. Our further comments of record will identify our reasons for so recommending.</p>
12-5	<p>1.8 <u>Public Hearing</u>. Brooktrails Township staff and Directors are pleased to have had this opportunity to meet with the Caltrans development team, particularly the District 1 Director, who operates as the decision maker in this review program. These comments reflect a decade of public meetings that the Township has held on this crucial project, including those leading to the preparation and adoption of the Brooktrails Specific Plan Element of the Mendocino County General Plan. A secondary draft treatment of the selected preferred route is essential to support a finding of "adequacy" in the final certification of this important project.</p>
<p>-1- EXHIBIT B</p>	

12-6 Chapter 2 (DEIS/EIR) describes in detail the existing and future traffic conditions within the project area that substantiate the need and purpose for the bypass project. See response to Comment 84-2 (Richard Estabrook). No change to the Purpose and Need Statement is necessary.

12-7 All alternatives studied in the DEIS/EIR meet the purpose and need for the project. However, Alternatives L/C and E3 do not meet Clean Water Act Section 404(b)(1) criteria and therefore, are not eligible for construction. See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails second access road and General Response 1.8 regarding traffic operations with Quail Meadows Interchange.

12-8 The analysis of existing and future traffic on U.S. 101 included Brooktrails traffic.

12-9 See General Response 1.6 regarding Brooktrails second access road and General Response 1.8 regarding traffic operations at the Sherwood Road/Main Street intersection.

12-10 Either of the proposed northern interchanges (Quail Meadows or Truck Scales) would provide safe merging and exiting operations on and off of U.S. 101.

12-11 Modified Alternative J1T has been identified as the Preferred Alternative (Section 1.4 and Chapter 2, FEIS/EIR). General Response 1.3 and Section 7.1 of the Final Alternatives Analysis (Appendix G, FEIS/EIR) explain the reasons Alternative E3 does not meet Clean Water Act criteria, and therefore, will not be considered for construction. Pursuant to both NEPA and CEQA, the lead agency is responsible for notifying affected landowners, other stakeholders, and the interested public of the identification of a preferred alternative. See also responses to Comments 75-1 and 75-2 (Marisela de Santa Anna).

12-12 See General Response 1.6 regarding Brooktrails second access road. The claim that a traffic signal would be required if the Brooktrails second access road intersects U.S. 101 near the Truck Scales interchange area may be true, but assumes: 1) that there will be a second access road; and 2) that it will intersect at-grade with U.S. 101 near where the Truck Scales interchange would have been constructed. However, such a second access road could join the existing highway and have an intersection with North Main Street just southwest of Quail Meadows interchange. A signal might still be warranted, but interregional traffic and some of the Brooktrails traffic would have been removed from the intersection.

	<p>Chapter 2</p> <p>2.0 <u>Purpose and Need for Project.</u> Brooktrails Township, by act of the State of California, was empowered to prepare a Brooktrails Specific Plan, which was adopted by the County of Mendocino Board of Supervisors in 1997, which caused it to become an element of the County General Plan. There are specific Goals and Policies contained in this General Plan Element, attached to these official comments as "Attachment A." These Goals and Policies need to be reviewed to identify any changes to the 1995 Willits Bypass Purpose and Need statement that might be expected if this Draft EIS/EIR can be found to conform to local planning law.</p> <p>2.1 <u>Purpose of Proposed Bypass Project.</u> Brooktrails Township believes that the L-C Hybrid Alternative could meet the Purpose and Need in relation to those Goals and Policies we must use in our review and comments on this Draft EIS/EIR. Level of Service "C" could be achieved with a "gateway" intersection as described for the Truck Scales Interchange, for a potentially seamless connection with a new Mendocino County road currently being planned, namely the Brooktrails Second Access project.</p> <p>In contrast, the Quail Meadows Interchange has serious traffic and safety impacts to our community. As well, the E3 western alternative would have unacceptable noise and visual impacts and would not provide an intersection that could allow for a seamless connection to Brooktrails.</p> <p>2.2 <u>Need for the Proposed Bypass Project.</u> As Brooktrails currently represents a significant interregional vehicle trip generator, and over the lifetime of the proposed Willits Bypass, Brooktrails is shown to have a growth potential several times that of the City of Willits, as disclosed in the Mendocino County General Plan. Brooktrails Township expects appropriate treatment in stating the need for this bypass project.</p> <p>2.2.1 <u>Existing Facility.</u> While Brooktrails Township can recognize that the U.S. 101 / State Route 20 intersection has greater impact on the existing 101 facility, the failure to even describe the Sherwood Road intersection with U.S. 101 warrants further review. Sherwood Road is the only facility currently serving Brooktrails as a direct connection to U.S. 101.</p> <p>2.2.4 <u>Interregional Truck Traffic Interferes with Local Travel.</u> Sherwood Road and the proposed Brooktrails Second Access road would generate an increasing need to facilitate safe merging and exiting operations on or off of the U.S. 101 Willits Bypass by heavy trucks that serve the Brooktrails corridor, as well as by lumber trucks from industrial land holdings beyond Brooktrails.</p> <p>2.2.5 <u>Noise and Vibration.</u> This statement will not stand if the western E3 route is chosen. Brooktrails would have significant noise impacts, many times greater than any other proposed route. The Mendocino General Plan requires Brooktrails Township to notify more than 5,000 property owners of any Draft EIS/EIR that selects the western E3 route as the "preferred" route.</p> <p>2.3 <u>Objectives of the Proposed Action.</u> Brooktrails Township requires the Quail Meadows interchange to be studied, as it would be served by the proposed Brooktrails Second Access route. It seems apparent that a control signal would be required on the intersection of the final U.S. 101 and the Second Access road entry point onto a two-lane segment of Highway 101 as it transverses the northern Truck Scales area. This new intersection could defeat the objectives of the proposed project.</p>
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	-2-
	EXHIBIT B

12-13 The Project Development Team was established in November 1989. The project was put on hold during the mid 1990's due to budgetary constraints. Brooktrails Township has been involved in PDT's since 1989.

12-14 See response to Comments 12-2 regarding Alternative L/C; General Response 1.10 for a discussion of why a two-lane alternative does not meet the purpose and need for the project and therefore is not appropriate for consideration in the DEIS/EIR; and response to Comment 9-2 (City of Willits Mayor's Office) and General Response 1.9 for a discussion of why a center valley interchange is not being considered for this project.

12-15 See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails second access road.

12-16 If the Brooktrails second access road project is able to complete its environmental approvals for construction of the project and to obtain necessary permits for use as a potential borrow site, then use of the area as an optional borrow site could be possible for the Willits bypass project.

12-17 Sherwood Road is a local road. Relinquishment of U.S. 101 to the City and County will not interfere with future reconfiguration of the Sherwood Road/Main Street intersection.

12-18 The comment does not explain why a description of Alternative C1T should include reference to a proposed Brooktrails second access. No response is required.

12-19 See General Response 1.3, which explains why Alternative E3 does not meet Clean Water Act Section 404(b)(1) criteria and is not considered eligible for construction. See also Section 7.1 of the Final Alternatives Analysis (Appendix G, FEIS/EIR).

12-20 The Modified Alternative JIT avoids impacts to commercial and recreational facilities. Caltrans is working with the City on minimizing impacts to the wastewater treatment plant. See General Response 1.8 regarding Quail Meadows Interchange.

12-13

2.4.2 Post 1987 History. Please identify the year the Project Development Team was established. Brooktrails Township was actively engaged in a CEQA program that led to the adopted Brooktrails Specific Plan Element in 1997. The Caltrans activity gap during the years 1994 through 1998 is precisely when the Township was most active in planning work that prepared us for this Draft EIS/EIR, and we suspect this gap in bypass planning activity caused Caltrans to be inattentive to the change of conditions that our comments now reflect. Brooktrails Township has coordinated with Mendocino Council of Governments and the County of Mendocino, and we supported MCOG's commitment of \$17.3 million of 1998 STIP funds under Senate Bill 45 for the Willits Bypass project.

12-14

2.6 Support for the Project. Brooktrails Township requests a secondary Draft EIS/EIR that studies the four-lane L-C Hybrid Alternative as shown in Attachment B. A secondary Draft EIS/EIR should also treat a two-lane L-C Alternative for comparative analysis, as well as describe a U.S. 101 / SR 20 interchange that could become a future MCOG project in the service life of this proposed U.S. 101 segment. Such secondary treatment would allow Brooktrails Township to make its own "adequacy" finding as required under the Brooktrails Specific Plan Element.

Chapter 3

12-15

3.3.1.1 Revised Truck Scales Interchange (Alternative C1T). This revision represents the best potential for a "seamless Gateway interchange" for Brooktrails once a new county road, the "Brooktrails Second Access," is constructed.

12-16

3.3.2 Estimated Cut and Fill Requirements – Designated Borrow Site. Brooktrails Township believes that the coordinated construction of the U.S. 101 Willits Bypass and the Brooktrails Second Access road could provide borrow soils for the valley construction, while creating cost savings to both projects. This should be considered.

12-17

3.3.3 Relinquishment of Existing Bypassed Portions of Existing U.S. 101. Brooktrails Township has safety and traffic congestion concerns as long as Sherwood Road is the sole access to U.S. 101. The City of Willits would need to redesign and construct a new Sherwood intersection, which could include elimination of a commercial lot and relocation of its business. This will become a major obstacle to reaching a relinquishment agreement between the California Transportation Commission and the City of Willits.

12-18

3.4.1 Alternative C1T. Please add a reference to the proposed Brooktrails Second Access when describing the north C1T segment.

12-19

3.4.2 Alternative E3. Brooktrails Township finds no advantages to the E3 Alternative and must notify each property owner of record if E3 becomes the "preferred alternative." Visual and noise impacts would have unavoidable impacts to our community.

12-20

3.4.3 Alternative JIT. Brooktrails Township supports the City of Willits' comments on its view of negative impacts the JIT Alternative would have on commercial and recreational facilities and on the jointly operated sewer plant. The Quail Meadows interchange takes prime potential residential land along the western hills in attempting to avoid wetlands. The JIT Alternative could worsen the Sherwood Road intersection problems and could require a controlled intersection on the two-lane

12-21 See response to Comment 12-20.

12-22 Alternative C1T does not meet Clean Water Act Section 404(b)(1) criteria due to its overall environmental harm, including unavoidable adverse impacts to aquatic resources and to federally listed species. See Section 2.1 (FEIS/EIR). As the comment states, Alternative C1T requires the use of the floodplain (and wetlands and other waters of the U.S.) for its northern interchange.

12-23 Improvements to the Sherwood Road/Main Street intersection are beyond the scope of the proposed bypass project. However, construction of the bypass project will reduce traffic congestion at this intersection. See General Response 1.8. Reconfiguring the Sherwood Road/Main Street intersection would not be warranted under relinquishment. Existing facilities would need to be brought to a “good state of repair.” Typically, this is accomplished by improvements such as placing an overlay of fresh asphalt, minor drainage repairs, and restriping. See response to Comment 12-12.

12-24 Caltrans’ study of a two-lane alternative concluded that it does not meet the purpose and need of the project and no further study will be conducted. See Section 1.2 (FEIS/EIR) “Project Description, Purpose, and Estimated Schedule.” See response to Comment 12-2 regarding “secondary amended DEIS/EIR.”

12-25 Section 15125 of the CEQA Guidelines states that an EIR “shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans.” Similarly the Federal Highway Administration’s *Technical Advisory – Guidance For Preparing and Processing Environmental And Section 4(F) Documents* states that: “The land use discussion should assess the consistency of the alternatives with the comprehensive development plans adopted for the area....”

The “Discussion” of this section in the Guidelines states: “Where individual projects would run counter to the efforts identified as desirable or approved by agencies in the regional plans, the Lead Agency should address the inconsistency between the project plans and the regional plans. As a result of this analysis, Lead Agencies may be able to find ways to modify the project to reduce the inconsistency.”

Compliance with all land use or other general plan goals and policies applicable to public works projects is not feasible in every case. Inconsistencies with the Brooktrails Specific Plan policies related to the proposed project (as found in Appendix A to the letter submitted by the Brooktrails Township to Caltrans on August 7, 2002) are discussed below.

U.S. 101 north segment when a Brooktrails Second Access road is constructed.

12-21 3.4.4 Alternative LT. The north segment of LT has the same issues with a Quail Meadows interchange and the difficulty in development of a Brooktrails Second Access intersection to north Highway 101.

12-22 3.5 Comparison of Alternatives. Brooktrails will not have equivalent project benefits with any alternative that cannot provide for an improved level of service or safety to our community of interest. Only the C1T northern segment with the Truck Scales interchange could provide a “seamless Gateway interchange” to a Brooktrails Second Access road.

The deficiencies of the Sherwood Road intersection in serving the commute trips to the Quail Meadows interchange need to be further studied. Only the C1T north segment avoids most impacts to land availability for residential and commercial uses, by using the flood plain where these types of uses are not feasible.

12-23 3.5.2 Level of Service. Currently Brooktrails has a direct connection to the existing U.S. 101, via Sherwood Road. Do any of the proposed Willits Bypass alternatives improve this direct connection? The timing of a new Mendocino County road connection from Sherwood Road to the selected Willits Bypass route is crucial to answering the Level of Service issue. Only a direct connection to a gateway interchange can provide the Level of Service shown to be required in the Brooktrails Township Specific Plan Element during the service life of these proposed U.S. 101 highway segments.

If the Quail Meadows interchange is selected, then traffic congestion on the two-lane north U.S. 101 segments could worsen when the County of Mendocino constructs a traffic control system to allow traffic to safely enter and exit the proposed Brooktrails Second Access intersection. Both the Purpose and Needs and Level of Service are defeated without a frontage road as planned for the Truck Scales interchange, as part of the Willits Bypass.

12-24 3.6.2 Two-Lane Alternative. Once the preferred alternative is selected for further study, a two-lane alternate project can be studied for comparative analysis. The funds needed to construct the final project might require a phased construction program, in which case a two-lane would be the first phase of a four-lane project. This analysis would satisfy NEPA and CEQA, and would allow full disclosure for public review and comment on the final project selection and mitigation plan. In recommending a secondary amended Draft EIS/EIR, however, Brooktrails Township remains focused on the four-lane L-C Hybrid Alternative, for meeting the needs identified in our Specific Plan Element.

Chapter 4

12-25 4.3.1 Land Use Requirements. CEQA requires compliance with local land use regulations, as shown in the Mendocino County General Plan, the City of Willits General Plan, and the Brooktrails Specific Plan Element. Each must be given equal weight in this Draft EIS/EIR review, as to their integration into the final project and its mitigation program. The Brooktrails Specific Plan Element contains land use requirements, as stated in Attachment A, that compel Caltrans to review and integrate into this and numerous other sections that relate to this Draft EIS/EIR.

Attachment A to the Brooktrails Township CSD letter references portions of the Mendocino County and Brooktrails Specific Plans, as follows:

TRANSPORTATION AND CIRCULATION GOAL FS-7.1-2: Recognize the need for a U.S. Highway 101 Willits Bypass.

The proposed project is consistent with this goal. The nodal analysis of alternatives in the DEIS/EIR provided a sufficient analysis of the hybrid Alternative L/C and the interchanges that would be constructed for that alternative. Also, a Section 404(b)(1) analysis of Alternative L/C concluded that it does not meet Clean Water Act Section 404(b)(1) criteria and no further study is warranted. See response to Comment 12-2 and General Response 1.3. The Brooktrails Township CSD has determined that either Quail Meadows interchange or Truck Scales interchange would accommodate a connection to a Brooktrails second access road (General Response 1.6). Since the Preferred Alternative has been identified (Modified J1T), Brooktrails Township CSD intends to pursue detailed studies on its second access road.

TRANSPORTATION AND CIRCULATION POLICY FS-7.1-2A: Coordinate Township growth and development with the California Department of Transportation to ensure the adequacy of U.S. Highway 101 improvements.

At the time the DEIS/EIR was circulated to the public, Brooktrails Township suggested that the proposed alternatives would not be adequate to support the Township's planned growth and development and would not provide sufficient interchange access for the Township's second access road. However, the proposed project is expected to provide sufficient capacity to ensure unimpeded access around the City of Willits, as well as alleviating congestion on Main Street.

TRANSPORTATION AND CIRCULATION GOAL FS-7.1-1: Improve vehicular access/egress to/from the Township and ensure adequate circulation within the Township.

The proposed bypass project does not inhibit Brooktrails Township's Goal FS-7.1-1.

12-26 Comment noted. See Volume 3, Text Changes to the DEIS/EIR.

12-27 A comparison of data from the 1990 and 2000 U.S. Census for Census Block Group 2 in Census Tract 106 – an area that roughly corresponds to that of Brooktrails Township – indicates that the Block Group’s population increased by 35 percent in this ten year period, or 3.5 percent a year. This is a high rate of growth relative to the City of Willits, which grew by approximately one percent between 1990 and 2000, or 0.09 percent annually.

In the year 2000, there were nearly 1,200 workers residing in Brooktrails and 2,240 in Willits. Most of these workers worked in Mendocino County. Thirty-five percent of Brooktrails-based workers had commute times between 30 and 90 minutes, possibly indicating destinations in the City of Ukiah, approximately 25 miles south of Willits in Mendocino County.

The numbers and proportions of workers both living and working in Willits fell by nearly 200 workers (13 percent of the workforce) between 1990 and 2000.

In 1990, no workers age 16 and over living in Willits reported leaving Mendocino County for work, while 61 workers in Brooktrails, or seven percent of the workforce, reported commuting out of the County. In 2000, four percent of Willits workers (90 workers) reported commuting out of the County, compared to seven percent of Brooktrails workers (86 workers).

In the nine Census Block Groups included in the study area, a total of 270 workers (five percent of the workforce) reported commuting out of Mendocino County in 2000.

Based on the existing ratio of workers to residents, at planned buildout, the Brooktrails community would be home to approximately 4,300 workers. Assuming that the proportion of workers commuting out of the County increases to ten percent, the number of workers commuting from Brooktrails to other counties would be 430 at buildout.

12-26	4.3.2 <u>Existing Land Use</u> . This section needs updating relative to Brooktrails. Please use the 2000 Census data for population. Also, narrative from the Brooktrails Specific Plan Element could be inserted here. The fact that Brooktrails is currently served with a direct connection to U.S. 101 at Sherwood Road is not mentioned in this Draft EIS/EIR, nor is there any narrative found that is specific to current conditions at this crucial intersection serving interregional trips from the Sherwood Road corridor. Please correct this oversight.
12-27	4.5.2 <u>Demographics</u> . Please refer to the Brooktrails Specific Plan Element for updated demographics on Brooktrails. As a bedroom and retirement community of homes, without a core commercial service area, Brooktrails is a commuters’ subdivision. The proposed Willits Bypass project, together with the proposed Hopland Bypass and the Hopland four-lane improvements to 101 now partially completed, are changing our local demographics. Commute trips to Sonoma County from Brooktrails is becoming the latest demographic factor, growing in direct relation to the 101 corridor improvements in Mendocino County. When this section on demographics is expanded to include Brooktrails, the need for a four-lane Willits Bypass will be established even more fully.
12-28	4.5.3 <u>Housing Characteristics</u> . A reading of the Brooktrails Specific Plan Element will illustrate the extensive differences between the characteristics of Brooktrails housing and those of Willits. Brooktrails Township is well aware of its role in representing the vast majority of available Single Family Residences in the Mendocino County unincorporated area. The majority, when constructed, are owner occupied units. The Mendocino County Housing Element is due to be updated by December 31, 2003. On August 5, 2002, Mendocino Council of Governments (MCOG) released the Draft Regional Housing Needs Plan for public review and comment. The State of California has placed the critical need for housing as a policy focus. These comments are meant to illustrate the need for this Draft EIS/EIR to be amended so as to give equal CEQA treatment to the Brooktrails community of interest, whenever references to the Brooktrails Specific Plan Element require such coordinated treatment.
12-29	Chapter 5 5.2 <u>Community Impacts</u> . The Brooktrails Specific Plan Element specifies that this Draft EIS/EIR project is a primary factor in Brooktrails Township’s ability to support future growth. The taking of our community’s only direct connection to the U.S. 101 highway facility, without providing for a new gateway intersection, will have dramatic community impacts on Brooktrails and on Mendocino County as a whole.
12-30	5.2.2 <u>Impact Thresholds</u> . Some of the potential impacts each project alternative could cause include: 1) Alternative E3 would create a physical division between Willits and Brooktrails, and 2) the lack of a direct gateway connection between Brooktrails and any design alternative would constrict Brooktrails’ ability to accommodate future growth, thus requiring new housing areas to be created in other areas of Mendocino County. to replace this taking.
12-31	5.2.5.9 <u>Regional Economic Impacts</u> . Any project alternative that cannot provide for a seamless gateway interchange connection to a Brooktrails Second Access road will have dramatic regional economic impacts. Only with the construction of the L-C Hybrid Alternative, as shown in <u>Exhibit</u>

12-28 The environmental analysis for this project has referred to the Brooktrails community because indirect impacts to this community are likely as a result of the proposed project. Indirect impacts can occur in places that are physically removed from the project itself. The City of Willits, on the other hand, would bear the direct effects of the proposed project, impacts such as construction noise, residential and business displacements, and the benefits and consequences of reduced through traffic. Because the direct impacts of the project are concentrated in Willits, the community's characteristics have been discussed in greater detail than those of the Brooktrails community. The Community Impact Assessment prepared for this project (and which is summarized in the DEIS/EIR) included additional information on the characteristics of Brooktrails' housing.

12-29 The proposed project would not constrain development in the Brooktrails community. Between 1990 and 2000, the population in Brooktrails increased approximately 35 percent. The data suggest that, with or without the proposed project, the demand for housing in this area is going to continue to drive Brooktrails' growth. The community's "only direct connection to U.S. 101" is a congested, combined U.S. 101/Main Street. The proposed project will provide the community two options, to drive south on a less congested Main Street or on the new bypass.

12-30 Alternative E3 does not meet Clean Water Act Section 404(b)(1) criteria and therefore, is not being considered for construction. Regarding item #2 of the comment, see response to Comment 12-29.

12-31 See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails second access road. See response to Comment 12-29.

12-32 The comment correctly states that most large emergency response vehicles must enter Sherwood Road by traveling north (i.e., from south of Sherwood Road). The proposed project would not alter the geometrics of the existing Main Street/Sherwood Road intersection.

The Little Lake Fire Protection District's fire stations are located in the City of Willits. The proposed alignments would not alter the emergency route(s) originating from these stations, to reach Sherwood Road and Brooktrails.

12-33 The community's "only direct connection to U.S. 101" is a congested, combined U.S. 101/Main Street. The proposed project will provide the community two options, to drive south on a less congested Main Street or on the new bypass. See response to Comment 12-17.

12-34 See General Response 1.7 and responses to the following letters: 10 (City of Willits Police Department), 13 (Brooktrails Township Fire Department), 14 (Coastal Valley EMS Agency), 16 (Little Lake Fire District), 23 (Mendocino County Office of the Sheriff-Coroner), 24 (Mendocino Emergency Services Authority).

12-35 See response to Comment 12-25.

12-36 The Brooktrails Township second access road is identified and discussed with reference to the U.S. 101 Willits Bypass in the June 2003 MCOG Regional Transportation Plan (RTP). The second access road is specifically listed in the RTPs long range program section and in the needs assessment section under objectives of the Mendocino County circulation system. Ten of thirty-nine proposed roadway improvements are individually prioritized in the RTP, however the Brooktrails Township second access road is not specifically listed.

SB45 did empower Regional Transportation Planning Agencies, such as MCOG, to prioritize and fund improvements to county roadways. The Brooktrails Township Community Services District will need to work with MCOG to complete planning studies needed to secure funding and ultimately to complete an environmental assessment and finalize the design to achieve construction of the Brooktrails Township second access road project.

12-37 The visual impacts of the E-3 Alternative for the Brooktrails area are discussed in Section 5.10.5.2 (DEIS/EIR), and specifically on page 5-126. Figure 5-9 (DEIS/EIR) shows Alternative E3 within Viewshed “L” in the Brooktrails landscape assessment unit.

12-38 See response to Comment 12-16.

12-39 Based on FHWA and Caltrans guidance, noise impacts need to be addressed when the predicted noise levels approach or exceed Leq 67dBA, or when there is a 12 dBA or greater increase in the ambient noise level. The Brooktrails Subdivision is approximately 800m (2600ft) from Alternative E3, and noise generated by freeway traffic at this distance would not cause noise levels to approach or exceed Leq 67 dBA or cause noise level to increase by 12 dBA or more. See also response to Comment 12-11.

	<p><u>A of Resolution No. 2002-28</u>, and later the addition of the Brooktrails Second Access, can provide for the continued availability of Brooktrails to accommodate future growth as detailed in the Brooktrails Specific Plan Element.</p>
12-32	<p>5.3.1 <u>Impact Thresholds</u>. The proposed project will alter the design criteria of the current Sherwood Road / U.S. 101 intersection, by creating a new bypass intersection north of the existing intersection. Unless a Brooktrails Second Access is constructed with a seamless interchange connection, the proposed Willits Bypass will reduce current conditions, creating new negative values to the Brooktrails community of interest.</p> <p>The foregoing comment includes issues of response time by emergency service providers, as their comments of record substantiate. The Sherwood Road intersection must be entered from the south by fire trucks and other emergency vehicles. This condition will continue until the seamless gateway intersection at the Brooktrails Second Access is completed.</p>
12-33	<p>5.3.2.2 <u>Streets and Roads</u>. All of the proposed project alternatives eliminate the direct connection to U.S. 101 from Brooktrails by way of the Sherwood Road intersection. As a result of placing a new northern interchange to U.S. 101, the Sherwood Road-Main Street intersection must be redesigned and reconstructed prior to any relinquishment of this intersection to the City of Willits. The timely completion of a Brooktrails Second Access road and its connection to the new northern U.S. 101 interchange could eliminate this need.</p>
12-34	<p>5.3.3.1 <u>Long Term Impacts</u>. Please refer to comments made by emergency service providers to Brooktrails, concerning their abilities to respond from the various proposed alternatives.</p>
12-35	<p>5.4.1.1 <u>Consistency with Local Plans & Policies</u>. Please make this section comply with CEQA, concerning the Goals & Policies referenced in <u>Attachment A</u>.</p>
12-36	<p>5.4.1.2 <u>Consistency with Regional Transportation Plan</u>. The Brooktrails Second Access stands to be the highest priority County road backbone project in the latest Regional Transportation Plan, once adopted by MCOG. Brooktrails would request that Caltrans review the intent of Senate Bill 45 to ensure proper treatment of the Second Access project in coordination with the Willits Bypass project (refer to <u>Attachment B</u>).</p>
12-37	<p>5.10.5.4 <u>Alternative E3</u>. Concerning both the Little Lake Valley and the Brooktrails “landscape assessment units,” hundreds of residential lots in Brooktrails would have visual impacts from this alternative route.</p>
12-38	<p>5.10.5.4 <u>Alternatives CIT, JIT, and LT as Designated Borrow Site</u>. Brooktrails Township believes significant project savings could be realized, with lesser environmental impacts, if a coordinated build program is reached between the Willits Bypass and the Brooktrails Second Access road project. Borrow soils from constructing the Second Access could be rolled across existing U.S. 101 into the Willits Bypass construction zone. This option should be studied.</p>
12-39	<p>5.11 <u>Noise</u>. Brooktrails will have a significant change in current conditions if the E3 Alternative is constructed (see Attachment A).</p>
	<p>-6- EXHIBIT B</p>

12-40 See response to Comment 73-3 (Mary Delaney).

12-41 See response to Comment 73-3 (Mary Delaney).

12-42 The section in question is based on the Brooktrails Specific Plan and its enumeration of infrastructure constraints to growth in the Brooktrails area. See response to Comment 12-29.

12-43 Comment noted. See response to Comment 3-17 (USEPA).

12-44 See response to Comment 12-33.

12-45 The comment is noted. However, no change to the DEIS/EIR is required, as this information does not change the cumulative impact conclusions. See response to Comment 3-17 (USEPA).

Chapter 6

6.1 Growth Inducement

12-40

6.1.1 As a result of the Willits Bypass project, Brooktrails Township can expect a measurable increase in population concentration, human use of the land (residential development), health and safety problems caused by physical changes, and other aspects of the resource base, such as water, scenic quality, and public services. Brooktrails Township is planning for new water storage, and for construction of an additional sewer main to increase capacity to the Willits sewer facility. The additional demands for new construction of single family units (SFRs) caused by the Willits Bypass project can be expected to accelerate the timing for these new facilities, creating a growth inducement impact on Brooktrails. Please refer to our comment on 4.5.2 Demographics and 4.5.3 Housing Characteristics.

12-41

6.1.2 Growth Inducement Analysis. In a related matter, in 1988 Brooktrails Township filed on the Federal Register a formal statement in response to Offshore Oil and Gas Lease Sale 91 (copy attached). This formal statement addressed the short-term demand on local infrastructure and the long-term result if the workforce hired to construct the project were to cause new single family home construction just for a short term occupancy demand. Brooktrails Township did not yet have a specific plan at the time we submitted this formal statement, and by our due diligence now are controlled by the Brooktrails Specific Plan Element. We can expect the Willits Bypass project to have a similar impact on our community. Brooktrails Township is now within a few hundred SFRs before we must act to provide additional water storage facilities. Our current growth rate has been less than the 20-year average, but has recently started a new upswing. (See comment 4.5.2 Demographics.) The Willits Bypass project cannot avoid triggering a measurable growth inducement impact on Brooktrails. It should be discussed as an unavoidable impact in the Draft EIS/EIR.

12-42

6.1.3.2 Local Government Plans & Policies. The reference to the Brooktrails Specific Plan Element is correct in identifying two known constraints to development, water availability and the need for a Second Access road. However, the narrative goes on to assume no additional constraining impacts to Brooktrails. Other impacts to be discussed include those caused by an improperly designed Willits Bypass. Please make this section comply with CEQA, concerning the Goals & Policies referenced in Attachment A.

12-43

Figure 6-1 is fair and accurate in portraying foreseeable future projects.

12-44

6.2.2.1 Buildout in Brooktrails and in Willits. Because of the preparation of the Brooktrails Specific Plan Element, the cost to Caltrans of preparing a separate analysis of Brooktrails has been avoided. However, Brooktrails Township believes that eliminating our direct connection to U.S. 101 elevates Caltrans' responsibility to create a new U.S. 101 segment that meets the transportation Goals & Policies of the Brooktrails Specific Plan Element, so as to avoid negative impacts on Brooktrails.

12-45

6.2.2.6 Second Access to Brooktrails. Please update this section to reflect the standing of this project, as currently a selected Project Study Report is budgeted by MCOG and the County of Mendocino. Further, this project is listed first among major proposed projects for transportation improvements to the County Backbone Circulation System and Local Roads in the most recent Draft Regional Transportation Plan.

12-46 See response to Comment 12-2. See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails second access road.

12-47 See response to Comment 12-2. See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails second access road.

Attachment A
Brooktrails Township Community Services District
Comments on the Draft Willits Bypass Draft (EIS/EIR)
August 6, 2002

The Mendocino County General Plan authorizes Brooktrails Township Community Services District to act as one of the agencies responsible for implementing the Goals & Policies of the Brooktrails Specific Plan element. As part of this responsibility, we are providing commentary on the Draft Willits Bypass EIS/EIR.

The following are excerpts of Goals & Policies of the Mendocino County General Plan that pertain to this matter:

1. TRANSPORTATION AND CIRCULATION GOAL FS-7.1-2: Recognize the need for a U.S. Highway 101 Willits bypass.

12-46

The Township, by acting on Resolution No. 2002-28, requests that Caltrans include in the selected preferred alternative a four-lane Willits Bypass known as the L/C Hybrid Alternative, (also commonly known as ELSIE - see Exhibit A), and necessary interchanges to accommodate a Second Access "Gateway" to Brooktrails Township.

TRANSPORTATION AND CIRCULATION POLICY FS-7.1-2A : Coordinate Township growth and development with the California Department of Transportation to ensure the adequacy of U.S. Highway 101 improvements.

12-47

Brooktrails Township has held many public meetings over the last decade so as to prepare to make these comments of record. Brooktrails Township has prepared a Brooktrails Specific Plan that was adopted by the Mendocino Board of Supervisors and resides as an amendment to the Mendocino County General Plan. It is specific to the expected buildout potential that needs to be serviced in the expected service life of the proposed Willits Bypass.

Brooktrails Township, in its review of the Willits Bypass Draft EIS/EIR, finds that the southern LT segments connected to the CIT north segments could provide the seamless gateway to the Willits Bypass as required by the Mendocino General Plan, Brooktrails Specific Plan element.

TRANSPORTATION AND CIRCULATION GOAL FS-7.1-1: Improve vehicular access/egress to/from the Township and ensure adequate circulation within the Township.

The ultimate roadway system in Brooktrails Township at buildout would consist of a system of residential, collector, and arterial streets, plus external connections outside the Township, which leads us to the next policy question which requires a second access road to U.S. 101, as follows.

TRANSPORTATION AND CIRCULATION POLICY FS-7.1-1A : Construct a new second Brooktrails Township access road extending from State Highway 20 to the Township.

Brooktrails Township would modify this policy by referencing the following specific language found in the Specific Plan to follow: "It was concluded that a Southern Access Route from

12-48 Refer to Section 2.5 (DEIS/EIR) which explains that the bypass project has been programmed for \$116 million in the 2002 STIP. See also Section 1.2 (FEIS/EIR). The Brooktrails Township has stated that its preferred second access will connect with the Quail Meadows Interchange, and the Brooktrails access to S.R. 20 will be a future third access based on Brooktrails growth.

12-49 Comment noted. See General Response 1.6.

12-50 Alternative E3 does not meet Clean Water Act Section 404(b)(1) criteria and therefore, is no longer a feasible alternative for construction. Brooktrails residents had the opportunity for review of the DEIS/EIR during the public circulation period.

12-51 See response to Comment 12-25. This information does not change the conclusions presented in the DEIS/EIR and no change to the document is required.

Brooktrails to State Route (S.R.) 20 was the preferred alternative *unless a U.S. 101 Willits Bypass was constructed.*" A Second access road into Brooktrails Township is a recognized need at this time. [This is also referenced in PUBLIC SAFETY GOAL PS-8.2 below.] It should be further noted that Brooktrails Township was considered the implementing agency in collaboration with the County of Mendocino, Department of Public Works for the Second access.

Moreover, the Specific Plan concludes the following: "At buildout, Brooktrails will be one of the largest communities in Mendocino County. Almost all traffic destined to or coming from Brooktrails will travel through Willits unless the U.S. 101 Bypass is constructed. While some shopping trips will be reduced by the presence of commercial land uses within the Township, virtually all other work related and discretionary trips will be via U.S. 101 and S.R. 20. Coordination of improvements between Brooktrails and Willits is critical. Without improvements in Willits and the County, Brooktrails will not be able to reasonably accommodate future growth.

The U.S. 101 Bypass project profoundly impacts the preferred second access route. At the current time, the Bypass project has not been included by the County or Caltrans on the list of fundable projects for the near future. Should the project re-surface prior to approval of the Southern Access Route, re-consideration for the third access route for priority as a second access route should be performed, especially if it will link directly with a new U.S. 101 interchange."

PUBLIC SAFETY GOAL PS-8.2: Provide for improved community emergency egress and access.

Brooktrails Township via PUBLIC SAFETY POLICY PS-8.2A has needed an improved second access road into the Township for decades. Previous traffic and circulation studies conclude that an additional access road into Brooktrails is warranted both from a level of service standpoint and from the need to provide an emergency access for public safety and evacuation. [This fact was essentially corroborated in a Specific Plan report prepared for the District by transportation consultants from Michael G. Jones, Fehr & Peers Associates, December 8, 1993, which stated in part on page 2: "... From an evacuation perspective, a second or third access route into Brooktrails is needed now. This is based on two factors. First, because of the predominate wind direction there is a high likelihood that a major fire would cut off Sherwood Road to the south, and also major sections of the Township itself. Second, in the event of a major fire any one exit route would quickly become congested with vehicles. Either of these scenarios would seriously hinder fire fighting equipment and access into the area.]

6. NOISE POLICY ER-6.6-2B requires Brooktrails Township to "Evaluate the noise implications of the U.S. 101 Willits bypass if the western route is selected."

Brooktrails would be required to review Willits bypass CEQA and/or NEPA noise impacts and mitigation data. As the "Implementing Agency/Entity: Township Board of Directors and interested property owners. The Township would notice property owners of the availability of the CEQA and/or NEPA environmental documents." Brooktrails currently has in excess of 5,500 lot owners and the estimated one-time certified mailing cost would be in excess of \$12,000. This would be a substantial impact on the Township's budget if the E3 Alternate were selected as the preferred route. Furthermore, this requirement contained in the County of Mendocino General Plan assumes full CEQA and/or NEPA environmental review. This would include the full evaluation and comment by the responsible agencies and citizens of the selected preferred route and its mitigation plan prior to certification of the final plan.

12-48

12-49

12-50

12-51

7. Conclusion: Brooktrails Township requests that all elements contained in the County of Mendocino General Plan specific to actions required in reference to the Willits Bypass be duly noted and inserted into this Willits Bypass Draft EIS/EIR. Brooktrails Township, a California General Law Local Government, prepared a Specific Plan which was submitted to the County of Mendocino for its approval as an element of the Mendocino County General Plan. Brooktrails expended approximately \$979,000 in local taxpayers money in exercising this responsibility to bring the Township into CEQA review compliance, and to prepare itself for projects such as the one envisioned by the Draft Willits Bypass EIS/EIR. Prior to the adoption of the Brooktrails Specific Plan, the County of Mendocino General Plan contained only one reference to the Brooktrails subdivision, as a housing source for the County containing 80% of the available residential lots with both water and sewer services available in the unincorporated area of Mendocino County.

13 Brooktrails Township Fire Department

13-1 See General Response 1.7.



**BROOKTRAILS TOWNSHIP
FIRE DEPARTMENT**

24860 BIRCH STREET
WILLITS, CA 95490
(707) 459-4441

Nancy Mackenzie
Department of Transportation - District 1
1656 Union Street
Eureka, CA 95501

Date: July 24, 2002

Subject: Environmental Document Review

Name: Willits Bypass Project
County: Mendocino
Type: Draft Environmental Impact Report
SCH#: 1990030006

Dear Ms. Mackenzie,

13-1

After attending several meetings in regards to the commonly known Elsie - Wild Oat Canyon Proposal, and the Department of Transportation's Draft EIR, I must agree with my colleagues, both Assistant Chief of Mendocino Unit, William A. Bradley, California Department of Forestry and Fire Protection, and Fire Chief Jeff Smith of Willits/Little Lake Fire District, that it would be imperative for public safety to encourage all of those involved in this project to select the Elsie-Wild Oat Canyon Proposal, "To Brooktrails Township". This would connect from the Willits Bypass to the Willits Truck Scale Interchange.

After sponsoring many annual fire preparedness and disaster management drills in Brooktrails, it is clear to myself and other County and State Agencies, that we would encourage the use of the Elsie-Wild Oat Canyon Road Access Proposal. This proposal will be for the benefit of all emergencies in both Willits and Brooktrails.

If you have any questions, please feel free to contact me here at the fire department office.

Sincerely,

Chief Daryl L. Schoeppner
Director of Emergency Services

cc: Mike Chapman, General Manager
Brooktrails Township CSD

14 Coastal Valleys EMS Agency

14-1 Caltrans and FHWA appreciate the serious responsibilities entrusted to all the emergency services providers in the project area. See General Response 1.6 regarding Brooktrails second access road.

Coastal Valleys EMS Agency

Mendocino, Napa and Sonoma Counties



Cher Daniels, Chief
Caltrans Office of Environmental Management S-1
2389 Gateway Oaks Dr.
Sacramento, CA 95833
Attn: Nancy MacKenzie, Environmental Coordinator

July 30, 2002

Maiser Khaled, Chief, District Operations
North Federal Highway Administration
980 9th Street, Suite 400
Sacramento, CA 95814

Chiefs,

Our agency is responsible for regulating and administering Emergency Medical Services (EMS) for the counties of Sonoma, Napa, and Mendocino. Some of those responsibilities include the planning, implementation, and assessment of the systems providers. These providers are Fire Departments, Ambulance providers (Air and Ground), and assorted other public safety agencies.

The purpose of the regulatory body to overview and plan is to facilitate the "best" most effective system to serve the needs of the sick and injured within our jurisdiction. Sometimes this is a formidable task as resources and money can be in short supply.

Some times we make or allow change to happen naturally and let the system evolve and grow to meet the needs of the public without significant intervention, however, there are times when action must be taken to change or affect an outcome due to overriding need and concern for the publics best interest. This is one of those times.

The four thousand people who live in the community of Brooktrails are counting on us to preserve their health and well being. To do that we must consider the most effective and expeditious methods to provide fast and easily available response from the EMS system first responders and ambulances. Time as you must know, in an emergency, and EMS deals with true "Life and Death" emergencies is a must.

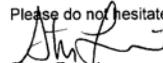
14-1

This is why I must strongly urge you to consider only the ELSIE/Wild Oat Canyon concept for the Willits Bypass Project. (Project #1990030006). Of the various options, only this access can relieve the congestion that delays and hinders prompt, expeditious care, treatment and transport of all persons in Brooktrails and further west on Sherwood Road.

The "ELSIE" Alternate (LT in the South and C1T in the North) which would terminate at the Truck Scales Interchange would allow Mendocino County to build a second very vital link to Brooktrails as well.

My business and experience are in EMS. This experience and knowledge leads me to believe the best solution to the Willits Bypass project is ELSIE/Wild Oat Canyon. I once again urge you to make this best solution a reality.

Please do not hesitate to contact me should I be of further assistance.


Steve Francis
EMS Coordinator

Mendocino County Office

890 N. Bush Street
Ukiah, CA 95482
(707) 463-4590 Office
(707) 467-2551 Fax

Napa County Office

1500 3rd St., Suite B
Napa, CA 94559
(707) 253-4341 Office
(707) 259-8112 Fax

Sonoma County Office

1030 Center Dr., Suite D
Santa Rosa, CA 95403
(707) 565-6501 Office
(707) 565-6510 Fax

15 Fort Bragg Planning Commission

15-1 Alternative E3, which is the most westerly alternative, would possibly result in the greatest reduction in collisions. However, Alternative E3 does not meet Clean Water Act Section 404(b)(1) criteria and therefore is no longer being considered for construction. See General Response 1.3.

15-2 Comment noted.

15-3 Alternative E3 would provide traffic on the U.S. 101 corridor bound for Fort Bragg an opportunity to bypass Willits completely and connect to S.R. 20. This may be perceived as having a marginal benefit to the coastal communities near the western terminus of S.R. 20, since this traffic would no longer be routed through Willits. The time savings would likely be on the order of 5 minutes on a trip of approximately one hour (more than 30 miles on a roadway with numerous turns). Time savings are always economically desirable and may provide a noticeable benefit to businesses that ship multiple loads through the project area daily. The time savings provided by Alternative E3, however, would not be likely to have a significant impact on economic conditions in Fort Bragg or other coastal communities.

Alternatives C1T, J1T, and LT would reduce the amount of traffic on Main Street in Willits, which would also benefit traffic using S.R. 20.

Via e-mail: 08/25/2002 09:47 PM

August 25, 2002

Cher Daniels, Chief
Office of Environmental Management S-1
Department of Transportation (Caltrans)
2389 Gateway Oaks Drive
Sacramento, CA 95833

Attn: Nancy MacKenzie

15-1 Please consider the over 10,000 people on the coast who use Highway 20 to get in or out of Fort Bragg. As your EIR states, The Western Bypass (alternative E-3) will save lives. And a disproportionate number of lives lost will be of Fort Bragg and North Coast residents. Table 3-2 of your report demonstrates that collisions will be reduced by a minimum of 234 over the next 5 years. That is almost 50 accidents every year we can eliminate by a western bypass.

15-2 The only other route residents of Fort Bragg have to go to Santa Rosa or the bay area is via a stretch of Highway 1 Caltrans has deemed to have higher than normal accidents.

15-3 Furthermore, in addition to the safety issues and lives to be saved by a Western Bypass, I ask you to consider the economic impact on a community already suffering from the closure of the GP Mill. As the North Coast depends more and more on Tourism we can not afford to miss an opportunity to make it safer and easier for visitors to reach the coast.

Please consider the overall safety of the Western Bypass (E-3) as well as the economic impact on North Coast tourism.

Dave Turner
Chairman, Fort Bragg Planning Commission
535 North Corry St.
Fort Bragg, CA 95437

16 Little Lake Fire District

16-1 The three objectives of the Willits bypass project are to improve level of service, *improve traffic safety*, and reduce delays for interregional traffic on U.S. 101. Section 2.2.3 (DEIS/EIR) explains the existing traffic safety concerns on U.S. 101/Main Street that would be alleviated by the project.

16-2 Caltrans and FHWA appreciate the serious responsibilities entrusted to all the emergency services providers in the project area. See General Response 1.6 regarding Brooktrails second access road. See also General Response 1.3 regarding Alternative L/C.



Little Lake Fire District

74 East Commercial Street • Willits, California 95490 • (707) 459-6271
Fax — (707) 459-7898

JEFF SMITH
Fire Chief

July 23, 2001

Nancy Mackenzie
Department of Transportation – District 1
1656 Union Street
Eureka, CA 95501

Subject: Environmental Document Review
Name: Willits Bypass Project
County: Mendocino
Type: Draft Environmental Impact Report
SCH#: 1990030006

Dear Ms. Mackenzie:

As Fire Chief of the Little Lake Fire Protection District and the City of Willits, I have some concerns regarding the Willits Bypass Project.

16-1

My first concern, public safety, is one which I'm sure I share with Caltrans. We would like to see the bypass constructed as quickly and efficiently as possible. There needs to be a balance between environmental concerns and safety concerns. It appears to me that the balance has shifted and the concern for the safety of human life has taken a back seat.

16-2

My second concern is with the north interchange location. In my opinion, the north CIT segment which places the interchange north of the railroad crossing and truck scales serves the public safety and future transportation needs far better than the Quail Meadows interchange would.

The interchange north of the truck scales will eliminate over one mile of two lane highway which would still exist if the Quail Meadows proposal is used. In my 25 years with the Willits Fire Department, I have responded to many bad vehicle crashes in that one-mile stretch of highway, several with fatalities.

The far north interchange would also coincide with the proposed Wild Oat Canyon Road connection. This connection is vital to the proposed emergency access/egress to the Brooktrails Township and upper Sherwood Road and also meets the local transportation needs and regional concerns.

16-3 See General Response 1.9, which discusses why a center valley interchange is not being considered for this project.

16-4 Caltrans and FHWA appreciate the fire district's interest in this project and will be coordinating closely with the district especially throughout construction of the project.

16-3

Finally, I would like to address the fact that a business interchange near the center of Willits is not being included in the project. A center interchange would enhance local traffic patterns and greatly improve our emergency response times to the north and south.

16-4

The Little Lake Fire Protection District provides emergency response to approximately 60 miles of state highways and we are extremely concerned with the final design of this bypass. Please feel free to call me if you have any questions.

Sincerely,



Jeff Smith
Fire Chief

Js/ns

17 Willits Unified School District

17-1 See General Responses 1.6 and 1.8 regarding Brooktrails second access road and traffic operations at Quail Meadows Interchange. The proposed project will provide the Brooktrails community two options, to drive south on a less congested Main Street or drive north to the new bypass via the Quail Meadows Interchange.

17-2 See General Responses 1.6 and 1.8 regarding Brooktrails second access road and traffic operations at Quail Meadows Interchange.

17-3 See General Response 1.3 which explains why Alternatives CIT and hybrid L/C do not meet Clean Water Act Section 404(b)(1) criteria and therefore, are no longer under consideration for construction. See General Response 1.8 regarding traffic operations at the high school and at the Sherwood Road/Main Street intersection. See General Response 1.6 regarding Brooktrails second access road.

Steven L. Jorgensen
Superintendent
G. Keller McDonald
Assistant Superintendent

Willits Unified School District

Boa
M
G
I

July 23, 2002

Nancy Mackenzie
Department of Transportation – District 1
1656 Union Street
Eureka, CA 95501

Re: Environmental Document Review
Name: Willits Bypass Project
County: Mendocino
Type: Draft Environmental Impact Report
SCH#: 1990030006

Dear Ms. Mackenzie:

17-1

I am writing to comment on the Willits Bypass Project and the potential effect the Quail Meadows Interchange would have on Willits High School and the district's transportation system.

Proceeding with the Quail Meadows Interchange would greatly add to an already congested traffic situation in front of, and around, Willits High School and expand safety concerns because of an on-going single access/egress to Sherwood Road from Highway 101. Morning commute traffic would turn left coming off Sherwood Road to catch the Quail Meadows Interchange, instead of the current right-hand turn for traffic heading south. This path will take more vehicles past Willits High School, creating more congestion in front of and around the school site at a time when close to 700 students are arriving for school. Traffic congestion continues during the lunch-time break and at the end of school.

17-2

An additional safety concern I have is the inability of large vehicles to make a left turn coming off Sherwood Road. The building of the Quail Meadows Interchange may eliminate a second access/egress to Brooktrails and the rest of the Sherwood Road community.

17-3

The pursuit of the CIT option north of the truck scales would reduce commuter traffic congestion in, and around, Willits High School because the majority of Brooktrails commuters would utilize the CIT access/egress, thereby avoiding the high school area. This plan would also ease congestion for school buses, especially at the Sherwood Road/Highway 101 interchange. The reduction of traffic would increase safety for

17-4 The Willits Unified School District was represented at the June 30, 2003 meeting, which Caltrans held for emergency services providers and school district representatives principally to address concerns regarding the operations of the Quail Meadows interchange. See response to Comment 17-3.

students who provide their own transportation or receive a ride from a parent or friend. This interchange would coincide with the proposed Wild Oat Canyon Road Connection which would reduce traffic greatly near the high school.

17-4

As stated earlier, the Quail Meadows Interchange would greatly impact traffic at, and around, Willits High School. I urge you to consider an alternative route. Please contact me if you would like to discuss this matter.

Sincerely,



Steven L. Jorgensen
Superintendent