State of California
Business, Transportation & Housing Agency
Department of Transportation

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ENVIRONMENTAL MATTERS

01-MEN-101, PM R43.1/52.3
Action Item

CTC Meeting: July 18, 2002

Reference No.: 2.2b.(1)

Original Signed By:
ROBERT L. GARCIA
Chief Financial Officer
July 1, 2002

SUMMARY - DRAFT ENVIRONMENTAL IMPACT REPORT STATE ROUTE 101 IN MENDOCINO COUNTY – CONSTRUCT FOUR-LANE FREEWAY ON NEW ALIGNMENT NEAR WILLITS

01-MEN-101, PM R43.1/52.3

Willits Bypass Project: KP R69.4/84.2 (PM R43.1/52.3) 01-26200

Proposed Action:

Construct four-lane freeway on new alignment near Willits from 0.9 km (0.6 mi.) south of Haehl Overhead to 1.6 km (1.0 mi.) north of Reynolds Highway.

Programming:

The project was originally programmed in the 1998 State Transportation Improvement Program (STIP) for total capital and support of $139.4 million. Subsequent STIP amendments revised the schedule with no change in funding. The project is currently programmed for project support of $22.5 million in Interregional Improvement Program (IIP) funding. Right-of-way and construction capital are programmed for $9 million and $90.6 million, respectively, using IIP shares. Additionally, $17.3 million of Regional Improvement Program (RIP) shares are programmed for construction capital. Construction is scheduled to begin in 2005/06.

Alternatives Being Considered:

- No-Build.
- Three freeway alignments bypassing Willits to the East through the Little Lake Valley.
- One freeway alignment bypassing Willits to the West through the rugged coastal foothills.

Potential Significant Environmental Effects:

- Biological resources: wetlands, special-status wildlife and fish species, and sensitive plant communities.
- Farmland impacts.
- Community impacts: business and residential relocation.

Proposed Measures to Minimize Harm:

- Utilization of construction windows to minimize impacts to special-status and sensitive species.
- Implementation of a comprehensive wetland restoration, preservation and creation plan including streambed restoration and realignment.
- Farmland preservation via construction easement purchase.
- Replacement planting of special-status plant species, upland forest habitat, and oak woodlands.
- Relocation assistance for displaced residences and businesses.

Willits Bypass Draft Environmental Impact Statement/Environmental Impact Report Executive Summary

Summary

S.1 Introduction

The following summary focuses on major areas of importance to decision-makers regarding the proposed project. The reader will find additional pertinent information regarding the project, such as detailed project description, in the body of the report.

This Draft Environmental Impact Report (EIR) / Environmental Impact Statement (EIS) contains two volumes. Volume 1 consists of ten chapters, following this summary, and the Technical Appendices. Maps are included separately in Volume 2, Environmental Altas. To read this Draft EIR/EIS, readers should have Volume 2. Readers may wish to review Chapter 1 Introduction, which describes the purpose of this document and how to use it.

S.2 Summary of Proposed Action And Its Alternatives

The project area is located in the City of Willits (Willits) in Mendocino County (Figure S-1). The project is being proposed to reduce delays, improve safety, and achieve a "C" Level of Service (LOS -- a qualitative means of describing traffic conditions, Table 2-1) for interregional traffic. To address these operational problems due to the current facility being used as both an interregional through route and a local main street, the project proposes construction of a new segment of U.S. 101 that would bypass Willits (Figure S-2). The Willits Bypass project has been programmed for $116 million for capital improvements in the 2002 State Transportation Improvement Plan. Start of construction is scheduled for 2005. The Mendocino Council of Governments included its entire $17.3 million share of 1998 Regional Improvement Program funds for the project. Estimated capital costs for the build

alternatives are Alternative C1T-- $128 million; Alternative E3 -- $301 million; Alternative J1T -- $151 million; and Alternative LT -- $130 million. Additional state and regional funds will be the source of the balance of funds needed to construct the project.

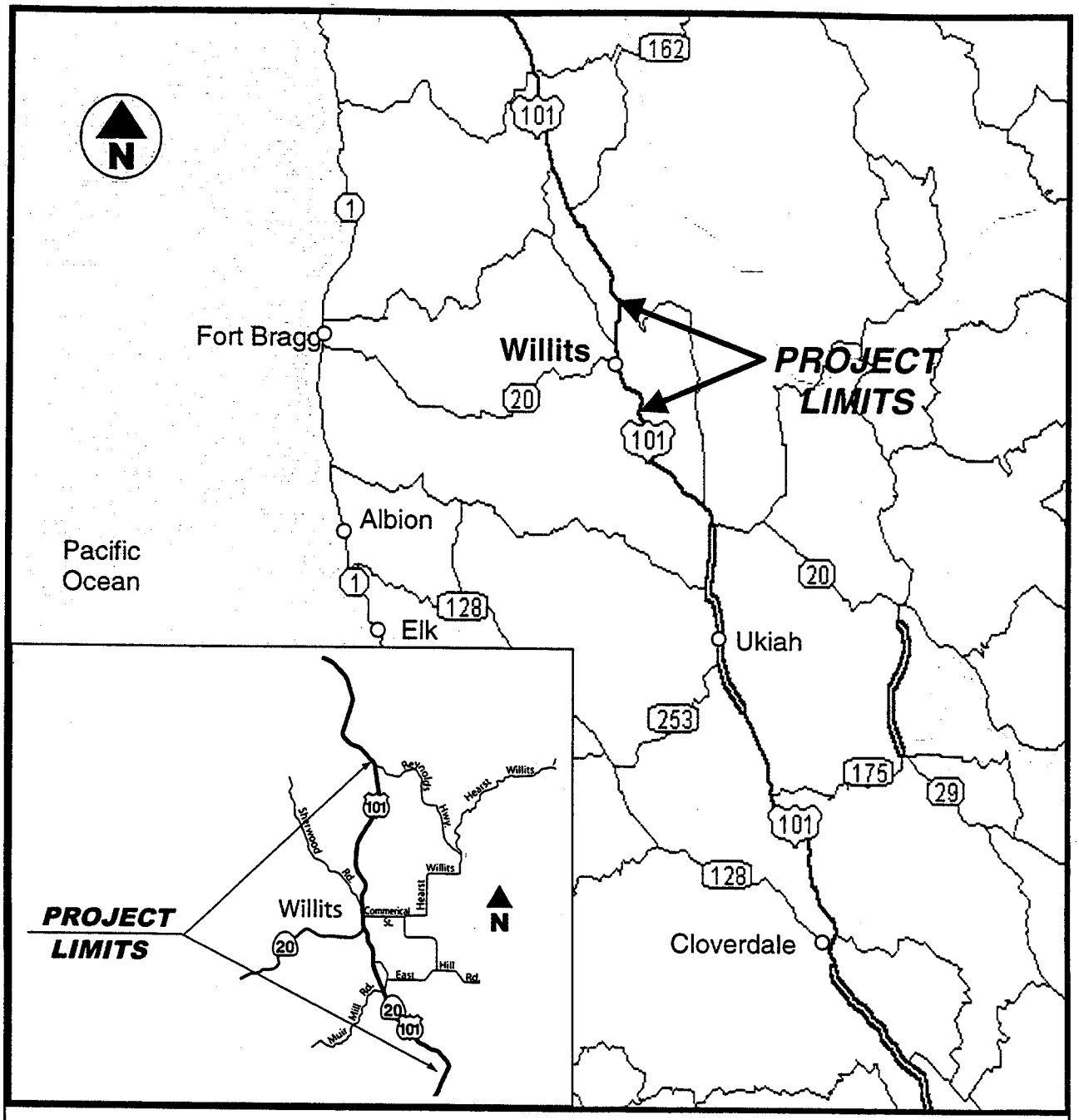
Approximately thirty bypass alternatives have been considered during the project's history (Figure S-3). The earliest alternative, referred to as Alternative A, was formally adopted by the California Transportation Commission (CTC) in 1963, prior to federal and state environmental laws. It involved building a new freeway segment across the Little Lake Valley and was essentially a straight line that was the shortest possible route between the beginning and ending points for the bypass. This alternative was dropped eventually because of its adverse environmental impacts. Since then, other alternatives have been considered as a result of public and governmental agency input and independent investigation by Caltrans staff.

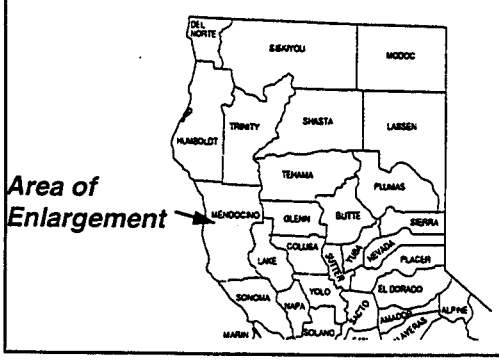
This Draft EIR/EIS presents four build alternatives to implementing the proposed project. Four of the alternatives (C1T, E3, J1T, and LT) would construct a four-lane freeway bypassing the Willits. Alternatives C1T, J1T, and LT would cross the Little Lake Valley east of Willits. Alternative E3 would traverse the hills west of Willits (Figure S-2).

In addition, a No-Build Alternative is being considered. Under, the No-Build Alternative, traffic would continue to travel on existing U.S. 101 on the same facility motorists now use.

The Willits Bypass Project Development Team (PDT) divided each alternative into smaller sections for evaluation purposes. This "nodal approach" also allows for combining sections of different alternatives, thus providing greater flexibility in identifying a preferred alternative (Section 1.5 Nodal Analysis). Most of the text and tables in this document display data in a manner that allows environmental impacts of each segment to be evaluated separately.

Chapter 3 of this document describes in detail each alternative under consideration and the alternatives that were considered but eliminated because they were determined to be infeasible or not "practicable."





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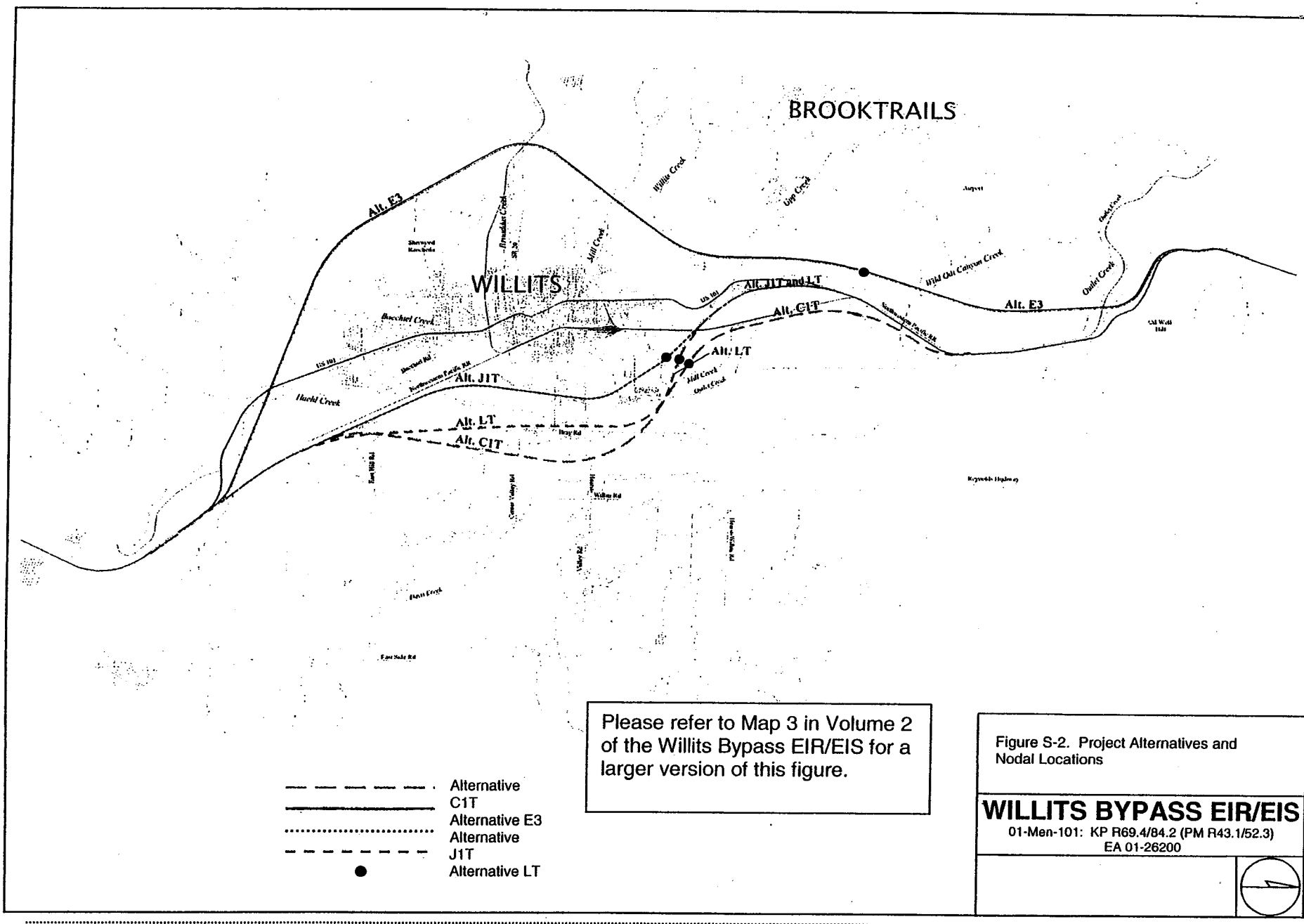
SCALE IN KILOMETERS

Figure S-1. Project Location

WILLITS BYPASS
01-Men-101: KP R69.4/84.2 (PM R43.1/52.3)
EA 01-26200

Caltrans



Please refer to Map 3 in Volume 2 of the Willits Bypass EIR/EIS for a larger version of this figure.

Figure S-2. Project Alternatives and Nodal Locations

WILLITS BYPASS EIR/EIS

01-Men-101: KP R69.4/84.2 (PM R43.1/52.3)
EA 01-26200

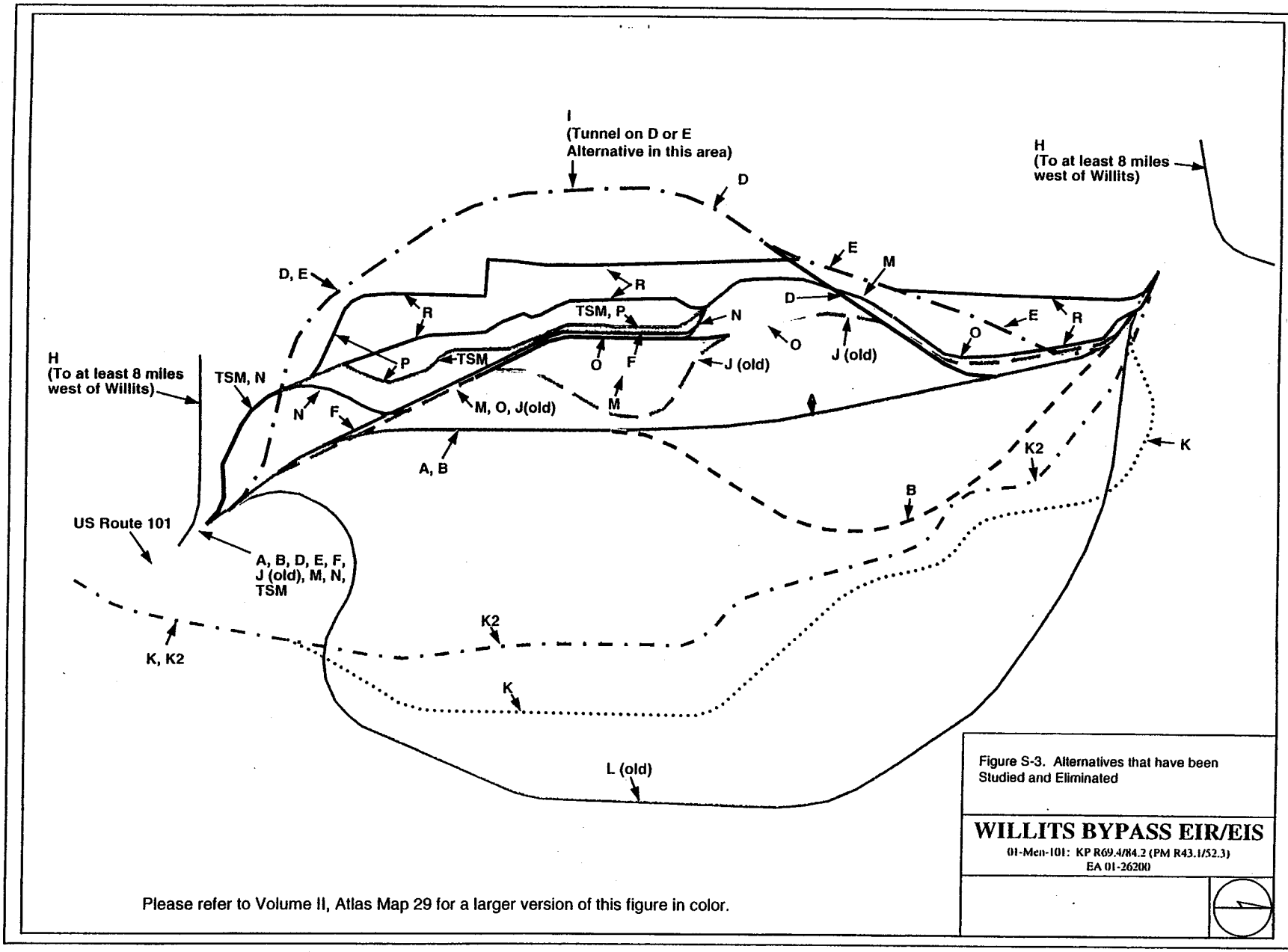


Figure S-3. Alternatives that have been Studied and Eliminated

WILLITS BYPASS EIR/EIS

01-Men-101: KP R69.4/84.2 (PM R43.1/52.3)
EA 01-26200

Please refer to Volume II, Atlas Map 29 for a larger version of this figure in color.

S.3 Summary of Possible Controversial Issues

CEQA Guidelines (Sec. 15123) and NEPA Regulations (40 C.F.R. 1502.12) require the summary to identify areas of controversy known to the lead agency including issues raised by other agencies and the public.

S.3.1 Two-Lane Bypass

FHWA regulations do not allow development of a facility that would be functionally obsolete within its design life. In 1992, Caltrans staff studied a two-lane bypass of Willits and determined that a two-lane bypass would not achieve a satisfactory level of service or improve safety. In 2000, after all technical studies were completed for the current range of alternatives, the Willits Environmental Center (WEC)[1] asked Caltrans to reconsider a two-lane alternative for the proposed bypass project. In response, Caltrans analyzed the concept but chose not to add a two-lane alternative because, foremost, a two-lane alternative would not meet the "purpose and need" for the project. The "purpose and need" calls for a facility that would provide a LOS "C" through the 20-year design period (i.e., 2028). A two-lane facility would provide a LOS "D" at peak hour upon construction (2008), and would diminish to LOS "E" within the 20-year period.[2] LOS "E" exists when a facility is at capacity during peak traffic flows. Thus, a new two-lane highway would be functionally obsolete within the design period. This issue is discussed in detail in Section 3.6.2.

S.3.2 Wetlands and Other Waters of the U.S.

Wetlands are distributed widely in the Little Lake Valley east of U.S. 101. Any of the valley alternatives (C1T, J1T, and LT) would result in the loss of a portion of these wetlands, with Alternative C1T having the greatest impacts. Alternative C1T would impact 52.3 ha (129.1 ac) of wetland habitat that qualifies as waters of the United States (U.S.). Impacts to wetlands and other waters of the U.S. are discussed in detailed in Section 5.7.4.6.

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[1] The Willits Environmental Center (previously Willits Citizens for a Safe Environment) has been a member of the project's Technical Advisory Group since 1990.

[2] It is important to recognize that LOS of "C" on a 4-lane freeway is substantially different than LOS "C" on a 2-lane highway, in that a freeway offers continuous passing opportunities. On a 2-lane road, passing opportunities are affected by volume and sight distance. Average operating speeds are directly affected by slower traffic.

Permanent impacts to waters of the U.S., due to loss of these wetlands, would be:

- Alternative C1T: 30.0 ha (74.2 ac) north segment and 22.3 ha (55.1 ac) south segment for a total of 52.3 ha (129.1 ac)
- Alternative E3: 1.0 ha (2.5 ac) north segment and 5.1 ha (12.6 ac) south segment for a total of 6.1 ha (15.1 ac)
- Alternatives J1T: 11.6 ha (28.9 ac) north segment and 9.5 ha (23.5 ac) south segment for a total of 21.1 ha (52.4 ac)
- Alternative LT: 11.3 ha (28.1 ac) north segment and 18.1 ha (44.7 ac) south segment for a total of 29.4 ha (72.8 ac)

S.3.3 Special-Status Plants

Two special-status plant species would be impacted by the build alternatives: Baker's meadowfoam and glandular western flax. Impacts include the direct loss of habitat that supports special-status species; direct loss of individual special-status plants; and indirect impacts. Indirect impacts could include project-related activities near habitats that support special-status species that could subsequently reduce habitat quality for those species. Direct and indirect impacts to special-status plants would be:

- Alternative C1T: 33,700 Baker's meadowfoam plants (north segment); 10,300 Baker's meadowfoam plants (south segment)
- Alternative E3: one population (less than 100 plants) of glandular western flax
- Alternatives J1T: 33,200 Baker's meadowfoam plants (north segment); 2,000 Baker's meadowfoam plants (south segment)
- Alternative LT: 33,200 Baker's meadowfoam plants (north segment)

S.3.4 Wildlife, Including Special-Status Species

All of the alternatives could impact riparian birds (including yellow warbler, yellow-breasted chat, and little willow flycatcher), raptors (including northern harrier, Cooper's hawk, white-tailed kite, and golden eagle), northwestern pond turtle, and foothill yellow-legged frog. In addition, Alternative E3 and the designated borrow site could impact Northern spotted owl and red tree vole.

Impacts include the direct loss of habitat that supports special-status species; direct loss of individual special-status species; and indirect impacts. Indirect impacts could include project-related activities near habitats that support special-status species that could subsequently reduce habitat quality for those species.

S.3.5 Special-Status Fish Impacts

Three special-status fish, which use project area streams for migration, spawning, and rearing, would be affected potentially by all the alternatives: coho salmon (*Oncorhynchus kisutch*), fall-run chinook salmon (*oncorhynchus tshawytscha*), and steelhead (*Oncorhynchus mykiss*).

Alternative C1T would have the greatest impacts to fisheries, followed by Alternative E3. Alternatives J1T and LT would have the least impacts to fisheries. Alternative C1T would require the realignment of three creeks: 275 m (900 ft) of upper Haehl Creek (south segment of Alternative C1T); 400 m (1,300 ft) of Mill Creek and 1,600 m (5,250 ft) of Outlet Creek (north segment of Alternative C1T).

Alternatives J1T and LT (south segments) would require the realignment of 275 m (900 ft) of upper Haehl Creek.

Alternative E3 would create the greatest impacts of potential erosion relative to the other alternatives. The proposed alternative would directly impact or degrade 3.6 ha (8.9 ac) of riparian habitat, most of which is along Haehl Creek, due to channel realignment. Impacts to wildlife, including special-status species, in the project area are discussed in Sections 5.7.4.7 and 5.7.4.8. Impacts to special-status fish are discussed separately in Section 5.7.4.9.

S.3.6 Farmland Impacts

Alternative E3 would exceed the Farmland Protection and Policy Act 160-point threshold in its conversion of Prime and Unique Farmland to other uses and would result in the largest conversion of agricultural land (288 ha/713 ac) of the other build alternatives. However, Alternatives C1T, J1T and LT would come close to exceeding the 160-point threshold in their conversion of Prime and Unique Farmland. The greatest impact to agricultural lands would be at the southern segments of all of the build alternatives. Section 5.4.2 discusses impacts to farmlands in the project area.

Community Impacts

Alternative E3 would require 114 residential relocations. Alternative J1T (south) would require the relocation of the three businesses in the city's recently constructed industrial park. Alternative J1T (south) would also require relocating an automobile dismantling

business, the six mini-storage units associated with this business, and a portion of a large local trucking company. Section 5.2 discusses impacts to community resources.

S.4 Issues To Be Resolved

This DEIR/EIS does not identify a "preferred" alternative. Based on the information provided in this document, as well as oral and written comments from the public and governmental agencies, Caltrans and FHWA will identify preferred alternatives and select one for implementation. The preferred alternative that is selected for implementation will be identified in the Final EIR/EIS.

S.5 Least Environmentally Damaging Practicable Alternative (NEPA) and Environmentally Superior Alternative (CEQA)

Because of impacts to wetlands and other waters of the U.S. that are subject to U.S. Army Corps of Engineers (ACOE) jurisdiction, project sponsors must evaluate all practicable alternatives that avoid or would have less adverse impacts to aquatic resources (Clean Water Act, Section 404 (b)(1) Guidelines, Alternatives Analysis). The Section 404(b)(1) Alternatives Analysis is a specific evaluation to determine the Least Environmentally Damaging Practicable Alternative (LEDPA) to wetlands and other waters of the U.S., including wetlands, while meeting the project's purpose. ACOE will issue a Section 404 Permit only for the LEDPA.

The California Environmental Quality Act [Guidelines Sec. 15126(d)] requires EIRs to identify the environmentally superior alternative from the range of reasonable alternatives being evaluated. If the environmentally superior alternative is the No-Build Alternative, the EIR "shall also identify an environmentally superior alternative among the other alternatives." The LEDPA would be considered the environmental superior alternative for CEQA purposes.

The Section 404 analysis of the build and no-build alternatives for this project concluded that Alternatives E3 and C1T do not meet the LEDPA as required under the Guidelines because of unavoidable and unacceptable environmental consequences and/or because of excessive costs. The No-Build Alternative, while being the least environmentally damaging alternative, does not meet the purpose and need of the project.

The two remaining alternatives, J1T and LT, would have similar impacts at the Quail Meadows Interchange where both Alternatives J1T and LT converge. Alternative J1T has

lesser wetland impacts than Alternative LT in the southern segment. The analysis concluded that either Alternative LT or J1T meets Guidelines criteria for the LEDPA, because these alternatives meet the project's purpose and need and have moderate wetland impacts with lesser environmental consequences to other resources (e.g., community, cultural resources, fisheries).

Following the public comment period and input from the resource and regulatory agencies, the NEPA preferred alternative/Section 404 LEDPA will be disclosed in the Final EIS. If a build alternative is selected, project features will be refined for additional minimization of impacts and avoidance of resources within the project limits. In addition, a detailed compensatory mitigation plan will be finalized and approved by the resource agencies for all unavoidable impacts to aquatic resources based on the agreed upon preferred alternative. The Section 404 Alternatives Analysis is included herein as Appendix H.

S.6 Irreversible Commitment of Natural Resources

The proposed project would not result in an irreversible commitment of resources (i.e., fossil fuels, fiscal resources, land use, labor, etc.). Considerable amounts of fossil fuels and highway construction materials such as cement and aggregate would be expended in construction of the proposed project. Additionally, a large amount of labor and natural resources are used in the fabrication and preparation of construction materials. These materials are generally not retrievable. However, they are not in short supply and their use would not have an adverse effect upon their continued availability. Construction of the project also would require a substantial one-time expenditure of both state and federal funds that are not retrievable. The commitment of these resources will benefit the region, the state, and the residents of the immediate area with an improved transportation system. Benefits consist of improved safety and savings in time and fuel, which are anticipated to outweigh the commitment of the resources being used.

S.7 Adverse Environmental Effects that Cannot be Avoided if the Project is Implemented

An EIS must discuss the environmental impacts of the proposed action and its alternatives including any adverse environmental effects which cannot be avoided should the proposal be implemented (40 CFR 1502.16). The CEQA requirement is comparable in that an EIR must include a description of those impacts identified as significant and unavoidable if the proposed project were constructed [CEQA Guidelines, Section

15126.2(b)]. A project results in unavoidable impacts if mitigation is not effective in reducing the impact or if no mitigation or only partial mitigation is feasible. Table S-1 illustrates impacts, by alternative, that cannot be avoided if the project is implemented.

Table S-1. Comparison of Alternatives

X= With mitigation, impact remains O= With mitigation, impact reduced or minimized	C1T	E3	J1T	LT
Landsliding and other Seismic Impacts	O	X	O	O
Relocation Impacts	O	X	O	O
Impacts to Minority or Low-Income Populations (Environmental Justice)	O	O	O	O
Water Quality	X	X	O	O
Sensitive Plant Communities	O	X	O	O
Waters of the U.S.	X	O	O	O
Special Status Wildlife	O	X	O	O
Special Status Fish Species	X	X	O	O
Potential Hazardous Waste Properties	O	O	X	O

S.7.1 Landsliding and other Seismic Impacts

- Alternative E3: Even with special design mitigation, the ***potential for landslides*** would remain high for this alternative.

S.7.2 Relocation and Environmental Justice Impacts

- Alternative E3 would require 114 ***residential displacements.***
- Alternative E3: Alternative E3 would result in the relocation of low-income residents. However, last resort housing payments and other relocation benefits constitute off-setting benefits that will reduce impacts to affected low-income residents.

S.7.3 Water Quality and Special Status Fish Species

- Alternatives C1T (north segment): Because of realignment of over 2,000 m (6,500 ft) of Mill Creek and Outlet Creek, and removal of riparian vegetation along some channel reaches, Alternative C1T would result in adverse impacts to ***fish migratory patterns and habitat quality***, including *water temperature.*
- Alternative E3: Potential for impacts to ***fish populations and suitable salmonid habitat*** (including *water temperature*) resulting from erosion is greatest with Alternative E3. Also would require several stream crossings and would impact 3.6 ha (8.9 ac) of riparian habitat primarily along Haehl Creek, due to channel realignment.

S.7.4 Sensitive Plant Species

- Alternative E3: Would impact 32.8 ha (81 ac) of ***sensitive plant communities.*** The loss of 22.7 ha (56.1 ac) of oak woodlands, in particular, would be adverse, because of the length of time required for oak trees to grow into stands of mature trees that provide wildlife habitat.

S.7.5 Waters of the U.S.

- Alternative C1T: Would impact 52.3 ha (129.1 ac) ***wetlands and other waters of the U.S.*** The north segment would also require the realignment of approximately 400 m (1,300 ft) of Mill Creek and 1,600 m (5,250 ft) of Outlet Creek.

S.7.6 Special Status Wildlife Species

- Alternative E3: Direct and indirect impact to intermittent streams resulting from culvert construction on the smaller drainages within this alignment would have impacts to ***foothill yellow-legged frogs*** and their habitats.
- Alternative E3: This alternative's impacts are unavoidable because of the magnitude of impacts and the difficulty of reestablishing mid- and old-growth forested habitat that provide optimal habitat for ***Northern spotted owl*** and ***red tree vole.***

S.7.7 Hazardous Waste Sites

- Alternative J1T: There is an unknown risk related to hazardous waste clean-up costs because four ***potential hazardous waste properties*** are located along its alignment.

S.8 Summary of Federal Actions Required for this Project

S.8.1 NEPA/404 MOU Integration Process

A Section 404 Individual Permit will be required from ACOE for impacts on wetlands and waters of the U.S. The ACOE issues the permit; however, the U.S. Environmental Protection Agency (USEPA) has oversight and override authority of this permit.

Concurrence has been obtained on the project's purpose and need, modal choice, range of alternatives and criteria for choosing an alternative by the signatories of the NEPA/404 Memorandum of Understanding (MOU): ACOE, USEPA, National Marine Fisheries Service (NMFS), U.S. Fish and Wildlife Service (USFWS), Federal Highway Administration (FHWA), and Caltrans. Concurrence also was received from the California Department of Fish and Game (CDFG). Although CDFG is not a signatory agency in the NEPA/404 MOU, Caltrans and FHWA invited them to participate early in the process.

An alternatives analysis (Appendix H) is being conducted in accordance with the Section 404(b)(1) Guidelines and the NEPA/404 Integration Process. The Section 404(b)(1) Alternatives Analysis is a specific evaluation to determine the Least Environmentally Damaging Practicable Alternative (LEDPA) to waters of the U.S., including wetlands, while meeting the project's purpose. This information would be used to obtain the Individual Permit from ACOE.

In coordination with public circulation of the Draft EIR/EIS, ACOE issues a Section 404 public notice of the Draft EIR/EIS. FHWA and Caltrans evaluate the Draft EIR/EIS comments received, and ACOE evaluates comments received on the Section 404 public notice. Following comments received on the Draft EIR/EIS and the Section 404 public notice, Caltrans/FHWA, ACOE and USEPA are required to concur with the NEPA-preferred/Section 404 LEDPA, which will be documented in the Final EIR/EIS for final approval. Written agreement that the preferred alternative is the LEDPA would be required from ACOE and USEPA. Agreement that the project mitigation plan and implementation schedule is adequate would be required after circulation of the Draft EIR/EIS, as well.

After circulation of the Draft EIR/EIS and identification of the LEDPA, a preliminary agreement with USFWS on project mitigation would be required. A "Non-Jeopardy" Biological Opinion pursuant to the Endangered Species Act (federal) also would be required from USFWS at that time. After Final EIR/EIS approval, the document is circulated and ACOE issues a Section 404 public notice of the proposed Individual Permit.

The following documents will be included in the Final EIR/EIS as a preliminary agreement of Section 404(b)(1) compliance:

- Written USFWS preliminary agreement in the project mitigation plan as a result of earlier Fish and Wildlife Coordination Act consultation,
- Written USFWS/NMFS Non-Jeopardy documentation,
- Section 401 certification from State Water Quality Control Board, and
- Written ACOE and USEPA preliminary agreement on the following:
  - The final EIS NEPA preferred/Section 404 LEDPA,
  - That the project will not significantly degrade the aquatic environment, and
  - That the project mitigation plan and implementation schedule is adequate.

S.8.2 Section 7 Endangered Species Act

FHWA and Caltrans currently are engaged in informal consultation with USFWS and NMFS under Section 7 of the Endangered Species Act. FHWA and Caltrans continue to meet with agency staff to discuss their concerns and mitigation approaches. When a preferred alternative is selected, after public circulation of the Draft EIR/EIS, formal consultation will begin. At this time also, Biological Assessments on Northern spotted owl, coho salmon, Northern California steelhead, and California coastal chinook salmon will be prepared, which will identify impacts of the selected project alternative and proposed mitigation for each affected species.

Filing, Notices and Record of Decision

This Draft EIR/EIS has been filed with USEPA and a notice published in the Federal Register. After the 60-day public review of the Draft EIR/EIS and selection of a preferred alternative (explained above under Section S.8.1 NEPA/404 MOU Integration Process), Caltrans/FHWA will prepare the Final EIR/EIS after comments on the draft are received and reviewed. Caltrans/FHWA will file the Final EIR/EIS with USEPA, a notice will be published in the Federal Register, and the Final EIR/EIS will be available for a 30-day public review. At the end of the public review period, Caltrans/FHWA may adopt the EIS and will prepare a Record of Decision (ROD), describing the reasons a specific alternative was chosen. The ROD will be made available to the public through public notice.

S.9 Revised Truck Scales Interchange (Alternative C1T)

In April of 2002, the Willits project design team developed revisions to the originally proposed Truck Scales Interchange for Alternative C1T. The original Truck Scales Interchange is shown on Map 25b in Volume 2. These revisions were made in response to critiques of the original proposal, as a result of Caltrans design exception approval process. The following interchange design changes are proposed: shift the mainline alignment easterly at the farthest point approximately 85 m (280 ft), change the interchange type to a diamond, and lengthen the connection to existing U.S. 101 at the north end by approximately 430 m (1400 ft) to complete the lane reduction. The revised interchange is shown on Map 25b(2) in Volume 2. Caltrans Headquarters and FHWA have approved the modified interchange concept proposed by the Caltrans Design team. The revised interchange improves operation and motorist safety.

Caltrans has studied the differences in environmental impact between the two interchanges and concluded that there would be a minimal change in area impacted by the revised interchange design. A table showing the differences in impact between the two interchanges is included in Appendix Q. The revised interchange design would result in approximately 0.43 ha (1.06 ac) increase in impact to jurisdictional wetlands and other waters of the U.S. Alternative C1T, with the former interchange design, impacted a total of 52.3 ha (129.1 ac). With the revised interchange the total would be 52.73 ha (130.16 ac). Caltrans has notified its NEPA/404 resource agency partners and California Department of Fish and Game of the revised interchange design and the differences in environmental impacts between the old and revised interchange designs (letter dated May 1, 2002, Appendix Q).