Chapter 4 Specific Responses to Public Comments on the Partial Recirculated Draft Environmental Impact Report / Supplemental Environmental Assessment

This chapter is organized as follows:

- 4.1 Public Agencies and Governments
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4.1 Public Agencies and Governments

One public/government agency, California Department of Fish and Wildlife (CDFW), submitted comments in response to the Partial Recirculated Draft EIR/Supplemental EA. Comments submitted by CDFW, as well as responses to those comments, are provided below.

California Department of Fish and Game

State of California
Department of Fish and Game

Memorandum

Date: November 19, 2012

To: Ms. Katrina Pierce, Chief
California Department of Transportation
North Region Environmental Planning
703 B Street
Marysville, CA 95901

From: **NEIL MANJI**, Regional Manager
Region 1 – Northern

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

On September 20, 2012, the Department of Fish and Game (DFG) received a copy of the Recirculated Draft Environmental Impact Report/Supplemental Environmental Assessment (RDEIR/SEA) for the proposed 197/199 Safe Surface Transportation Assistance Act (STAA) Access Project (Project). The California Department of Transportation (Caltrans) is proposing to construct spot improvements on State Route 197 (SR 197) and U.S. Highway 199 (US 199) in Del Norte County to comply with federal and state legislation and regional programs, plans, and policies to allow STAA access.

The Project includes seven locations found in five previously identified and separately proposed projects. Since the circulation of the RDEIR/SEA, two of the five original projects (Washington Curve and The Narrows) were combined into one project. Two project locations – Ruby 1 at Post Mile (PM) 4.5 and Ruby 2 at PM 3.2-4.0 – are located on SR 197. The remaining two projects, with five spot locations, are located on US 199: Washington Curve at PM 26.3-26.5, the Narrows at PM 22.7-23.0, and Patrick Creek Narrows (PCN) in three locations: PCN1 at PM 20.5-20.7, PCN2 at PM 23.9-24.3, and PCN3 at PM 25.55-25.65. Improvements at PCN2 include bridge replacement over the Middle Fork of the Smith River.

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

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DFG's most substantial concern is that the RDEIR/SEA does not clearly describe and analyze the magnitude and nature of the direct physical impacts to the environment from the loss of more than 1.2 acres of old growth and late-seral forest along US 199, nor does it provide feasible and effective mitigation for significant impacts of project activities on these forest habitats. 1

Recommendation 1. Based on information provided in this memorandum, DFG recommends Caltrans consider as significant, and provide appropriate mitigation for the permanent removal or loss of: 1) late-seral and old-growth upland Douglas-fir forests, 2) riparian forests including red alder and bigleaf maple, and 3) wetlands.

Additionally, the Tree Survey information in the text and tables of the RDEIR/SEA is unclear and offers conflicting statements in numerous locations regarding tree surveys, numbers of trees affected and/or proposed for removal, and extent of natural communities impacted by project activities. 2

Recommendation 2. DFG recommends the discrepancies in the RDEIR/SEA be resolved as described under Tree Surveys, below.

Late-seral Douglas-fir Forest: Significantly Rare, Unique, and Important Habitat 3

The loss of late-seral Douglas-fir forest is a significant impact for many reasons including a dwindling old-growth forest community; limited reserves of late-seral and old-growth Douglas-fir forests; the increasingly rare late-seral wildlife habitat elements on the landscape; and the cumulative long-term effects of loss of ecosystem inputs from these forests and large old trees.

Impacts of losing late-seral forests and large old trees from the landscape are long-term and far reaching, and limit available habitat for old-growth dependent species for decades or centuries. Impacts include both the immediate and the cumulative sustained loss of old-growth wildlife habitats, and the associated ecosystem inputs that drive and sustain these old-growth forests.

Decreasing forests and limited reserves
Within the last 150 years, forests in Northern California have changed tremendously from anthropogenic activities such as timber harvesting and road building. Compared to pre-settlement, a much smaller proportion of the forest is old-growth, and remaining old-growth stands generally occur on small and scattered parcels (Bolsinger and Waddell, 1993).

Old-growth forests in the western states, including Douglas-fir forests, have been decreasing significantly in recent years (Bolsinger and Waddell, 1993). The area with old-growth forest in California, Oregon, and Washington, including both redwood and Douglas-fir, has declined by two thirds within about 50 years, from 32.8 million acres in 1933-1945 to 10.3 million acres by 1992.

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The RDEIR/SEA states removal of old-growth Douglas-fir was not considered a significant impact because of the extensive range of the tree, and with more reserves than redwood. While it is true Douglas-fir has a more extensive range than redwood, the RDEIR/SEA provides no evidence to substantiate the claim of more remaining reserves of old-growth Douglas-fir than redwood. 3

In fact, results of DFG CalVeg analyses for Del Norte County estimate total old-growth Douglas-fir at 1,599 acres, while total old-growth redwood is estimated at 41,833 acres (Calveg, 2012). With regards to reserves in Del Norte County, DFG CalVeg analyses show protected reserves of old-growth redwood are 13 times more extensive than protected reserves of Douglas-fir (6,329 acres vs. 446 acres, respectively).

Late-seral wildlife habitat

Although removal of late-seral trees and forests adjacent to US 199 is generally linear in nature, removal of forests in and adjacent to sensitive and important riparian and riverine habitats increases old-growth habitat fragmentation by widening the US 199 footprint through the corridor along the Middle Fork of the Smith River.

The importance of late-seral forest habitats are extensively documented in the available literature. They provide structure and critical breeding and foraging habitats that are not found in young forests except as an occasional remnant feature of an older forest. Large old trees and their wildlife structural components require centuries to develop. In the Coast Range approximately 175 to 250 years are required to develop old-growth forests and reproduce the wildlife features associated with large old-growth trees (Franklin et al., 1981).

Old-growth forests are significantly different from younger forests in species composition, function, and structure, with differences related to several key structural components including: 1) live large old trees; 2) large snags; and 3) large logs on land and in streams (Franklin et al., 1981). These important old-growth structural components are related over time, typically going from component 1 to component 3 over decades or centuries. Effects of removal of component 1 (a live large tree) is magnified over time as it includes a resultant concomitant loss of wildlife habitat components 2 and 3 – the snag and large woody debris (LWD) attributes of late-seral forests.

In late-seral forests, numerous vertebrates find optimum breeding and foraging habitat features, including cavities, basal hollows, large limbs and broken tops, snags in varying states of decay, and dead and down woody material (Thomas 1979). Sensitive or lesser-known vertebrates requiring these old-growth habitat features for breeding or foraging include Vaux's swift (*Chaetura vauxi*); pileated woodpecker (*Drycopus pileatus*); red tree vole (*Arborimus pomo*), northern flying squirrel (*Glaucomys sabrinus*); ringtail (*Bassariscus astutus*), silver-haired bat (*Lasionycteris noctivagans*), long-eared

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Other species, including mycoheterotrophic plants and epiphytic lichens, also find optimum habitats in old-growth forests. The RDEIR/SEA reports mycotrophs are common at Washington Curve.

Old-growth Douglas-fir trees have significant attributes

On Page 2.3-3, the RDEIR/SEA considers removal of any large old redwood trees a significant effect as they are "...an irreplaceable resource because of their longevity, large diameter, height, the amount of time it takes to achieve their size, the unique micro-ecosystem supported by their upper canopy habitat and less than 5 percent of the original 'old-growth' forest remains uncut."

However, the same important attributes and conditions can be assigned to large old Douglas-fir trees. For example, old-growth Douglas-fir may be an irreplaceable resource due to: longevity of 350 to 750 years, diameters of 3 to 6 feet, typical heights between 165 and 295 feet, providing large snags and LWD for wildlife more quickly than redwood, and a long regeneration period. The removal and loss of irreplaceable large old Douglas-fir trees and forest must also be considered a significant effect of the Project.

Late-seral forest habitat loss: longevity of Project effects

Under "Effects on Natural Communities" on Page 2.3-11 the RDEIR/SEA discusses and acknowledges removal of mature trees is considered a permanent long-term effect. However, later on Page 2.3-23, the RDEIR/SEA states "Adverse effects to native species composition in existing natural communities as a result of this Project are expected to be minor and temporary."

Recommendation 3. DFG concurs that removal of mature trees from the landscape results in long-term and permanent effects to the natural community species composition, and recommends Page 2.3-23 be revised to reflect the more accurate information provided on RDEIR/SEA Page 2.3-11.

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Greenhouse Gas Emissions and Climate Change

Significant effects of loss of forests and large old trees include the loss of ecosystem services such as long-term carbon sequestration. A disproportionately high percentage of an old-growth forest's biomass and sequestered carbon (nearly half) can stem from as few as 1% of the trees (Lutz et al., 2012). Large trees (≥ 3 feet dbh) sequester carbon in plant tissue, often for centuries, and forests 200 years and older are estimated to sequester 8.8 tCO_2/ha/y on average (Luyssaert et al., 2008).

Along US 199, the RDEIR/SEA identifies more than 1.2 acres of mature forest and several large old-growth Douglas-fir trees to 52 inches dbh that will be removed as a result of the Project.

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Recommendation 4. DFG recommends the Final DEIR/SEA disclose and provide an analysis for the Project's contribution to greenhouse gas (GHG) emissions from the Project's removal of more than 1.2 acres of mature Douglas-fir forest vegetation along US 199, including an analysis of cumulative impacts of GHG on climate change. 4

Late-seral forest habitat at PCN2 5

Project disturbance for the Downstream Bridge Replacement takes place directly adjacent to and over the Middle Fork Smith River, where US 199 is currently located. This location is along the edge and transition zone between the river's aquatic habitat and the adjacent old-growth upland Douglas-fir forest.

The Arborist/Forester Report states approximately three-quarters of the 120-acre PCN2 action area (that area affected directly or indirectly by the Federal action) is composed of late-mature and old-growth coniferous forest with high canopy closure (over 80 percent). The remainder is primarily composed of early- and mid-mature coniferous forest with high canopy closure (over 80 percent). A stand-replacing fire in the late 1990's destroyed approximately 20 percent of the coniferous forest within the action area, equally distributed amongst early-, mid-, and late-mature seral stages.

The RDEIR/SEA and the Arborist/Forester Report describe the old-growth Douglas-fir stand on the east side of the northern approach, including some large old-growth trees >36 inches dbh in the Project Area that would need to be removed. The overstory in the Project Area also includes at least 14 mature Douglas-fir trees 24 to 36 inches dbh in addition to the old-growth trees. To the west of US 199 in the location of the fire, most of the larger trees have died in or after the fire.

An active northern spotted owl activity center (the Dollar Bend pair) is located near PCN2. In 2010, the pair was detected within the PCN2 action area. The pair's activity center was estimated approximately 0.12 mi (630 feet) south of the action area. Project activities at PCN2 will result in loss of approx. 0.7 acre suitable northern spotted owl nesting/roosting/foraging habitat in Douglas-fir forest (USFWS, 2012).

Table 2.3.1-1 in the RDEIR/SEA documents 2.88 acres of Douglas-fir forest at PCN2. Table 2.3.1-5 shows an estimated 1.0 acre of mature Douglas-fir forest will be permanently affected (removed) by Downstream Bridge Replacement Project activities at this site.

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Wetlands and Riparian Forests

Ecological functions and the importance of limited wetland and riparian habitats are extensively documented in the literature. California has experienced a substantial loss of wetland and riparian habitat in recent years, with California losing the largest percentage (91 percent) of original wetlands (Dahl, 1990). It is the policy of the Fish and Game Commission to ensure that proposed projects result in no net loss of wetland or riparian habitat acreages or values. All habitats should be protected by buffers or other measures as necessary to prevent impacts to water quality, fish and wildlife resources. Conversion or permanent loss of these limited wetland and riparian forest acreages, including red alder and bigleaf maple forests, must be considered a significant impact. 5

On SR 197, based on preferred alternatives, Tables 2.3.1-2 through 2.3.1-3 show permanent impacts to 0.013 acres of waters/wetlands (Ruby 1 and Ruby 2), and permanent impacts to 0.06 acres of red alder forest at Ruby 2.

Based on preferred alternatives, Tables 2.3.1-4 through 2.3.1-8 show permanent impacts to 0.041 acre of waters/wetlands on US 199. The preferred alternative at PCN2 will result in permanent impacts to 0.01 acres of red alder forest and 0.01 acres of bigleaf maple forest, and approximately 0.76 acres of temporary impacts to waters/wetlands.

Recommendation 5. DFG recommends the Final DEIR/SEA identify and include mitigation for the permanent loss of 0.054 acre of wetland and 0.08 acre of riparian habitats, including red alder and bigleaf maple forests. Mitigation for permanent losses should result in "no net loss" of either habitat; a typical mitigation ration for the loss of high-quality wetland or riparian habitat is 3:1.

Tree Surveys 6

The RDEIR/SEA on Page 2.3-9 states surveys were conducted Feb 23-25, 2009, yet in subsequent sections, the RDEIR/SEA states surveys were conducted February 22, 2009, and on additional unstated dates in December 2011.

Recommendation 6. DFG recommends clarification in the RDEIR/SEA of the tree survey dates and survey information including who conducted the surveys and on which dates.

At PCN2 the RDEIR/SEA contains conflicting statements about the number of trees proposed for removal, and it's unclear exactly which trees may be removed. For example: 7

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On Page 2.3-18, 4th paragraph the RDEIR/SEA states, "The 137 trees shown in Table 2.3.1-10… would be removed under all three alternatives." However, there are 171 trees shown in Table 2.3.1-10, and only 84 trees would be taken under the Downstream Bridge Replacement Alternative. 7

On Page 2.3-18, 5th paragraph, the RDEIR/SEA states an additional 29 trees (total 154) would be removed under the Downstream Bridge Alternative. Five large old Douglas-fir (*Pseudotsuga menziesii*) trees > 36 inches dbh would be impacted, including one 52-inch dbh tree that would be removed; one 40-inch dbh tree with 20-30% of root zone disturbed ("moderate" root effects); one 53-inch dbh tree with 10-20% root zone effects; and two trees, 37-inch dbh and 51-inch dbh with no root effects. However, Table 2.3.1-11 shows only 24 trees removed via this alternative. The RDEIR/SEA also states: "The 40-inch dbh Douglas-fir tree with moderate root effects may need to be removed."

On Page 2.3-18, 6th paragraph: the RDEIR/SEA states an additional 16 trees (total 141) would be removed under the Upstream Bridge Replacement Alternative, including a 42-inch dbh and a 48-inch dbh Douglas-fir. However, Table 2.3.1-11 shows 13 trees removed via this alternative, and include a 42-inch dbh and two 38-inch dbh Douglas-fir trees.

On Page 2.3-18, 7th paragraph, the RDEIR/SEA states an additional 23 trees (total 148 trees) would be removed under the Upslope Retaining Wall Alternative. This includes two large old-growth Douglas-firs (a 42-inch dbh and a 48-inch dbh), a 26-inch dbh Douglas- fir and a 23-inch dbh bigleaf maple (*Acer macrophyllum*). However, Table 2.3.1-11 shows five trees removed via this alternative, and none of those in the text are listed in the table.

Recommendation 7. DFG recommends the RDEIR/SEA clearly disclose all large old trees that may be impacted through ground-disturbing activities (both within and adjacent to the Project Area), and recommends clarification of discrepancies within the text and between the text and Tables 2.3.1-10 and 2.3.1-11 regarding how many and which trees are proposed for removal.

Recommendation 8. DFG recommends Caltrans include an additional table in the RDEIR/SEA that shows all large old trees over 24 inches in dbh that may be impacted by ground disturbing activities both within and adjacent to the Project Area, including species, dbh, and nature and level of potential impact. 8

Reestablishment of Native Species Composition in Existing Natural Communities 9

Reestablishing the natural community species composition (i.e., late-seral forests) in locations like the Project sites on US 199 where steep, rocky or nutrient-poor soils prevail is difficult at best. For long-term maintenance of essential characteristics of old-growth forests, management must focus on key features associated with these forests,

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beginning with live large trees, large snags, and LWD. Retention of remaining large old trees, and recruitment of new large old trees and habitat elements is required if old-growth wildlife features and values are to be retained in future years. 9

Section 2.3.1.3: Avoidance, Minimization, and/or Mitigation Measures

This Project has the potential to permanently remove a number of old-growth redwood stumps and large conifer trees during construction, including more than 1.2 acres of Douglas-fir forest.

The three years of mitigation and monitoring currently proposed for Natural Communities does not adequately compensate for the long-term permanent loss of large old-growth trees and forest habitat. If limited late-seral wildlife features and values are to be retained in future years, retention and recruitment of old-growth trees and forests is required.

Recommendation 9. DFG recommends Caltrans provide in the Final DEIR/SEA appropriate mitigation for the long-term and permanent losses associated with late-seral forests including more than 1.2 acres of large old Douglas-fir forest, and that Caltrans consult with DFG before construction begins to assess salvage options for large trees and stumps.

Recommendation 10. In addition, DFG recommends the final EIR/EA provide a timeline for mitigation activities that provides for implementation concurrently with the Project and within 2 years of its completion. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. 10

Mitigation for the loss of the late-seral forest should focus on avoidance, retention, and recruitment of late-seral forest elements on-site and in-kind. If this is not possible, off-site or out-of-kind mitigation will likely be required for Project impacts. 11

Recommendation 11. DFG recommends Caltrans focus mitigation efforts on high risk and high value areas such as those found on-site and locally within the Middle Fork Smith River and Smith River watersheds. For partial on-site mitigation, DFG recommends Caltrans consider in the Final DEIR/SEA the following:

1. Use excavated stumps and trees on-site locally for enhancement and/or restoration, as LWD on the ground and in riparian and aquatic habitats;

2. Provide intensive treatment and removal of invasive species within the Project area and along the roadway and river corridor to help maintain forest resiliency;

3. Provide similar on-site protection measures for old-growth Douglas-fir as for old-growth redwood (e.g. using only handwork and pneumatic excavation tools;

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excavating duff and top soil, watering during construction, etc.), where impact to these late-seral Douglas-fir trees does not include removal; 11

4. Intensively manage to reestablish native species in increased densities in other natural communities within and adjacent to the Project area, (e.g., "sparsely vegetated slope" and "ruderal/disturbed");

5. Provide on-site protection and mitigation measures for affected riparian trees not proposed for removal, including excavating duff and top soil by hand, watering during construction, etc.

6. Create snags in or near the Project area by anchoring larger conifer tree boles to create new snag habitat.

Recommendation 12. For off-site mitigation, DFG recommends Caltrans consider in the RDEIR/SEA the following: 12

1. Protect additional unreserved old-growth forests, e.g., purchasing acreage of existing old-growth Douglas-fir stands for transfer to a non-profit conservation organization for off-site mitigation for Project effects;

2. Promote increased natural community habitat connectivity for plants and animals and restore natural ecological process and movement by removing impediments and barriers to migrations, including wildlife crossings and corridors, and fish passage;

3. Provide large wood and stumps to be used for placement in DFG or other fish habitat or large wood restoration projects in Del Norte County;

4. Provide intensive treatment/removal of invasive species in the Middle Fork Smith River corridor along the roadway and river corridor both in between the Projects on US 199 and beyond to assist existing older forests in maintaining resiliency;

5. Implement management options on younger second or third growth stands on nearby protected or reserved public lands to accelerate or recreate old-growth characteristics, e.g., selectively thinning to increase growth rates; selectively girdling trees to increase snag component; placement of Project-generated LWD on the ground and in streams; and

6. Create snags on lands off-site on nearby protected or reserved public lands where this habitat element is lacking, by anchoring larger conifer tree boles to create new snag habitat.

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If you have any questions or comments regarding this matter, please contact Staff Environmental Scientist JoAnn Dunn at 619 Second Street, Eureka, California 95501 or telephone (707) 441-2076.

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ec: See Page 11

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Responses to California Department of Fish and Wildlife

Response to Recommendation 1

This comment recommends that the EIR/EA change significance determinations for impacts to 1) late seral Douglas-fir forest, 2) riparian forests, and 3) wetlands. The Department believes that impacts to these resources have been avoided, minimized and mitigated to less than significant as described in the Draft Environmental Impact Report/Environmental Assessment (DEIR/EA), Partial Recirculated Draft Environmental Impact Report/Supplemental Environmental Assessment (PRDEIR/SEA) and Final Environmental Impact Report/Environmental Assessment (FEIR/EA).

The Department agrees that the mature (or late-seral) Douglas-fir forest habitat is important, but does not concur with the conclusions or analysis presented by CDFW based on CalVeg data. CalVeg is a GIS based vegetation classification system maintained by the U.S Forest Service which includes information on the major habitat classification, seral stage (maturity and canopy structure) and size class of forest. The analysis by CDFW found 1599 acres of mature Douglas-fir forest, and 41,833 acres of mature redwood forest in Del Norte County. The Department's analysis of the CalVeg data shows there are 130,304 acres of mature Douglas-fir/Mixed Hardwood/Conifer Habitat, and 19,380 acres of mature Redwood habitat in Del Norte County.

The CalVeg database uses fields based on definitions in the California Wildlife Habitat Relationships (WHR) database. The fields used in the CDFW and Department analysis are:

WHRSIZE = This variable represents the dbh (diameter at breast height) size class of the forest habitat type, with largest size class (5) was used for the analysis representing stands with trees > 24 inches. This size class was assumed to be "mature" for this analysis, because the CDFW letter states that 24 inch dbh Douglas-fir should be considered mature.

WHRTYPE = This variable represents the dominant vegetation community based on WHR habitat type definitions, the values used in this analysis were RWD = Redwood, DFR = Douglas-fir and MHC = Mixed Hardwood/Conifer.

NWSTRUCT = This variable represents forest structure and is from the U.S Forest Service for use with the Northwest Forest Plan. The values represent single-storied (1) or multiple-storied canopy (2).

The canopy structure field (NWSTRUCT) is an incomplete data set. While the data is well populated for the coastal strip (within approximately 10 miles of the coast line), it is not populated for the inland areas surrounding the US 199 sites. The Department is not inclined to use this field in the analysis, because it would eliminate all stands outside of the coastal zone, regardless of canopy structure, and the does not accurately represent multistoried habitat across the county.

The forest type (WHRTYPE) at the Patrick Creek Narrows Location 2 area in question is listed as WHRTYPE=Mixed Hardwood/Conifer (MHC). This is a common forest type with Douglas-fir and other conifers mixing with the hardwood species such as tanoak and big-leaf maple. This

habitat type fits what Department surveys found in the area, as the Douglas-fir stands did have components of tanoak and big-leaf maple, as well as alder closer to the river. The Department included both the Mixed Hardwood/Conifer (MHC) and Douglas-fir (DFR) forest types in the analysis.

The size class (WHRSIZE) of "5" represents trees greater than 24 inches dbh. This is the largest size class in the database, and while trees present may be much larger than 24 inches, at this size forests will begin showing signs of maturity such as stem exclusion and a more complex canopy structure. The was the largest size class in the database and was used for both the CDFW and Department analyses. It should be noted that within the north coast region timber operations are regularly harvesting trees from 12 to 40 inches and greater.

The Department did not include NWSTRUCT in the analysis, and combined the WHRTYPEs DFR and MHC. Based on this broader analysis, the Department found 19,380 acres of mature Redwood Habitat, and 130,304 acres of mature Douglas-fir/Mixed Hardwood/Conifer habitat in Del Norte County. Thus there are substantially more acres of mature Douglas-fir than Redwood within the county and even more within the region if this analysis were to extend outside of the county. It should be noted that there is also a substantial Douglas-fir component within the protected mature redwood stands. This is not to minimize the importance of mature Douglas-fir forest habitat, but to demonstrate how the Department reached its significance conclusions.

The 1.2 acre amount in the PRDEIR/SEA is the total impacted Douglas-fir habitat, but not all of that habitat is mature, some of it would be young and mid-age Douglas-fir habitat. Additionally, the design has since been refined, reducing the necessary hillside cut areas. The area of mature Douglas-fir forest was calculated following Recommendation 8, that trees greater than 24 inches dbh be considered mature. The area of late seral forest impacted east of the bridge at the Patrick Creek Narrows 2 site is approximately 0.1 acre. The area west of the bridge between US 199 and the river is a strip of trees where the project would impact approximately 0.02 acres of mature Douglas-fir with two trees greater than 24 inches dbh. The area west of the bridge uphill from US 199 would be excavated, removing approximately 0.3 acres of mixed Tanoak/Douglas-fir habitat, of which 0.12 acres may be mid- to mature, the area of impact in this location was substantially reduced after further geotechnical studies. This slope is sparsely vegetated and contains two Douglas-fir trees greater than 24 inches dbh. The project would remove approximately 0.2 acres of mature Douglas-fir habitat at the Washington Curve site. As currently designed, the preferred alternative of the proposed project would remove approximately 0.42 acres of mature Douglas-fir forest habitat, and approximately 0.12 acres of early- to mid-seral Douglas-fir habitat.

The project impacts approximately 0.42 acres of mature Douglas-fir habitat, under the recommended CDFW definition. The following avoidance, minimization and mitigating measures were considered in the significance determination:

1. The small area of mature habitat to be permanently affected.
2. All large trees removed by the project will be used as large woody debris in salmonid restoration projects.
3. All disturbed areas will be revegetated with native species.

4. A program of invasive removal will be implemented to improve the resiliency of mature forest within the project vicinity.

While the Department does consider the large Douglas-fir trees at these sites to be an important ecological component, given the acreages of large size class Douglas-fir present within the county, the Department does not consider impacts to less than 0.00001% of the mature Douglas-fir habitat in Del Norte County to be a significant impact under CEQA. Nonetheless, the Department recognizes the importance of improving the resiliency of this natural community. One way this can be achieved is through the control of non-native invasive plant species. Therefore, the Department will enter into a cooperative agreement with the U.S. Forest Service to help fund ongoing weed eradication projects in the mature Douglas-fir forest community on U.S. Forest Service land in the Middle Fork Smith River watershed in the project vicinity.

Impacts to riparian habitat (red alder and big leaf maple) and wetlands will be minimized, avoided or mitigated as outlined in the DEIR/EA Section 2.3.2.4, with exact impacts and mitigations to be determined after final design is completed during the permitting phase of the project. Approximately 0.08 acres of riparian habitat will be impacted by the project at Patrick Creek Location 2. The project will restore an equivalent amount of riparian habitat in footprint of the old bridge after it is removed, and will detail this information in the California Department of Fish and Wildlife's Stream and Lakebed Alteration Agreement (1602). The 0.0006 acres of permanent wetland impacts at Patrick Creek Narrows Location 2 will be replaced at a 1:1 ratio. Details of mitigation measures will be negotiated with the U.S. Army Corps of Engineers (USACE) and the North Coast Regional Water Quality Control Board (NCRWQCB) during the permitting phase of the project, and will be detailed in the Clean Water Act (CWA) Section 404 Permit and Water Quality Certification (CWA Section 401). Based on the level of impact and avoidance, minimization and mitigation measures, together with the requirements of the necessary permits, the Department determines that these impacts to wetlands and riparian areas are not significant under NEPA or CEQA.

The FEIR/EA Section 2.3.1 was updated to reflect this information.

Response to Recommendation 2

The three primary sources of tree count discrepancy within the recirculated draft document and specialist reports are: 1) Multiple-trunk trees were counted by initially Caltrans as a single tree and later by the Arborists as individual trees ; 2) On the steep slope cut areas of The Narrows, Patrick Creek Location 2, and Washington Curve tree surveys were initially conducted from the roadway with binoculars and 3 years later surveys by foot were conducted; 3) From when the first tree surveys were conducted in 2009, Caltrans engineers have modified and refined the project design resulting in changes in tree impact estimates. The Department believes that the estimates of acreages and number of trees provided are adequate to characterize and evaluate the potential impacts and make a significance determination. The inconsistencies in the numbers of trees would not change any significance determinations. The discrepancies were minor and still allowed for an analysis and comparison of impacts.

This information has been added to the FEIR/EA Section 2.3.1.

Response to Recommendation 3

The Department concurs that the removal of mature trees is a long-term and permanent effect to the natural community, but does not agree that it rises to the level of a significant effect under CEQA for the reasons stated above in the Response to Recommendation 1.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 4

Caltrans has provided a best faith effort with the methodology currently available to identify the projected Carbon Dioxide emissions that may occur as a result of this project. Currently there is no widely accepted scientific methodology to calculate the change in emissions due to removal of the identified .6 acres of mature Douglas fir habitat.

Caltrans remains committed to reducing CO2 emissions through various activities as outlined in the climate change section of the environmental document.

In addition, the re-vegetation of all disturbed areas will help offset potential CO2 emissions increase.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 5

The Department will restore and enhance an equivalent amount of riparian habitat in the footprint of the old bridge after it is removed. The habitat will be restored at a 1:1 ratio because the habitat to be lost adjacent to the highway and bridge, and is not exceptional or high quality habitat. The acreages listed in the DEIR/EA and PRDEIR/SEA are approximations based on the potential footprint of the project at the time the DEIR/EA was published (2010). The designs used to evaluate environmental effects are preliminary, and the footprint of the project can often be reduced during the final design process after the FEIR/EA is complete and signed. Acreages for mitigation will be determined based on final design, and permitted through the CWA Section 404 Dredge and Fill Permit, CWA Section 401 Water Quality Certification and Lake and Streambed Alteration Agreement 1600 processes with the appropriate agencies (USACE, NCRWQCB, and CDFW respectively).

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 6

Department's Office of Field Surveys surveyed the roadways, including tree locations in 2008 and 2010. Consultant staff conducted additional surveys in 2009. Department design and environmental staff conducted surveys in 2010, 2011 and 2012. Details by site are in the FEIR/EA.

These dates and surveyors have been updated in the FEIR/EA in Section 2.3.1.

Response to Recommendation 7

Under the preferred alternatives, no large (greater than 36 inch dbh) redwoods would be removed at the Ruby 1 and Ruby 2 sites on SR 197.

Under the preferred alternatives 8 large (greater than 24 inch dbh) Douglas-firs would be removed, and one would have potentially substantial root damage and need removal at the US 199 sites.

Changes have been made in the FEIR/EA Section 2.3.1 to clarify this information.

Response to Recommendation 8

The Department has included information on which trees would be removed and which large trees would have root impacts in the text describing tree impacts for each site and alternative. The Forester/Arborist Report includes a table with all impacts to all trees potentially affected by the project.

These changes have been made in the FEIR/EA Section 2.3.1.

Response to Recommendation 9

Approximately 0.42 acres of low quality mature Douglas-fir would be impacted by the project. Overall, the habitat value of the Douglas-fir habitat in the project area is diminished by previous logging and a fire that killed many trees. Additionally, the wildlife habitat value of this forest community is reduced by the proximity of the highway and the associated noise and human activity. Nonetheless, after the project is completed, all temporarily disturbed areas will be revegetated with native local plant species characteristic of Douglas-fir forest community.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 10

This recommendation is for mitigation to occur concurrent to and/or within 2 years of project completion. All revegetation and invasive plant removal will begin within one year after construction completes ground disturbing activities at a site. Riparian restoration activities will be detailed in and be conditional of the California Department of Fish and Wildlife Stream and Lakebed Alteration Agreement (1602 permit).

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 11

1. Use of Large Woody Debris for enhancement.

   The Department will make all Large Woody Debris available for restoration projects.

2. Invasive species removal.

   The Department will conduct invasive species removal to enhance the resiliency of mature forest within the watershed.

3. Use same avoidance on Douglas-fir as proposed for Redwood.

   The Department will implement the Redwood root avoidance and minimization measures (FEIR/EA Section 2.3.1.3) when conducting work near Douglas-fir.

4. Re-establish native species in disturbed areas.

The Department will re-establish native species in disturbed areas. This is described in the FEIR/EA Section 2.3.1.2 and 2.3.1.3, and Appendix R.

5. Use same avoidance on Riparian as proposed for Redwood.

   The Department will implement the Redwood root avoidance and minimization measures (FEIR/EA Section 2.3.1.3) when conducting work near riparian trees.

6. Create snags with removed trees?

   The Department will not create snags. There are sufficient snags in the area already due to the past fires.

No revisions to the Draft EIR/EA were necessary.

Response to Recommendation 12

1. Protect unreserved late seral Douglas-fir.

   The Department found that the other measures (stream restoration, invasive plant removal) were more appropriate given the level of impacts.

2. Increase ecological connectivity: fish passage, wildlife crossings

   The Department considered these concerns and may find ways to incorporate wildlife crossing into other projects in the future.

3. Provide large stumps and woody debris to DFG for enhancement projects.

   The Department will make all Large Woody Debris available for restoration projects.

4. Invasive species control along corridor.

   The Department will conduct invasive species removal to enhance the resiliency of mature forest within the watershed.

5. Late seral management on reserved public lands.

   The Department considered this approach, but has settled on the invasive species removal measures.

6. Create snags on nearby reserved public lands by anchoring tree boles.

   The Department will not create snags. There are sufficient snags in the area already due to the past fires.

No revisions to the Draft EIR/EA were necessary.

4.2 Organizations

Two organizations, Environmental Protection Information Center (EPIC) and Friends of Del Norte, submitted comments in response to the Recirculated Draft EIR/EA. Both organizations submitted two separate comment letters. Comments submitted by EPIC and Friends of Del Norte, as well as responses to those comments, are provided below

EPIC (submitted by Andrew Orahoske)

epic

Keeping Northwest California wild since 1977

November 5, 2012

Transmitted via electronic mail

Jason Meyer
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Email: jason.meyer@dot.ca.gov

RE: Comments on Caltrans' Hwy 197/199 STAA Access Project and Recirculation of Draft EIR and Supplemental EA

Dear Responsible Officials,

I am writing on behalf of the Environmental Protection Information Center ("EPIC"), a nonprofit organization that works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in northwestern California. Consistent with this mission, EPIC submits the following comments and attachments to the California Department of Transportation ("Caltrans") on the proposed Highway 197/199 STAA Safe Access Project (the "Project"). Please include all attachments in the administrative record for this Project.

EPIC is aware that Caltrans, through this recirculation, is attempting to limit public comment to supplemental reports concerning tree impacts. Given the marked changes in the recirculated document, however, EPIC believes comment is appropriate on the nature and scope of the Project, its impacts, and alternatives. Furthermore, under NEPA, the agency has an ongoing duty to continually evaluate new information presented by the public and other sources when that information bears on a decision. Here, Caltrans must accept all information presented on the overall impacts of the Project and cannot limit its evaluation based on an illegal restriction. EPIC incorporates by reference its previously submitted comments on this Project. 1

As an initial matter, EPIC opposes the Project and demands that Caltrans simply abandon the Project in its entirety. We view this Project together with several others, including the already completed STAA project at Big Lagoon, the Highway 101 widening project through Richardson Grove State Park, the STAA project on Highway 299, the and the Willits Bypass project. 2

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EPIC (submitted by Andrew Orahoske)

Fundamentally, these projects constitute one major project to establish a STAA transportation network into and through coastal Northern California. When taken together, these Caltrans' projects pose significant and unnecessary risks to our region. STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, we urge Caltrans to spend that limited public funds on maintaining existing facilities and improving safety in ways that make common sense. 3 4

If Caltrans does not abandon the project, then EPIC maintains that an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. Based on the clear risks involved with this major highway development project, it is clear that significant impacts "may" occur and therefore an EIS is required. 5

The project would have significant impacts on: 6

- The Wild and Scenic Smith River
- Old-growth Redwoods and Douglas-fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls, Coho and Chinook Salmon, Steelhead and Cutthroat Trout
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyon slopes
- Rare plants, including species only in the Smith River serpentine soils

Based on the recirculated documents, and information which EPIC has recently obtained from Caltrans, EPIC maintains that the following additional significant impacts will result from the Project:

- Increases in large truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove). 7
- Increases of safety hazards from increased large truck traffic, including truck cargo spills that threaten water quality and endanger the drinking water supply And increased potential for traffic accidents in general given the unsafe condition occurring as a result of the design exceptions being implemented to make way for STAA trucks. 8 9

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 10

EPIC urges Caltrans to adopt the "no project" alternative and abandon this Project and focus on maintaining the existing road infrastructure. 11

EPIC (submitted by Andrew Orahoske)

Harm to Old-Growth Redwood and Douglas-Fir Trees, and Removal of Trees

Tree Roots and Removal of Hundreds of Trees

At both project locations on SR 197, many old-growth redwood trees (with a dbh of more than 36 inches) are within the project area. Caltrans admits that the agency will impact many old-growth tree roots. EPIC prevailed in the federal case against Caltrans' Richardson Grove project on the issue of old-growth tree roots and the lack of analysis by Caltrans. EPIC raised this point in a recent letter. Caltrans clearly has attempted to improve its analysis of the impacts to tree roots through development of an "Arborist/Forester" report and supplement to the Natural Environment Study through the submission of a Memorandum by Gail Popham, which are the basis for the recirculated DEIR/SEA However, Caltrans essentially ignored our concerns. 12

Moreover, the data in the Arborist/Forester Report and the Popham Memo is routinely inconsistent and unreliable. Here are some examples. 13

The August 21, 2012 Gail Popham Memorandum ("Popham Memo" or "Popham") provides inconsistent numbers of trees to be removed. It attempts to compare the numbers of trees to be removed as indicated in the March 2010 NES report with the more recent "Arborist/Forester Report." But these numbers are not consistent.

Popham reports that the March 2010 NES report determined that **224 trees** would be removed from seven locations. In the same document, Popham reports that Caltrans initially estimated **220 trees** would be removed.

Popham then reports that the "Arborist/Forester Report" revised estimate identifies **98 additional, or a total of 322 trees** to be removed. However, in the same document she then states the revised estimate is approximately **331 trees**, an increase of **111 trees**. Table 1, included in the memorandum, has a third and different number, listing **320 trees** to be removed.

Moreover, these figures are not consistent the figures in the "Arborist/Forester Report." For example, Popham Table 1 lists **138 trees** to be removed at the Washington Curve location, yet the Arborist/Forester Report advises at page 48 that **143 trees** will be removed. Other inconsistencies are noted in review of the Arborist/Forester report.

.

In the "Arborist/Forester" Report, the analysis is limited to only 4 of the 7 project locations, and potential effects only as to redwood trees at Ruby 1 and 2, and old growth Douglas-fir at PCN2. 14

The report advises that the "PEZ trees evaluated in this report are not necessarily the same trees that were identified in the DEIR/EA." The reason is "that the DEIR/EA identified many trees that are outside of the PEZ, and, as such, are not directly relevant to the project as planned." (p. 15) However, we could not find any explanation that justifies this statement, and identifies those trees which have been removed from consideration as potentially effected. 15

In addition, while summary conclusions are made as to what effects may or may not be "likely" we could not find any analysis of the current status of the trees, both individually and as 16

EPIC (submitted by Andrew Orahoske)

ecological communities. In order to evaluate whether the conclusions, for example, that root zone effects are "mostly none, minimal or slight," we need an explanation of the current conditions and relative health of the trees and their ecological communities. We believe that is missing from the "Arborist/Forester Report," the Popham Memo as well as the Recirculated DEIR/EA. 16 cont.

The report considers the effect of natural fill on root systems (p. 10), but this does not equate to the kind of fill that root systems will encounter with this road project and use. 17

In addition, we note that the report failed to evaluate an "old growth" stand of trees, "although 2 large old Douglas-fir trees alongside the highway are unavoidable and will be removed as a consequence of the project." (p. 40) The claim that "their removal will not change the characteristic of the "old growth" is not documented or justified. 18

Even though the Report admits at p. 48 that a 33" DBH Douglas Fir may not survive due to substantial root area being affected, it fails to evaluate the related effect this loss will have on the surrounding trees and slope. 19

The Arborist/Forester report is also internally inconsistent as to the number of trees to be removed. 20

> **Ruby 1**, on page 19, it reports that 2 alders and 2 redwoods will be removed, for a total of **4 trees**. On the next page, however, it refers to the **6** trees to be removed.
>
> **Ruby 2**, the text lists **9 trees** plus one associated sprout will be removed (p. 29), but the Table 8 lists **only 6 trees** for removal.
>
> **Patrick Creek Narrows 2**, no clear summary of tree removal is provided. Adding the figures from Table 12 indicates that **74 trees** will be removed. Adding the trees identified in the Discussion on page 47 indicates that **61 trees** will be removed. The "Summary of Tree Removals on Hillside above Rt. 199" states "**80 stems** in all" but the list only identifies **27 trees** slated for removal. And these figures are inconsistent with the Popham Table 1, which indicates that **108 trees** will be removed.
>
> **Washington Curve**, the text at page 48 states that **143 trees** will be removed; the text at page 51 states **140 trees** will be removed. And the list immediately below identifies only **108 trees** to be removed. As noted, the Popham Table 1 advises that **138 trees** will be removed.

And, just as with Richardson Grove, Caltrans is consistent in its inability to adequately mitigate for harm to the trees. While it represents that only hand digging, and air-spades will be used around tree root zones, in fact, it authorizes the construction engineer to decide on other methods for excavation. (DEIR2.3-25.) Without any standards to ensure no harm to the root zones. The only guidance is "to *minimize*" disturbance or damage. 21

EPIC (submitted by Andrew Orahoske)

Possible Removal of Old-Growth Redwoods

Caltrans admits that the agency may choose to remove old growth redwood trees within Ruby Van Deventer County Park, along SR 197. Somehow, the agency maintains that by purchasing old-growth redwoods off-site would mitigate for this harm. The agency ignores that fact that less than 2 percent of the original old-growth redwoods remain, and that the loss of even one tree cannot be mitigated for hundreds of years. This potential for removing old-growth Redwoods is clearly a significant impact on an increasingly rare ecosystem, which Caltrans has failed to analyze. 22

Removal of Old-growth Douglas-fir

Caltrans admits that the project will result in the removal of old-growth douglas-fir trees. The Arborist/Forester Report declined to evaluate the impact of removing these irreplaceable resources. The removal of these trees, and in conjunction with extensive road side cuts, will have a significant impact on the visual quality of the Wild & Scenic Smith River as well as numerous negative ecological impacts. For purposes of the timeframe for this Project, the loss of old-growth trees is an irreparable harm that cannot be mitigated, because it takes centuries to replace these trees on the landscape. 23

Harm to Coho Salmon and other salmonids

The Smith Rivers numerous fish species, including Coho Salmon, Chinook Salmon, Steelhead, and Coastal Cutthroat Trout would be negatively impacted by the project in the vicinity of Patrick Creek. 24

Caltrans admits negative impacts to Coho Salmon, a species protected under both the federal Endangered Species Act (ESA) and California Endangered Species Act (CESA). 25

Effects on coho salmon are expected to occur at Patrick Creek Narrows Location 2 sites because of the work proposed at these locations and the proximity to the Middle Fork Smith River. Coho salmon may be killed by construction activity. CESA stipulates that any lethal take of a state-listed species be fully mitigated. To fully mitigate for lethal take of coho under CEQA, the Department may be required to improve fish passage at upstream tributaries to the Middle Fork Smith River to the extent deemed acceptable by DFG. Incidental take authorization may be requested from NMFS for impacts on coho salmon. Caltrans admits that the project is likely to adversely affect Coho Salmon and their critical habitat. See generally, DEIS at 2.3-67.

Caltrans admits that juvenile coastal cutthroat trout may be harmed or killed by the work associated with the bridge replacement at Patrick Creek Narrows. Both bridge replacement alternatives will destroy nearly an acre of rearing and foraging habitat for cutthroat trout.

Caltrans has failed to actually ensure that the Project will not jeopardize the continued existence of the Coho Salmon or destroy or adversely modify critical habitat. While the filling of wetlands and bridge replacement have been consulted over, the overall operation of increased large truck traffic has not been analyzed. Considering that several major accidents and spills of toxic

EPIC (submitted by Andrew Orahoske)

chemicals have occurred on Hwy 199, it follows that the purpose of this project in bringing larger trucks and more traffic will only increase that risk in the future. 25 cont.

Caltrans also has failed to meet the duty to conserve, as defined by the ESA § 7(a)(1) and relevant caselaw. Section 7(a)(1) of the ESA directs Federal agencies to utilize their authorities to further the purposes of the ESA by carrying out conservation programs for the benefit of threatened and endangered species. Because Caltrans is operating under the delegation of authority to implement federal law by the Federal Highway Administration, Caltrans must comply with ESA Section 7(a)(1). Caltrans cannot point to a single action or set of actions, no less a program, for carrying out this conservation duty. Illustrative of this failure is the Caltrans bridge and culvert on Little Mill Creek on Hwy 197 just down the road from major work proposed in this Project. The bridge and culvert is a complete fish passage barrier, preventing the Coho Salmon from reaching spawning and rearing habitat. A Caltrans commissioned study in fact identified the Little Mill Creek barrier a priority for action, and yet the agency has completely ignored the problem. See Lang 2005 (attached via email to these comments). By failing to consider the existing fish passage barriers and other harm caused by Caltrans roadways and actions (including sediment, and polluted runoff), the agency has failed in its duties under the ESA. 26

Impacts Associated with Increased Large Truck Traffic

The recirculated documents fail to address the core impacts associated with expanding the use of Highway 197/199 to permit STAA trucks. Even with the project, the highways cannot physically accommodate these trucks without mandating design exceptions to not require adherence to the state highway design standards. The consequence is an **increased** safety hazard, which will impact not only the motorists who use these highways, but the natural resources along the highways, including the trees. 27 28

We asked Smith Engineering and Management to provide comment on this issue, as Caltrans continues to ignore it. Because the Project Study Report was not identified or listed as a Reference to the June 2010 DEIR/EA, and Fact Sheet Exceptions Reports were not available until a few months ago[1], EPIC provides Smith's comments now. In its thrust to open up coastal Northern California with an STAA transportation network, Caltrans has ignored these increased safety hazards. It must be addressed in document that the public is permitted to review and comment on. 29 30

In addition, as the Friends of Del Norte shows in its comments, opening Highways 197/199 to STAA trucks will definitely increase traffic from the inland Interstate-5 transportation network. This is particularly true during the winter months, when I-5 can be closed for extended periods of time due to snow and ice. Truckers will use the alternative coastal route to avoid those delays, and inherent hazards associated with weather conditions. Highway 197/199 do not have those weather limitations. These significant impacts must be evaluated including the direct, indirect and cumulative impacts. 31

[1] We note for the record that while Caltrans has made some materials available to EPIC for review, it has not made all public records available to EPIC for review prior to this November 5, 2012 deadline, thereby depriving EPIC of the ability to fully comment on all necessary issues. 29 cont.

EPIC (submitted by Andrew Orahoske)

Sincerely,

Andrew Orahoske
Conservation Director

Environmental Protection Information Center
145 G Street, Suite A
Arcata, California 95521

Enc.:

- November 5, 2012 Smith Engineering and Management Letter Addressed to Jason Meyer
- Lang, M. 2005. Caltrans District 1 Pilot Fish Passage Assessment Study: Volume 1 – Overall Results. Final Technical Report: Submitted to California Department of Transportation for the project: F 2001 EN 10 Researching State Highway Culverts to Determine Impacts on Threatened and Endangered Salmonids. Available at: http://www.calfish.org/

7

Responses to EPIC (Andrew Orahoske)

This letter included 2 attachments. The first, (Smith Engineering) is addressed below. The second attachment (Caltrans District 1 Pilot Fish Passage Study: Vol. 1 – Overall Results) is over 198 pages long, and is not included here. However, it is available for viewing online and upon request as a technical study.

Response to Comment 1

This comment states that Caltrans must consider all new information presented during the NEPA process. Under the CEQA guidelines for Recirculating an EIR, the agency need only recirculate the chapters relevant to the new information [15088.5(c)], and need only respond to the comments on the new information [15088.5(f)(2)]. Under NEPA, we are required to review all materials submitted, but we are not required to provide a written response to all comments. The Department meets these requirements by reviewing all comments submitted, and is providing written responses to these comments. It should be noted that the primary reason for the recirculation was to open public discourse on the methods and results or the Arborist/Forester study and the potential effects to large trees.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 2

This comment states opposition to the project and is not a comment on the RDEIR/EA.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 3

This comment states that this project in association with other projects in the region are to establish an STAA transportation network in Northern California. This is correct, please see Group Response #1. The comment also states that to projects pose significant risks. The risks, or effects, of this project were analyzed in the DEIR/EA and RDEIR/EA and determined to be less than significant under NEPA and CEQA.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 4

This comment states that the funds for this project should be used on different projects. Please see Grouped comment #1 and #2 for a discussion of the purpose and need, and costs vs. benefits of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 5

This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and accordingly proceeded to prepare a Finding of No Significant Impact (FONSI).

No revisions to the Draft EIR/EA were necessary.

Response to Comment 6

This comment states that the project would have significant impacts on various resources. The DEIR/EA and RDEIR/EA analyzed all of these resources and determined that there would not be significant impacts. For Wild and Scenic Rivers see DEIR/EA Section 2.1.1.3 and Chapter 4 of the FEIR/EA for the consultations with the Forest Service and National Park Service on potential effects, and Group Response #5. For effects to large trees see Grouped Response #4. For effects to endangered species see the DEIR/EA and FEIR/EA Section 2.3.5, and Chapter 4 of the FEIR/EA for consultations with USFWS and NMFS. For effects to tourism, recreation and parks see DEIR/EA and FEIR/EA Sections 2.1.1.4 and Appendix B (4f) Evaluations and the FEIR/EA Chapter 4 for 4(f) consultations with the Forest Service and Del Norte County Parks. For geologic stability concerns see DEIR/EA and FEIR/EA Section 2.2.3. For rare plants see the RDEIR/EA Section 2.3.3 and the Response to DFG comments on the DEIR/EA.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 7

This comment states there will be increases in large truck traffic between the Bay Area and Grants Pass. The Traffic Study for the project considered these effects found there would be a small increase in the amount of traffic along the 197/199 route. This increase was determined to not be significant, please see DEIR/EA Section 2.1.5.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 8

This comment states there will be increased safety hazards from cargo spills. Please see the response to Vern Powers comment #1 for a discussion of cargo spills and hazardous materials.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 9

This comment states there will be increased safety hazards from collisions. Please see Grouped Response #8 for discussion of safety concerns.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 10

This comment states that Department's Route Concept Report recommends leaving SR199 a 2-lane, conventional highway. This is correct, and the highway will remain a 2-lane conventional highway. STAA access can be achieved on a 2-lane conventional highway.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 11

This comment states support for the "no project" alternative.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 12

This comment states that the Department conducted an additional study to investigate the potential impacts to large trees, but failed to address the concerns of the commenter. The Department did conduct an additional study, incorporated the information into the RDEIR/EA and circulated it for public review. The Forester/Arborist Report did consider the issues raised in the Richardson Grove Operational Improvement Project when developing a methodology. It is not clear which specific concerns were ignored.

No revisions in the FEIR/EA were necessary.

Response to Comment 13

This comment states that data in internal technical memo, the Arborist/Forest, and the RDEIR/EA are not consistent. There are some discrepancies within the counts of trees to be removed at the various sites. The discrepancies are due to the data coming for different surveys being conducted under different methods and the project footprint changing slightly as the design is refined. The three primary sources of tree count discrepancy are: 1) Multiple-trunk trees were counted by initially Caltrans as a single tree and later by the Arborists as individual trees ; 2) On the steep slope cut areas of The Narrows, Patrick Creek Location 2, and Washington Curve tree surveys were initially conducted from the roadway with binoculars and 3 years later surveys by foot were conducted; 3) From when the first tree surveys were conducted in 2009, Caltrans engineers have modified and refined the project design resulting in changes in tree impact estimates. Some surveys focused on trees to be removed and the Forester/Arborist Report focused on the potential impacts to the trees that would remain. The larger impact (higher number of trees) for each site was used to ensure the full potential impact was analyzed and disclosed. It is likely that through final design the project the project footprint will be refined and the impacts may be decreased. The Department believes that the estimates of acreages and number of trees provided are adequate to characterize and evaluate the potential impacts and make a significance determination. The minor inconsistencies in the numbers of trees would not change any significance determinations.

The FEIR/EA Section 2.3.1 was changed to address this concern and updated with the most current tree numbers.

Response to Comment 14

This comment states that the Forester/Arborist Report only analyzed four of the seven project sites. The Forester/Arborist Report was primarily to address potential impacts to large trees adjacent to the project sites. The Patrick Creek Location 1 and 3, and Narrows did not have large trees adjacent to or potentially affected by the project and thus were not included in the analysis. This focus was due to concerns over large trees and late seral habitats. The north coast of California has extensive timberlands, both private and public, and younger seral stages are well represented within the region and thus were not considered as a sensitive resource requiring additional analysis.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 15

This comment questions the Potential Effects Zone and differences between which trees were addressed in DEIR/EA and the Forester/Arborist Report. The DEIR/EA discussed trees that would be removed by the various alternatives. The Forester/Arborist Report analyzed only the preferred alternative, and focused on potential effects to the trees which would remain. Thus there were trees potentially identified previously in other alternatives which were not included in the analysis, because they were not close enough to the project (based on the Root Health Zone). Also, the Forester/Arborist Report did not analyze potential impacts to individual trees that the Department had already determined would be removed by the preferred alternative. Trees which were over 5x dbh from the project footprint were not included in the Forester/Arborist Report.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 16

This comment states that there was no analysis of the current status of the trees relative health and ecological communities. The current health of the trees was recorded in Forester/Arborist Report as described on pages 16 through 18. Ruby 1 was described as being in a "remarkably healthy condition" on page 19; Ruby 2 is described as "fragmented yet healthy very large old trees" on page 27; the various stands at Patrick Creek Location 2 are described on page 40; and habitat at Washington Curve is described beginning on page 48. Data recorded on the current condition of the trees is reported in the Appendix at the end of the Forester/Arborist Report. The focus of the report was to analyzed the potential effects of the project on the individual trees, not to extensively characterize their current condition. The Forester/Arborist Report did state that in the overall context of forest resources within the region the effects of the project were not substantial. The DEIR/EA, RDEIR/EA and FEIR/EA Section 2.3.1 discusses the natural communities and ecological significance of the potential effects of the project. The DEIR/EA, RDEIR/EA and FEIR/EA Section 2.3.3, 2.3.4 and 2.3.5 discuss potential effects to specific plants, animals and federal and state listed threatened and endangered species. These effects were determined to be less than significant under NEPA and CEQA for the preferred alternatives.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 17

This comment states that the Forester/Arborist Report does not consider the effects of fill due to road projects. The Forester/Arborist Report states on page 8, under "c. Fill in the Root Zone" that "Fill soil is one of the most damaging construction operations affecting root systems." It continues to discuss the impacts that soil compaction can have on root systems. Fill within the Root Health Zone was one of the primary impacts analyzed.

Response to Comment 18

This comment questions the analysis and impacts to "old growth" Douglas-fir at Patrick Creek Narrows Location 2. This stand east and northeast of the bridge was described as an old-growth stand. The portion of the stand that was not evaluated was the portion uphill from the project site, outside of the zone of potential impacts. The trees to be removed and impacts to remaining trees are described in the RDEIR/EA Page 2.3-18. The trees to be removed are along the highway and constitute approximately 0.1 acres of a stand which is at least 70 acres, thus removing

approximately 0.14% of the stand. Thus, the character of the stand would not be affected because of the small portion of the stand which would be affected by the project.

Response to Comment 19

This comment states concern about effects to the trees and slope surrounding a 33 inch dbh Douglas-fir (45_PAT in the Forester/Arborist Report) which would have substantial root impacts and may not survive the implementation of the project. The tree does not provide shade to the river. It does not represent contiguous habitat, in that it is part of a narrow strip of trees between the highway and the river. Across the river is a slope which suffered a stand replacing fire and is currently in an early seral stage of shrubs. The slope is not geologically such that the loss of this tree would compromise the slope. Thus, potential effects of the loss of this one tree are insignificant.

Response to Comment 20

This comment states that the number of trees to be removed is not internally consistent within the Forester/Arborist Report. Please see the response to EPIC 2012 Comment 13 above.

Revisions have been made in the FEIR/EA Section 2.3.1 to update these numbers.

Response to Comment 21

This comment states that there are no standards for protection of tree roots, and the construction engineer is authorized to approve alternative methods of excavation. Because the exact location of underground roots is unknown until excavation begins, it is difficult to account for all instances which may be encountered during construction. The intent with this language is for the construction engineer and the arborist monitoring the construction to confer and come up with reasonable solutions to logistical problems during construction within the Root Health Zones of large trees. The measures in the FEIR/EA have been updated to reflect that the other excavation methods must be authorized by the on-site monitoring arborist.

Revisions were made in the FEIR/EA Section 2.3.1.3 to update the protection measures.

Response to Comment 22

This comment states that protecting large redwoods off-site is not sufficient mitigation for removal of large redwoods. The Department does not consider these trees to be representative of pristine old-growth redwood ecosystems, because it is a thin strip of edge habitat adjacent to a highway, residential, quarry and industrial timber activities. If the Ruby 2: Four-Foot Widening or Ruby 2: Two-Foot Widening, which would remove large redwoods, were selected, it may require a Statement of Overriding Considerations. However, the Department selected the Ruby 2: Two-Foot Widening in Spot Locations alternative, which has no significant removal of large redwoods, and therefore would not require mitigation.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 23

This comment states that the removal of a large Douglas-fir should be a significant impact. The Department does not consider the removal of large Douglas-fir to be a significant impact, please see the response to CDFW 2012 Comment #1 for a discussion. Effects on the visual character of

the Wild and Scenic Smith River were evaluated in the DEIR/EA Section 2.1.6 and in consultation with the Forest Service (see FEIR/EA Section 4.3) and determined to not be significant.

The FEIR/EA Section 4.3 was updated to include consultations with the Forest Service for 4(f) and Wild and Scenic Rivers.

Response to Comment 24

This comment states that the project will have negative impacts on salmonids within the Smith River at Patrick's Creek Narrows Location 2. The project described in the DEIR/EA included in stream work which had the potential for lethal take of Coho Salmon. The design and construction techniques have been modified to avoid in-stream work and through consultation with NMFS it was determined the project "may affect, but is not likely to adversely affect" the coho salmon or their critical habitat.

Revisions were made to the FEIR/EA Section 2.3.5 to reflect this change.

Response to Comment 25

This comment states that the project will have negative impacts on salmonids within the Smith River at Patrick's Creek Narrows Location 2. The project described in the DEIR/EA included in stream work which had the potential for lethal take of Coho Salmon. The design and construction techniques have been modified to avoid in-stream work and through consultation with NMFS it was determined the project "may affect, but is not likely to adversely affect" the coho salmon or their critical habitat.

The Department does not anticipate an increased incidence of spills, see response to Vern Powers Comment 1. The Department does not anticipate a significant increase in truck traffic over the route, and there is no evidence that increased truck traffic on the roadway would lead to an increased impact to fish in the river.

Revisions were made in the FEIR/EA Section 2.3.5 to reflect the new information on impacts to salmonids.

Response to Comment 26

This comment states that the Department is not meeting its obligations under NEPA assignment by the Federal Highway Administration to meet Endangered Species Act Section 7(a)(1) to carry out conservation programs. The Department has designated District Fish Passage Coordinators, and is part of the Fish Passage Advisory Committee (FishPAC), which meets quarterly and includes USFWS, NOAA-NMFS, CDFW and the California Coastal Conservancy. The Department commissioned the Lang 2005 report to prioritize efforts to address fish passage. This report is being used, and under Senate Bill (SB) 857 the Department keeps track of projects which improve fish passage. The Department is required by SB 857 to improve fish passage when a barrier is within the limits of a project. However, there are no fish barriers listed in the Lang report that fall within the boundaries of the project sites. The Department also worked with the California Department of Fish and Wildlife to implement the Chadd Creek Fish Passage Modification. Thus, the Department is actively working to improve fish passage and is meeting the requirements of ESA 7(a)(1).

No revisions to the Draft EIR/EA were necessary.

Response to Comment 27

This comment states that the highway cannot physically accommodate the STAA trucks without design exceptions. The project was specifically designed to accommodate the STAA trucks, even with the design exceptions. Please see the response to the Smith letter below for a discussion of design exceptions.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 28

This comment states that there will be an increased safety hazard after implementation of this project. The improved roadway design will offer safety enhancements to all drivers along this route such as, improved geometry, increased sight distance, wider lanes, and wider shoulders.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 29

This comment states that Smith Engineering and Management was asked to comment on the Draft Project Report. The Smith letter is discussed below. EPIC filed a California Public Records Act request during the circulation of the RDEIR/EA, the Department is responding to this request.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 30

This comment states that there is an increased safety hazard associated with this project. The improvements in this project will enhance safety through improved roadway geometry, greater sight distance, wider lanes and wider shoulders.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 31

This comment states that there are impacts associated with increased traffic along SR 197/US 199 when Siskiyou Pass closes due to winter weather conditions. Please see the response to Friends of Del Norte 2012 response to comments 1-23 below for a full discussion of potential impacts.

EPIC (submitted by Smith Engineering)

SMITH ENGINEERING & MANAGEMENT

November 5, 2012

Sent via electronic transmission: Jason meyer@dot.ca.gov

Mr. Jason Meyer
California Department of Transportation
P.O. Box 3700
Eureka, CA 95502-3700

Subject: Del Norte 197/199 Safe STAA Access Project

P12010

Dear Mr. Meyer:

1

As requested by Friends of Del Norte and the Environmental Protection Information Center, I have reviewed the Caltrans Draft Project Report (hereinafter "the PR") and supporting documentation for the Routes 197/199 Safe STAA Access Project in Del Norte County My qualifications to perform this review include registration as both a Civil and Traffic Engineer in California and 44 years professional consulting practice in these fields. I have extensive experience in matters of highway design and highway safety in California. My professional resume is attached. My comments follow.

Assessment In Brief

Contrary to the repeated statements in the PR, introduction of the longer STAA trucks and construction of the measures necessary to enable them to theoretically navigate the route combination is likely to increase rather than decrease crashes. The PR and related documents fail to evaluate this probability.

A simpler program of improvements not involving provision for STAA trucks could improve traffic safety at lower cost and with less invasive changes to the roadside environment.

Supporting evidence for these points is provided below.

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1 cont.

Why the Project May Render the Route Combination Less Safe

What the Project does is to define a minimum program of improvements that *theoretically enable* an STAA truck to be driven through the route combination without crossing the centerline, running off the road or striking a roadside obstacle. We use the words "theoretically enable" advisedly, because the facilities that would be provided by the Project require that the drivers of STAA trucks and other long vehicles to select and maintain a virtually perfect line of travel through some curves to avoid crossing the centerline, running off the road or otherwise striking a roadside obstruction. For example, the fact sheet for exceptions to mandatory design standards for The Narrows (DN 199 PM 22.7 – 23.0) included as PR Attachment F-4 indicates that the swept path width for an STAA truck on the proposed alignment at this location is 12 feet wide. This means, as the cited attachment indicates, that with only 12-foot travel lanes and 2-foot shoulders on either direction of the roadway under the Project, the driver of an STAA vehicle has only 1 foot of tolerance to either side of the perfect line through the curve; any more deviation either way and the passage involves a hazardous incident. Ordinarily, if there were 12-foot lanes and shoulders conforming to the applicable mandatory 8-foot width standard, an STAA driver would have 4 times as much leeway to either side of the perfect line through the curve to negotiate it safely than the Project provides.

The driver's difficulty in picking and maintaining a near perfect line through this particular location are compounded by three closely spaced reversing curves, each of shorter radius (sharper curvature) than the mandatory minimum radius for a 40 mph design speed (respectively only 59%, 68% and 73 percent of the mandatory design minimum). Hence, the driver's task is not just picking and maintaining a near-perfect line through a narrow area, but doing so on thrice-reversing curves of substandard sharpness.

Moreover, the driver's difficulty is further compounded by the fact that these curves restrict stopping sight distance to that adequate for 30 miles-per-hour, and to only 25 miles-per-hour for a 120-foot section rather than the 40 mph approach speed. In other words, the driver must slow down from normal speed, pick and maintain a near perfect line through a narrow area on a set of sharp, triple-reversing curves at a place where line-of-sight to that perfect line-of-travel is restricted.

These compounding conditions, to say nothing of other normal ones like high wind, wet pavement and dark of night, lead to an obvious conclusion that the proposed Project's features impose too challenging task on big-rig drivers and as the result, frequent hazardous incidents involving failure to stay with the narrow 1-foot envelope of tolerance to either side of the perfect line will occur. Consequently, even with the proposed roadway modifications, introduction of

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STAA trucks to the route combination will increase hazard to the traveling public. It is insufficient to claim that the geometric features of the route, though continuing to be substandard with the Project improvements, are better than what exists and that an STAA truck, if perfectly driven under perfect conditions can safely negotiate the route combination. If Caltrans is determined to authorize STAA trucks on this route, it must define and implement an improvement plan that provides a normal envelope of safety for the variations from the perfect driving line that a normal, alert truck driver running the entire length of the route would typically experience including the variations that result from the vaguaries of wind, wet pavement and dark of night. If such an improvement plan is too costly or is too detrimental environmentally, then Caltrans must admit it is infeasible to approve STAA trucks on this route combination. 1 cont.

When the consequences of all the Project's exceptions to mandatory design standards are viewed in combination as in the above example, it becomes obvious that Caltrans attempt to justify designating this route combination for STAA trucks while avoiding the enormous cost and environmental consequences of improving the road to, or even close to, minimum mandatory standards, involves a significant compromise to public safety.

A second safety issue, aside from crashes involving big rigs, is how the Project's roadway features affect the safety of other roadway users. The PR's record shows that most of the crashes involve run-off-the-road or (to a much lesser extent) centerline crossover incidents where excessive speed, wet pavement and nighttime darkness were factors. The PR and its Exceptions To Mandatory Standards attachments assert that the added shoulder widths at most of the locations where work is contemplated will create an increased recovery area that will enable motorists to avert many crashes. This optimistic assertion ignores two salient contrarian factors.

- The added shoulder width at most locations is marginal in relation to mandatory minimum shoulder width and to true clear recovery zones.
- The increases in curve radius and other improvements to curve alignments and introduction of engineered superelevation on curves will tend to increase traffic speed, thereby increasing the propensity of run-off incidents and increasing the width of recovery area needed to avoid crashes.

Below we examine how the Project's features affect these considerations at each work location.

Ruby 1

Although the PR Table associated with Section 5 claims that Ruby 1 meets all mandatory design standards, the actual approved Fact Sheet Exceptions to

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Mandatory Design Standards for this location reveals that there are two exceptions and appears to have omitted a third. The first exception is to the mandatory shoulder width of 4 feet applicable at this location. The Project design does provide the required 4 foot shoulders on the inside of curves because it is needed to accommodate STAA offtracking. But on the outside of the curves, where run-offs due to speed, darkness and wet pavement most frequently occur, a variable shoulder ranging from as little as 0.5 feet (as little as 12.5 percent of mandatory minimum) up to the mandatory 4 feet would be provided (this is changed from the existing shoulder of 0.5 feet to 3.4 feet). The changes to the outside shoulders are obviously very marginal. Meanwhile, the Project would also increase curve radii in the area from seriously non-conforming 300 and 430-foot lengths to 575 and 550-foot radii and improve superelevation, though not fully conforming to mandatory standards as noted in the Exceptions Fact Sheet. These changes will *increase* the comfortable speed through the curves from 36 to 42 miles-per-hour (a 16.7 percent increase). This change in comfortable speed would offset the benefits of marginally increased recovery areas the Project provides on the outside of curves, the place on curves where most run-offs occur due to excess speed, wet pavement and darkness.

1 cont.

Interestingly, this overall section of Route 197 has a purported design speed and posted speed limit of 55 miles-per-hour although advisory speeds of 35 and 30 miles-per-hour are posted on the subject curves. This poses several issues.

- The standard curve radius for a 55 mile-per-hour design speed is 1000 feet.[1] The PR and the Exception Fact Sheet make no mention that the curve radii proposed in the Project at this location, although improved, remain only approximately half the mandatory minimum for the design- and posted speed.
- The fact that the posted speed limit on the specific Ruby 1 area approach is 55 miles-per-hour makes it likely that many vehicles will enter the subject curves at speeds well above the advisory speed signs of 30 and 35 miles-per-hour or the comfortable speed of 42 miles-per-hour. Contrary to the claim of the PR and its exceptions attachment, this makes it unlikely that the Project's marginal improvement to recovery area would reduce the incidence of the types of collisions experienced at the subject location.
- The PR admits that traffic enforcement on the subject routes is sparse. This makes it likely that many vehicles will attempt to travel faster than the posted and advisory speed limits.
- *Highway Design Manual* Topic 309.1(2) indicates that on conventional highways a clear recovery zone of 20 feet minimum is desirable. Although this is a desirable, not mandatory standard, it illustrates the sheer

[1] Value interpolated from Caltrans *Highway Design Manual* Table 203.2.

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inadequacy of the proposed 0.5 to 4-foot shoulders in this segment of the Project, especially with the changes to the curve radii and superelevation engendering increased speeds.[2]

1 cont.

In summary, there is no reasonable support for the PR's assertion that safety will be enhanced by the proposed marginal increases in shoulder width (recovery area) would reduce crash incidence and substantial evidence that changes in speed characteristics engendered by the Project would cause greater crash incidence.

Ruby 2

The concerns in this segment of the Project are similar to those described above for Ruby 1. The Project would widen shoulders at these curves from a variable 0- to 2 feet to a consistent 2 feet (minimum mandatory standard at this location is 4 feet). The Project would also change the radius of curves at this site from 200 feet to a still substandard 400 feet (minimum mandatory standard for 40 mile-per-hour speed limit is 550 feet. Sight distance, though improved, would remain 23% short of the mandatory minimum for 40 miles-per-hour. Rather than decreasing collision incidence, the increased speed engendered by the improved curve radius, compounded by the remaining sight distance deficiency, would likely offset any benefits of the increased recovery area provided by consistent 2-foot shoulders and result in increased crash incidence.

Patrick Creek Location 1.

The proposed horizontal curve and shoulder changes at this location appear as a reasonable response to the constraints of the site. However, the PR unreasonably minimizes its estimate of the potential consequences the considerable sight distance deficiencies at this location, dismissing them as likely to cause only minor rear-end collisions. In fact, at a 55 mile-per-hour speed, rear end collisions have the potential to be far worse than minor and in addition, losing sight of the road ahead can cause drivers to misjudge the alignment with more serious run-off-the-road and cross-centerline crashes as the result. In addition, the PR appears to have failed to assess the potential compounding effects of sight distance limitations on overlapping or closely spaced combinations of horizontal curves. More study of this issue is needed.

Patrick Creek Location 2

[2] Conventional highways with posted speed limits with posted speed limits at or below 40 miles-per-hour and curbs are exempt from clear recovery zone requirements. Since the posted speed limit is 55 and no curbs exist or are proposed, this exemption does not apply to the Ruby 1 segment.

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The PR considered 3 alternatives at this location: replacing the existing bridge at an upstream location with corresponding roadway changes, replacing the existing bridge at a downstream location with corresponding roadway changes, or preserving the existing bridge with changes to the approach roadway alignments to increase curve radii, eliminating the need for large vehicles to cross the roadway centerline while entering and exiting the bridge. Subsequently, Caltrans has settled on the downstream bridge replacement as the preferred alternative. The alternative to preserve the existing bridge is dismissed, despite costing only two-thirds the cost of the replacement alternatives (roughly $6 million versus $9 million). The reason given is "functional obsolescence".[3] Since the primary element of functional obsolescence apparently is the need of large modern vehicles to cross the roadway centerline while getting on and off the bridge, a condition remedied by approach realignments in the 'preservation alternative', this dismissal is ridiculous. Although the present bridge lacks room for walkable and bikeable shoulders, this is not reasonable justification for dismissal through functional obsolescence, since much of the entire 197/199 route combination lacks walkable and bikeable shoulders.

1 cont.

Caltrans PR also failed to consider two other very low cost alternatives for preserving the existing bridge that are easily and quickly constructible and that would avoid the environmentally intrusive massive rock slope cuts needed to realign the approaches in the 'bridge preservation' alternative and that are also features of the upstream and downstream bridge replacement alternatives. The simplest would be to place signs on the immediate approaches to the bridge requiring traffic approaching the bridge to "Yield To Traffic On Bridge". In this way, there would be no conflict when large vehicles need to cross the centerline while entering or exiting the bridge. The other slightly more sophisticated way of maintaining the functionality of the existing bridge and approaches without massive approach reconstruction is to operate the bridge and its immediate approaches in reversible one-way operation controlled by traffic signals at each end. This latter alternative would also remedy the current lack of shoulders satisfactory for use by bikes and pedestrians, since, with the bridge essentially operating as a one-lane bridge, there would be adequate room for walkable/bikeable shoulders.

The Exceptions To Mandatory Design Standards Fact Sheet for the downstream bridge replacement alternative reveals that Caltrans currently preferred alternative would involve significant compromises to design standards. In an area where the posted speed limit is 55 miles-per-hour, the three approach curves, realigned at high costs with massive rock slope cuts, would only support speeds of 25, 32 and 32 miles-per-hour respectively and would have curve radii

[3] No evidence of structural deficiency is presented.

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only 21.4%, 25% and 25% of the minimum mandatory curve radius for the 55 mile-per-hour speed limit. This large a disparity between the high speeds at which vehicles approach and the low design speeds supported by the substandard curve radii is a circumstance under which run off the road and centerline crossing hazardous incidents will continue to be prevalent. 1 cont.

Similarly, the compromises to mandatory minimum standards for curve radius, shoulder width and other separations from lateral obstructions result in 4 situations where the mandatory minimum 500 foot stopping sight distance to support the 55 mile-per-hour speed limit is not achieved, with available sight distance limited to respectively 131-, 177-,199- and 199-feet (26% to 40% of the mandatory minimum). These available sight distances support safe speeds of only 21, 26, 30 and 30 miles-per-hour respectively. The large disparity between the posted speed limit and the safe speeds that would be supported by available sight distance is a serious compromise to safety. This situation is compounded by portions of the road located within Patrick Creek Narrows Location 2 where stopping sight distance is also compromised below mandatory minimum by the proposed vertical alignment of the road. There are 4 such locations some of which are contiguous or overlapping to the locations where sight distance is also impaired by horizontal obstructions. Available sight distance at these locations are respectivel 300-, 442-, 330- and 370-feet, supporting safe speeds of 40, 50, 42 and 45 miles-per-hour (as contrast with the 500-feet minimum required for the 55 mile-per-hour speed limit).

Patrick Creek Location 3

Modifications proposed at Location 3 involve construction of a soldier pile retaining wall, eliminating an S-curve alignment and widening shoulders.
Although an S curve is eliminated, all of the 5 remaining curves in the segment continue to be substandard (less than the 1000-foot mandatory minimum for a 55 mile-per-hour design speed). The remaining curves have respective radii of 895-, 300-, 300- ,300- and 500-feet, supporting design speeds of 52, 30, 30, 30, and 38 miles per hour respectively. Hence, there remains a serious disparity between the safe speeds of the curves and the speed limit at 4 locations as identified in the Exceptions To Mandatory Design Standards Fact Sheet. However, the Fact Sheet fails to note that this creates substantial potential for motorists to over-drive the curve and that the proposed design is also in conflict with the principles of Alignment Consistency described in *Highway Design Manual* Topic 203.3. This topical section states:

> "*Sudden reductions in alignment standards should be avoided. Where physical restrictions on curve radius cannot be overcome and it becomes necessary to introduce curvature of lower standard than the design speed for the project, the design speed between successive curves should change not more than 10 miles per hour. Introduction of curves with lower design speeds*

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should be avoided at the end of long tangents, steep downgrades , or at other locations where high approach speeds may be anticipated."

1 cont.

Clearly, the disparity between Curve 31 (52 mph) and Curve 32 (30 mph) is more than double the tolerable maximum and is a safety concern. A similar disparity exists in Patrick Creek Narrows Location 1 between Curve 12 (53 mph) and Curve 11 (31 mph).

The proposed Project leaves stopping sight distance below minimums at 4 locations, two due to lateral obstructions and two due to vertical alignment. The lateral obstructions limit available sight distance to that suitable to 28- and 30 miles per hour. The vertical alignment sight distance obstructions limit available sight distance to that safe for 40 and 47 miles-per-hour. The safe speeds at the horizontal obstruction areas particularly disparate from the 55 miles-per-hour posted speed limit for the area.

The Narrows

The deficiencies in the Project proposal for this segment have already been discussed extensively in this report and will not be reiterated here.

Washington Curve

This area of US 199 has a posted speed limit of 55 miles-per hour. Inexplicably, Caltrans has chosen to design the Project in this segment for a design speed of 40 miles per hour instead of the posted speed limit and the actual design fails to meet mandatory standards for even that reduced design speed. The existing Washington Curve is a broken back-curve comprised of a compound curve of 422- and 161-foot radii curves joined to a 1410 radius curve by a very short tangent. The proposed alignment changes the broken-back compound curve to 430- and 180-foot radii curves joined to a 1308-foot curve by an even shorter tangent. Minimum radius for 40 mile-per-hour design speed curves is 550 feet, substantially more than what is proposed.

Even at the 40 miles-per-hour design speed, the proposed curves are seriously deficient. The longer radius part of the compound curve hase as safe speed of 23 miles-per-hour, the shorter part has a safe speed of approximately 35 miles-per-hour. When compared to the posted speed limit of 55 miles-per hour (which would require a minimum 1000 foot radius curve), the proposed curve is clearly hazardous.

The PR's Exceptions To Mandatory Design Standards Fact Sheet reveals that the proposed design fails to meet the mandatory minimum stopping sight distance for the purported design speed of 40 miles-per-hour (300) feet but fails to disclose what the actual available sight distance would be. Clearly, the available sight distance

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would be far below the mandatory minimum sight distance for traffic approaching at the signed speed limit of 55 miles-per-hour at this location (500 feet).

1 cont.

The PR Exceptions To Mandatory Design Standards Fact Sheet admits that even at the 40 miles-per-hour design speed, the proposed Project will not meet the mandatory minimum standards for stopping sight distance (300 feet), although it fails to disclose by how much. Clearly, the available stopping sight distance is vastly less than the 500 foot mandatory minimum for the posted speed limit of 55 miles-per-hour that should be the real design speed at this location. Although the Fact Sheet attempts to minimize the adverse safety consequences of the substandard design, the reality in this situation, as with other proposed situations in the Project where stopping sight distance is substandard, the fundamental fact is that if drivers cannot see far enough ahead on the road to stop safely, they are likely to run off it or hit something in it.

The proposed design would only provide 50% of the mandatory minimum shoulder width applicable to this segment. Given the other substandard design elements noted above, this would compound safety problems.

Cost Effective and Environmentally Sensitive Measures To Enhance Safety Without STAA Accommodation Are Possible

Caltrans could enhance the safety of the 197/199 route combination for the general motoring public without the high cost and environmental intrusion necessary to accommodate STAA trucks. Measures, some of which are currently included at some locations as minor features of the proposed Project, include:

- Open graded pavement surface at all locations,
- More prominent edge line and centerline delineation including raised reflective markers and centerline and edge line rumble strips,
- More extensive curve warning, and advisory speed signing
- Night lighting at selective locations,
- Transverse rumble strips in advance of the sharpest curves, most complex curve combinations, or ones with safe speeds at large differential from the approach roadway,
- Radar displays of vehicle speed,
- The previously mentioned signal-controlled, alternating one-way operation of the bridge at Patrick Creek Narrows Location 2 or the aforementioned "Yield To Traffic On Bridge" regulatory sign solution for the same location,
- Trucker-directed advisory signing such as is employed along the mountainous section of I-80 between the Nevada State Line and Auburn.

The PR should be redone to design and evaluate an alternative that is based on these principles.

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Other Issues

1 cont.

Lack of Measured Speed Data

It is evident from Caltrans documentation that speed, particularly the differential between approach speed limits and the speeds that are safe at the "pinch points" addressed in the Project as well as the differential between speeds at which drivers attempt to drive through the "pinch points" and the safe speeds through those "pinch points" is a major causal factor in the crash experience documented in the PR. However, there is no evidence on record that Caltrans has ever considered the actual distribution of speeds driven at the pinch points and there approaches. This vital data should be collected and considered in determining whether the modifications proposed in the Project are adequate improvements for public safety, detrimental, or measures that solely provide a justification for shoe-horning STAA trucks onto the road.

Inconsistency of Traffic Volume, Truck Volume and Truck Percentage Data Between PR and Caltrans Posted Data

Data posted on the Caltrans Traffic Data Branch internet web site for US 199 northeast of the junction with SR 197, the location closest to the proposed Project work sites on US 199 indicate 2010 annual average daily traffic (AADT) of 4200, a truck percentage of 18.52 % of AADT and a truck volume of 778 AADT. Yet the PR analysis for the Project locations on US 199 uniformly assume the existing traffic volume is only 3000 AADT, the truck percentage is only 12% of AADT. In fact, the traffic and truck volumes that existed in 2010 on this area of US 199 already considerably exceed the PR's projected traffic and truck volumes for 2013, 2023 and 2033. Clearly, the PR has based its analysis of Project adequacy and critical design variables like Traffic Index (TI)[4] on seriously understated traffic and truck volumes on US 199.

Caltrans Traffic Data Branch posts traffic and truck volumes at two locations bracketing the Ruby 1 and Ruby 2 sites on SR 197. These show AADTs of 1800 vehicles and a truck percentage of 12.33% (222 trucks) to the northwest of the Ruby sites and 2300 vehicles and a truck percentage of 5.65% (130) trucks to the southeast. The average, since the Ruby sites lie between these count points is 2050 AADT and 176 trucks (truck percentage of 8.59). The PR baseline for the Ruby sites is only 1700 AADT and a truck percentage of only 8 percent (equivalent to only 136 trucks – 50 per day less than the above average. In fact, the PR's 2013 forecasts are below the 2010 values and its 2023 forecasts barely exceed them.

[4] This is a critical parameter used in determining the required structural strength and composition of the roadway surface based primarily on the expected numbers of heavy vehicle axel passages over the expected life of the pavement.

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EPIC (submitted by Smith Engineering)

Again, the PR analysis appears to have relied on understated estimates of overall traffic and truck traffic both current and in the future. This is particularly disturbing since the section of US 199 between its junction with SR 197 and its junction with US 101 is reported to have carried an AADT of 719 trucks (15.63%). If the segment of SR 197 between US 199 and US 101 is improved as proposed in the Project, some of the truck traffic on the sinuous section of US 199 between its junctions with SR 197 and US 101 would likely shift to the improved SR 197, especially if Caltrans signs direct truck traffic that way. Caltrans analyses of Project truck traffic have made no evident attempt to estimate diversions of truck traffic from the westerly segment of US 199 to SR 197 that the Project would cause. This is a serious flaw in the analysis. 1 cont.

Improper Use of Accident Statistics

A well understood truism in highway safety analysis is the fact that curves are locations where some of the highest accident rates tend to occur. In the case of the PR, accident statistics are presented for short segments involving one or several curves. Accident rates at these locations are compared to the statewide average accident rate for 2-lane conventional highways in rural areas with similar terrain. This apples-to oranges comparison of accident rates for individual curve segments or short segments involving a multiple curve sequence to the overall statewide average for 2-lane conventional highways (which averages in many, many miles of tangent segments where few accidents normally occur) is a comparison that exaggerates the apparent deviation of crash rates on the subject route segments above that which is purportedly typical, thus exaggerating the need for some kind of improvement action based on safety. A fair comparison of crash rates on the subject segments to overall State Highway System 2-lane conventional highway crash rates in similar rural terrain on curves would present an unbiased depiction of the safety situation on the subject route segments and would doubtless show that the subject segments experience crash rates more typical of curve segments statewide.

Conclusion

Based on all of the points noted in detail above, we are convinced the Project Report's analysis and conclusions are inadequate and need to be revised. The Project's provisions are insufficient to authorize STAA trucks on the subject routes with reasonable safety to the public. Caltrans has failed to evaluate the safety impacts associated with the Project's exception to mandatory minimum design standards. An alternative that improves the operational safety characteristics of the route combination at modest cost and with minimal environmental intrusion is preferable to one that accommodates STAA trucks at significantly higher cost and environmental intrusion accompanied by detrimental effects on public safety.

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EPIC (submitted by Smith Engineering)

Mr. Jason Meyer
November 5, 2012
Page 12

Sincerely,

Smith Engineering & Management
A California Corporation

Daniel T. Smith Jr., P.E.

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EPIC (submitted by Smith Engineering)

SMITH ENGINEERING & MANAGEMENT

DANIEL T. SMITH, Jr.
President

EDUCATION

Bachelor of Science, Engineering and Applied Science, Yale University, 1967
Master of Science, Transportation Planning, University of California, Berkeley, 1968

PROFESSIONAL REGISTRATION

California No. 21913 (Civil) Nevada No. 7969 (Civil) Washington No. 29337 (Civil)
California No. 938 (Traffic) Arizona No. 22131 (Civil)

PROFESSIONAL EXPERIENCE

Smith Engineering & Management, 1993 to present. President.
DKS Associates, 1979 to 1993. Founder, Vice President, Principal Transportation Engineer.
De Leuw, Cather & Company, 1968 to 1979. Senior Transportation Planner.
Personal specialties and project experience include:

Litigation Consulting. Provides consultation, investigations and expert witness testimony in highway design, transit design and traffic engineering matters including condemnations involving transportation access issues; traffic accidents involving highway design or traffic engineering factors; land use and development matters involving access and transportation impacts; parking and other traffic and transportation matters.

Urban Corridor Studies/Alternatives Analysis. Principal-in-charge for State Route (SR) 102 Feasibility Study, a 35-mile freeway alignment study north of Sacramento. Consultant on I-280 Interstate Transfer Concept Program, San Francisco, an AA/EIS for completion of I-280, demolition of Embarcadero freeway, substitute light rail and commuter rail projects. Principal-in-charge, SR 238 corridor freeway/expressway design/environmental study, Hayward (Calif.) Project manager, Sacramento Northeast Area multi-modal transportation corridor study. Transportation planner for I-80N West Terminal Study, and Harbor Drive Traffic Study, Portland, Oregon. Project manager for design of surface segment of Woodward Corridor LRT, Detroit, Michigan. Directed staff on I-80 National Strategic Corridor Study (Sacramento-San Francisco), US 101-Sonoma freeway operations study, SR 92 freeway operations study, I-880 freeway operations study, SR 152 alignment studies, Sacramento RTD light rail systems study, Tasman Corridor LRT AA/EIS, Fremont-Warm Springs BART extension plan/EIR, SRs 70/99 freeway alternatives study, and Richmond Parkway (SR 93) design study.

Area Transportation Plans. Principal-in charge for transportation element of City of Los Angeles General Plan Framework, shaping nations largest city two decades into 21'st century. Project manager for the transportation element of 300-acre Mission Bay development in downtown San Francisco. Mission Bay involves 7 million gsf office/commercial space, 8,500 dwelling units, and community facilities. Transportation features include relocation of commuter rail station; extension of MUNI-Metro LRT; a multi-modal terminal for LRT, commuter rail and local bus; removal of a quarter mile elevated freeway; replacement by new ramps and a boulevard; an internal roadway network overcoming constraints imposed by an internal tidal basin; freeway structures and rail facilities; and concept plans for 20,000 structured parking spaces. Principal-in-charge for circulation plan to accommodate 9 million gsf of office/commercial growth in downtown Bellevue (Wash.). Principal-in-charge for 64 acre, 2 million gsf multi-use complex for FMC adjacent to San Jose International Airport. Project manager for transportation element of Sacramento Capitol Area Plan for the state governmental complex, and for Downtown Sacramento Redevelopment Plan. Project manager for Napa (Calif.) General Plan Circulation Element and Downtown Riverfront Redevelopment Plan, on parking program for downtown Walnut Creek, on downtown transportation plan for San Mateo and redevelopment plan for downtown Mountain View (Calif.), for traffic circulation and safety plans for California cities of Davis, Pleasant Hill and Hayward, and for Salem, Oregon.

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EPIC (submitted by Smith Engineering)

Transportation Centers. Project manager for Daly City Intermodal Study which developed a $7 million surface bus terminal, traffic access, parking and pedestrian circulation improvements at the Daly City BART station plus development of functional plans for a new BART station at Colma. Project manager for design of multi-modal terminal (commuter rail, light rail, bus) at Mission Bay, San Francisco. In Santa Clarita Long Range Transit Development Program, responsible for plan to relocate system's existing timed-transfer hub and development of three satellite transfer hubs. Performed airport ground transportation system evaluations for San Francisco International, Oakland International, Sea-Tac International, Oakland International, Los Angeles International, and San Diego Lindberg.

Campus Transportation. Campus transportation planning assignments for UC Davis, UC Berkeley, UC Santa Cruz and UC San Francisco Medical Center campuses; San Francisco State University; University of San Francisco; and the University of Alaska and others. Also developed master plans for institutional campuses including medical centers, headquarters complexes and research & development facilities.

Special Event Facilities. Evaluations and design studies for football/baseball stadiums, indoor sports arenas, horse and motor racing facilities, theme parks, fairgrounds and convention centers, ski complexes and destination resorts throughout western United States.

Parking. Parking programs and facilities for large area plans and individual sites including downtowns, special event facilities, university and institutional campuses and other large site developments; numerous parking feasibility and operations studies for parking structures and surface facilities; also, resident preferential parking .

Transportation System Management & Traffic Restraint. Project manager on FHWA program to develop techniques and guidelines for neighborhood street traffic limitation. Project manager for Berkeley, (Calif.), Neighborhood Traffic Study, pioneered application of traffic restraint techniques in the U.S. Developed residential traffic plans for Menlo Park, Santa Monica, Santa Cruz, Mill Valley, Oakland, Palo Alto, Piedmont, San Mateo County, Pasadena, Santa Ana and others. Participated in development of photo/radar speed enforcement device and experimented with speed humps. Co-author of Institute of Transportation Engineers reference publication on neighborhood traffic control.

Bicycle Facilities. Project manager to develop an FHWA manual for bicycle facility design and planning, on bikeway plans for Del Mar, (Calif.), the UC Davis and the City of Davis. Consultant to bikeway plans for Eugene, Oregon, Washington, D.C., Buffalo, New York, and Skokie, Illinois. Consultant to U.S. Bureau of Reclamation for development of hydraulically efficient, bicycle safe drainage inlets. Consultant on FHWA research on effective retrofits of undercrossing and overcrossing structures for bicyclists, pedestrians, and handicapped.

MEMBERSHIPS

Institute of Transportation Engineers Transportation Research Board

PUBLICATIONS AND AWARDS

Residential Street Design and Traffic Control, with W. Homburger *et al*. Prentice Hall, 1989.

Co-recipient, Progressive Architecture Citation, *Mission Bay Master Plan*, with I.M. Pei WRT Associated, 1984.

Residential Traffic Management, State of the Art Report, U.S. Department of Transportation, 1979.

Improving The Residential Street Environment, with Donald Appleyard et al., U.S. Department of Transportation, 1979.

Strategic Concepts in Residential Neighborhood Traffic Control, International Symposium on Traffic Control Systems, Berkeley, California, 1979.

Planning and Design of Bicycle Facilities: Pitfalls and New Directions, Transportation Research Board, Research Record 570, 1976.

Co-recipient, Progressive Architecture Award, *Livable Urban Streets, San Francisco Bay Area and London*, with Donald Appleyard, 1979.

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Responses to EPIC (Smith Engineering)

Response to Comment 1

The letter asserts that by not designing the roadway to the standards laid out in the Caltrans Highway Design Manual, and by taking exceptions to the Manual, the roadway will not be safe for STAA vehicles. It argues that there is insufficient "margin of error" to account for driver error and imperfect driving conditions, and proceeds to provide detailed geometric critique of various project components. This response outlines the legal and logical basis behind the project design, which should address most of the comments put forth in the letter.

STAA Information

The Code of Federal Regulations, Title 23 requires that states allow STAA trucks reasonable access to terminals. In the 1980's, California evaluated all State routes and allowed STAA vehicles immediate on those routes that could readily accommodate them. These are called Terminal Access routes. State routes are continuously re-evaluated as improvement projects are completed. Local governments also evaluate local roads for STAA access to create local Terminal Access routes.

When highway improvements are implemented, routes may be re-evaluated to analyze whether they can accommodate STAA trucks. The evaluation of a route may also be initiated when requested by a local agency or business owner. The Caltrans Highway Design Manual, Topic 404, is recommended as a guide for analyzing and evaluating routes for STAA access. When the local Caltrans District is satisfied that a route meets the guidelines for STAA design vehicles, based on engineering analysis, a request is made to Caltrans Headquarters for review and approval. Upon approval, Terminal Access signs are installed and maps are updated on the Caltrans website to reflect the change in the route's classification. District 1 has opened STAA routes since the 1980's evaluation, including US 101 from the Oregon border to Benbow, CA in June of 2008 and a portion of Highway 175 in Mendocino County in January of 2004.

The Route 199/197 Safe STAA Project balances STAA access, ease of operation, cost and environmental impacts in an area with challenging terrain. At each location, engineers weighed cost, environmental impacts, highway design standards, and the goal to provide for STAA access. Once project geometrics and constraints were established, alignments were tested for STAA compatibility with "Autoturn" software, using an STAA truck with a 1 foot "buffer" on either side as a template to allow for driver variability. At all project locations, the result of the proposed widening and alignment improvements will be that an STAA truck, with its greater size and swept width around curves, will have more maneuvering room than the smaller California Legal trucks presently have on the existing highway. The maneuvering room for any vehicle smaller than an STAA truck will be improved considerably. This project will fully satisfy requirements for STAA access, and the improved roadway will be similar to the remainder of Routes 197 and 199, and to other STAA Terminal routes.

Safety

On two-lane, rural routes such as Route 199 and 197, there is a clear statistical relationship between additional shoulder width, curve improvement and reduced collision rates. Even though these projects were not initiated for safety reasons, existing collision concentrations,

where present, were taken into consideration during project design. The proposed designs all provide substantial geometric improvements over existing conditions, and the improved roadways will be similar to adjacent sections of the Routes.

In response to the "Improper Use of Accident Statistics" comment: It is true that the statewide collision rates include curves as well as tangents. However, not all curves have collision rates that are significantly greater than the statewide average. Thus we strive to decrease collisions at curve locations where the collision rates are significantly greater than the statewide average collision rates.

The primary purpose of the project is to provide for STAA Terminal Access. The curve and shoulder improvements that will enable STAA access should have a positive effect on overall collision rates at the project locations.

Design Exceptions

Design exceptions are a way of documenting and justifying deviation from the Caltrans Design Manual on specific geometric standards. Design exceptions will be needed for all project locations in the Route 199/197 Safe STAA Project, due to economic, environmental and physical constraints. The following passages were taken from the Caltrans Highway Design Manual. Emphasis is added where appropriate.

"Highway Design Manual guidance allows for flexibility in applying design standards and approving design exceptions that take the context of the project location into consideration; which enables the designer to tailor the design, as appropriate, for the specific circumstances.

The design standards used for any project should equal or exceed the minimum given in the Highway Design Manual to the maximum extent feasible, taking into account costs (initial and life cycle) traffic volumes, traffic and safety benefits, right of way, socio-economic, and environmental impacts, maintenance, etc. . . . **It is not intended that current manual standards be applied retroactively to all existing State highways; such is neither warranted nor economically feasible.** A record of the decision not to upgrade the existing non-standard mandatory or advisory features shall be provided through the exception process."

Per Highway Design Manual guidance, design standards are intended to be taken in context with the route, and it is expected that there will be instances where design standards will be impractical or infeasible. While some project features do not meet design standards due to severe terrain and the desire to minimize environmental impacts, at each location engineers strived to strike a balance between safety, environmental and aesthetic impacts, design standards and economic concerns. This project will provide for safe STAA access along the Route 199/197 corridor, while enhancing driver comfort and safety by improving geometrics in ways that are statistically proven to reduce collision rates. Since the improvements will be at spot locations, minimal change in the overall operation of the Route 199/197 corridor is expected.

Friends of Del Norte (submitted by Don Gilespie)

Friends of Del Norte
P. O. Box 229
Gasquet, California 95543

April 3, 2012

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

Jason Meyer

November, 2nd, 2012

Cal.Dept. of Transportation

North Region Environmental, Unit E1

P.O. Box 3700, Eureka, Ca. 95502

Dear Mr. Meyer,

Thank you for this opportunity to comment on the Partial Recirculation of DEIR/Supplemental EA for SR 197 and US 199 in Del Norte County. We appreciate you reopening this document for further public review. Our concerns about vegetation and tree impacts are as follows.

We would like to emphasize to Caltrans and all involved parties, that both highways 199 and 197 are tourist gateways to Redwood National Park, a rare World Heritage Site. Both the National and State Parks are responsible for a very significant portion of the local economy of Del Norte County. The scenic quality of our highway gateways need to take a high priority in considering alterations to these highways. Caltrans proposed widening projects will forever change the character of these scenic byways. 1

On the proposed projects, Ruby 1 and Ruby 2, with the Two-Foot Widening In Spot Locations Alternative as the Caltrans preferred alternative, the proposed highway changes have reasonable tree removal guidelines though we prefer to keep the larger redwood trees on the east side. Serious consideration for redwood tree root compaction is lacking in your report. As we understand these proposals, there will be no trees removed on the west or river side of Hwy.197. We do however; have very grave concerns for tree removal if the Four Foot Alternative were to be chosen. These projects are along one of the most scenic portions of Hwy.197 and near Ruby Van Deventer County Park, so we appreciate your concern for the scenic quality of this portion of the highway. All tree stumps should be completely removed our ground down so they have no permanent visibility to the common motorist. 2 3

On the US Hwy.199 sites, Patrick Creek Narrows Location 1, PM 20.5, the removal of eighteen six inch to eight inch Douglas Fir and White Alder trees seems reasonable as outlined in the DEIR/EA. 4

At the Patrick Creek Narrows Location 2, PM 23.9 to 24.3, eighty three trees many of them large old Douglas Fir, are slated to be cut if the proposed down river bridge is to be built. Since the existing bridge is still structurally solid, the realignment of the highway to ease the approach to the bridge looks like the best 5

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

Friends of Del Norte (submitted by Don Gilespie)

Friends of Del Norte

alternative when considering the overall impacts on trees. The upstream bridge is out of the question as it will require the removal of 23,000 cubic yards of rock and will create an ongoing potential for rock slides into the Smith River. We question whether the downstream cut slope needs to be as extensive as proposed to get the necessary two foot shoulder. A smaller cut would maintain the present scenic values of this portion of the highway and have less impact on tree removal. There does not seem to be a solution that totally respects the scenic qualities of Hwy.199 and this remains a significant impact to our Wild and Scenic river Corridor. 5 cont.

The PC Narrows Location 3 seems appropriate with very little change to the scenic value of the highway. 6

At The Narrows Location, PM 22.7 to 23.0, forty six trees are slated to be removed. Since tree roots help create slope stability, and since the majority of this project is cutting into bedrock, we question the need to cut trees on the uphill slope. There are a few trees that were burned and killed by the Biscuit Fire and these need to come down. It is not clear if the burned trees are part of your original count of trees to be removed. We also question the need to cut any small trees on the river side of the highway, outside of the immediate vicinity of the retaining walls that are part of this project. 7

The Washington Curve cut slope, PM 26.5 requires the cutting of many small trees and is not a significant biological concern. The specified tree removal seems appropriate to the scope of the motorist safety issues addressed by this specific portion of the overall project. 8

We do have concerns for the impaction of old growth Redwood tree roots adjacent to the roadway throughout this project and in an area not mentioned in the DEIR/EA report. This is the stretch of Hwy.199 from the Jed Smith State Park entrance to the Hiouchi Bridge, approximately MP 4.5 to 4.0. This section is not slated for change, but it is part of the cumulative impacts as increased STAA truck traffic will impact these trees located within Redwood National and State Park boundaries. How will these trees be impacted by the proposed increase in truck traffic related to the seven STAA projects? Will the design features of the roadway need to be changed for excavation depth, thickness and compaction to handle many more trucks? There will be significantly more disturbances from highway failures and repair projects that affect the old trees adjacent to the highway. Such cumulative impacts, including impacts along Hwy.101 at Last Chance Grade, need to be addressed. 9

We further maintain that the DEIR/EA is faulty because the proposed projects create a 'barely legal' status for Hwys.199/197 in allowing STAA truck traffic. You state on page ii of this Supplemental Environmental Assessment, In the Summary, that "All seven project locations currently have roadway geometries that can result in STAA trucks and other long-wheelbase vehicles off tracking across the double yellow line and entering the oncoming traffic lane. Additionally, the limited sight distances at all seven project locations do not allow enough time for drivers to adequately react to roadway conditions ahead and make timely decisions to avoid unexpected conditions ahead". We know of at least three other blind locations, MP 9.5, MP 8.0 and MP 6.3 that also meet these motorist safety, reaction time conditions. How many more are there? The concept of creating a 'barely legal' STAA corridor along Hwy.199 is something that Caltrans needs to seriously reconsider. 10

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

Friends of Del Norte (submitted by Don Gilespie)

We also regard your Traffic Study for adding STAA trucks to Hwys.199/197 as the result of your proposed projects, to be seriously flawed. As you will find in the following pages of this document, much information has been left out of your very brief and flawed traffic study. Furthermore, the overall economic benefits of this project to the citizens of Del Norte County are negligible. 11

The Friends of Del Norte can only conclude that Caltrans needs to complete a full Environmental Impact Study of the proposed STAA projects. Please carefully review our attached submissions. 12

Thank You, Don Gillespie

Don Gillespie, President FDN,

P.O. Box 229,

Gasquet, Ca. 95543

Responses to Friends of Del Norte (Don Gilespie)

Response to Comment 1
This comment states that the project area contains significant tourist sites, parks and visual resources. The Department is aware of the value of the resources within the area and attempted to minimize impacts to all resources while meeting the purpose and need of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 2
This comment states the Ruby 1 and Ruby 2 sites have reasonable tree removal guidelines.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 3
This comment states that compaction of redwood roots was not considered in the report. The Forester/Arborist Report discusses soil compaction and tree roots on page 8, Section 4.b. and 4.c. Soil compaction causes negative impacts to root by preventing roots from obtaining water and nutrients and also slowing the growth rate of roots.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 4
This comment states that it is reasonable to remove the trees listed at Patrick's Creek Narrows Location 1.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 5
This comment discusses the Patrick's Creek Narrows Location 2 bridge replacement and cut slope. The bridge, although currently structurally sound, is nearing the end of its design life and will need to be replaced in the near future. Geotechnical engineers are currently investigating the downstream cut slope area and will make recommendations on the slope and extent of the cut. Stability of the slope is a major factor in this process. The Department will minimize the cut to the extent feasible as this will reduce the cost and environmental impacts of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 6
This comment states that Patrick's Creek Narrows Location 3 seems appropriate.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 7
This comment questions the tree removal at the Narrows. The slope is primarily rock and thus not held together by tree roots, in contrast to how a soil slope may be stabilized by tree roots. The excavation will be into the slope on the uphill side, away from the river. The trees will be

removed if they are in an area where the slope will be cut. Trees outside of the cut will only be removed if they are an immediate safety hazard due to proximity to the cut. This will be determined on an individual tree basis. There are no trees proposed for removal on the river side of the roadway.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 8

This comment states that the proposed project at Washington Curve seems reasonable.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 9

This comment states concern for redwoods between PM 4.5 to PM 4.0 due to increased truck traffic through the area. The area under the roadway was compacted during initial construction. The STAA trucks have the same weight limits as the current California Legal trucks. The forecasted increase in volume of traffic fits within the current design of the roadway and no additional impacts would be expected due increased traffic. Potential effects to Last Chance Grade are not anticipated because: there would be no increase to the weight of the individual trucks; and increase in the volume of trucks would not be significant.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 10

This comment states that the proposed project creates a "barely legal" status for STAA access along the route. The roadway improvements were designed to have a safety margin. See the response to the EPIC/Smith comment above for a discussion on design, safety standards, and design exemptions.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 11

This comment states that the Traffic Study for this project was flawed. Please see Grouped Response 9 for a discussion of the Traffic Study. This comment also states that the benefits to the citizens of Del Norte County are negligible. Please see Grouped Response 1 and 2 for discussions of the purpose and need and costs vs. benefits of the project.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 12

This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and accordingly proceeded to prepare a Finding of No Significant Impact (FONSI).

No revisions to the Draft EIR/EA were necessary.

Friends of Del Norte (submitted by Eileen Cooper)

Friends of Del Norte, *Committed to our environment since 1973,*
A nonprofit, membership based conservation group, **advocating sound environmental policies for our region. PO Box 229, Gasquet, CA 95543**

November 5, 2012
Comments to Caltrans Recirculated DEIR/EA for STAA truck access on Hwy 199/197, due Nov. 5, 2012
ATT: Jason Meyer, California Department of Transportation,
North Region Environmental, Unit E1, P.O. Box 3700, Eureka, Ca. 95502-3700
jason_meyer@dot.ca.gov

RECEIVED
NOV 0 5 2012

Summary

After the close of the previous DEIR/EA comment period, our organization became aware of new, relevant and significant information which exposes the current DEIR/EA to be fundamentally flawed and misleading. The DEIR/EA fails to provide an accurate evaluation of a broad range of impacts, including impacts considered within the Recirculated DEIR/EA. This new information raises significant new concerns that have not yet been previously considered or analyzed as well. 1

New information has now led us to believe that an immediate and significant increase of STAA truck traffic is likely to result as a cumulative impact of creating a frost free STAA bypass through Hwy 199/197 and Hwy 101 (Richardson Grove STAA project) that diverts, or significantly induces I-5 STAA truck traffic around Siskiyou Summit and the Weed/Shasta area in winter.

The cumulative impacts of this new I-5 bypass route, and the inducement of significant I-5 heavy truck traffic would substantially affect the evaluation of so many aspects of the DEIR/EA, and because these impacts are likely to be significant and far reaching and extend the scope of the project to such a broad range, we believe a fully recirculated DEIR/EIS is necessary for adequate reevaluation. NEPA requires an EIS under such circumstances. 2

We also believe that a new and accurate assessment will show that this is an ill-conceived project that will endanger the public welfare, and that the only rational decision would be abandonment of the project, in order to protect the public welfare. Within the following text are electronic references. Please use e-mail copy of comments to access those web sites.

Siskiyou Summit is known to be the most dangerous pass along I-5, with a steep grade of 6%, and frequent accidents, only two lanes, closures due to high elevation winter snow storms, and frequent truck chaining requirements. 3

Oregon Dept. of Transportation (ODOT) information, as Attachments: 9, 10, 11

New Information: In phone conversation on October 29, 2012, Caltrans District1 Maintenance Engineer, Royal McCarthy stated:

It is a rare occasion that Hwy 199 has required chains. Snow doesn't get up there because it is coastal and it is not that high.

Phone message, October 30, 2012, from Caltrans states:

We checked our records. The only chain control record we have is prior to 2009. Nothing since January 2009.

Friends of Del Norte (submitted by Eileen Cooper)

Creating a relatively frost free alternate STAA coastal bypass around Siskiyou Summit changes the dimensions of the Hwy 199/197 project to likely involve substantial increased traffic and safety hazards, as well as exacerbating fragmentation and increasing the need for more traffic lights or traffic calming measures in all communities along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities. A project with such a broadly increased Interstate scope should be elevated to an EIS. 3 cont.

The DEIR/EA has completely failed to identify and assess induced I-5 traffic, both immediate and long term. The DEIR/EA has completely failed to inform the general public, as well as managers of trustee agencies, about such a traffic diversion.

The DEIR/EA and RDEIR have failed to evaluate the cumulative impacts that result from the combined projects that constitute an I-5 bypass around Siskiyou Summit. This omission significantly changes most aspects of analysis. The DEIR/EA fails to evaluate the following likely significant I-5 induced traffic impacts: increased motorist and pedestrian safety risks; Redwood National Park and National Recreation Area visitor safety risks; water quality risks and endangerment of public drinking water from increased truck cargo spill risks; as well as biological risks, vegetation impacts and endangered (Coho) and California Species of Concern (steelhead) impacts, from increased truck cargo spill risks; biological and vegetation impacts due to accelerated road failures, maintenance and repair projects; Wild and Scenic River impacts; National Park and National Recreation Area visitor impacts; exacerbation of community fragmentation that will likely increase the need for more traffic lights or traffic calming measures, including communities in Oregon that have not been noticed and engaged; and severe economic impacts from accelerated road maintenance and repair costs; economic impacts from loss of jobs due to the collapse of a niche local trucking network that utilizes California legal size trucks (short cab). Such a broad stroke of likely change in the region should necessitate a full EIS evaluation. 4

Furthermore, because the public has thus far been so misled as to think that there will be an insignificant increase in traffic, a full reassessment of the goals and policy decisions is in order, and a recirculation and opportunity for reevaluation by all agencies, including consultations for Endangered species, Wild and Scenic Rivers Act consistency, National Park Management Plan consistency, and National Recreation Area consistency. 5

The DEIR/EA has failed to provide useful and meaningful quantitative information about I-5 induced traffic increases and associated traffic risk analysis.

New Relevant, Significant Evidence has emerged. 6

New Information, Attachment 1, letter dated **March 12, 2012**: The Friends of Del Norte and Caltrans received a letter of communication from James R Barrett, an experienced truck driver who delivered freight using Hwy 199 and Hwy 101. In part it states:

"Using Interstate Route I-5 very frequently requires truck drivers to chain their trucks and trailers because of snow. This can happen as many as seven different times on a trip from the middle of Oregon to the middle of California. This chaining is easily dodged if one is allowed as I have been to use US Highway101 instead of I-5. One could easily imagine many times more trucks per hour on the proposed route in heavy snow if the planned changes are implemented. This does not take in to account what would happen to the traffic numbers if I-5 closed for snow or accident as it often does. A study could quickly and easily be done on the impact of the proposal by counting the number of trucks that pass any given I-5 mile marker verses the number of trucks that currently pass any given mile marker on US 101. I believe the variance would be shocking. This change in road usage is important because Cal-trans finds it difficult to maintain these roads now. With a huge increase of trucks with winter weather, I think maintaining the roads would be impossible."

2.

Friends of Del Norte (submitted by Eileen Cooper)

New Information: Phone Conversation with Kevin Church: Within a few days after receiving the above letter, FODN (Eileen Cooper, vice president) telephoned Kevin Church, Caltrans project manager, with concern. Kevin Church informed Eileen Cooper that I-5 trucks would not be diverted because the coastal route was longer. He also directed FODN to examine the Cumulative Impact Analysis within Fehr and Peers Traffic Study. 7

FODN and James Barrett then carefully measured the difference in distance between the I-5 route and the Coastal route from Grants Pass, Oregon and San Francisco, using road length information from Rand McNally, The Road Atlas, 2008, and also checking trip info on the internet. The new STAA coastal bypass would be only 44 miles longer than taking I-5 from Grants Pass to San Francisco, or visa-versa.

New Information, Attachment 3, http://www.dot.ca.gov/dist6/opsnowflake/guide.pdf

Caltrans' currently published pamphlet "Operation Snowflake" is a two page winter driving guide that directs traffic around Tejon Pass on I-5 in Southern California, another problematic pass on I-5. The various STAA bypasses shown around Tejon Pass are much longer than route I-5 to Los Angeles. The shortest difference is bypass route 41/ Hwy 101 to Los Angeles, about 91 miles longer than Hwy I-5. The Hwy 166 bypass is about 188 miles longer than route I-5 (these routes were measured using Rand McNally, The Road Atlas, 2008). Caltrans advertises and encourages the use of these longer I-5 coastal bypasses. 8

There is absolutely no evaluation or factual basis within the DEIR/EA for assuming that I-5 STAA trucks would not make good use of a frost free bypass around Siskiyou Summit (as well as other northern mountainous problematic areas along I-5, such as Weed/Shasta), a bypass that is only 44 miles longer.

New Information: Web site http://www.thetruckersreport.com/truckingindustryforum/questions-from-new-drivers/189462-to-chain-or-not-to-chain-2.html 9

This survey is from a truck drivers' magazine that takes up the issue- "to chain or not to chain," to which truck drivers respond. They point out how dangerous it is to drive with chains; how trucking in the west shuts down because of winter weather; how drivers avoid chaining; how truck drivers get paid by the mile, and lose money and time waiting for bad weather to clear.

It is only logical that truck drivers will be highly motivated to take a frost free loop to avoid chaining, and avoid having to lose time and money waiting for bad weather to clear. The following are two entries.

Entry #6 If you are going to run the West, and (especially as a rookie making little cpm) you need to learn how to safely run in the snow...not necessarily ice, but in the snow. Your pay is depending on you making miles....you don't make any miles sitting at a truck stop waiting for the chain law to be lifted. Most times it will be a few hours...but every year there are several storms that will shut down highways for 2-3 or more days....can you afford to sit half the week? Had you kept moving when the conditions weren't as bad, you might have gotten through the snow and continue on with what you are getting paid to do.

Entry #12 If you don't handle the truck, and have an accident, it's on you and your record. The chance of injury, death and damage is higher. As one place I worked said, "If you chain up, you're fired". Why? Because in their opinion, that's endangering their equipment, cargo, the public and yourself and that means that your judgement wasn't sound. The greed isn't necessarily the company's in these cases. It's the driver's. Driving in those conditions is a gamble. Will it get worse? Will it get better? Will there be ice? Will the truck slide off the road because I can't control it? If you've never had that experience of a vehicle sliding uncontrollably, driving in mountain snow is not the place to experience it.

James Barrett writes a follow-up letter to Caltrans. 10
New Information, Attachment 2, letter dated **April 17, 2012** from James Barrett, which in part states:

3

Friends of Del Norte (submitted by Eileen Cooper)

"I have been told that Cal-Trans officials do not believe truck drivers will use the chain free route of highway 199-197-101. This is difficult for me to believe because most everybody knows "energy flows to the area of least resistance".

What may not be known is how hard it is to chain a truck and trailer. Each chain weighs about 30 pounds. They must be pulled out of the truck, straightened, placed on the truck, removed, and replaced to wherever they were stored in or on the truck. This must be done for eight wheels in most cases. I think it is also worth pointing out, that there is a great deal of inertia to be overcome to get one to leave a warm truck cab and lay down in the snow to chain a truck and trailer. Needless to say chaining a truck is a lot of work.

When freight is shipped from the middle of Oregon to the San Francisco Bay Area, any part of Southern California, or from south to north, in winter driving conditions, a truck driver must ask themselves "do I want to chain my truck and trailer or just sit and wait until the chain requirements are lifted?" This is the actual decision that must be made now. The proposed change in status of Hwy 199, Hwy197, and Hwy101 will add a third choice, namely "or will I drive an extra 44 miles along the California Coast to avoid chaining?"

I think it is a safe bet that every driver asked would answer "yes" to the question "Would you drive and extra 44 miles out of your way to skip chaining your truck and trailer in the snow?", especially when one factors in the last time involved in chaining and driving the 30 mile per hour speed limit which applies to all chained vehicles." 10 cont.

Upon Kevin Church's suggestion, FODN carefully examined the methodology of the DEIR/EA cumulative impact analysis, as stated on page ES-3 of Fehr and Peers Traffic Study. We attach page ES-3 which describes the methodology used by Fehr and Peers Traffic Analysis regarding Induced Travel under 2030 build conditions. This methodology is also described in the main text and a memo within the Traffic Analysis from Fehr and Peers. **Attachment 18:** It states: 11

"...a 2002 study by Robert Cervero of U.C. Berkeley explicitly estimated the amount of traffic that is caused by roadway projects. Cervero's research indicated that the long-term induced travel effect is about 3.9 times larger than the short-term induced travel effect...."

FODN was suspicious about the magic multiplier of 3.9, as there had been no appropriate survey of current STAA long haul users along I-5 that might be immediately induced. The DEIR/EA contains only a limited survey of current local users.

FODN contacted Dr. Robert Cervero. 12

New Information. Attachment 4, E- mail from FODN to Dr. Robert Cervero dated April 6, 2012, and response e-mail from Dr. Robert Cervero dated April 9, 2012 to Eileen Cooper, vice president FODN at upsprout@yahoo.com.
Dr. Robert Cervero states:

"I take it from your e-mail that the study borrows some of my research on induced growth effects of highways. That work was for road expansion projects in suburban parts of California thus how germane the results might be for a rural part of the state can be questioned."

The Friends of Del Norte engaged expert Mara Feeney to shed light on our concerns. 13
New Information- Attachment 5 & 6, expert Planning Consultant Mara Feeney, letter dated Sept. 26, 2012; with Mara Feeney Resume. Within this letter, Mara Feeney reviews and critiques the DEIR/EA, RDEIR/EA and the proposed STAA access project for Hwys 199/197. It states, in part:

Friends of Del Norte (submitted by Eileen Cooper)

13 cont.

"For a project as important as this one, in a setting with such extraordinary environmental resources, Caltrans should have used the opportunity of recirculating the draft document to provide additional information and address other key issues that have been raised by FODN including the faulty assumptions underpinning the truck traffic analysis, the weakness of the economic impact analysis, and the lack of a cumulative traffic impact analysis.
Estimates of short-term increased truck traffic on US 199 in the Draft EIR/EA are based on a very limited survey of local businesses (based on a small number of brief survey questions), in which 80 percent of the respondents stated they did not need and would not use STAA trucks on US199 if the project were implemented…
Furthermore, the analysis does not include any consideration of additional through truck traffic that might be encouraged by the creation of a new STAA truck traffic loop connection I-5 via SR 197/US199 to US 101 south through Richardson Grove…

The irony is that the creation of a STAA truck route (with uncertain truck traffic and safety impacts)may kill the very goose that remains capable of laying golden eggs in Del Norte County in the future—namely, tourism in this area that is known for its pristine river, extraordinary parks, and scenic resources.

I have no stake whatsoever in this project. Nonetheless, on behalf of FODN, I urge local elected officials and the State of California to reconsider prioritizing funding for this project, which has been declared to be good for public safety and the Del Norte County economy based on wishful thinking and inadequate information pertaining to environmental impacts."

14

The purpose and need of the DEIR/EA states, page ii:

"The lack of STAA truck access on the SR 197–US 199 corridor restricts options for goods movement between Crescent City and Interstate 5 (I-5)."

There is no discussion within the DEIR/EA about what might happen regarding I-5 induced STAA truck traffic.

The Fehr and Peers Study focuses on current local users and local diversions from south Hwy 101. The Fehr and Peers Study interviews only local trucking companies. The surveys and evaluation of current local truckers within Fehr and Peers Traffic Study does make the point quite clearly that there is little or negligible local demand or economic benefit for STAA access on Hwy 199/197. So, why do such an expensive project?

TRAFFIC STUDY PURPOSE, Fehr and Peers, page 1
"This report assesses the extent to which new access provided by the proposed project could alter truck traffic patterns on the surrounding transportation network. The impacts related to the changes in truck travel patterns will be determined and mitigation measures, if required, to reduce the significance of project-related impacts will be identified."

Induced Travel, Fehr and Peers, page 7

"Roadway projects by themselves do not generate traffic, but by providing access, these projects change travel and land use development patterns. The phenomenon where new roadway capacity leads to additional traffic is known as induced travel. The following discussion summarizes the methodology used by Fehr & Peers to determine the change (increase, decrease, or no change) in, and impact of, future truck volumes on US-199 and SR-197 due to the planned STAA improvements."

6

Friends of Del Norte (submitted by Eileen Cooper)

Latent Demand, Fehr and Peers, page 7

14 cont.

"Latent demand is traffic that would use a route, but cannot or does not for some reason. For this study, latent demand itself is comprised of two components. First, there is latent demand related to STAA trucks that currently travel north on US-101 through Oregon and then onto I-5 that would switch to US-199 if it were accessible. Figure 4 summarizes this type of latent demand (the yellow path would shift over to US-199, the green path, after the improvements are made) and indicates that 160 miles can be cut-off for each one-way journey on US-199/SR-197. Second, there is latent demand for STAA trucks that would switch from CA-Legal trucks."

Attachment 7, DEIR 199/197, Fehr & Peer Traffic Analysis, Figure 9. This figure provides heavy truck traffic volumes of regional Hwys 199/197, Hwy101, as well as I-5 heavy truck traffic. It clearly illustrates the dramatic differences in current average daily heavy truck volumes of I-5 compared to Hwys 199/197 and Hwy 101 south of Crescent City.

Fehr and Peers, Figure 9, current average daily heavy truck traffic data:

Hwy 197 carries (1800 x .15) = 270
Hwy 199 carries (2800 x .17) = 476
Hwy 101 south carries (4200 x .13) = 546
Hwy I-5 south of Grants Pass carries (35200 x .21) = 7392
Hwy I-5 north of Grants Pass carries (25400 x.26) = 6604

As you can immediately see, just a small percentage of I-5 heavy truck diversion in winter will result in extremely large increases of induced heavy truck traffic for Hwys 199/197 and Hwy 101 south. A real assessment with interviews of through route I-5 truckers during winter, when Siskiyou Summit requires chains or is closed (which is very frequent) is needed to evaluate this situation. A real assessment of impacts is needed.

15

New Information- Attachment 9, ODOT traffic records for Siskiyou Summit closures/chainings, 2009, 2010, 2011. These events are frequent.

New Information- Attachment 10 & 11, ODOT planning information about Siskiyou Summit
Respect the Pass: http://www.oregon.gov/ODOT/MCT/docs/siskiyoupass.pdf

New Information- Web site and Attachment 12, Snowfall data from National Climate Data Center NOAA, 2009,2010,2011. These maps show that the Coastal bypass for I-5 route between Grants Pass, Oregon and San Francisco is snow free, and the I-5 route has significant snowfall:

http://gis.ncdc.noaa.gov/maps/snowfall.map?view=daily

New Information- Web site, http://www.dot.ca.gov/dist2/planning/pdf/tcr/I5/factsht3.pdf
Fact Sheets from Caltrans District 2, with evaluations of each section of I-5.

These fact sheets demonstrate that the entire mountainous stretch of I-5 has problematic harsh winter weather that closes I-5.
The segment of I-5 at Black Butte is described on page 235: Fact Sheets, I-5 TCR, June 2008
General Issues

"High percentage of truck traffic limits maneuverability (creates rolling queues). Heavy truck usages at SouthWeed interchange. Limited alternative routes/detours. Wide variations in terrain including a steep summit at Black Butte (3817 ft). Harsh winter and wind conditions can cause the route to be closed or traffic detoured..."

6

Friends of Del Norte (submitted by Eileen Cooper)

The Deir/EA fails to provide a Design and Cost Analysis based on accurate and relevant data that forecasts induced traffic volumes. 16

New Information- Web site: http://www.dot.ca.gov/hq/tsip/hseb/index.html 17

Highway System Engineering Branch About Us

"We provide information to State and Federal Legislators necessary to ensure the connectivity, integrity, continuity, and functionality of the highway system and of the California Road System (CRS). We provide data to the Governor's office, the State Legislators, and the Federal Highway Administration in order to secure transportation funding for California's highways."

In 1989, the FHWA established a policy saying that all states must have a pavement management system (PMS) to manage their Federal Aid Primary Highway System (Interstate and Principal Highways). As a result of this policy, all states were required to develop and implement a PMS as one of many conditions for federal funding. Pavement management is generally described, developed, and used in two levels: network and project level (AASHTO 1990). These two levels differ in both management application and data collected (FHWA 1995). The primary results of network-level analysis include M&R needs, funding needs, forecasted future impacts on the various funding options considered, and prioritized listings of candidate projects that must be repaired for the evaluated options.

The DEIR/EA fails to inform responsible Federal fiduciary agencies about the volumes of trucks that might be diverted from I-5, thus the DEIR/EA fails to provide the necessary data for a cost analysis.
The DEIR/EA fails to assess cost impacts from accelerated road maintenance from I-5 diversions.
The DEIR/EA fails to provide the necessary data to optimize the design selection process.
The DEIR/EA fails to provide alternatives for design that consider impacts from likely traffic volumes.

New Information- Web site: http://www.fhwa.dot.gov/cadiv/techapps/pms.htm

California Pavement Management System 18

"The State of California was among the first to adopt a Pavement Management System (PMS) in 1979. Like others of its era, the first PMS was based in a mainframe computer and contained provisions for an extensive database. After the data from each biennial condition survey was entered and analyzed, District Maintenance Supervisors used the voluminous printouts which they received to confirm their suspicions regarding pavement deterioration and recommended maintenance or rehabilitation activities.

For over twenty years, FHWA has actively promoted infrastructure management systems. Initially the states responded quickly to establish their baseline management systems for bridges and pavements. Not until the 1991 ISTEA legislation (and subsequent regulations in 23 CFR 500) were the requirements for management systems refined and expanded. Suddenly the states were burdened with new requirements for existing management systems. To add to the burden, CFR mandated four additional management systems.

CFR-mandated PMS enhancements fell under three general categories:

1. Data collection and management

- *An inventory of physical pavement features including the number of lanes, length, width, surface type, functional classification, and shoulder information.*
- *A history of project dates and types of construction, reconstruction, rehabilitation, and preventive maintenance.*
- *Condition surveys that include ride, distress, rutting, and surface friction.*
- *Traffic information including volumes, classification, and load data.*

2. Analysis, at a frequency established by the State, consistent with its PMS objectives.

7

Friends of Del Norte (submitted by Eileen Cooper)

- *A pavement condition analysis that includes ride, distress, rutting, and surface friction.*
- *A pavement performance analysis that includes an estimate of present and predicted performance of specific pavement types and an estimate of the remaining service life of all pavements on the network.*
- *An investment analysis at network and project levels.*
- *An engineering analysis for appropriate sections to include evaluation of how design, construction, rehabilitation, materials, mix designs and preventative maintenance all relate to pavement performance.*

3. Annual evaluations and upgrades as necessary in conformance with agency policies, practices, engineering criteria, and experience."

18 cont.

The purpose of project-level analysis is to provide the most cost-effective, feasible, and original design as a possible strategy for the maintenance, rehabilitation, or reconstruction for a selected section of pavement within available funds and other constraints (AASHTO 2001).

19

In the past three decades, PMSs have significantly improved. The early systems used simple data-processing methods to evaluate and rank candidate pavement rehabilitation projects only based on current pavement condition and traffic. Future pavement condition forecasting and economic analyses were not considered in such systems. Systems developed in the 1990s use integrated techniques of performance prediction, network- and project-level optimization, multi-component prioritization, and geographic information systems (GIS) (Kulkarni and Miller 2003). A mature PMS includes three key components: data collection, deterioration prediction, and cost analysis.

The costs of maintenance and repairs greatly increase with increased heavy truck traffic. Therefore, accurate information about traffic volume is required in order to optimize designs and obtain funding. The DEIR/EA fails to provide accurate and useful data for deterioration prediction and cost analysis regarding I-5 diverted STAA truck traffic.

There would be a significant and impractical economic burden, and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 under such increased winter traffic.

20

New Information- Attachment 13 - Caltrans presentation about project history and future projects to correct immediate road failures of Last Chance Grade and South Hwy101.

New Information- Attachment 14 - 2012 Report by Busch Geotechnical Consultants, regarding South Hwy 101 instability problems.

New Information- Web sites: Caltrans' reference about landslides and Last Chance Grade on South Hwy 101. Internet references for Land slide information, provided to FODN during public records act request.

Special Report 184 - Landslides in the Highway 101 Corridor between Wilson Creek and Crescent City, Del Norte County, California
by C.J. Wills, 2000, California Geological Survey, 24 pgs.

http://www.conservation.ca.gov/cgs/rghm/landslides/Pages/index.aspx

http://www.conservation.ca.gov/cgs/rghm/landslides/SR_184/Documents/CT101dn.pdf

Download Special Report 184- PDF Document (1.8 MB)
Download Geologic Map (1 MB)
Download Landslide Map (2.2 MB)

The DEIR/EA fails to evaluate the increased risk of road failure on Hwys 199, 197 and 101, due to the extra burden of significant increases in number of trucks diverted from I-5.

21

Friends of Del Norte (submitted by Eileen Cooper)

New Information- Attachment 15. Vehicle Weight and Road Damage, GAO study, which states that the damage done by one fully loaded tractor-trailer at 80,000 pounds compared to a 4,000 lb. car is exponentially greater.
"That's 20 times difference in weight, but the wear and tear caused by the truck is *exponentially greater.*"
http://www.vabike.org/vehicle-weight-and-road-damage/

21 cont

New Information- Attachment 16, and Web site, http://www.saferoads.org/issues/fs-trucks.htm

Cost. One legal 80,000 pound GVW tractor-trailer truck does as much damage to road pavement as 9,500 cars. (Highway Research Board, NAS, 1962). Overweight trucks chronically underpay their fair share of taxes and user fees for the repair of U.S. roads and bridges. By damaging roads, large trucks further degrade highway safety. (U.S. DOT, 1997).

Bigger Trucks Still Mean More Trucks. Increases in truck size and weight will not decrease the number of trips, result in fewer miles traveled, or improve safety by reducing the number of trucks on the highways. Past increases in truck size and weight have not resulted in fewer trucks, fewer trips, or fewer miles traveled. The number of trucks on U.S. highways has consistently grown, even after increases in both the sizes and weights of large trucks.

The most recent federal study to look at the issue showed that the federal government already subsidizes heavy truck operations almost $2 billion every year. (FHWA Addendum to Highway Cost Allocation Study, 2000)
• 80,000-pound single-trailer trucks only pay 80% of the cost of the damage they cause.

The Currently adopted District1 System Management Plan identifies maintenance funding needs to be growing as many facilities are reaching design life expectancy:

22

New Information- Web Site: http://www.dot.ca.gov/dist1/d1transplan/dsmp.pdf

DISTRICT 1 – DISTRICT SYSTEM MANAGEMENT PLAN – SEPTEMBER 2012

"Maintenance funding is also a concern, since many of our facilities are reaching their design life expectancy. This issue has been further exacerbated by recent budgetary constraints."

All set aside approvals of Federal funding, made by Caltrans Commission fiduciary agents for Hwy 199/197 STAA project, has been done so under misinformation about STAA induced truck volumes. The cumulative impact of the combined various projects that results in establishing an entirely new STAA long haul bypass around I-5, should be considered an expansionary new highway project with significant maintenance and repair cost impacts.

9

Friends of Del Norte (submitted by Eileen Cooper)

The Profound Significance of Inducing I-5 STAA truck traffic to a frost free coastal route in winter. 23

FODN is now more concerned than ever about the severe effects that are likely to happen, and that have not been investigated by the DEIR/EA for STAA cumulative impacts for Hwys 199/197 and Hwy 101 Richardson Grove.

The DEIR/EA has failed to survey likely STAA through truckers on I-5 to and from Grants Pass and San Francisco. The DEIR/EA has failed to survey through truck drivers that originate from Washington or Portland on North I-5 and are headed for I-80 or I-10 or I-40 across the U.S.A. or visa-versa. The DEIR/EA has failed to quantify these diversions both immediate and long term. Caltrans has completely overlooked the profound changes that may occur in national shipping. 24

The DEIR/EA fails to consider the economic burden for maintaining the roadway under induced traffic from an STAA bypass loop around Siskiyou Summit and the snowy Shasta region on I-5, as discussed above. The DEIR/EA fails to incorporate design features that accommodate such increases of induced heavy traffic. 25

Safety hazards would likely significantly increase from such great increased truck traffic during the most hazardous rainy winter conditions, along an already very challenging and dangerous route such as Hwy 199/197, even with proposed safety improvements, a narrow, rural winding canyon road that follows a Wild and Scenic River. 26

The DEIR/EA fails to evaluate and quantify *average accident risk increases or marginal risk elasticity*, and the *risk externality* for each route (199,197, and 101) as a result of induced STAA I-5 diversion estimates predicted from surveys of these through trucks along I-5, during the most hazardous winter driving conditions. 27

These diversions will not be distributed evenly throughout time, but will spike or peak during winter time I-5 Siskiyou Summit road closures, as well as other chaining events on I-5. This drastic spike in distribution of induced I-5 STAA truck traffic is likely to cause endless streams of trucks on already dangerous routes. The DEIR/EA has completely failed to identify peak diversion accident risk increases and the peak risk externality for I-5 diverted traffic based on relevant data, or surveys.

Hwy 101 south of Crescent City already has Fatality-plus-injury and Total Collision rates at 8 and 11 times the statewide average for a similar facility (ref: Caltrans, **Attachment 19**) 28

The three year accident rate for this segment of U.S. Hwy 199 exceeds the statewide average for similar facilities by over four times. (**Reference-** 2007 Del Norte Local Transportation Commission document, "Achieving STAA Route Status for Hwys 199/197, A Goods Movement Action Plan." 29

Hwy 197 is currently a rural residential road with 72 driveways directly entering onto the road. There will likely be a significant increased safety hazard to the residents along this road due to increased wintertime I-5 truck traffic diversions. The DEIR/EA fails to consider or evaluate safety issues in regard to egress to and from Hwy 199/197, as a result of significant increases of induced traffic from I-5 diversions. 30

Safety is inadequately addressed on Hwy199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate. 31

Resubmit: Attachment 8, Summary of California Hwy Patrol (CHP) records, comments submitted by Dori and David Bruce to the DEIR/EA 199/197 STAA Access and scoping. Speed was listed within CHP records as the most common cause of accidents. The 7 spot locations were chosen based on off tracking truck studies that are based on geometry. The road tests took videos of trucks accompanied by CHP and traveling at 32

10

Friends of Del Norte (submitted by Eileen Cooper)

unrealistically slow speeds. The DEIR/EA fails to consider and incorporate speed as a factor during their selection of locations for necessary project improvements and features. The DEIR/EA fails to consider accident history as a factor during their selection of locations for necessary improvements. 32 cont

As stated in FODN original comments, the DEIR/EA project will require mandatory design exceptions, due to geological constraints. Such design exceptions will likely become problematic with great increases in heavy truck traffic. The DEIR/EA has failed to consider the adequacy of these design exceptions with great increases of heavy truck traffic. 33

The DEIR/EA identifies the Hwy 199 corridor to be geologically unstable, and prone to rock slides. How will this corridor respond to such heavy volumes of increased truck traffic? The DEIR/EA fails to evaluate structural designs with regard to increased I-5 diversion loads. 34

Greater volumes of heavy truck traffic will increase the need for more traffic lights or traffic calming measures to address egress and pedestrian safety issues in communities along the entire highway from Grants Pass to California. Caltrans' DEIR/EA process has failed to engage Oregon in the conversation, although large truck diversions from I-5 would affect such communities. 35

Such I-5 diverted truck traffic increases would likely result in a significant increase in the risk of truck spills along Hwy 199/197, threatening the water quality of the Wild and Scenic Smith River, a refugia for California's last salmon, and only drinking water source for Crescent City. The City has very limited reserve water capacity. 36

New Information: Oct. 29 2012, Phone conversation with Eric Weir, assistant head Crescent City Engineer (permission to quote):

> *"Crescent City water tank holds 5.5 million gallons of water, plus Bertsch tank holds another 0.75 million gallons. Under normal use, 2 million gallons are used on average per day, which is a three day supply. In an emergency with restrictive use, the supply may last 5 days."*

The DEIR/EA fails to assess the increased risk of cargo spills based on real surveys of likely I-5 traffic diversions and peak diversion risk assessments that evaluate historical information about truck spills. The DEIR/EA fails to assess the endangerment and impact that an increased risk in cargo spills will have on Federally Endangered salmonids (Coho) and California species of Concern (steelhead), the water quality impacts to a Wild and Scenic River, California's Gem.

Attachment 20 ,Ted Souza comments to the DEIR/EA tracks the history of spills on Hwy 199/197, resubmitted. There have been 8 to 10 truck spills over the last 50 years (an additional one in 1983 that was glue -Don Gillespie, Triplicate Coastal Voices **Attachment-** 17). There appears to be two others mentioned in the Triplicate articles searched for truck spills: 37

http://www.triplicate.com/News/Local-News/Diesel-spills-on-Hwy-101-after-wreck

http://www.triplicate.com/News/Local-News/Petroleum-spilled-on-Hwy-101-in-Klamath

http://www.triplicate.com/News/Local-News/Spill-closes-highway

http://www.currypilot.com/News/Local-News/TRAILER-SPILL-SHUTS-DOWN-HIGHWAY-197

https://groups.google.com/forum/?fromgroups#!topic/parklandsupdate/xEscCe2ec4s

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Friends of Del Norte (submitted by Eileen Cooper)

http://www.times-standard.com/ci_8332873

http://www.triplicate.com/News/Local-News/Diesel-from-Hwy-199-tanker-spill-in-river

http://www.triplicate.com/News/Local-News/Firewood-blocks-Highway-199

http://www.triplicate.com/Opinion/Letters/Letters-to-the-Editor-July-13-2010

http://www.triplicate.com/News/Local-News/Charges-filed-in-diesel-spill

http://www.triplicate.com/News/Local-News/State-OKs-money-for-Hwy-199

http://www.triplicate.com/Opinion/Editorials/Letters-No-toxic-substance-should-ever-be-trucked-on-Hwy-199

http://www.triplicate.com/News/Local-News/Truck-overturns-spills-diesel-on-Hwy-199

37 cont

Increased volumes of diverted I-5 STAA truck traffic and the increased risks of truck spills would occur during the winter, the most dangerous time to drive our wet and windy roads. Is it acceptable to allow streams of STAA trucks onto such a narrow, windy dangerous route as Hwy 199 during the wet winter months every time Siskiyou Summit closes or requires chains? Is it an acceptable risk to endanger our drinking water so? Our fishery resources?

Imagine the devastation to our salmon fisheries, and our drinking water supply that can result from increased truck spills. We should not significantly endanger these irreplaceable resources.

38

The DEIR/EA fails to provide pavement designs that take into consideration the extra loads from significant increases of volumes of trucks. Design changes for increased capacity will likely result in extra thickness, compaction, etc. Such changes in design can significantly affect the root systems of old growth Redwoods and other trees directly along the highways. And the DEIR/EA fails to consider the biological and vegetation impacts due to accelerated road failures, maintenance and repair projects from road deterioration.

39

There would be a significant impairment of providing safe and enjoyable travel through a National Recreation Area, as well as Redwood National Park, and endangerment of tourists who travel to the Smith River during the winter for our fishing season and holiday season. Managers of the following trustee agencies have been so misled as to believe that there will be no significant increase of induced traffic and impact from induced traffic: Redwood National Park; the Six Rivers National Forest Service; managers of the Smith River National Recreation Area; as well as trustee agencies for protection of endangered species and California Species of Concern (US Fish and Wildlife, and California Dept. of Fish and Game).

40

The DEIR/EA fails to inform managers of these public trust lands about the inducement of traffic from I-5 in winter, through an I-5 STAA bypass loop, and does not provide these managers with factual data about I-5 average and peak diversions that will significantly impair safe and enjoyable travel, and significantly put at risk endangered species and the water quality of a Wild and Scenic River. Any concurrences they have made or are contemplating is based on misinformation. A new DEIR/EIS should be recirculated to all.

Thank you, Eileen Cooper

Eileen Cooper, Vice President FODN, on behalf of the Board

Attachments 21 & 22, 1989 Route Concept Reports Hwys 199/197
Attachment 23, Friends of Del Norte Brochure

12

Friends of Del Norte (submitted by Eileen Cooper) Attachment 1

Att: 1

3-12-2012

James R Barrett
1281 Anzio Street
Crescent City, California 95531

Kim Hayler, Caltrans Environmental Coordinator, Kimberly.Hayler@dot.ca.gov
Kevin Church, Kevin.Church@dot.ca.gov
P.O. Box 3700
Eureka, California 95502

Dear Kim,

This regards the Cal trans Hwy 199 / 197 / 101 STAA Truck Access DEIR

I am an experienced long haul (Truck Load) truck driver with a current Class A TX license. I have delivered freight using Hwy 199 and Hwy 101 for many years by sliding the trailer axles to within 40 foot of the rear axle / kingpin setting required and driving a short wheel base cab-over tractor. This has allowed me to see the roads in question at all times of the year.

I want to point out that the planned changes to the truck access rules will result in a huge increase in truck traffic and probable road damage for a very simple reason, namely greatly reduced chain requirements.

Truck drivers hate to chain their trucks needlessly. Using Interstate Route I-5 very frequently requires truck drivers to chain their trucks and trailers because of snow. This can happen as many as seven different times on a trip from the middle of Oregon to the middle of California. This chaining is easily dodged if one is allowed as I have been to use US Highway 101 instead of I-5. One could easily imagine many times more trucks per hour on the proposed route in heavy snow if the planned changes are implemented. This does not take in to account what would happen to the traffic numbers if I-5 closed for snow or accident as it often does. A study could quickly and easily be done on the impact of the proposal by counting the number of trucks that pass any given I-5 mile marker verses the number of trucks that currently pass any given mile marker on US 101. I believe the variance would be shocking.

This change in road usage is important because Cal-Trans finds it difficult to maintain these roads now. With a huge increase of trucks with winter weather, I think maintaining the roads would be impossible.

I would also like to point out that the so called "Manditory Safety Exemptions" in the proposed STAA Truck Access DEIR, would allow trucks to partially enter the on-coming traffic lanes and track off the road in spots. This is not a good idea as seen by current guard rail damage and the Hwy 199 accident history.

James R Barrett

Friends of Del Norte (submitted by Eileen Cooper) Attachment 2

Att 2

4-17-2012
James R Barrett
1281 Anzio Street
Crescent City, California 95531

ATT: Kim Hayler, Caltrans Environmental Coordinator, Kimberly.Hayler@dot.ca.gov
Kevin Church, Kevin.Church@dot.ca.gov
P.O. Box 3700, Eureka, California 95502

This is a follow up comment on the idea of changing the status of Hwy 199, Hwy 197, and Hwy 101 to allow them to be part of the STAA Truck Route in California for large full length trucks.

I have driven trucks and these roads for a long time, starting back in 1976 if one counts my military time. I have previously written a letter pointing out that the difficulty of chaining one's truck on I-5 will cause a radical increase in truck traffic on the proposed route. I have been told that Cal- Trans officials do not believe truck drivers will use the chain free route of highway 199-197-101. This is difficult for me to believe because most everybody knows "energy flows to the area of least resistance".

What may not be known is how hard it is to chain a truck and trailer. Each chain weighs about 30 pounds. They must be pulled out of the truck, straightened, placed on the truck, removed, and replaced to wherever they were stored in or on the truck. This must be done for eight wheels in most cases. I think it is also worth pointing out, that there is a great deal of inertia to be overcome to get one to leave a warm truck cab and lay down in the snow to chain a truck and trailer. Needless to say chaining a truck is a lot of work.

When freight is shipped from the middle of Oregon to the San Francisco Bay Area, any part of Southern California, or from south to north, in winter driving conditions, a truck driver must ask themselves "do I want to chain my truck and trailer or just sit and wait until the chain requirements are lifted?" This is the actual decision that must be made now. The proposed change in status of Hwy 199, Hwy 197, and Hwy 101 will add a third choice, namely "or will I drive and extra 44 miles along the California Coast to avoid chaining?"

I think it is a safe bet that every driver asked would answer "yes" to the question "would you drive 44 miles out of your way to skip chaining your truck and trailer in the snow?", especially when one factors in the lost time involved in chaining and driving the 30 mile per hour speed limit which applies to all chained vehicles.

In short, I have lots of experience chaining trucks and trailers in the snow on California roads and I can assure anyone that no one with any sense will chain a truck and trailer needlessly. Therefore, the option of using the coast roads instead of I-5 will become very popular with truck drivers in the winter.

James R Barrett.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 3

Caltrans

Operation Snowflake

I-5 Grapevine/Tejon Pass Closure

Winter Driving Guide

MOVE OVER

It's The Law!

On January 1st, 2010 a new law, California Vehicle Code (CVC 21809(a)), took effect. It states, in part, that the driver of a motor vehicle while on a freeway approaching an Emergency Response Vehicle (CHP, Caltrans, tow truck, etc.) displaying emergency or flashing lights, shall approach with due caution and, before passing in a lane immediately adjacent to the Emergency Vehicle, make a lane change into one available lane not immediately adjacent to the Emergency Vehicle with due regard for safety and traffic conditions, if practicable and not prohibited by law. If the maneuver described above would be unsafe or impracticable, slow to a reasonable and prudent speed that is safe for existing weather, road and vehicular or pedestrian traffic conditions.

http://www.dmv.ca.gov/summonses/

Frequently Asked Questions

Who decides when to close I-5?

Where can I find updated information?

Highway Advisory Radios (HAR) / Changeable Message Signs (CMS)

Why are chains not allowed on the Grapevine, as in the case on I-80 over Donner Pass?

California Highway Information Network (CHIN) - Road Conditions via Phone or Internet

How long after it stops snowing, will the roadway be reopened?

Follow us on Twitter
@I5Grapevine

Friends of Del Norte (submitted by Eileen Cooper) Attachment 3

Friends of Del Norte (submitted by Eileen Cooper) Attachment 4

Att : 4

From: Robert Cervero <roberte@berkeley.edu>
To: eileen cooper <upsprout@yahoo.com>
Sent: Monday, April 9, 2012 1:05 PM
Subject: Re: att profesor, could you help avert a disasterous misapplication of your research, from the Friends of Del Norte, an environmental organization

Hello Eileen:

It's always good to get contacted by concerned citizens about local transportation issues. Clearly this highway proposal has you and others gravely concerned about the consequences. I really, truly wish I could help you however I am simply too swamped with workload and pressing deadlines to take on any more work or assignments -- something I've had to tell a number of people over the last month. I take it from your email that the study borrows some of my research on induced growth effects of highways. That work was for road expansion projects in suburban parts of California thus how germane the results might be for a rural part of the state can be questioned. You might consider contact a consulting firm, such as Fehr & Peers, who does a lot of traffic impact evaluation.: http://www.fehrandpeers.com/ Jerry Walters is a principal for the firm and knows all the key issues in the state. They might be a bit pricey for your budget however Jerry might know a local traffic engineer or planner who could help your group out. Best wishes with this project. Robert Cervero

On Fri, Apr 6, 2012 at 10:57 PM, eileen cooper <upsprout@yahoo.com> wrote:

Friends of Del Norte, *Committed to our environment since 1973 A nonprofit, membership based conservation group*, advocating sound environmental policies for our region. PO Box 229, Gasquet, CA 95543 707-954-BIRD
ATT: Professor, Robert Cervero, University of Berkeley

The Friends of Del Norte is deeply concerned about the resulting cumulative environmental impacts of two currently proposed California Hwy improvement projects, which will in combination result in a new through traffic corridor for STAA trucks that bypasses I-5.

Perhaps you have been following the recent drama concerning improvements to Hwy 101 to allow STAA traffic through Richardson Grove State Redwood Park. Caltrans District 1 also intends to make STAA improvements along Hwy 199/197 along the federally designated Wild and Scenic Smith River in Del Norte County and within a National Recreation Area.

Combined, these two projects will create a complete new STAA truck route that bypasses Hwy I-5 from Grants Pass Oregon all the way to San Francisco California.

What is most disconcerting is that the inducement of truck traffic by creating such a STAA bypass loop has not been reasonably explored in the DEIRs. The Hwy 199/197 DEIR refers to your research, stating that the long term induced effects of creating new access generally results in a long term induced growth effect at 3.9 times the short term induced growth.

The traffic study for Hwy 199/197 DEIR relies on surveys of local users from the immediate area surrounding Crescent City who might immediately benefit and use STAA trucks. Amazingly this survey finds very little local need or change of use to STAA trucks. This is largely because most local users are already maxed out in weight with current smaller trucks, and would not benefit from utilizing larger trucks.

The traffic study then procedes to take this small number of local increased STAA use, multiply it by the slow growth rate of Crescent City and then multiply it by your research figure of 3.9 times for long term induced growth. The traffic study then concludes that long term induced growth will be a less than a significant impact from the project as compared to without the project.

What is wrong with this picture? The survey of users did not include those who would benefit from the combination of improvements to both Hwy 199 and Richardson Grove that

Friends of Del Norte (submitted by Eileen Cooper) Attachment 4

will not only impact the local area, but includes through STAA traffic along I-5 from north of Grants Pass all the way to San Francisco. What is unique about this situation is that the new STAA bypass Coastal Route has a mild climate, that does not experience freezes or snow, and does not require special tires or chains in the winter. While the current STAA route along I-5 frequently has long closures and requires truckers to chain up in the winter. Although the proposed new bypass is slightly longer, the convenience may induce large volumes of trucks from the I-5 truck corridor during winter.

Our organization received the attached letter from an experienced truck driver, that alerted us to these unusual circumstances.

Can you help us expose the disasterously inappropriate application of your research, in consideration of this case.

The the entire new STAA loop route along Hwy 101 spans crumbling ocean cliffs that can barely be maintained today because of geologic instability. These unstable cliffs continually slump and have "deep seated instability that cannot be fully corrected." The STAA loop will also continue through to Grants Pass along Hwy 199 and the Wild and Scenic Smith River canyon. This stretch is like a windy roller coaster ride, that cannot be widened adequately because of geologic instability of the canyon walls and narrowness of the canyon itself. The route will be barely legal. The STAA 199 HWY will require mandatory safety exemptions because of geologic instability.

Might you review (or for very small compensation) recommend some expert traffic consultant who might help expose the faults of the Traffic Analysis for the STAA Hwy 199/197 proposed project. Just the Traffic Analysis is not lengthy or complicated. We from the rugged northwest California would be profoundly greatful for any help you can extend.

Thank you, Eileen Cooper, boardmember of the Friends of Del Norte. 707-954-2473.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

Att 5

MARA FEENEY & ASSOCIATES
Community Relations and Socioeconomic Analysis
19 Beaver Street, San Francisco CA 94114

September 26, 2012

To Whom It May Concern:

The Friends of Del Norte (FODN) contacted me earlier this year and asked me to provide an objective review of the environmental impact analysis that Caltrans District 1 prepared for the proposed 197/199 Safe STAA Access Project (June 2010), as well as the comments that FODN has submitted on this project to date, and to offer my professional opinion on both.

I am a planning consultant with approximately 35 years of experience in community involvement and environmental review for complex and often controversial projects throughout the United States and Canada. My experience includes participating in multidisciplinary environmental analyses for numerous infrastructure development and improvement projects in California, including work for Caltrans on proposed roadway improvement projects throughout the State, including District 1 (see resume attached).

Although a Final EIR/EA for the 197/199 Safe STAA Access Project was scheduled to be released this summer, instead the Draft EIR/EA is now being re-circulated for public review and comment, with additional information provided on potential impacts to trees. For a project as important as this one, in a setting with such extraordinary environmental resources, Caltrans should have used the opportunity of re-circulating the draft document to provide additional information and address other key issues that have been raised by FODN--including the faulty assumptions underpinning the truck traffic analysis, the weakness of the economic impact analysis, and the lack of a cumulative traffic impact analysis.

Estimates of short-term increased truck traffic on US199 in the Draft EIR/EA are based on a very limited survey of local businesses (based on a small number of brief survey questions), in which 80 percent of the respondents stated they did not need and would not use STAA trucks on US199 if the project were implemented. Only three local businesses stated that they would use STAA trucks on US199 to lower shipping costs, but one of these has subsequently closed and another ships products only two months each year. Based on these local business surveys, the analysts concluded that Crescent City would enjoy substantial economic benefits from the project yet there would be a negligible short-term increase in truck traffic on US199 associated with local business demand.

The traffic analysis also uses data from a study done by a reputable transportation analyst at UC Berkeley, Dr. Robert Cervero, whose research indicated that long term induced effects of creating new access generally occur at a rate of 3.9 times the short term induced growth rate. However, in direct correspondence with FODN, Dr. Cervero indicated that the referenced research had been done "for road expansion projects in suburban parts of California thus how germane the results might be for a rural part of the state can be questioned."[1]

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1 E-mail message from Robert Cervero, University of California Transportation Center, to Eileen Cooper, FODN, April 9, 2012

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

Furthermore, the analysis does not include any consideration of additional through truck traffic that might be encouraged by the creation of a new STAA truck traffic loop connecting I-5 via SR 197/US 199 to US 101 south through Richardson Grove. Caltrans evaluated proposed changes to US101 at Richardson Grove, a state park with significant old growth redwood resources south of Eureka, in a separate environmental document.2 These two proposed projects combined, however, would make it possible for STAA trucks to travel from I-5 at Grants Pass to San Francisco using a scenic coastal route—and, more importantly, one that would allow them to avoid chaining requirements in the Siskiyou range during winter storms. The Draft EIR/EA prepared for the 197/199 Safe STAA Access Project, based on limited survey information and a questionable multiplier, concludes that there would be no significant increase in heavy truck traffic and therefore no significant increase in associated safety risks to local residents, visitors, or the environment.

The project purports to improve safety—but the STAA truck off tracking modeling appears to have assumed unrealistic speeds. In addition, the project proposes no roadway improvements at all for those segments of US199 that now have the highest accident rates.

STAA access on SR 197/US 199 is also purported to be good for the local economy, but the Draft EIR/EA identifies no fiscal benefit to local government entities, nor does it document that the project in any way would result in lower consumer costs for products sold in Del Norte County. Clearly, the lack of STAA network status on SR 199 has not deterred businesses from locating to Crescent City to date. Despite its relatively small population size and remote location, Crescent City has succeeded in attracting such big box retailers as Home Depot and WalMart, as well as a major state prison with continuous resupply needs.

A handful of surveyed business owners in Del Norte County speculated that as many as 30 new local jobs *might* be created if the proposed roadway improvements are made. At a project cost of $22-34 million (depending on which alternative is selected), this would be an expenditure of on the order of $1 million per new job in a few businesses, but the economic analysis does not consider potential jobs that would be lost due to switching from local trucking firms that own predominately CA legal trucks to outside firms offering STAA trucks for deliveries, nor does it calculate potential job losses in the tourism sector (which employs more people than any other private sector in the County) resulting from the deterioration of prime scenic and recreational values and perceptions of increased safety and environmental risks.

Caltrans is proposing a large investment of public funds for little clear economic benefit, and for a project that would have substantial impacts on quality of life by: taking private property, decreasing existing buffers between highway right-of-ways and adjacent homes and businesses, increasing the risk of fatal traffic accidents3 due to increased heavy truck traffic; increasing the risk of toxic spills into the Smith River corridor (threatening community water supply sources, world class sport fishing, and critical habitat for several endangered species), and degrading scenic values4. The project would increase heavy truck traffic on a road that local residents and businesses depend upon for daily access, but that is also on a significant scenic byway that attracts many visitors annually for bird watching, sightseeing, camping, river rafting, boating and sport fishing—activities that would be disrupted by additional heavy truck traffic. These visitors are the backbone of the tourism industry that employs more people in Del Norte County than any other private sector of the economy, as noted in the Draft EIR/EA.

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2 In response to lawsuits filed by local environmental organizations, a federal judge ordered Caltrans to redo the environmental analysis for this project on April 4, 2013.

3 According to DOT statistics, while large trucks represent only 3 percent of all registered vehicles, they are responsible for 12-13% of all crash fatalities.

4 According to the draft EIR, "A vast area of cut slope with a rock fall mitigation system would greatly degrade the existing visual quality of the roadway corridor" (2010R p. 2.1-86)

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

The land use analysis fails to identify project conflicts with adopted plans and policies pertaining to the protection of scenic, recreational and biological resources in the Smith River corridor, such as the Smith River National Recreation Area Management Plan, which states that "the management emphasis for the middle Fork-Hwy199 management area shall be on maintaining wildlife values and providing for a full range of recreation uses, with particular emphasis on the scenic and recreation values associated with the Smith River, old growth redwoods, and CA state highway 199." Designation of US 199 as part of the STAA truck network would not be consistent with this management priority.

Caltrans' own Route Concept Report, prepared in 1989 (well after the passing of the Surface Transportation Act of 1982, allowing 53' truck trailers), acknowledges "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make SR 199 "a poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." The report recommended developing additional passing lanes as necessary only to maintain acceptable Level of Service, and concluded that: "This Route Concept should serve as a guide for long range planning of improvements to Route 199. It will protect the State's investment in the Route, while recognizing environmental and financial constraints which will not allow the programming of extensive improvements for this highway."

It seems that local lobbying and calls for better STAA truck access to Crescent City have caused Caltrans to abandon this previous (and apparently rational) position. The proposed project will result in an increase in heavy truck use on a roadway whose main value is in providing access to environmental and recreation resources along the scenic Smith River Canyon, as well as access to the redwood forests that comprise one of California's two UNESCO World Heritage sites (the other being Yosemite). Enjoyment of these scenic drives and the natural resources that surround them would be marred by driver concerns about long, heavy trucks careening around curves in areas that would still have considerable variability in lane widths, shoulder widths, and sight distances. There is already a documented history of truck accidents on US199, including fatalities and diesel spills threatening the Smith River. The existing roadway is so narrow and twisting that the improvements Caltrans has proposed at seven locations along the roadway to allow STAA truck access cannot all meet Caltrans engineering design guidelines and will require mandatory design exceptions.

US199 is a vanishingly rare resource: a winding country road that meanders through an area with extraordinary recreational and scenic values. This road—one of only ten routes included in the Forest Service Scenic Byway Network--traverses rolling terrain in the most heavily visited part of the Smith River National Recreation Area, which lies within a National Forest. For much of its length, US 199 follows the course of the Smith River, the only major river system in California that remains undammed, with the longest stretch (over 300 miles) of designated as Wild and Scenic Rivers of any river in the United States. Together with several other roadways, Route 199 is part of the "Mystic Corridor" connecting Crater Lake National Park in Oregon to the redwoods and the California coast near Crescent City.

In my view (both personal and professional), there is still a place for winding country roads along scenic rivers with exceptional scenic, recreational, and ecological values. We should be trying to preserve them, rather than "improving" them to become part of the STAA truck network. Such resources will become more highly valued and sought after over time, as they become more scarce. The irony is that the creation of a STAA truck route (with uncertain truck traffic and safety impacts) may kill the very goose that remains capable of laying golden eggs in Del Norte County in the future—namely, tourism in this area that is known for its pristine river, extraordinary parks, and scenic resources.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 5

Furthermore, the proposed improvements, which *at great cost* would provide the bare minimum of changes needed to meet current STAA route qualification requirements are not likely to be a sensible long term investment. In the 1960s, the industry standard in trucking was a 40' trailer; in the 1970s it was 48', in the late 1980s, 53' trailers were authorized. The American Trucking Association recently has been seeking Congressional approval for even longer, heavier trucks, despite evidence that heavy trucks are the major source of highway and bridge damage, and that heavy trucks do not pay their fair share of the cost of roadway deterioration and bridge replacement. The continuation of these trends into the future is reasonably foreseeable.

I have no stake whatsoever in this project. Nonetheless, on behalf of FODN, I urge local elected officials and the State of California to reconsider prioritizing funding for this project, which has been declared to be good for public safety and the Del Norte County economy based on wishful thinking and inadequate information pertaining to environmental impacts.

Sincerely,

MARA FERNEY & ASSOCIATES

Mara Ferney

Principal

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

A#6

MARA FEENEY & ASSOCIATES
Community Relations and Socioeconomic Analysis
19 Beaver Street, San Francisco CA 94114

RESUME OF MARA FEENEY

EDUCATION
University of British Columbia: M.A. in Community and Regional Planning, 1977
Bryn Mawr College: A.B. with Honors in Anthropology, 1973

PROFESSIONAL HISTORY
Principal, Mara Feeney & Associates, 1983-present
Woodward-Clyde Consultants, Senior Staff Scientist, 1980-1983
Sonoma State University, Instructor in Environmental Impact Reporting, 1982
Strong, Hall and Associates, Senior Socioeconomist, 1978-1980

REPRESENTATIVE EXPERIENCE
Mara Feeney is a Planner with over thirty years of professional experience in environmental consulting, specializing in community impact analysis, socioeconomic impact assessment, housing market analysis, land use studies, recreation impact analysis, farmland impact analysis, public involvement and relocation studies. Her assignments have included evaluation of potential impacts to land use, regional employment and income, population and demographic characteristics, public finance, housing, community infrastructure, public services and quality of life. Ms. Feeney is thoroughly familiar with the requirements of NEPA and CEQA (as well as both FHWA and Caltrans) for growth inducement, land use and socioeconomic analysis, and Environmental Justice evaluations. In 1982, she was an Instructor in Environmental Impact Reporting at Sonoma State University. In addition, Ms. Feeney has extensive recent experience completing community impact analyses, relocation reports and section 4(f)/303(c) analyses for transportation improvement projects throughout California. Relevant project experience is summarized below.

For Placer County Transportation Planning Authority, Caltrans and FHWA, she completed the socioeconomic impact analysis, environmental justice analysis, Section 4(f) analysis, and growth inducement analysis for the proposed Placer Parkway, a new 15-mile transportation facility that would connect the Roseville-Rocklin-Lincoln area with the Sacramento Airport vicinity. She also peer reviewed the land use and farmland impact analyses and produced the CIA report.

For Caltrans and the Fresno County Transportation Authority, she completed socioeconomic and land use impact analyses for construction of State Route 168 through urban neighborhoods in Fresno, California. In addition, she was responsible for preparing relocation reports for the proposed project, which potentially would displace over 900 households.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

For URS Corporation and the California High Speed Train Authority, she evaluated potential community impacts associated with proposed alternatives for the new High Speed Train alignments for the Fresno to Bakersfield and Bakersfield to Palmdale segments.

For Caltrans District 1, she completed the community impact analysis for Proposed improvements to the US 101 corridor from Eureka to Arcata. This work Included a survey of potentially affected local businesses, as well as identification of Environmental Justice impacts to residents of an adjacent mobile home park.

For Caltrans and the Fresno County Transportation Authority, she was responsible for socioeconomic impact analysis, farmland impact rating and relocation studies for proposed improvements to State Route 180 east of the City of Fresno.

For Caltrans District 6, she completed a major growth study for southeastern Madera County. This project included developing population, housing and employment projections for southeastern Madera County for the year 2020 for scenarios with and without a future UC campus. Inputs were used to model future traffic to determine needed improvements to the Route 41 bridge connecting Fresno and Madera Counties.

For Caltrans District 1, she evaluated the land use and socioeconomic impacts, as well as Section 4(f) recreation resource impacts, associated with proposed improvements to Route 101 on Last Chance Grade south of Crescent City, involving changes to the historic Redwood Highway alignment through the Del Norte Coast Redwoods State Park, part of a UNESCO World Heritage Site.

For Caltrans and The Duffey Company, Ms. Feeney completed the land use and socioeconomic analysis for proposed widening of State Highway 156 through the community of San Juan Bautista in San Benito County.

For the Bay Area Rapid Transit District, she analyzed the potential land use and socioeconomic impacts associated with the proposed Dublin/Pleasanton heavy rail extension.

For San Francisco's Municipal Railway (MUNI), she assisted in the preparation of the EIS/EIR for the Third Street Light Rail line to connect Visitacion Valley and the Bayview/Hunters Point neighborhoods to the new UCSF campus and the downtown.

For the Port of Oakland, she has completed socioeconomic, land use and growth inducement analyses for the proposed 42-foot deep dredging project aimed at keeping the Port of Oakland competitive in international container shipping.

For American High Speed Rail and Woodward-Clyde Consultants, she prepared a work plan for analysis of socioeconomic and land use impacts associated with the proposed Los Angeles to San Diego "bullet train."

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

For San Francisco Airport, she completed analysis of the impacts of new runways in San Francisco Bay on recreation resources along the peninsula from San Francisco to Palo Alto. She also worked on the land use, farmland and socioeconomic analyses for this controversial project.

For Caltrans, she completed the socioeconomic and land use impact analyses, as well as the conceptual relocation plan, for site selection of the proposed CalTrain Peninsula Commute Service Rail Maintenance facility. Four potential sites were evaluated--in Brisbane, Santa Clara, San Jose and Gilroy.

For the Water Emergency Transportation Agency, she completed the analysis of community impacts associated with proposed improvements to the Downtown San Francisco Ferry Terminal to accommodate future new ferry services. This included identifying impacts to population, employment, housing, regional growth and environmental justice considerations.

For Reliant Energy Company, she analyzed land use plans and policies consistency, and prepared the land use compatibility and farmland impact sections for the Application for Certification for a proposed 500 MW power plant in a rural agricultural area of Colusa County, California. She also peer reviewed the socio-economic and environmental justice analyses for this proposed project.

For the San Francisco Public Utilities Commission, she evaluated impacts to agricultural and recreational resources associated with the Water System Improvement Project to replace aging water transport facilities carrying drinking water from the Hetch Hetchy Valley in Yosemite to the Bay Area.

For Mirant Corporation, she provided peer review services for the socioeconomic and Environmental Justice analyses for the proposed Potrero Power Plant in San Francisco and served as an expert witness at CEC evidentiary hearings for this controversial urban energy project.

For the Emeryville Redevelopment Agency, Ms. Feeney provided public participation consulting services for a U.S. Environmental Protection Agency Brownfields Pilot project grant aimed at developing a regional approach to groundwater monitoring that would facilitate the City's reuse of abandoned and underutilized industrial properties.

For the SFPUC Water Department, she managed public outreach activities for the environmental review process for the Chloramine Conversion project. This required publication of notices and conducting of public meetings in both rural and urban locations potentially affected by the project.

For Pacific Refining Company, she analyzed the potential local economic benefits (tax revenues, local purchasing, employment and income) associated with planned modifications to a petroleum refinery in Hercules, California.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 6

For Southern Pacific Transportation Company, she developed and implemented a Community Relations Plan required by a DHS Consent Order for the remedial investigation of an abandoned rail yard in Brisbane. She conducted interviews and held community meetings in the Visitacion Valley and Little Hollywood neighborhoods of San Francisco, the closest residences to the site.

For the Bureau of Land Management and Frontier Pipeline Company, she was Task Leader for the assessment of socioeconomic impacts for a crude oil pipeline proposed for construction through five counties in Wyoming.

For the U.S. Navy, she completed housing market analyses for facilities and personnel stationed in the San Francisco Bay Area (at Hunters Point and at Naval Air Station Moffett Field), as well as at the Navy's Postgraduate School in Monterey and at a Naval Air Station located in Fallon, Nevada.

For the Bureau of Land Management, Montana State Office, she designed a sample survey of homes and businesses on the Northern Cheyenne and Crow Indian Reservations. She conducted primary research to obtain information about the Reservation economies which was used in BLM's input-output model for Federal coal leasing in southeastern Montana.

For the U.S. Navy and the City of San Francisco, Ms. Feeney was responsible for analyzing the social and economic impacts associated with the proposed reuse alternatives being considered for both the Hunters Point Shipyard and Treasure Island.

For the Bureau of Land Management and La Sal Pipeline Company, she was Task Leader for the assessment of socioeconomic impacts for a shale oil pipeline proposed for construction through six counties in Colorado and Wyoming. This project included extensive interviewing with local elected officials and planners in affected counties and communities.

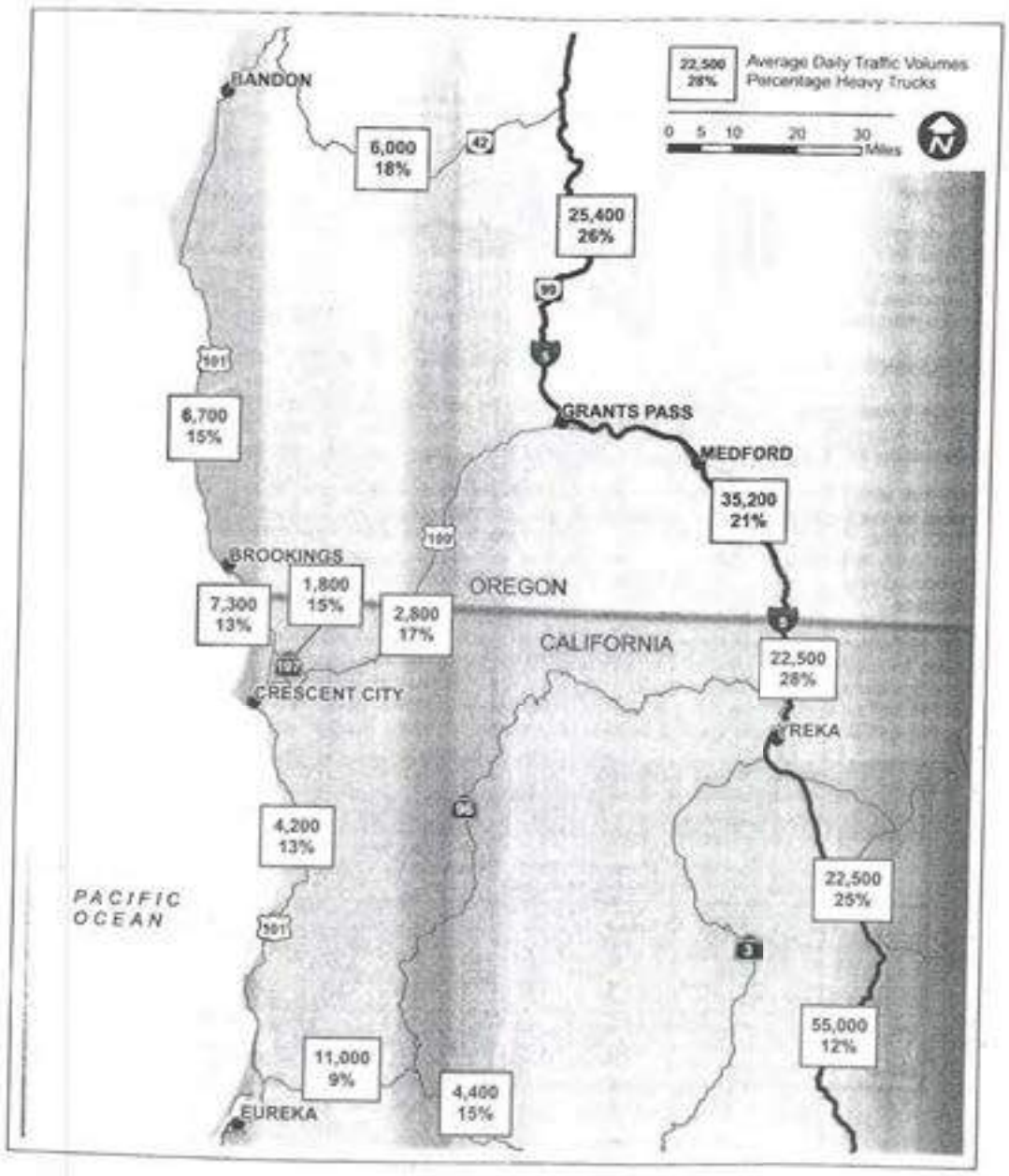
For West County Landfill, Inc., she revised and helped DTSC to implement the Public Participation Plan for RCRA closure of the Hazardous Waste Management Facility at the West County Landfill located in North Richmond, California. She was invited to be an Expert Witness in CERCLA and RCRA public participation requirements for the cost recovery suit associated with closure of this hazardous waste landfill.

In Cortez, Colorado, she mediated a conflict between Shell Oil Company and local human services agencies concerning community impacts that might result from a proposed CO^2 wellfield development, then facilitated local acceptance of an appropriate mitigation package.

For Del Norte County, California, she provided advice on the development and implementation of a public outreach program to enhance citizen involvement in assessing the potential environmental effects of a controversial nickel mine.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 7

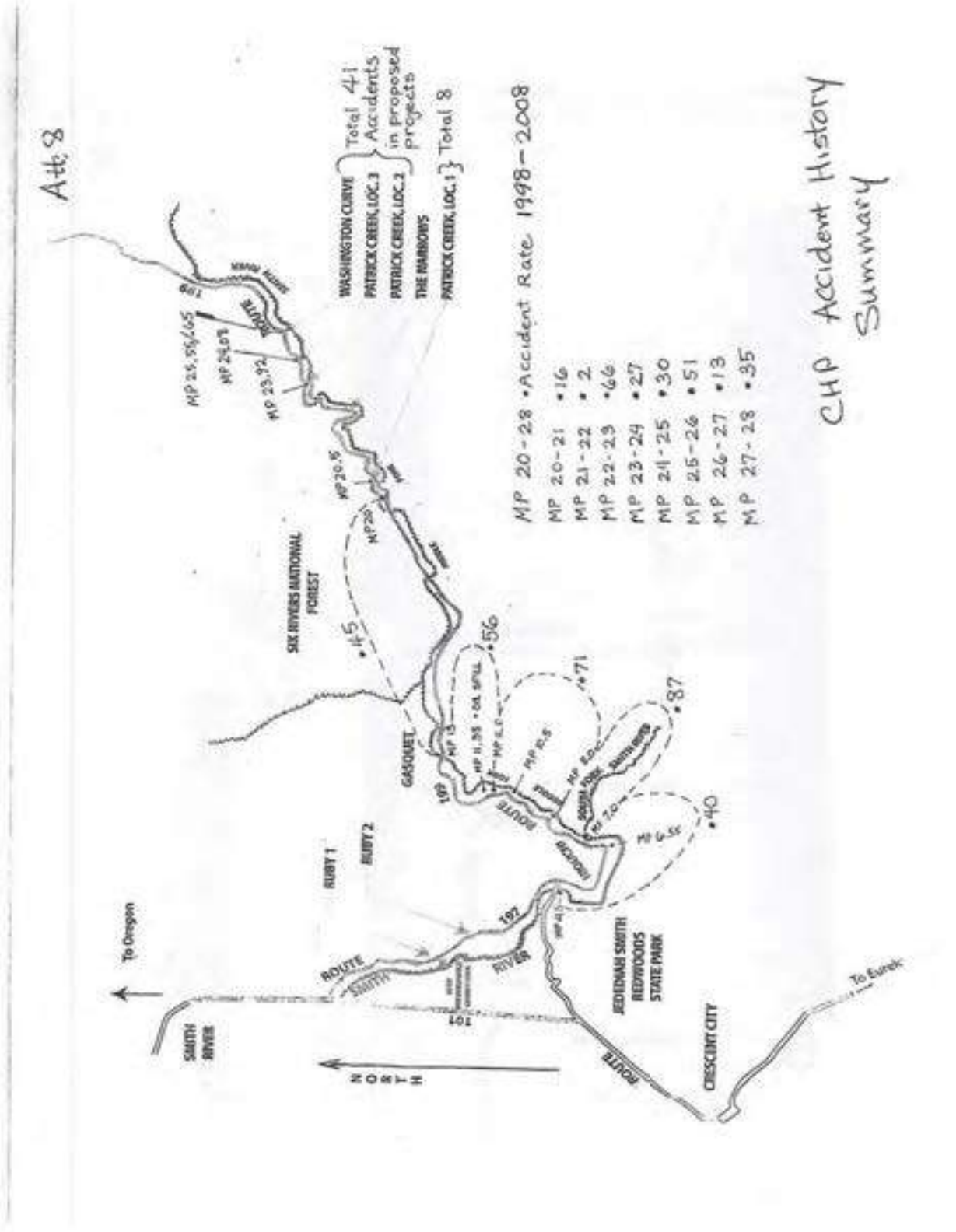
Att 7



EHR & PEERS
TRANSPORTATION CONSULTANTS

197/199 SAFE STAA ACCESS PROJECT
Regional Roadway System Comparison
FIGURE 9

Friends of Del Norte (submitted by Eileen Cooper) Attachment 8



Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

Att: 9

Oregon Department of Transportation

ODOT PUBLIC RECORDS REQUEST

Please read ( ) before completing and submitting this request.

Section A – Requester Information

NAME		TITLE
Eileen Cooper		Ms
PHONE	**FAX**	**E-MAIL ADDRESS**
707-465-8904		upsprout@yahoo.com
FIRM OR TRADE NAME		
Friends of Del Norte		
MAILING ADDRESS		
2644 Roy Ave		
CITY	**STATE**	**ZIP**
Crescent City	CA	95531

Section B – Record(s) requested

DESCRIPTION OF RECORDS REQUESTED
Please provide me in electronic form (by email or on disc) the following information for Siskiyou Summit Pass and chain-up area on I-5 for the last 5 years: the days and total number of all road closures and duration of road closures, the reason for the closure (bad weather and/or accident) and the days, total days, and duration for required chain-ups for large trucks.

Section C – Receiving record(s), certification

CERTIFICATION	PREFERRED METHOD OF RECEIPT	PICK UP LOCATION (IF APPLICABLE)
	E-mail	
AREA(S) OF ODOT CONTACTED REGARDING THIS REQUEST		
ask odot, Kim Jordan		

Submit by fax: (503) 986-4025

Submit in person or by postal mail: Records Officer, ODOT Business Services Section, 3930 Fairview Industrial Drive SE, MS3, Salem, OR 97301

ODOT OFFICE USE ONLY				
ESTIMATE AMOUNT	DATE ESTIMATE PROVIDED	DATE AUTHORIZED TO PROCEED	REQUEST WITHDRAWN	REQUEST COMPLETED
ACTUAL COST	PAYMENT RECEIVED	MISCELLANEOUS BILLING DATE	COMPLETED BY	COMPLETED BY
COMMENTS				

Jim 541-774-6352 Oregon Traffic Info - Siskiyou Summit.

731-0489 (10/10)

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RDKILL TALLY
DARRIN NEAVOLL
CANYONVILLE

ASHLAND	CALL TYPE	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	TOTAL
	1216'S	26	17	16	4	3	5	6	4	9	15	15	30	150
		Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	
	1216's	8	9	14	14	6	1	9	7	7	12	22	29	138
		Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	
	1216's	15	12	24	9	8	4	7	5	2	9	13	8	116
	1216's	10	12	8	11									41

hold - for CA closure
full chain - everybody except 4 wheel drive - the Big Trucks
cond B1 single axle - including towing
Siskiyou Summit is most dangerous pass on I-5
6% grade & only 2 lanes
the Grapevine is safer ≈ 4% grade & 6 lanes

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH
1	Oct-09	10/23/09	HAZARD	SEMI BLOCKING	1	5 NB	12:22 PM	12:39 PM	0:17
1		10/23/09	HAZARD	VEHICLE BLOCKING	1	8.5 SB	9:43 AM	11:02 AM	1:19
								TOTAL	2
	Nov-09								
1		11/14/09	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	10:39 AM	1:33 PM	2:54
1		11/18/09	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	10:29 PM	2:33 AM	4:04
1		11/18/09	HAZARD	VEHICLE BLOCKING	1	6.5 NB	5:44 PM	6:55 PM	1:11
1		11/21/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 NB	10:56 PM	4:07 AM	5:11
1		11/21/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 SB	10:56 PM	4:29 AM	5:32
1		11/22/09	HAZARD	VEHICLE BLOCKING	1	4.3 SB	4:37 PM	4:58 PM	0:21
1		11/25/09	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	5:56 PM	6:50 PM	0:54
1		11/26/09	HAZARD	VEHICLE BLOCKING	1	6	1:18 PM	1:37 PM	0:19
1		11/29/09	HAZARD	VEHICLE BLOCKING	1	4.5 SB	6:31 PM	6:57 PM	0:26
								TOTAL	9
	Dec-09								
1		12/1/09	HAZARD	SEMI BLOCKING UPPER ESCAPE RAMP	1	6 NB	1:40 PM	1:49 PM	0:09
1		12/12/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 SB	1:34 AM	5:39 AM	4:05
1		12/12/09	CHAIN	COND B1/SINGLE AXLE	1	4.3 NB	1:36 AM	5:39 AM	4:03
1		12/22/09	HAZARD	VEHICLE BLOCKING	1	3-5	2:27 AM	3:36 AM	1:09
1		12/23/09	HAZARD	VEHICLE BLOCKING	1	4.32 SB	10:00 AM	1:13 PM	3:13
1		12/25/09	HAZARD	VEHICLE BLOCKING	1	6 SB	6:35 PM	8:45 PM	2:10
1		12/29/09	HAZARD	VEHICLE BLOCKING	1	6 NB	12:39 PM	3:21 PM	2:42
1		12/29/09	CHAIN	TEMP HOLD/ CALIFORNIA	1	11 SB	3:56 PM	8:49 PM	4:53
1		12/29/09	WINTER	TEMP HOLD/ CALIFORNIA	1	0 SB	4:44 PM	10:06 PM	5:22
1		12/29/09	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB	9:08 PM	8:08 AM	11:00
1		12/29/09	CHAIN	FULL CHAINS	1	4.32 SB	8:08 PM	8:08 AM	12:00
1		12/30/09	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	8:09 AM	9:06 AM	0:57
1		12/31/09	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	4:00 AM	8:10 AM	4:10
								TOTAL	13
	Jan-10								
1		1/10/10	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	2:18 PM	2:59 PM	0:41
1		1/11/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	6:16 PM	7:54 PM	1:38
1		1/16/10	HAZARD	SEMI BLOCKING	1	4 SB	6:38 PM	10:40 PM	4:02
1		1/20/10	WINTER	CALIFORNIA CLOSURE	1	0 NB&SB	1:27 PM	3:05 PM	1:38
1		1/22/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	7:21 AM	8:19 AM	0:58
1		1/24/10	CHAIN	TEMP HOLD/SISKIYOUS	1	4.32 SB	10:06 AM	10:13 AM	0:07
1		1/24/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	5:27 PM	9:19 PM	3:52
1		1/24/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	5:58 PM	6:27 PM	0:31
1		1/25/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:23 PM	10:46 PM	1:23
								TOTAL	9

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8/X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH
1	Jan-10	1/25/10	CHAIN	FULL CHAINS	1	0 NB	10:46 PM	5:16 AM	6:30
1		1/25/10	CHAIN	FULL CHAINS	1	11 SB	10:46 PM	3:51 AM	5:05
1		1/25/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	3:51 AM	5:16 AM	1:25
1		1/25/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:24 AM	5:28 AM	1:04
1		1/29/10	HAZARD	VEHICLE BLOCKING/LOWER ESCAPE RMP	1	9 NB	6:18 PM	6:36 PM	0:15
									TOTAL 5
1	Feb-10	2/10/10	HAZARD	VEHICLE BLOCKING/ONRAMP	1	14 SB	6:36 PM	8:38 PM	2:02
1		2/17/10	HAZARD	SEMI BLOCKING	1	10	9:56 PM	2:00 AM	4:04
1		2/23/10	CHAIN	FULL CHAINS	1	11	7:55 PM	3:11 AM	7:16
1		2/23/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	3:11 AM	5:11 AM	2:00
1		2/23/10	CHAIN	FULL CHAINS	1	0 NB	7:55 PM	2:53 AM	5:58
1		2/23/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	2:53 AM	5:11 AM	2:18
1		2/24/10	HAZARD	SEMI BLOCKING	1	9 NB	10:57 AM	11:34 AM	0:37
1		2/26/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	8:38 PM	1:53 AM	5:15
									TOTAL 8
1	Mar-10	3/5/10	HAZARD	VEHICLE IN LOWER ESCAPE RAMP	1	9 NB	10:08 AM	11:44 AM	1:36
1		3/8/10	HAZARD	SEMI BLOCKING	1	3.5 NB	7:17 AM	8:47 AM	1:30
1		3/9/10	CHAIN	FULL CHAINS	1	4.32 NB&SB	7:32 PM	9:42 PM	2:10
1		3/9/10	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	9:42 PM	5:27 AM	7:45
1		3/12/10	WINTER	TEMP HOLD	1	4.32 SB	12:21 PM	1:15 PM	0:54
1		3/12/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:53 PM	1:34 PM	0:41
1		3/13/10	HAZARD	SEMI BLOCKING	1	6 NB	11:13 PM	12:38 PM	1:25
1		3/23/10	HAZARD	SEMI BLOCKING LOWER ESCAPE RAMP	1	9 NB	7:25 PM	9:19 PM	1:54
1		3/24/10	HAZARD	SEMI BLOCKING UPPER ESCAPE RAMP	1	6 NB	12:29 PM	12:41 PM	0:12
1		3/24/10	HAZARD	VEHICLE BLOCKING	1	10 NB	3:24 PM	3:44 PM	0:20
1		3/29/10	HAZARD	SEMI BLOCKING	1	10 SB	11:39 AM	2:35 PM	2:56
1		3/30/10	CHAIN	TEMP HOLD	1	4.32 NB&SB	6:39 AM	6:59 AM	0:20
1		3/30/10	WINTER	TEMP HOLD/SEMI BLOCKING	1	4.32 SB	5:52 AM	6:12 AM	0:20
1		3/30/10	WINTER	TEMP HOLD	1	11 SB	6:29 AM	6:40 AM	0:11
1		3/30/10	CHAIN	COND B1/SINGLE AXLE	1	4.32 NB&SB	6:39 AM	7:29 AM	0:50
1		4/2/10	CHAIN	TEMP HOLD	1	4.32 SB	10:01 AM	11:16 AM	1:15
1		4/2/10	CHAIN	TEMP HOLD	1	0 NB	11:01 AM	11:27 AM	0:26
1		4/2/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	10:01 AM	10:17 AM	0:16
1		4/2/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	10:13 AM	10:17 AM	0:04
1		4/2/10	CHAIN	FULL CHAINS	1	11 SB	10:17 AM	1:30 PM	3:13
1		4/2/10	CHAIN	FULL CHAINS	1	0 NB	10:45 AM	1:30 PM	2:45
1		4/2/10	HAZARD	SEMI'S BLOCKING	1	6 SB	10:10 AM	10:33 AM	0:23
									TOTAL 22

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH
1	Apr-10	4/4/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	4:30 PM	5:01 PM	0:31
1		4/4/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:31 PM	5:05 PM	0:34
1		4/4/10	HAZARD	VEHICLE BLOCKING	1	4 SB	5:17 PM	6:26 PM	1:09
1		4/11/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	7:32 PM	9:56 PM	2:24
1		4/15/10	HAZARD	SEMI BLOCKING	1	7 SB	2:33 PM	3:16 PM	0:43
1		4/16/10	HAZARD	SEMI BLOCKING	1	6.7	12:56 AM	1:18 AM	0:22
1		4/29/10	HAZARD	VEHICLE BLOCKING	1	4 NB	10:04 AM	10:19 AM	0:15
								TOTAL	7
	Nov-10								
1		11/5/10	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	3:00 PM	4:51 PM	1:51
1		11/8/10	HAZARD	VEHICLE BLOCKING	1	10 SB	6:47 PM	7:19 PM	0:32
1		11/17/10	HAZARD	SEMI BLOCKING	1	5.5 SB	8:04 PM	9:54 PM	1:50
1		11/21/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	2:49 AM	5:56 AM	3:07
1		11/21/10	HAZARD	VEHICLE BLKG LOWER ESCAPE RAMP	1	9 NB	4:05 AM	4:32 AM	0:27
1		11/21/10	HAZARD	VEHICLE BLOCKING	1	14 NB	3:50 PM	4:05 PM	0:15
1		11/21/10	HAZARD	SEMI BLOCKING	1	4.32 NB	4:58 PM	5:48 PM	0:50
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:58 AM	8:54 AM	7:56
1		11/23/10	CHAIN	FULL CHAINS	1	11 SB	8:54 AM	8:59 AM	0:05
1		11/23/10	CHAIN	FULL CHAINS	1	11 SB	8:59 AM	10:10 AM	1:11
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	10:10 AM	1:29 PM	3:19
1		11/23/10	CHAIN	FULL CHAINS	1	0 NB	3:39 AM	4:03 AM	0:24
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:03 AM	8:55 AM	4:52
1		11/23/10	CHAIN	FULL CHAINS	1	0 NB	8:55 AM	11:07 AM	2:12
1		11/23/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	11:07 AM	12:25 PM	1:18
1		11/23/10	CHAIN	TEMP HOLD	1	0 NB	12:55 PM	1:19 PM	0:24
1		11/23/10	HAZARD	SEMI BLOCKING	1	7.5 SB	7:03 PM	8:44 PM	1:41
1		11/23/10	WINTER	TEMP HOLD	1	7 NB	12:47 PM	2:25 PM	1:38
1		11/26/10	HAZARD	VEHICLE BLOCKING	1	7 SB	11:52 PM	12:29 AM	:007
1		11/27/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	12:02 PM	12:18 PM	0:16
1		11/27/10	CHAIN	FULL CHAINS	1	0 NB	12:18 AM	12:26 PM	12:08
1		11/27/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:05 AM	12:23 AM	0:18
1		11/27/10	CHAIN	FULL CHAINS	1	11 SB	12:23 AM	12:33 PM	12:10
1		11/27/10	HAZARD	SEMI BLOCKING	1	14 SB	4:46 PM	5:07 PM	0:21
1		11/30/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:17 PM	9:51 PM	0:34
1		11/30/10	CHAIN	FULL CHAINS	1	11 SB	9:51 PM	7:11 AM	9:20
1		11/30/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	9:18 PM	10:13 PM	0:55
1		11/30/10	CHAIN	FULL CHAINS	1	0 NB	10:13 PM	7:11 AM	8:58
								TOTAL	28

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH
	Dec-10								
1		12/1/10	HAZARD	SEMI'S BLOCKING	1	1 NB	4:48 AM	5:06 AM	0:18
1		12/2/10	HAZARD	SEMI BLOCKING	1	6 SB	2:51 PM	4:18 PM	1:27
1		12/8/10	HAZARD	VEHICLE LOWER ESCAPE RAMP	1	9 NB	3:37 AM	4:00 AM	0:23
1		12/12/10	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	1:54 PM	3:32 PM	1:38
1		12/17/10	CHAIN	FULL CHAINS	1	11 SB	11:34 PM	11:44 PM	0:10
1		12/17/10	WINTER	TEMP HOLD	1	4.3 SB	11:44 PM	12:10 PM	:26
1		12/17/10	CHAIN	FULL CHAINS	1	11 SB	12:10 PM	12:41 PM	0:31
1		12/18/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	2:47 AM	6:34 AM	3:47
1		12/18/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	2:48 AM	6:28 AM	3:40
1		12/18/10	HAZARD	SEMI BLOCKING	1	5 SB	2:50 AM	3:24 AM	0:34
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	8:12 PM	8:26 PM	0:14
1		12/19/10	WINTER	TEMP HOLD	1	4.3 NB	8:26 PM	8:50 PM	0:24
1		12/19/10	CHAIN	FULL CHAINS	1	0 NB	9:06 PM	1:23 AM	4:17
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	1:23 AM	5:15 AM	3:52
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	8:12 PM	8:32 PM	0:20
1		12/19/10	CHAIN	TEMP HOLD	1	4.3 SB	8:32 PM	8:52 PM	0:20
1		12/19/10	CHAIN	FULL CHAINS	1	11 SB	9:06 PM	1:45 AM	4:39
1		12/19/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:45 AM	5:41 AM	3:56
1		12/26/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:43 AM	9:12 AM	1:29
1		12/26/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:43 AM	9:12 AM	1:29
1		12/26/10	HAZARD	VEHICLE BLOCKING	1	7 SB	9:42 AM	10:23 AM	0:41
1		12/26/10	HAZARD	SEMI BLOCKING	1	7 NB	12:04 PM	12:06 PM	0:02
1		12/26/10	CHAIN	FULL CHAINS	1	11 SB	6:13 PM	7:54 PM	1:41
1		12/26/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:54 PM	8:38 PM	0:44
1		12/26/10	WINTER	TEMP HOLD	1	4.3 SB	8:38 PM	8:43 PM	0:05
1		12/26/10	CHAIN	FULL CHAINS	1	11 SB	8:52 PM	11:02 AM	14:10
1		12/26/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:54 PM	8:45 PM	0:51
1		12/26/10	CHAIN	FULL CHAINS	1	0 NB	8:45 PM	9:35 AM	11:50
1		12/26/10	WINTER	TEMP HOLD	1	4.3 NB	9:35 AM	10:03 AM	0:28
1		12/26/10	CHAIN	FULL CHAINS	1	0 NB	10:05 AM	11:21 AM	1:16
1		12/26/10	HAZARD	SEMI BLOCKING	1	6 NB	8:38 PM	9:15 PM	0:37
1		12/26/10	HAZARD	SEMI'S BLOCKING	1	7 SB	9:13 PM	10:23 PM	1:10
1		12/26/10	HAZARD	VEHICLES BLOCKING	1	14 NB/SB	11:06 PM	11:44 PM	0:38
1		12/29/10	WINTER	TEMP HOLD	1	1 NB	1:03 PM	1:20 PM	0:17
1		12/31/10	CHAIN	COND B1/SINGLE AXLE	1	0 NB	11:17 PM	4:06 AM	4:49
1		12/31/10	CHAIN	COND B1/SINGLE AXLE	1	11 SB	11:18 PM	4:06 AM	4:50
								TOTAL	36

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MPH	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH
	Dec-10								
	Jan-11								
1		1/22/11	HAZARD	SEMI BLOCKING	1	6 SB	10:13 PM	10:31 PM	0:18
1		1/29/11	HAZARD	SEMI LOWER ESCAPE RAMP	1	9 NB	1:16 PM	3:19 PM	2:03
								TOTAL	2
	Feb-11								
1		2/4/11	HAZARD	UHAUL UPPER ESCAPE RAMP	1	6.23 NB	2:24 AM	3:48 AM	1:24
1		2/18/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:49 AM	4:09 AM	2:20
1		2/24/11	CHAIN	FULL CHAINS	1	0 NB	4:08 AM	8:40 AM	4:32
1		2/24/11	CHAIN	FULL CHAINS	1	11 SB	4:08 AM	8:28 AM	4:20
1		2/24/11	HAZARD	SEMI BLOCKING	1	12 SB	9:17 AM	9:39 AM	0:22
1		2/25/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:06 PM	8:28 PM	1:22
1		2/25/11	CHAIN	FULL CHAINS	1	11 SB	9:23 PM	6:57 AM	9:34
1		2/25/11	CHAIN	FULL CHAINS	1	0 NB	9:24 PM	6:59 AM	9:37
								TOTAL	8
	Mar-11								
1		3/5/11	HAZARD	VEHICLE BLOCKING	1	10 SB	2:38 PM	3:09 PM	0:31
1		3/5/11	HAZARD	SEMI BLOCKING	1	9 NB	2:55 PM	6:57 PM	4:02
1		3/18/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	6:53 AM	7:52 AM	0:59
1		3/18/11	CHAIN	FULL CHAINS	1	11 SB	7:52 AM	9:40 AM	1:48
1		3/18/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:01 AM	8:22 AM	1:21
1		3/18/11	CHAIN	FULL CHAINS	1	0 NB	8:22 AM	11:58 AM	3:36
1		3/18/11	HAZARD	SEMI BLOCKING	1	5.8 SB	7:18 AM	7:57 AM	0:39
1		3/23/11	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	6:34 PM	7:11 PM	0:37
1		3/24/11	CHAIN	COND B1/TEMP HOLD/FULL CHAINS	1	11 SB	12:12 PM	1:31 PM	1:19
1		3/24/11	CHAIN	COND B1/FULL CHAINS	1	0 NB	12:14 PM	1:11 PM	0:57
1		3/24/11	HAZARD	SEMI'S BLOCKING	1	6 SB	12:40 PM	12:45 PM	0:05
1		3/25/11	CHAIN	COND B1/FULL CHAINS	1	0 NB	4:28 AM	10:08 AM	5:40
1		3/25/11	CHAIN	COND B1/FULL CHAINS	1	11 SB	4:28 AM	9:20 AM	4:52
1		3/26/11	HAZARD	VEHICLE BLOCKING	1	6	4:56 AM	5:12 AM	0:16
1		3/26/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	1:54 AM	6:40 AM	4:46
1		3/26/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:55 AM	5:38 AM	3:43
1		3/28/11	HAZARD	SEMI UPPER ESCAPE RAMP	1	6 NB	1:11 PM	1:47 PM	0:36
								TOTAL	17
	Apr-11								
1		4/1/11	HAZARD	VEHICLE BLOCKING	1	14 SB	2:54 PM	3:08 PM	0:14
1		4/4/11	HAZARD	VEHICLE BLOCKING	1	6 SB	5:25	8:26	3:01
1		4/7/11	CHAIN	FULL CHAINS	1	11 SB	4:07	8:28	4:21
1		4/7/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:55	7:58	3:03
1		4/13/11	HAZARD	VEHICLE BLOCKING	1	10 SB	17:31	18:38	1:07
								TOTAL	5

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND	DATE OF INCIDENT	CALL TYPE		HWY #	MP#	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
	Nov-11									
1		11/6/11	CHAIN	FULL CHAINS	1	0 NB	1:47	8:26	6:39	
1		11/6/11	CHAIN	FULL CHAINS	1	11 SB	1:50	8:14	6:24	
1		11/18/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:27	7:48	0:21	
1		11/18/11	WINTER	TEMP HOLD	1	4 SB	9:45	10:17	0:32	
1		11/18/11	WINTER	TEMP HOLD	1	4 SB	14:19	14:57	0:38	
1		11/24/11	1216	TEMP HOLD	1	6 NB	22:09	22:30	0:21	
									TOTAL	6
	Dec-11								0:00	
1		12/12/11	CHAIN	COND B1/SINGLE AXLE	1	11 SB	4:28	6:14	1:46	
1		12/12/11	CHAIN	COND B1/SINGLE AXLE	1	0 NB	4:27	6:14	1:47	
1		12/12/11	FIRE	TEMP HOLD/TANKER FIE	1	4 NB	7:10	7:31	0:21	
									TOTAL	3
	Jan-12									
1		1/3/12	AGASST	CALIFORNIA CLOSURE	1	4 NB&SB	16:04	17:59	1:55	
1		1/18/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	6:42	12:18	5:36	
1		1/18/12	CHAIN	FULL CHAINS	1	11 SB	10:58	12:18	1:20	
1		1/18/12	WINTER	TEMP HOLD	1	11 SB	10:47	11:06	0:19	
1		1/18/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	14:07	15:05	0:58	
1		1/19/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:09	9:45	0:36	
1		1/19/12	WINTER	TEMP HOLD	1	4,3 SB	9:48	11:25	1:37	
1		1/19/12	CHAIN	FULL CHAINS	1	11 SB	10:38	15:27	4:49	
1		1/19/12	WINTER	TEMP HOLD	1	11 SB	12:14	13:22	1:08	
1		1/19/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	9:56	10:32	0:36	
1		1/19/12	WINTER	TEMP HOLD	1	0 NB	10:32	11:22	0:50	
1		1/19/12	CHAIN	FULL CHAINS	1	0 NB	10:38	15:27	4:49	
1		1/19/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	15:39	19:02	3:23	
1		1/20/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	17:43	18:02	0:19	
1		1/20/12	CHAIN	FULL CHAINS	1	11 SB	18:02	19:43	1:41	
1		1/20/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	17:46	19:36	1:50	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	10:48	13:54	3:06	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	10:49	11:20	0:31	
1		1/22/12	CHAIN	FULL CHAINS	1	11 SB	11:20	13:19	1:59	
1		1/22/12	WINTER	TEMP HOLD	1	11 SB	11:12	12:28	1:16	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	4:41 PM	4:42 PM	0:01	
1		1/22/12	WINTER	TEMP HOLD	1	11 SB	4:42 PM	5:35 PM	0:53	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	5:15 PM	6:02 PM	0:47	
1		1/22/12	CHAIN	FULL CHAINS	1	0 NB	6:02 PM	1:42 AM	6:40	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	1:42 AM	5:17 AM	3:35	
									TOTAL	25

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND Jan-12	DATE OF INCIDENT	CALL TYPE		HWY #	MPH	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
1		1/22/12	CHAIN	FULL CHAINS	1	11 SB	5:48 PM	3:40 AM	9:52	
1		1/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	3:40 AM	4:48 AM	1:08	
1		1/22/12	HAZARD	SEMI BLOCKING	1	4 SB	7:33 PM	7:47 PM	0:14	
1		1/24/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	5:49 AM	6:06 AM	0:17	
	Feb-12								TOTAL	4
1		2/28/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	7:15 AM	9:04 AM	1:49	
1		2/28/12	CHAIN	FULL CHAINS	1	0 NB	7:41 PM	7:15 AM	11:34	
1		2/28/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	7:15 AM	8:54 AM	1:39	
1		2/28/12	WINTER	TEMP HOLD	1	11 SB	8:22 PM	11:54 PM	3:32	
1		2/28/12	WINTER	TEMP HOLD	1	11 NB	9:03 PM	10:16 PM	1:13	
1		2/28/12	WINTER	WINTER WEATHER	1	11 SB	10:54 PM	2:41 AM	3:45	
	Mar-12								TOTAL	6
1		3/1/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:28 AM	10:06 AM	9:38	
1		3/1/12	WINTER	TEMP HOLD	1	11 SB	10:06 AM	10:10 AM	0:04	
1		3/1/12	CHAIN	FULL CHAINS	1	11 SB	10:10 AM	11:18 AM	1:08	
1		3/1/12	CHAIN	COND B1/SINGLE AXLE	1	0 NB	12:28 AM	10:14 AM	9:46	
1		3/1/12	WINTER	TEMP HOLD	1	1 NB	10:14 AM	11:14 AM	1:00	
1		3/1/12	CHAIN	FULL CHAINS	1	1 NB	10:14 AM	11:18 AM	1:04	
1		3/1/12	HAZARD	SEMI BLOCKING	1	10 SB	3:47 AM	4:45 AM	0:58	
1		3/1/12	WINTER	TEMP HOLD	1	11 SB	9:53 AM	10:05 AM	0:12	
1		3/1/12	WINTER	TEMP HOLD	1	11 SB	10:19 AM	11:14 AM	0:55	
1		3/13/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	2:53 AM	3:03 AM	0:10	
1		3/13/12	CHAIN	FULL CHAINS	1	11 SB	3:03 AM	7:22 AM	4:19	
1		3/13/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	3:00 AM	7:01 AM	4:01	
1		3/13/12	CHAIN	FULL CHAINS	1	1 NB	7:01 AM	7:34 AM	0:33	
1		3/20/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:45 AM	1:56 AM	0:11	
4		3/20/12	CHAIN	FULL CHAINS	1	4,3 SB	1:56 AM	7:23 AM	5:27	
1		3/20/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	1:46 AM	2:02 AM	0:16	
1		3/20/12	CHAIN	FULL CHAINS	1	1 NB	2:02 AM	7:34 AM	5:32	
1		3/20/12	HAZARD	VEHICLE BLOCKING	1	6 NB	3:47 AM	3:50 AM	0:03	
1		3/22/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:58 AM	1:55 AM	0:57	
1		3/22/12	CHAIN	FULL CHAINS	1	11 SB	1:55 AM	4:47 AM	2:52	
1		3/22/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	1:00 AM	1:55 AM	0:55	
1		3/22/12	CHAIN	FULL CHAINS	1	1 NB	1:55 AM	5:37 AM	3:42	
1		3/22/12	HAZARD	VEHICLE BLOCKING	1	4 NB	1:44 AM	2:07 AM	0:23	
1		3/22/12	HAZARD	SEMI BLOCKING	1	3 NB	3:41 AM	5:42 AM	2:01	
1		3/22/12	HAZARD	SEMI BLOCKING	1	3 NB	4:03 AM	4:35 AM	0:32	
									TOTAL	25

Friends of Del Norte (submitted by Eileen Cooper) Attachment 9

RESERCH REQUEST
FOR 8X2 JEREMIAH

HOW MANY	ASHLAND Mar-12	DATE OF INCIDENT	CALL TYPE		HWY #	MPM	TIME OF INCIDENT	TIME CLEARED	HOURS OF LENGTH	
1		3/27/12	CHAIN	FULL CHAINS	1	11 SB	11:18 PM	1:09 AM	1:51	
1		3/27/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	1:09 AM	2:37 AM	1:28	
1		3/27/12	CHAIN	FULL CHAINS	1	1 NB	11:21 PM	1:23 AM	2:02	
1		3/27/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	1:23 AM	2:26 AM	1:03	
1		3/27/12	WINTER	TEMP HOLD	1	1 NB	11:25 PM	11:45 PM	0:20	
									TOTAL	5
	Apr-12									
1		4/4/12	HAZARD	SEMI BLOCKING	1	7 SB	9:20 AM	9:21 AM	0:01	
1		4/4/12	CHAIN	FULL CHAINS	1	11 SB	4:48 PM	5:58 PM	1:10	
1		4/4/12	CHAIN	FULL CHAINS	1	1 NB	5:28 PM	5:58 PM	0:30	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	9:54 PM	10:14 PM	0:20	
1		4/4/12	CHAIN	FULL CHAINS	1	11 SB	10:14 PM	12:50 AM	2:41	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	11 SB	12:50 AM	3:26 AM	2:36	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	9:55 PM	10:14 PM	0:19	
1		4/4/12	CHAIN	FULL CHAINS	1	1 NB	10:14 PM	12:34 AM	2:20	
1		4/4/12	CHAIN	COND B1/SINGLE AXLE	1	1 NB	12:34 AM	3:26 AM	2:52	
1		4/4/12	WINTER	TEMP HOLD	1	11 SB	10:19 PM	10:44 PM	0:25	
									TOTAL	10

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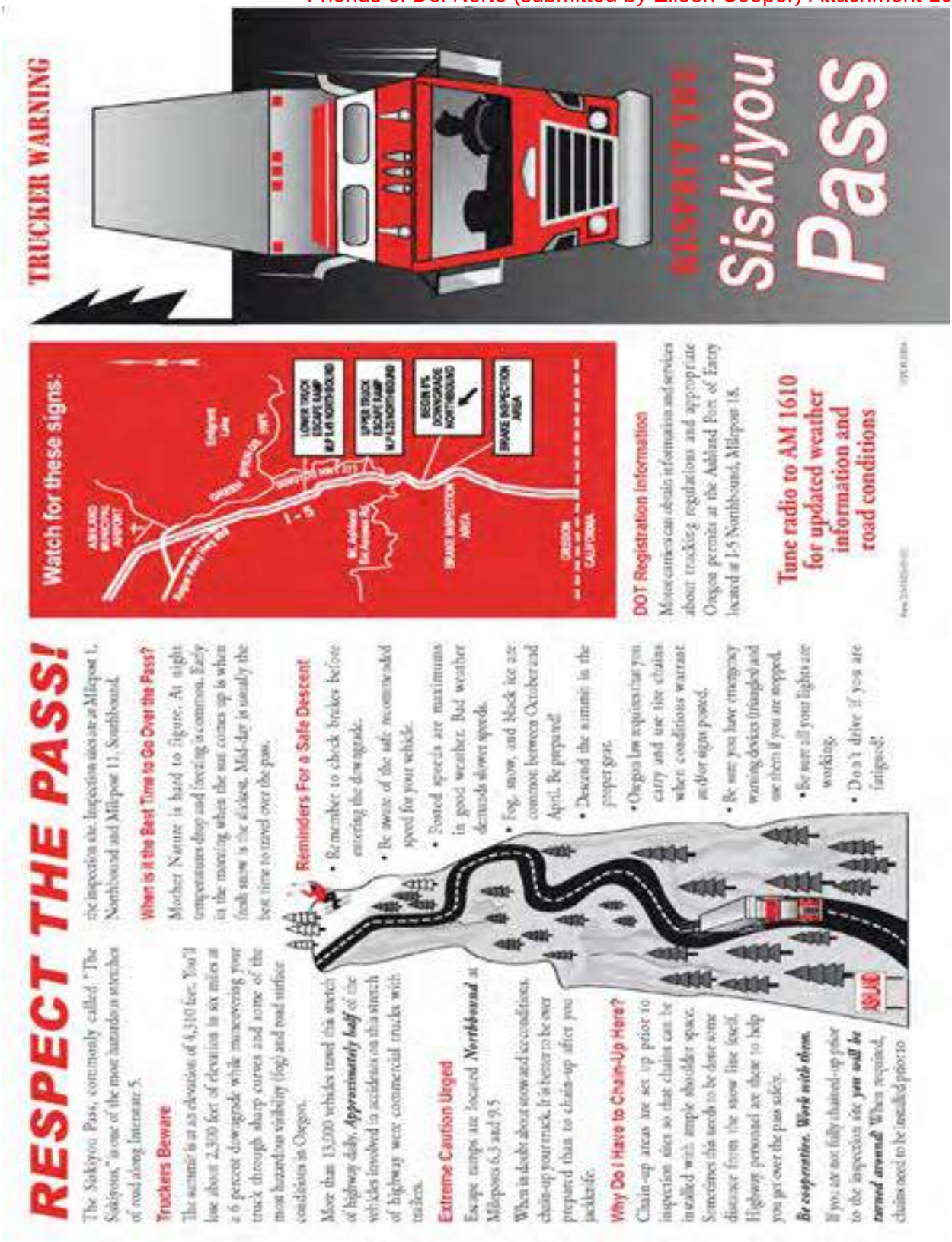

Friends of Del Norte (submitted by Eileen Cooper) Attachment 11

Att 11

Guide to the 2012 Oregon Commercial Vehicle Safety Plan

Law Regarding Safety Plan

Oregon Revised Statute – ORS 825.248 – Annual commercial motor vehicle safety plan.

(1) The Department of Transportation shall develop an annual commercial motor vehicle safety plan. The goal of the plan is to reduce accidents involving commercial motor vehicles and to reduce injuries and fatalities resulting from accidents. . . The priority for each year's plan shall be determined on the basis of accurate and timely data. The department shall use performance measures to determine the success of an annual plan and to develop the subsequent plan.

(2) In conducting inspections described in ORS 810.560, a person who is trained and certified as a commercial vehicle inspector under ORS 810.560 shall adhere to the provisions of the commercial motor vehicle safety plan . . .

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Summary of Key Problems & Objectives

The following series of state-specific problem statements and national program objectives represent the heart of Oregon's Safety Plan for 2012. This section describes problems that must be addressed and objectives that must be achieved in order to have the greatest positive impact on commercial vehicle safety. Oregon enforcement officers and inspectors need to particularly focus on state-specific objectives that seek to reduce the five-year average crash total by 5%.

Problem and Objective #1 – Address the number of truck crashes in Portland, Salem, and Eugene that are caused by non-commercial motor vehicle (non-CMV) drivers. Reduce the percentage of non-CMV-driver-caused crashes in these large metropolitan areas by 5%, from a five-year average of 55% to 50% in Fiscal Year 2012. Work with police to conduct intensified traffic enforcement operations, including Ticket Aggressive Cars and Trucks (TACT) exercises, to check aggressive driving and spread key safety messages.

Problem and Objective #2 – Determine the percentage of commercial vehicle drivers in Oregon who don't wear safety belts and reduce that number. A nationwide study in 2008 found 28% don't wear their belts. An Oregon stucy in 2010 put the number as high as 19%.

Problem and Objective #3 – Prevent truck-at-fault crashes in high-elevation stretches of Interstates 5 and 84 during Winter months, particularly in December and January. The

Friends of Del Norte (submitted by Eileen Cooper) Attachment 11

Siskiyou Summit on I-5 and Emigrant Hill, Ladd Canyon, and Nelson Point to Weatherby on I-84 are plagued with treacherous weather conditions. Reduce by 5% the number of truck-at-fault weather-related crashes in these areas from a five-year average of 43 to 41 in Fiscal Year 2012. Police will aggressively enforce traffic laws for both commercial and non-commercial vehicles as all enforcement officers focus on chain law awareness and compliance in inclement weather.

Problem and Objective #4 – Address the number of hazardous material incidents and truck-at-fault crashes involving hazmats and reduce both by 5%. Based on five-year average totals, reduce hazmat incidents from 286 to 272 and reduce truck-at-fault crashes involving hazmats from 18 to 17. Conduct hazmat bulk and non-bulk inspections and special operations targeting "at-risk" hazmat motor carriers and shippers.

Problem and Objective #5 – Maintain or decrease the number of bus-at-fault crashes, which have averaged three per year in the past nine years. Conduct 110 Level 5 terminal inspections, along with other Level 2 and 3 inspections at weigh stations and areas that can accommodate passengers.

Problem and Objective #6 – Return Oregon's State Safety Data Quality rating to "Good" for all crash categories – completeness, timeliness, accuracy, and consistency. Oregon was downgraded to an overall "Fair" rating in 2010, primarily due to the timeliness of crash report processing at DMV and uploads to the national database.

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Accident Intensified MCSAP Corridors

Safety officials working under the Motor Carrier Safety Assistance Program (MCSAP) focus enforcement efforts on 268 road miles in 12 parts of the state that are plagued by crashes, historically called AIM Corridors — Accident Intensified MCSAP Corridors.

AIM Corridor Truck Crashes

Corridor	2008	2009	2010
1. Siskiyou Summit, I-5, MP2-9	9	8	5
2. Weaver to Roberts Mountain, I-5, MP108-117	5	5	2
3. Salem, I-5, MP252-260	11	8	9
4. Tualatin to Portland, Marquam Bridge, I-5, MP289-300	11	13	20
5. West Linn to Clackamas, I-205, MP8-14	10	9	13
6. Hood River to Mosier, I-84, MP63-73	6	7	2
7. Emigrant Hill, aka Cabbage Hill, I-84, MP219-228	14	7	17
8. Ladd Canyon, I-84, MP270-278	12	5	5
9. Nelson Point to Weatherby, I-84, MP331-340	13	3	5
10. North Bend to Coos Bay; US101, MP233-243	2	2	0
11. Eugene, I-5, MP168-208, and Lane County, OR58, MP1-62	51	32	28
12. Deschutes County, US20, Sisters to Bend and Bend to 10 miles east of Bend US97, Terrebonne to LaPine, Deschutes County	15	14	17

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2 Reduce the number of truck drivers who don't wear safety belts — A nationwide study has concluded that 28% of commercial vehicle drivers don't wear their belts. An Oregon study in 2010 put the number as high as 19%.

Safety Improvement Objective #1: Definitively determine the percentage of truck drivers in Oregon who don't wear safety belts and reduce that number.

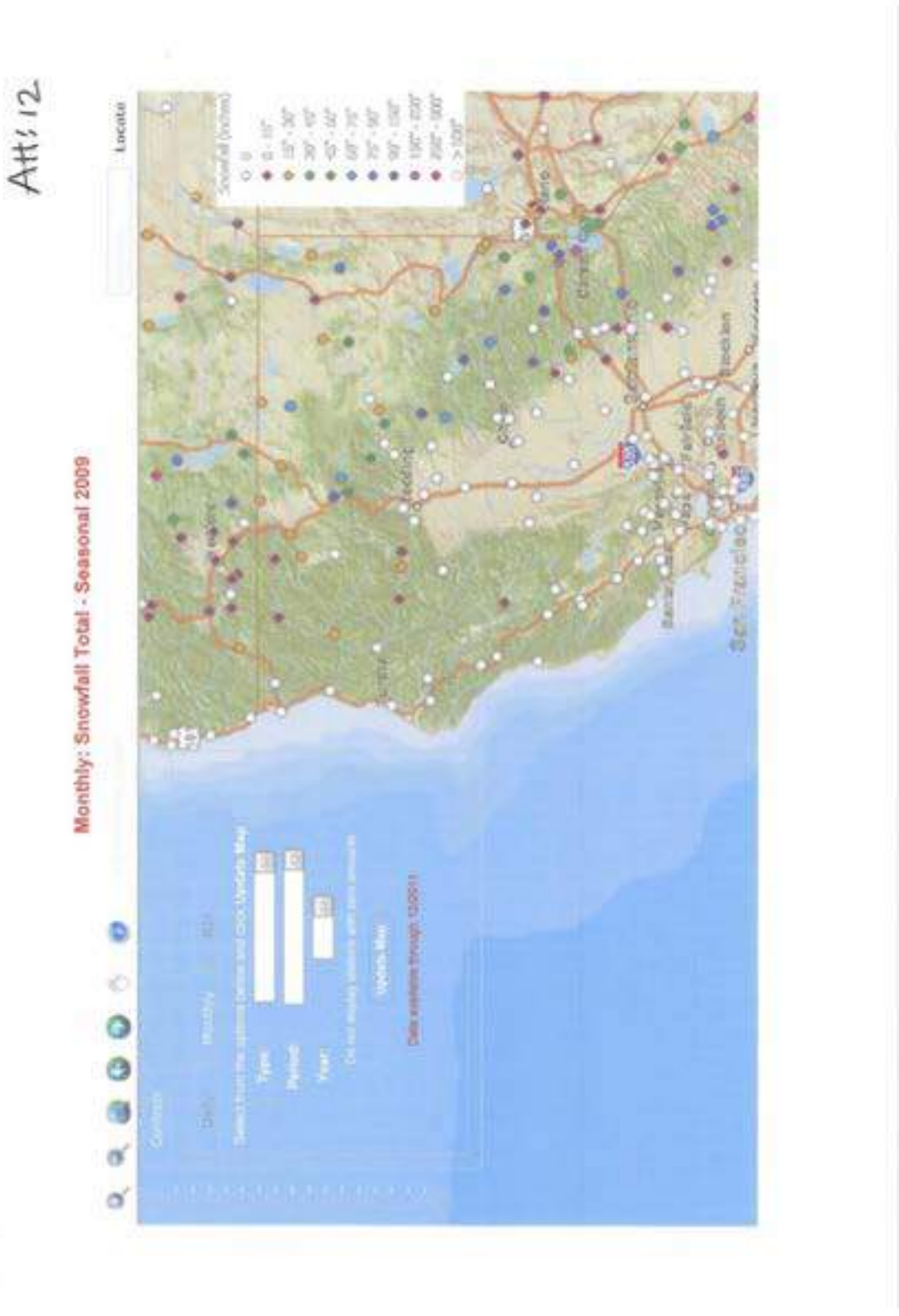
Status: A study conducted in Oregon in 2010 found that safety belt usage varies by location in the state, but as many as 81% of drivers were seen using belts. This establishes 19% as a baseline percentage of drivers failing to use them.

Activity and Performance Measures:

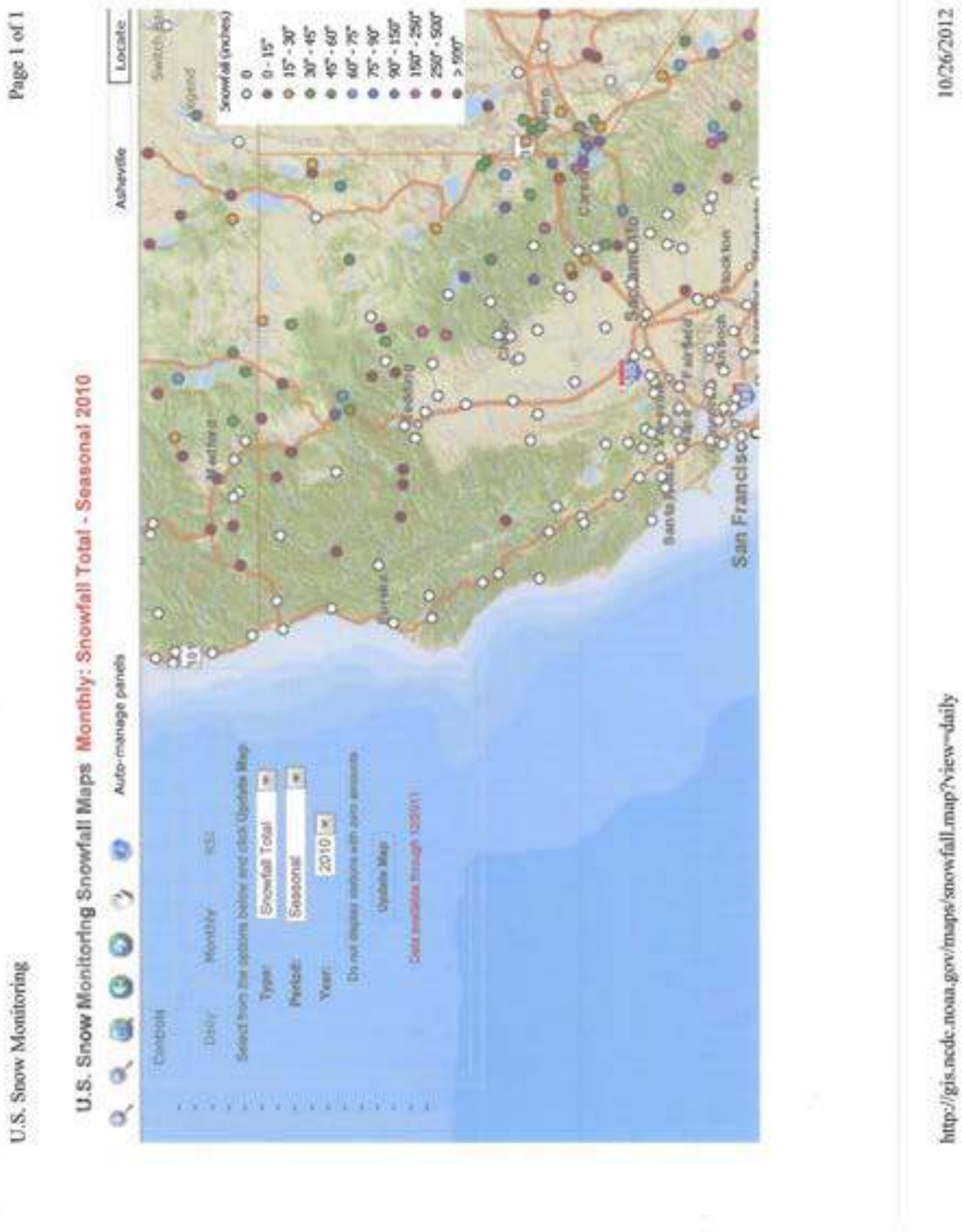
- All traffic enforcement operations and on-highway inspections include safety belt observation and enforcement. Inspectors document safety belt enforcement actions.
- Produce quarterly reports tracking the number of inspection form observations, violations, traffic citations, and warnings for failing to use safety belts.

3 Reduce truck-at-fault crashes in Winter — The highest elevations on Oregon's major freight routes are found at Siskiyou Pass – a 7-mile rural stretch of I-5 near the California border identified as AIM Corridor #1 – and in a 197-mile mostly rural stretch of I-84 in Eastern Oregon with particular trouble spots identified as Corridors #7, #8, and #9.

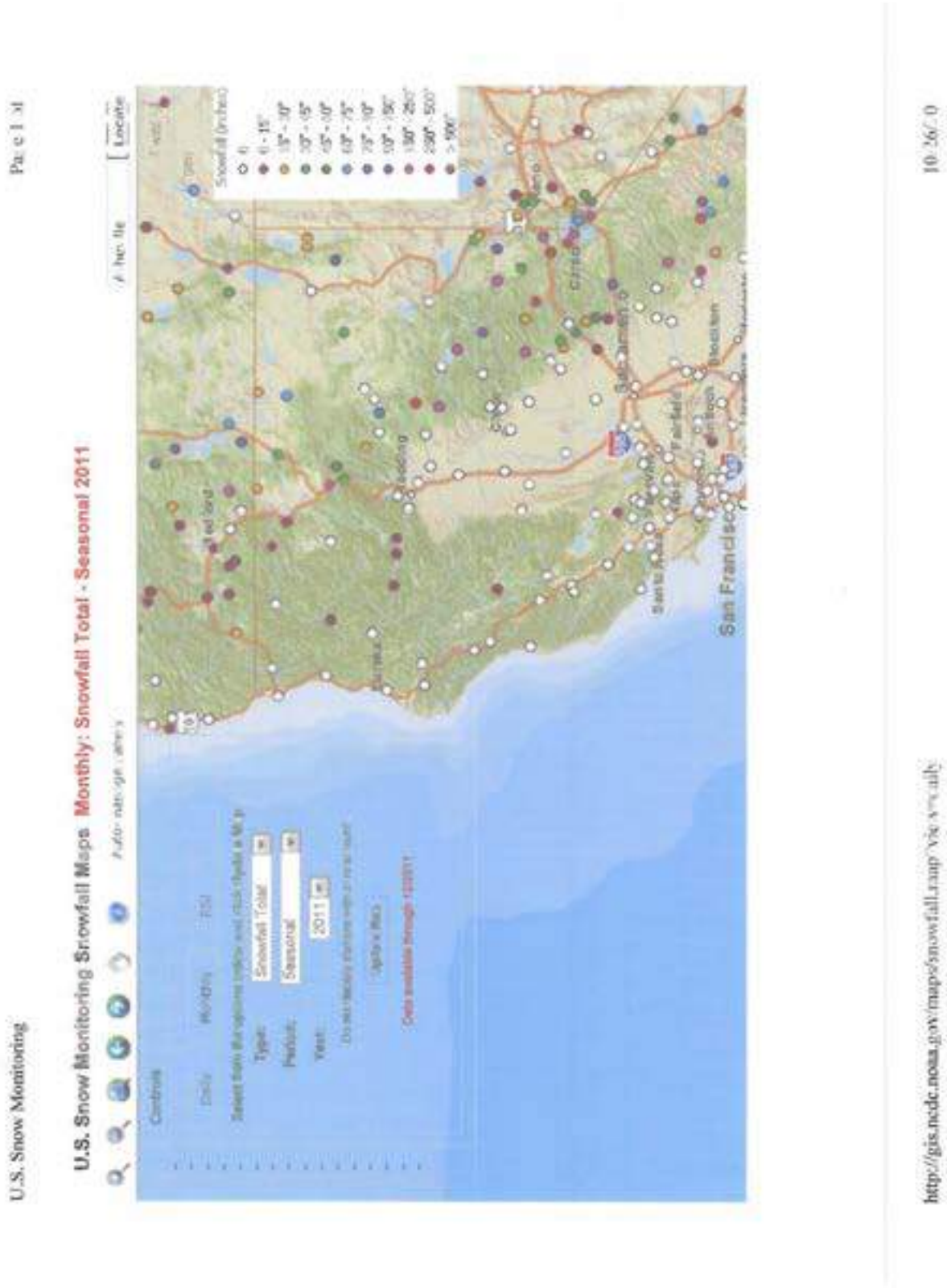
Friends of Del Norte (submitted by Eileen Cooper) Attachment 12



Friends of Del Norte (submitted by Eileen Cooper) Attachment 12

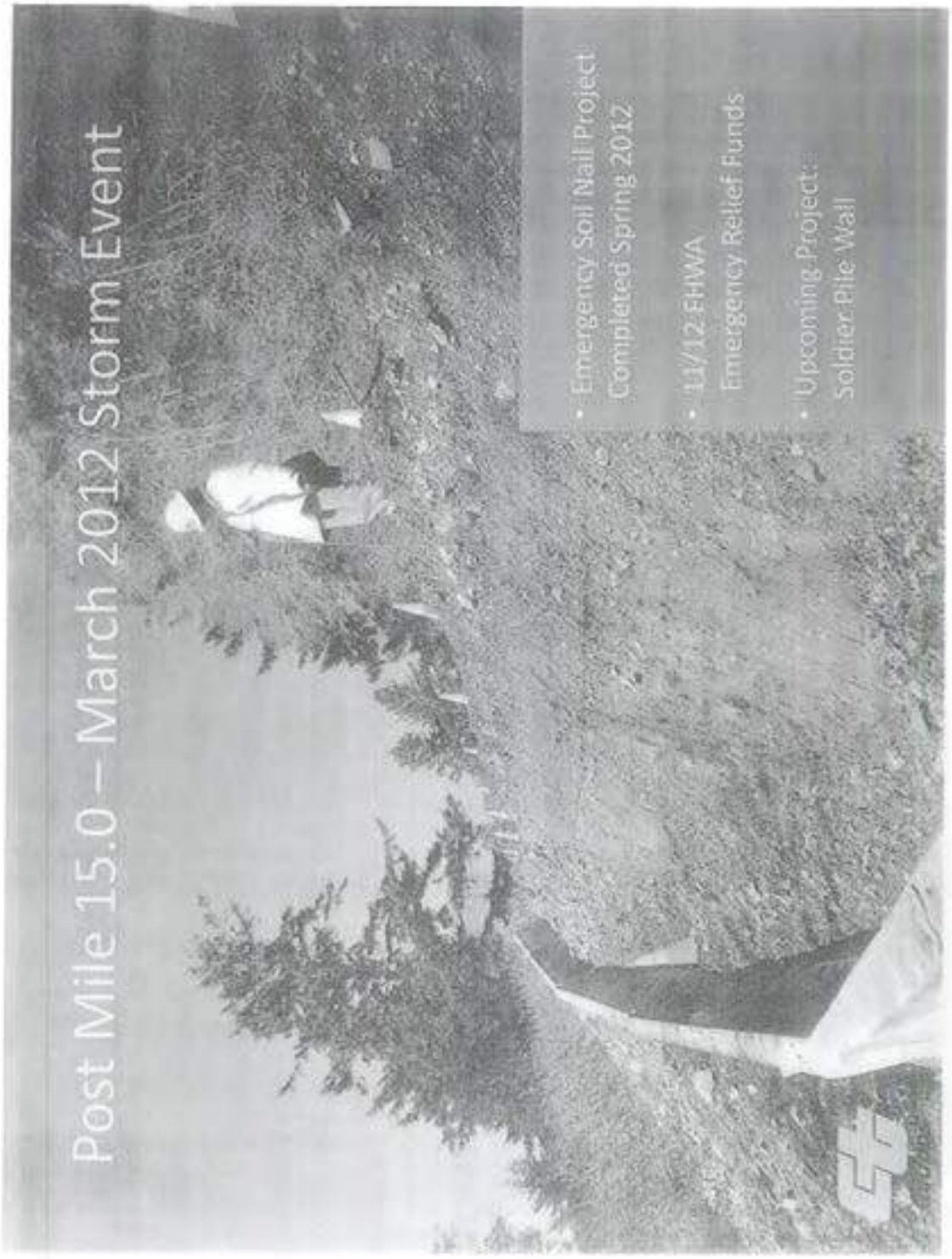


Friends of Del Norte (submitted by Eileen Cooper) Attachment 12

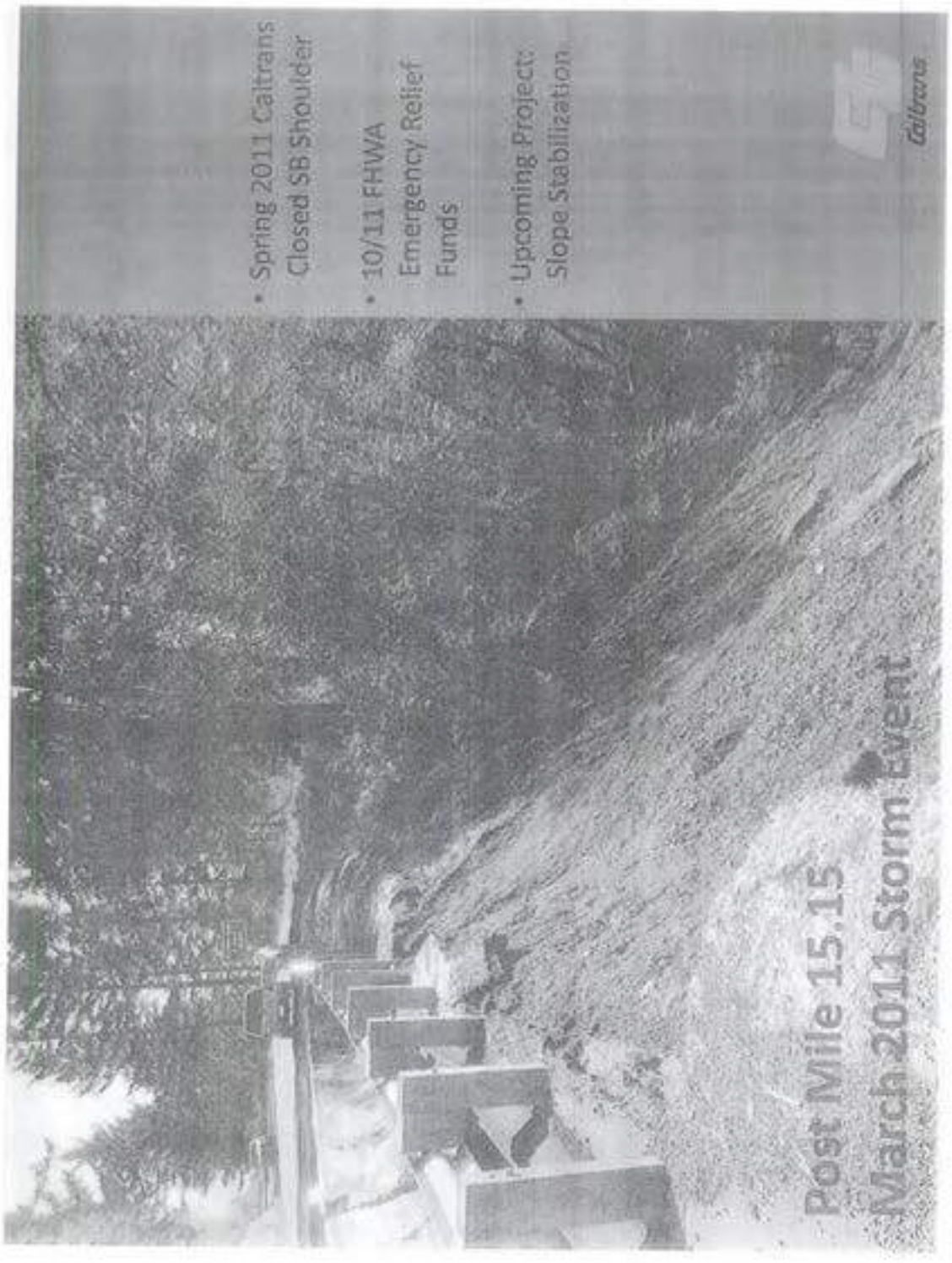


Friends of Del Norte (submitted by Eileen Cooper) Attachment 13

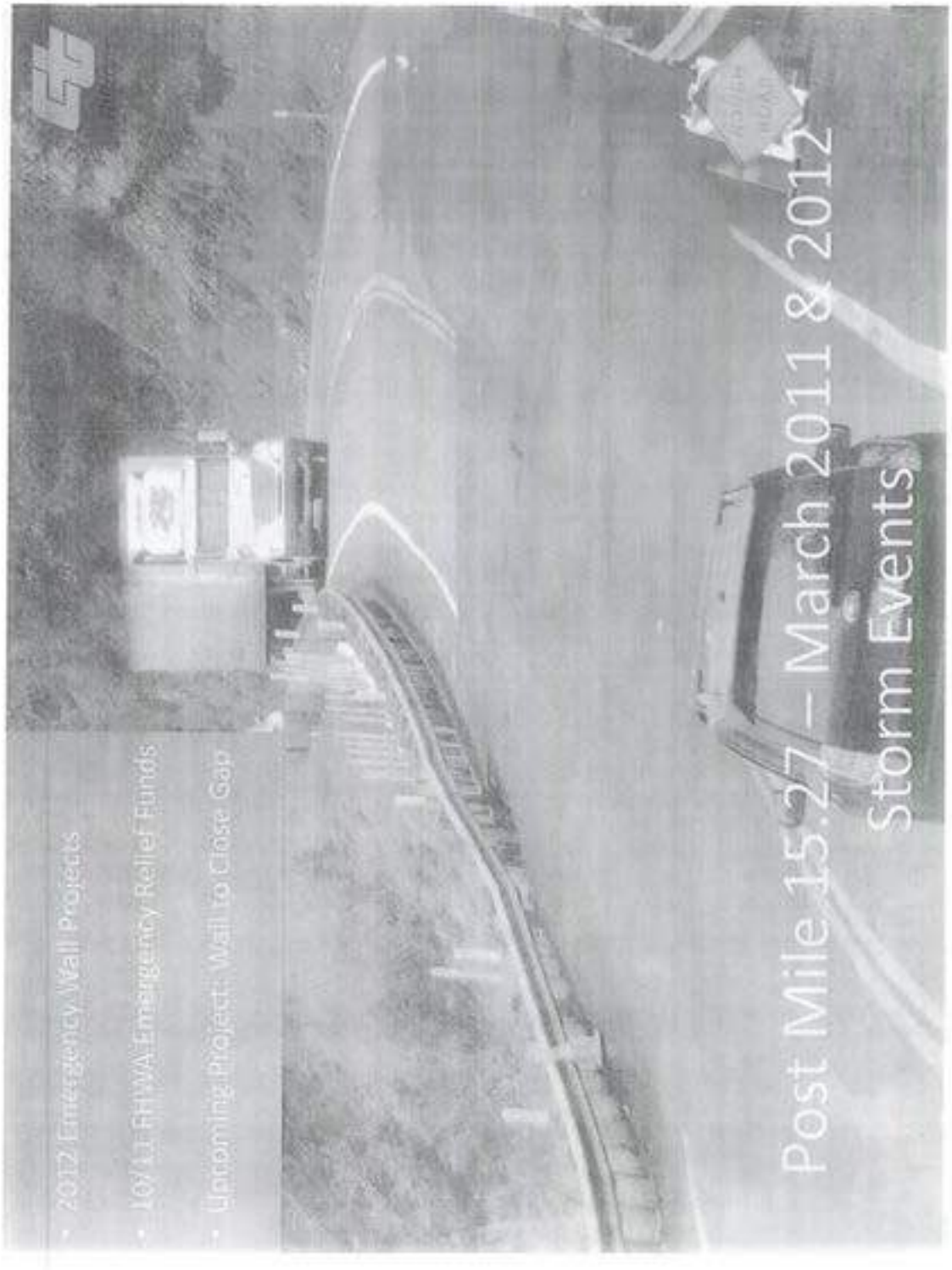
Friends of Del Norte (submitted by Eileen Cooper) Attachment 13



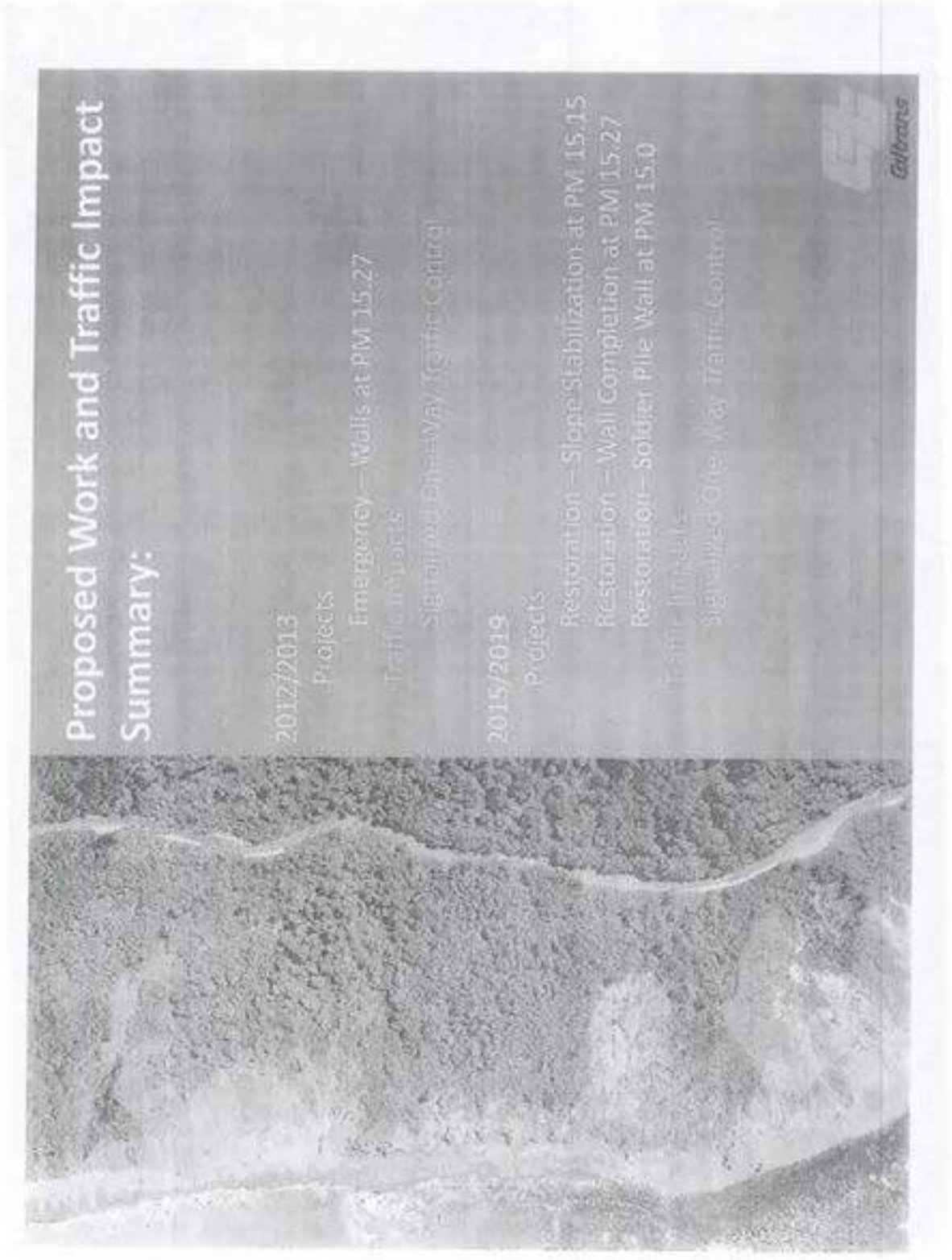
Friends of Del Norte (submitted by Eileen Cooper) Attachment 13



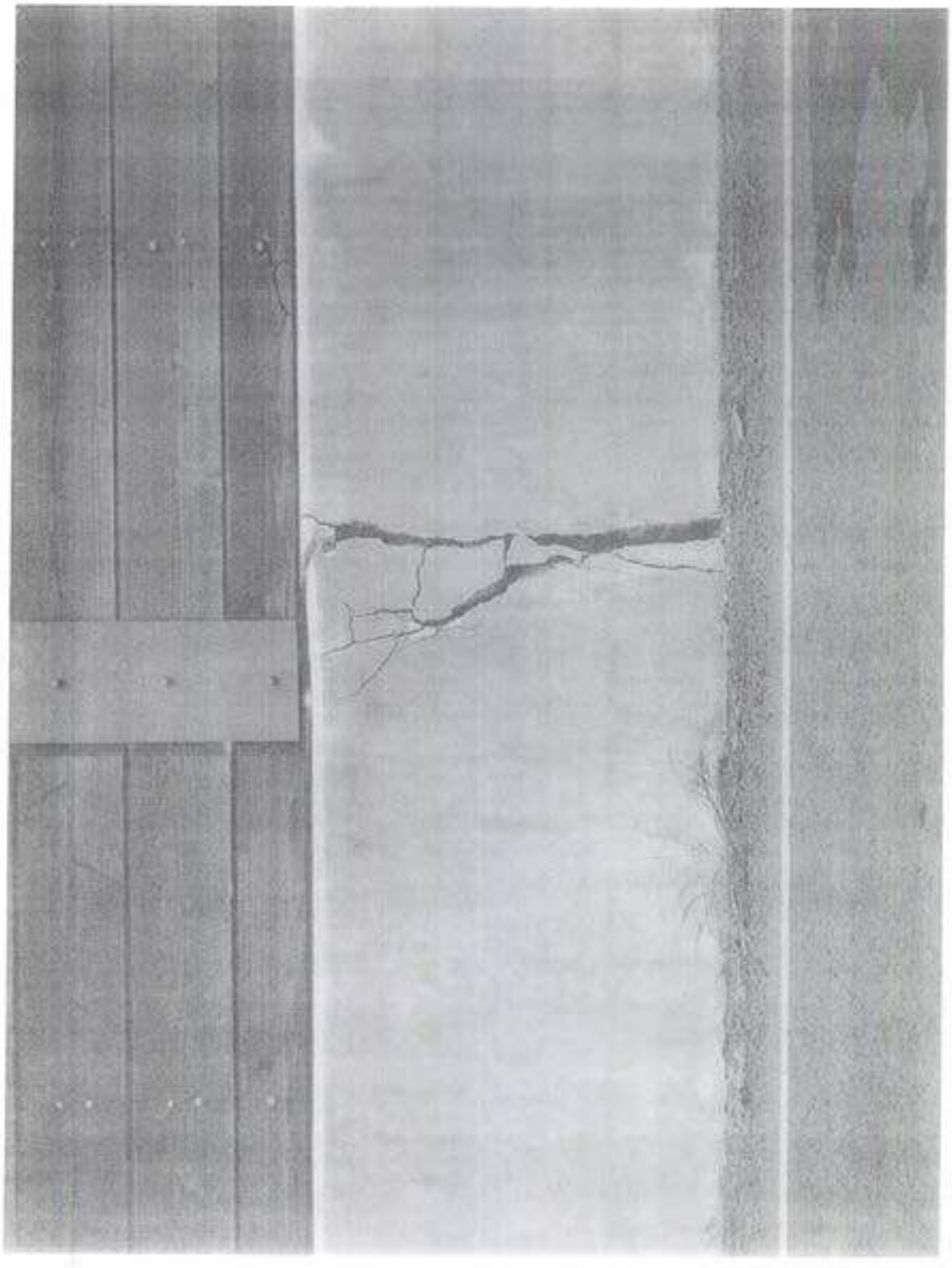
Friends of Del Norte (submitted by Eileen Cooper) Attachment 13



Friends of Del Norte (submitted by Eileen Cooper) Attachment 13



Friends of Del Norte (submitted by Eileen Cooper) Attachment 13



Friends of Del Norte (submitted by Eileen Cooper) Attachment 14

Att: 14

BUSCH GEOTECHNICAL CONSULTANTS

March 29, 2012

Friends of Del Norte
C/o Don Gillespie, President
2075 Moseley Road
Crescent City, CA 95531

Results of a Reconnaissance-Level Geotechnical Inspection of Specific US 101 Mileposts between Wilson Creek and the Cushing Creek Curve, Del Norte County, California for the Friends of Del Norte

Dear Mr. Gillespie:

Introduction

At your request, with the Friends of Del Norte Board's approval, and under the general terms of our Work Agreement of March 9 as amended, I am delivering this brief summary of the conditions at each of five specific mileposts (MPs) you asked me to evaluate on US 101. I have retained numerous documentary digital photographs in your job file (#12-010) as well as a copy of my field notes and other materials. This is a short form report in that it does not contain background geologic information, information on the tectonic setting, figures, photographs, or references. My scope of work was limited to visually inspecting each area from the road edge, categorizing the type of road problem I observed, and qualitatively assessing the risk of future problems at the locale. Hand-auguring boreholes, collecting soil and rock samples, doing lab tests, and making measurements were excluded from my scope of work.

P.O. BOX 222 • ARCATA, CA 95518-0222 • 707-822-7300 • FAX 707-822-9011
Geotechnical and Geologic Studies for Land Development and Resource Management

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Observations and Conclusions

The MPs I inspected, the type of problem, and the risk at each are:

Milepost	Type of Road or Slope Problem	Long-Term Risk
MP 12.92 to 14.42	**Slump / earthflow undercut by ocean**	**Very High**
MP 15.27	**Probable head of incipient debris slide**	**Mod to High**
MP 16.5 to 16.9	**Provisionally stable earthflow**	**Moderate**
MP 17.5	**Failure of outboard road prism**	**High**
MP 21.9 to 22.0	**Previously repaired failure failing again**	**High**

GLOSSARY: To help you make sense of my observations and conclusions I first want to present some short-form definitions of critical words I use in this report.

Debris slide (n): A type of mass movement of soil and rock that often occurs on steep (often 65% and steeper) slopes following a prolonged rain. Debris slides occur rapidly so often are catastrophic. A prior study Busch Geotechnical did of the entire Wilson Creek bluff section for an energy company identified many debris slide scars on the slopes, some extending upslope to US 101 (reference available upon request). The study also determined that debris slides are reoccurring phenomena here.

Earthflow (n.): A plastic deformation of soils in which the failing materials typically tend to creep or otherwise move slowly downslope en masse, often above one or more slip planes or zones that roughly parallel the slope of the ground surface. The type of movement is primarily **translational**. Often the upslope (head) region of an earthflow begins as a **rotational** failure called a **slump**, hence the term slump-earthflow or SEF for the terrain as a whole. Common landforms in SEF terrain include hummocky ground supporting leaning trees, indeterminate drainages, steps and back-tilted benches, and others. SEF terrain is common in structurally weak bedrock such as sheared mudstone, particularly when it is on steep, wet, or surcharged slopes, slopes undercut by an ocean, river, or excavation, or slopes with several of these factors.

Inboard (adj.): The uphill side of a road. The downslope side is the **outboard** side.

Provisionally Stable (adj.): A provisionally stable slope is a marginally stable slope. It is "stable" on the day it is evaluated, but is at risk of a future failure if some external force acts on it (e.g., an earthquake, 25-yr storm, human excavation, etc.).

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Geotechnical and Geologic Studies for Land Development and Resource Management

Friends of Del Norte (submitted by Eileen Cooper) Attachment 14

Road prism (n): The cross-section of the road between the **top of a cutbank** on the inboard side and the **toe of the fill** on the outboard side. The upslope portion of a road prism often is a surface excavated into the slope materials whereas the downslope portion (usually called the **fill prism**) often consists of compacted soils. Failures of fill prisms are common on steep slopes, wet slopes, and poorly prepared slopes, and where the fill was inadequately compacted or placed on a slope that itself was unstable.

Additional Details by Mile Post

MP 12.92 to 14.42 Slump / earthflow terrain undercut by ocean Very High

The actual range of this slump / earthflow terrain is ~MP 12.92 (the northwest corner of the Wilson Creek Bridge) to ~MP 14.08 (the northernmost recognizable landforms indicative of earthflow movements beneath the road). This section of road crosses extremely hummocky terrain within a chronic failure. The failure is worst so most often affects the road near the north end of the Wilson Creek Bridge because the ocean is nearest to the toe of the slope at that location. Also, because this area is one of the few four-lane areas, passing cars tend to speed across a travelway surface where control is difficult. The long-term risk of failure of this section of road is Very High. Keeping the road open here will require continuous repairs and eventually the construction of some type of high-cost /mile stabilization structure (rip rap buttress, soldier pile wall, sheet pile wall, etc.) beginning at the north end of the bridge and extending for several hundred feet. Currently this at-risk area is kept passable by filling open cracks and top-dressing it with asphaltic concrete. Each repair, in effect adds more weight to the top of the failing block of land, surcharging the slope.

As a note, I inspected this section of road on March 5th, and saw it again on March 23rd and 27th. It had been repaired (more asphalt top dressing had been added during the interim).

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MP 15.27 Probable head of incipient debris slide Mod to High

This milepost and a similar one at the curve at MP 15.15 are sites of possible future catastrophic outboard road edge failures because they are above precipitous provisionally stable to inactive debris slide heads that could be reactivated. These two sites will be difficult to stabilize without cutting old growth trees below the road. It is likely that it will be necessary to construct a high-cost stabilization structure much like those nearby on this grade because the road probably cannot be shifted inboard.

MP 16.5 to 16.9 Provisionally stable earthflow Moderate

This is the least threatening site of any of those I reviewed. Future repairs are likely to be minor and successful.

MP 17.5 Failure of outboard road prism High

This stretch extends from ~MP 17.4 or a little before to ~17.6. The outboard edge of the road is failing (settling, cracking) and is at risk of a more significant (larger, deeper) failure because the fill prism face is steep and it is located above a steep native slope. Risk is highest to the north. Slopes on the east side of the road are moderate, but there is a weakly defined drainage there that brings groundwater below the road, probably saturating the outboard toe. The road fill prism was constructed on top of a steep native slope. This section too was repaired in the short interim between my visits.

MP 21.9 to 22.0 Previously repaired failure failing again High

This section of road was repaired previously using high-density foam as the fill, rather than compacted soil or rock. Undoubtedly this is because it is steep and unstable below the road here, so the project engineers attempted to minimize the load on the bearing soils. Unfortunately, the native soils below the high-tech "fix" are still moving, so this section of road is still failing. I inspected and photographed this section on March 2nd, on March 22nd noticed the road shoulder and outboard travelway had cracked more. On March 27 I observed Cal Trans vehicles on the site and on March 28 new asphalt patching was obvious.

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 14

Closure and Authentication

In closing, thank you again for hiring me. I hope this is not too technical and that it provides you the information you need to argue your case successfully. I am available to do a more detailed (preliminary) geotechnical investigation if necessary. That investigation would provide slope steepness data for the fill prisms and native slopes below; crack length and pattern information; more descriptive detail; and annotated photographs.

If I can help in any other way, please call.

Cordially,

Busch Geotechnical Consultants

R. E. Busch, Jr., Ph.D.
C.E.G. #1448
Owner

Distribution: Three (3) wet-signed copies to Friends of Del Norte

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 15

Att 15

Virginia Bicycling Federation

Advocacy, Safety, & Education

Vehicle Weight and Road Damage

by admin on December 2, 2009

Heavy trucks obviously cause more road damage than cars, but how much more? According to a GAO study, Excessive Truck Weight: An Expensive Burden We Can No Longer Afford, road damage from **one 18-wheeler is equivalent to 9600 cars** (p.23 of study, p.36 of PDF).

The study assumed a fully loaded tractor-trailer at 80,000 pounds, and a typical passenger car at 4,000 pounds. That's 20 times difference in weight, but the wear and tear caused by the truck is *exponentially greater*.

Food for thought: a bicycle and rider at 200 pounds is the same 20 times less heavy than a 4000 pound passenger car. Similarly, the wear and tear caused by that bike and rider would be *exponentially less* than a passenger car's.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 15

The DEIR/EA fails to identify and investigate how large increases in numbers of trucks (as a result of creating an STAA I-5 bypass loop) will affect Hwy 101 south of Crescent City, which is a very geologically unstable area.

These sites contain a special report that show that Hwy 101 is geologically very unstable. We are very concerned about this impact due to the creation of an STAA loop that induces large volumes of trucks.

Special Report 184 - Landslides in the Highway 101 Corridor between Wilson Creek and Crescent City, Del Norte County, California
by C.J. Wills, 2000, California Geological Survey, 24 pgs.

Download Special Report 184- PDF Document (1.8 MB)
Download Geologic Map (1 MB)
Download Landslide Map (2.2 MB)

http://www.conservation.ca.gov/cgs/rghm/landslides/Pages/index.aspx

http://www.conservation.ca.gov/cgs/rghm/landslides/SR_184/Documents/CT101dn.pdf

Friends of Del Norte (submitted by Eileen Cooper) Attachment 16

A-H : 16

ADVOCATES for Highway and Auto Safety

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FACT SHEET

Press Room: Truck Safety

Fact Sheet: NAFTA Trucks

Fact Sheet: Young Drivers & Large Trucks

Young Drivers: What Others Are Saying

The Dangers of Large Trucks

Large trucks - including tractor-trailers, single-unit trucks, and certain heavy cargo vans with gross weight of more than 10,000 pounds - account for a disproportionate share of traffic deaths based on miles traveled. The fatal crash rate for large trucks is 2.4 deaths per 100 million vehicle miles traveled - more than 50 percent greater than the rate for all vehicles on the roads. People in passenger vehicles are especially vulnerable in collisions with large trucks because of the great difference in weight between cars and large tucks. *In two-vehicle crashes involving passenger vehicles and large trucks, 98 percent of the fatalities were occupants of the passenger vehicle.*

Overweight trucks are even more dangerous than trucks that stay within the current federal weight limits. *Overweight trucks not only take longer to brake and are more prone to roll over in crashes, but they also damage roads and bridges at rapidly increasing rates even when slightly overloaded.*

LARGE TRUCK CRASH FACTS

- 5,190 people were killed in crashes involving large trucks in 2004, representing 12 percent of all traffic fatalities. Of these, 77 percent were occupants of another vehicle, 14 percent were large truck occupants, and 8 percent were non-occupants. An additional 116,000 people were injured in those crashes. (National Highway Traffic Safety Administration, (NHTSA) 2005).
- Nearly one-quarter of occupant deaths in passenger vehicles that had multi-vehicle collisions were the result of crashes involving large trucks. (Insurance Institute for Highway Safety).
- Large trucks make up just 4 percent of all registered vehicles and 7 percent of all vehicle miles traveled, but are involved in 11 percent of all crash fatalities. (NHTSA).
- The annual death toll from truck-related crashes is the equivalent of twenty-six major airplane crashes every year.
- The large number of truck-related deaths and injuries carries an enormous personal and financial price tag. The costs of large truck crashes in a year exceed $19 billion. (Federal Motor Carrier Safety Administration (FMCSA)).

WHY FREEZE TRUCK SIZE AND WEIGHT?

Bigger Trucks Compromise Safety. The chances of a big truck crash resulting in deaths and serious injuries increase with

http://www.saferoads.org/issues/fs-trucks.htm 10/22/2012

Friends of Del Norte (submitted by Eileen Cooper) Attachment 16

each extra ton of weight over the 80,000 pound gross vehicle weight (GVW) limit in federal law. These federal weight limits are used by many states as the upper limit on truck weight even on most of their state roads. A big truck weighing even a legal 80,000 pounds is more than twice as likely to be involved in a fatal crash than a truck weighing about 50,000 pounds. (University of Michigan Transportation Research Institute (UMTRI) 1988).

Cost. One legal 80,000 pound GVW tractor-trailer truck does as much damage to road pavement as 9,600 cars. (Highway Research Board, NAS, 1962). Overweight trucks chronically underpay their fair share of taxes and user fees for the repair of U.S. roads and bridges. By damaging roads, large trucks further degrade highway safety. (U.S. DOT, 1997).

Bigger Trucks Still Mean More Trucks. Increases in truck size and weight will not decrease the number of trips, result in fewer miles traveled, or improve safety by reducing the number of trucks on the highways. Past increases in truck size and weight have not resulted in fewer trucks, fewer trips, or fewer miles traveled. The number of trucks on U.S. highways has consistently grown, even after increases in both the sizes and weights of large trucks.

TRB Study Supporting Increase in Truck Size and Weight is Fundamentally Flawed. The Transportation Research Board (TRB) Special Report No. 267, Regulation of Weights, Lengths, and Widths of Commercial Motor Vehicles (2002), has been rebutted by every truck and highway safety organization. The study supports two specific configurations as larger, heavier vehicles of choice without a single argument as to why these configurations are better than others. The Committee undermines any possible support for these combinations by pointing out that virtually nothing is known about the relationship between any specific design configurations, crash risk, and truck handling and stability. The Committee also issued warnings about the unintended consequences that may accompany the use of larger combination trucks with higher axle and gross weights.

Trucks Keep Getting Bigger. Trailer lengths for combination vehicles (tractor-trailers) have continued to grow over the past few decades, moving from an industry standard of 40 feet in the 1960s, to 48 feet in the 1970s, to 53 feet in the late 1980s. Some states even allow 57- and 59-foot trailers.

Infrastructure Cannot Support Bigger Trucks. A survey conducted in the early 1990s by the American Association of State Highway and Transportation Officials (AASHTO) showed that many ramps on even Interstate highways were unable to accommodate the off-tracking, swept path width of a tractor-trailer pulling even a 48-foot long semi-trailer. Many combination trucks currently pulling 53-foot long trailers cannot safely negotiate such ramps, especially elevated ramps bordered by bridge parapets or guardrails. These trucks also intrude into the traffic lanes used by passenger cars and threaten their safety.

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Bigger Trucks Require More Stopping Time. A truck weighing 100,000 pounds with unadjusted brakes travels 25 percent further after the driver steps on the brakes than an 80,000 pound truck. A 120,000 pound truck can travel as much as 50 percent further before stopping than an 80,000 pound truck. (UMTRI, 1983; TRB; National Academy of Sciences (NAS) 1990).

Americans Don't Want Bigger Trucks. By an 88 percent majority, the American public is opposed to allowing bigger and heavier trucks on the highways. (Lou Harris Poll, 1996). Seventy-eight (78) percent of Americans are willing to pay higher prices for goods shipped in trucks in exchange for tougher truck safety standards. (Caravan Poll, 1999).

September 2005

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http://www.saferoads.org/issues/fs-trucks.htm

Friends of Del Norte (submitted by Eileen Cooper) Attachment 17

A4
The Daily Triplicate
Wednesday
April 9, 2008

A# 17

OPINION

Do we really want big truck access?

Coastal Voices

Don Gillespie

For the past year I have read with interest Triplicate articles about making changes to Highways 199 and 197 to accommodate STAA-approved trucks. The momentum is building to invite these trucks in the name of progress and economic viability.

There may be compelling arguments in favor of making these changes, and it appears that the money may be made available to Caltrans for these projects. However, I am amazed that no public officials, in any public forum that I am aware of, are asking the hard questions about highway safety for the motorist, the actual economic benefits of the STAA trucks, and the potential increased environmental hazards of pursuing such a project.

I would expect our county supervisors, the Local Transportation Commission, other elected officials and newspaper reporters to raise some questions, but so far there seems to be just a pep-rally mentality to support inviting these large trucks to our remote county. Are there really no concerns about the possible negative aspects?

Motorist safety

My first concern is for the safety of the regular motorists who drive our already dangerous highways. Truckers are not the only people who rely on safe access to Interstate 5 and beyond. What are the safety issues of allowing bigger trucks to access Highways 199/197?

Of course the highways will be widened at pinch-points to make them safer, but this will also create an STAA corridor to access Humboldt and Curry counties. This will increase truck traffic with bigger trucks from around the country, with hurried drivers who are unfamiliar with local highway pinch-points.

How will we be impacted when I-5 closes in winter at Siskiyou Summit? Won't truckers detour over Highway 199? In the same breath our local Chamber of Commerce talks of increasing the number of tourists in motor homes and trailers. I don't see how bigger trucks and more slow motor homes can be a safe mix. Our roadways are not being straightened, just a few realignments, and they will remain dangerous to drive.

In 2007 the Del Norte Local Transportation Commission published an 18-page document entitled, "Achieving STAA Route Status for Hwy's 199/197, A Goods Movement Action Plan." This document serves as the basis for asking Caltrans to improve our Hwy. 199/197 corridor, yet it dedicates one six-sentence paragraph to the issue of "Enhanced Public Safety." It doesn't even mention the possibility of negative impacts to motorists. It does state, "The three-year accident rate for this segment of U.S. Highway 199 exceeds the statewide average for similar facilities by over four times."

What happens when we add bigger STAA-approved trucks to this mix? It is possible that the accident rate may increase. Shouldn't we look at this?

Economic impact

Another thing that I have been looking for is a study showing the importance of STAA trucks to our economy. The closest anyone has come to this is Kelly Atherton in her Feb. 15 Triplicate article, "Big Cost of Small Trucks." She does a good job of delving into the core economic issues of STAA trucks. Ms. Atherton states, "One local company estimates it's losing hundreds of thousands of dollars because of the situation."

But there is no explanation of who this is, how this loss is calculated, or why the costs are so huge. Is the economic loss to a large company or to our community?

Short wheel-based trucks

We keep hearing about saving money because STAA trucks will pull bigger trailers to haul more goods per load and save on fuel efficiency. Sounds great, but the largest legal trailer in America is 53 feet. We already have 53-foot trailers legally coming into Del Norte County; but, they are being pulled by short wheel based, cab-over trucks. STAA trucks have a long wheelbase so they can carry the fancy sleeping accommodations and avoid hotel expenses for the company. This is a negative impact to the local hotel establishments.

We presently have a niche market for short wheelbase, cab-over truckers who haul freight over Hwy. 199/197. They are experienced drivers who are familiar with the problems of hauling 53-foot trailers along our narrow canyon. They stay in our hotels. Cab-over trucks are much cheaper to purchase than the big STAA trucks. So where is the savings to our economy? If these drivers are replaced, won't that be a net job loss to our community?

It would benefit us all if our Chamber of Commerce did a comparative economic analysis of other small communities who already have access to STAA trucks. How about the cities of Yreka, Cottage Grove, Coos Bay, or Cave Junction—they all have access to STAA trucking. It would be interesting to know how they benefit. I have friends who checked prices on 39 common items at Wal-Mart and Safeway stores in Cottage Grove, next to I-5, and Crescent City. They found virtually no difference in prices to the consumer.

Environmental concerns

Finally there are the environmental concerns of increasing the amount of goods being hauled along our pristine Smith River. The recent 4,000-gallon diesel spill, and the 1982 truck wreck that dumped a thousand-gallon industrial glue bag resulting in a Smith River fish-kill, exemplify these concerns.

These spills have to be handled by agencies outside our county and it takes hours for them to respond. How many more of these accidents will our river tolerate? The Smith River certainly has an economic value that is worth protecting. The improvements made to accommodate STAA trucks must contribute to this protection, not create more hazards. We must investigate the possibility of these impacts before we move headlong into spending millions to accommodate STAA trucks.

Get answers

With the current rah-rah-rah mentality of our community leaders concerning the use of STAA trucks, I feel that the only way to get viable answers to these questions is to demand a complete economic analysis and a full Environmental Impact Report before any construction begins on Highways 199 or 197.

We live in a remarkable and remote environment here in Del Norte and Curry counties. We accept driving rugged and challenging roads and understand that is the price we pay for living in this beautiful place. As drivers we can minimize the dangers of navigating routs 199/197 by being cautious, skillful and alert. But having to compete for road space with STAA trucks will degrade, not enhance, the benefits of living in this pristine environment.

Therefore, we must embrace an EIR before Caltrans acts. It is up to our community to make sure that our elected officials are doing a comprehensive review of all aspects of this project.

Don Gillespie is a Crescent City resident.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 18

Att : 18

Induced Travel Under 2030 Build Conditions

Induced travel is also a factor that must be considered under future 2030 conditions. To develop an estimate of future induced travel effects of the proposed improvements, a literature review of induced travel research was performed. In general, all the studies indicated that long-term induced travel is more pronounced than short-term induced travel because over time more people have the opportunity to change their travel patterns and adapt business strategies to take advantage of lower transportation costs. While most of the studies reviewed merely correlated the growth in traffic on a corridor to a reduction in travel costs, a 2002 study by Robert Cervero of U.C. Berkeley explicitly estimated the amount of traffic that is caused by roadway projects. Cervero's research indicated that the long-term induced travel affect is about 3.9 times larger than the short-term induced travel affect.

Although the STAA improvements for US-199 and SR-197 will not add any new lane miles (e.g. building a new road or widening a road) or add a significant decrease or increase in travel speed, the improvements will straighten curves and make safety improvements, increasing lane miles that are accessible to STAA trucks. Therefore, the improvements' induced travel effects will apply only to STAA trucks and not to general vehicular traffic. No measurable increase in non-STAA vehicles trips or vehicle miles traveled is anticipated.

Applying data collected from surveys, growth factors, research on induced travel, and changes in land use, in 2030 there would be approximately 46 (8.25 short-term truck growth x 3.9 short-term/long-term induced growth factor x 1.44 growth factor) round-trips or 92 more trucks per day using the US-199 and SR-197 corridors than the 2030 no-build scenario.

LEVEL OF SERVICE ANALYSIS

Traffic operations analysis was conducted to evaluate the level of service (LOS) for study area roadway segments under four scenarios: Existing, Existing Build, Future 2030, and Future 2030 Build. The Build scenarios assume the STAA improvements. Caltrans attempts to maintain LOS C on State highway facilities (as listed on page 1 of the Caltrans Traffic Impact Study guidelines). To account for financial, environmental, and right-of-way limitations of achieving LOS C on all roadways, Caltrans publishes Route Concept Reports (RCR) where a long-term concept LOS is defined based on what can reasonably be constructed. For this report, impacts are based on the following concept LOS thresholds published in the Route Concept Reports for the respective highways:

- SR-197 – the selected concept LOS is E.
- US-199 – the selected concept LOS is D.
- US-101 – the preferred LOS is C for four-lane segments in rural areas, and D for urban areas and two-lane segments in rural areas.

LOS was measured using methodologies contained in the Highway Capacity Manual 2000. The Highway Capacity Software was used to apply these methodologies.

All routes operate at, or better than, their respective concept LOS in all scenarios (see report for a more detailed report on LOS and percent time-spent-following). The traffic effects of improving US-199 and SR-197 to allow STAA trucks on truck volumes are minimal and do not significantly affect LOS between the no-build and build scenarios.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 19

Att 19

safety info for hwy 101 cushing creek curves:

SCH Number: 2012048123

Document Type: NOE - Notice of Exemption

Project Lead Agency: Caltrans #1

Project Description

Project is to apply a high friction surface tretment (HFST) to the traveled lanes, turning lanes and both shoulders of the highway. HFST is an epoxy-resin or polyurethane-resin binder topped with a calcined bauxite aggregate topping. Standard pavement markings will be applied to the road after HFST application. Shoulder backing is not anticipated. Purpose of treatment is to reduce collisions by increasing the traction of cars on the roadway. Treatment is needed because Fatality-plus-Injury and Total Collision rates are 8 and 11 times the statewide average for a similar facility.

Contact Information

Primary Contact:
Valerie Gizinski
California Department of Transportation, District 1
707 445-5320
1656 Union Street
Eureka, CA 95501

Project Location

County: Del Norte
City:
Region:
Other Location Info: 3 mi S of Crescent City

Friends of Del Norte (submitted by Eileen Cooper) Attachment 20

Att 20

20 AUG 2010

TO: KIM HAYLER ENVORNMENTAL COORDINATOR
CALTRANS P.O BOX 2700
EUREKA CA 95502

FROM: TED W SOUZA
P.O. BOX 229
GASQUET CA 95543

SUBJECT: HWY 197/199 STAA PROJECT

A. MY LETTER DATED 28APRIL 2008

DEAR MR HAYLER

I VIEW WITH GRAVE CONCURN THE MANY BAD TURNS ADDRESSED BETWEEN MILE POST 13.00 AND MILE POST 6.55 THAT HAVE MAJOR PROBLEMS THAT ARE NOT ADDRESSED IN THE DRAFT ENVORNMENTAL INPACT REPORT. THAT ARE SAFTY ITEMS.

THIS PLAN STATES THERE WILL BE ECONOMIC GAINS MAUBE OR COULD ?

THIS PROJECT DOSN'T STRIGHTEN ANY CONERS IT SLIGHTLY LENGTHENS THE RADIOUS OF A CURVES AND MANY DANGERIOUS AREAS REMAIN.

IN THE AREA OF MILE POST 6.55 THE SPEED LIMIT SIGN SAY END OF 50 MPH. THIS SHOULD BE REVIEWED AS YOUR GOING INTO A SHORT CURVE WITH A ROAD COMMING OUT IN THAT AREA.

ENCLOCED IS MY LETTER DATED 28APR08 SUBJECT CAL/TRANS MEETING STAA STILL APPLIES.

SINCERELY

Ted W. Souza

Friends of Del Norte (submitted by Eileen Cooper) Attachment 20

April 28, 2008

To: Kevin Church, Project Manager
CALTRANS P O Box 3700
Eureka, Ca. 95502

From: Ted W. Souza
P O Box 229
Gasquet, Ca. 95543-0229

SUBJECT: CAL/TRANS Meeting of April 17, 2008
STAA Access

Dear Mr. Chruch,

My family has been coming to Del Norte County every since 1956, both winter to fish and summer for vacations and a full resident of Gasquet since 1972.

There have been many highway changes over those years: in 1963 the Collier Tunnel opened the East gateway to Del Norte County, was the Greatest; the Patrick Narrows, Blue Slide to name; a few others were very good.

I still pull my travel trailer up and down the canyon every year and still feel safe on both HWY 197/199.

For many years Loggers, Hambro, Lilly Bulb trucks and many other trucking lines used these roadways with very few problems. The roads are as safe asthe drivers and the loads they carry.

Do we need an environmental impack report? Yes. As your past record reads.

In 1962, CAL/TRANS made changes to the Smith River courses in several places. MP.20.05 Howard Griffith Bridgearea. To this day the Slides are Still active and coming down, effecting our Fishery. At MP.20.15 the hillside is still not stable.

At MP.19.00, after the 1964 flood CAL/TRANS used the old Cedar Forest camp ground fora fill site for every slide in the canyon. The high winter water usedto flood thru the camp ground and continue down stream.

PAGE 1 of 3

Friends of Del Norte (submitted by Eileen Cooper) Attachment 20

Now after your mountain of fill you have forced the high water on to the other side of the river, causing that other hill to come down destroying more large fishing holes and more precious fishery every year. Take some of your money and try to fix that.

Let's not forget the toxic spills of the past and not because of the roads.

As close as I can remember the dates are close and they did happen.

1962, the creosote mill above Bar-O got into the river. Not good for fish.

Early 1980's, late December, a ASBY gasoline truck full went into the river above Gasquet. High water at the time. Fumes were everywhere in the canyon.

In the 1990's the Hiouchi Bridge. A truck with a large crane took a shortcut, did not use Hwy.197, but used Hwy.199 in the early AM took out the bridge. For 18 months we used Hwy197 to get to Crescent City. Not a road problem.

In 1993, above Bar-O, a beer truck spilled into the river, many cans of beer and some beer. Not good for the fish.

August, 1994, paint spill MP.28.00 area caused big fish kill: both Steelhead and Coho Salmon Smolts in the middle fork.

In 2000, around MP 25.30, an Otten Gasoline truck hit cement colvert, spilling a load of fuel in to ground water of the homes in the area. Not a road problem.

2006 or '07, MP. 2.56 in Jed Smith State Park, a large transformer fell off of a flat bed truck into Clarks Creek. Not good for fish.

PAGE 2 of 3

Friends of Del Norte (submitted by Eileen Cooper) Attachment 20

February, 2008, MP.11.30, 4000 Gal.+, diesel spill. CAL/TRANS workers did an outstanding job of containing it with their quick response. Still being cleaned up to this day. Not a road problem either.

Del Norte County should promote tourism as our roads are very good by most standards. Remember, this is a National Recreation area. We have had good growth without these STAA trucks in Del Norte County. Let's keep it that way. This is a STAA and HWY 199 is a Scenic Highway.

Safty item not addressed at the meeting: HWY 197, MP 6.0 No Guard rail. River very close and steep bank. HWY 199, just above MP.9.27, many, many single car accidents. (Speed?) Look at the trees on the turn. It may need a guard rail?

In the 15 years I was the Chief of the Crescent Fire Dept., I don't remember one accident caused by the road. It was always the drivers, speed, wet weather or something else.

Thank you for this opportunity to express my thoughts.

Sincerely

Ted W Souza

Ted W. Souza

Copy to: Tamera Buchanan, Del Norte Local Trans. Comm.
Congressman Mike Thompson

Page 3 of 3

Friends of Del Norte (submitted by Eileen Cooper) Attachment 21

Att 21

ROUTE CONCEPT REPORT

ROUTE 199

1-DN-199-T0.5/36.4

All information in this Route Concept Report is subject to change as conditions change and new information is obtained.

I approve this Route Concept Report to guide today's route development decisions and/or recommendations.

Approval Recommended:

JERRY HAYNES Date
Deputy District Director
Office of Project Development
and Construction

Approval Recommended:

RICK KNAPP 9/25/89 Date
Deputy District Director
Office of Planning
and Programming

Approved:

E. F. POCH 9-29-89 Date
District Director
of Transportation
District 1

Friends of Del Norte (submitted by Eileen Cooper) Attachment 21

ROUTE CONCEPT REPORT

Statement of Planning Intent

The Route Concept Report (RCR) is a planning document which describes the Department's basic approach to development of a given route. Considering reasonable financial constraints and projected travel demand over a 20-year planning period, the RCR defines an appropriate type of facility and level of service for each route. The objective of the effort is to provide a better basis for the development of the State Transportation Improvement Program and for determination of the appropriate concept for future highway projects.

Route Concept Reports are prepared by District staff in cooperation with local and regional agencies. They will be updated as necessary as conditions change or new information is obtained.

Route Concept Reports are a preliminary planning phase that lead to subsequent programming and the project development process. As such, the specific nature of proposed improvements (i.e., roadway width, number of lanes, access control, etc.) may change in later project development stages, with final determinations made during the project report and design phases. Roadway widths, as discussed in Route Concept Reports, are used for the purpose of estimating improvement costs, and may change depending upon operating conditions and design standards at the time of actual project development.

Assumption

The following assumptions form the basis for the development of Route Concept Reports:

1. The relative importance of State highways in the District can generally be established based on the functional classification of the routes. In general, higher priorities will be given to major improvements on principal arterial routes as compared to minor arterials and collectors.

2. For routes the District can reasonably expect to improve (generally Principal Arterials), realistic concept LOS must be established for each route in order to have route concepts and route development plans which are possible to achieve, given a forecast of future revenues. A concept LOS is not established on routes which will only be rehabilitated and/or maintained.

3. Level of service and capacity calculations are based on the 1985 Highway Capacity Manual. Previous Route Concept Report level of service and capacity calculations were based on the 1965 Highway Capacity Manual.

4. The 1985 Highway Capacity Manual Chapter addressing two-lane highways does not set a maximum limit on the level of service attainable based on restricted design speed. District 1 uses the table in Chapter 5 page 15 to limit the level of service attainable due to restricted design speed. Further, District capacity calculations include a factor to increase capacity based on the length of passing lanes in two-lane segments.

5. Determinations of future LOS for the routes in District 1 are based in part upon Statewide and District forecasts of State highway travel developed by Caltrans.

6. Route concepts are generally uniform for an entire route, unless there is a major change in function along the route.

7. Major projects will be developed to meet standards acceptable to the Federal Highway Administration in order to receive Federal funding for projects. Otherwise, a "design exception" will be prepared during the project development process.

8. For all routes, safety projects will be pursued on an on-going basis in order to be responsive to safety problems as they are identified.

9. No planned or programmed improvements were assumed to be complete in analyzing present and future operating conditions. Section V of the Route Concept Report details programmed improvements in the 1988 STIP, with all costs in 1988 dollars.

10. An environmental document will not be required for Route Concept Reports. However, individual improvement projects identified in Route Concept Reports will follow the appropriate environmental process as required by law.

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SUMMARY

ROUTE CONCEPT REPORT
FOR
ROUTE 199
1-DN-199-T0.5/36.4

ROUTE DESCRIPTION

Route 199 originates at Route 101 north of the City of Crescent City, traversing most of northern Del Norte County in a northeasterly direction to the Oregon State line. The Route is approximately 36 miles in length (within California) and is a Federal Aid Primary, Rural Principal Arterial. As a link between Route 101 and Route I-5 at Grants Pass, Oregon, it is used primarily for inter-state travel, recreational purposes and the movement of goods. The entire Route is part of the California Freeway and Expressway System and is eligible for designation as a Scenic Highway, but has not been officially designated. The Route is included in the "SHELL" Route System for the movement of extra-legal (permit) loads, however, it is not a STAA truck route.

The existing facility is typically 2-lane conventional highway with 12 foot wide lanes and 0- to 4-foot wide paved shoulders. Some locations are developed to 4-lane standards and passing lanes exist at other locations. Horizontal alignment is generally curvilinear, and vertical alignment reflects the rolling to mountainous terrain. Traffic volumes range from 2,450 to 3,100 AADT. Truck volumes range from 10% to 17% of the AADT, and peak month average daily traffic is approximately 135% of the AADT.

OPERATING CONDITIONS

Two lane segments of Route 199 operate at a "C" to "D" level of service currently. Level of service is expected to deteriorate to "D" and "E" on two lane segments by the year 2010. The one four lane segment currently operates at an "A" level of service, and is expected to continue to operate at this level through the year 2010.

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ROUTE CONCEPT/RATIONALE

Route 199 should remain basically a 2-lane, conventional highway, with passing lanes, maintained and rehabilitated as necessary. Additional passing lanes should be developed in the segment which does not meet the concept level of service. Where feasible, widening should be considered in conjunction with future rehabilitation projects to provide an adequate paved shoulder. Safety and operational improvements should be considered as necessary.

The recommended concept LOS for this Route is "D".

This Route Concept for Route 199 was selected based on the Route's function as a Principal Arterial, environmental and funding constraints, and competing priorities from other routes in the District.

CONCERNS

Future level of service is a concern on the DN-199-T0.5/13.0 segment.

IMPROVEMENTS NEEDED TO ACHIEVE ROUTE CONCEPT

Improvements necessary to achieve (or approach) the Route Concept for Route 199 include the provision of additional passing lanes in the segment which is not expected to maintain the concept level of service through the 20 year period. It is anticipated that such passing lane improvements will cost an estimated $3 million.

Safety and operational improvements should be considered as necessary.

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PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 199

DN-199-T0.5/13.0	DN-199-13.0/19.8	DN-199-19.8/27.1	DN-199-27.1/36.4
Terrain: Mountainous	Terrain: Rolling	Terrain: Mountainous	Terrain: Mountainous
Gradeline: Rolling	Gradeline: Rolling	Gradeline: Rolling	Gradeline: Rolling
Existing (1988)	Existing (1988)	Existing (1988)	Existing (1988)
2-lane Conventional	2/4-lane Conventional	2-lane Conventional	2-lane Conv./Expressway
22'-92' Paved Width	60' Paved Width	20'-40' Paved Width	28'-60' Paved Width
2500-3100 AADT	2450-2850 AADT	2450-2600 AADT	2450-2600 AADT
"B" LOS	"A" LOS	"C" LOS	"C" LOS
V/C: 0.28	V/C: 0.08	V/C: 0.26	V/C: 0.27
Accident Rate:	Accident Rate:	Accident Rate:	Accident Rate:
less than 1.5 times	less than 1.5 times	less than 1.5 times	less than 1.5 times
the statewide average	the statewide average	the statewide average	the statewide average
Future (2010)	Future (2010)	Future (2010)	Future (2010)
4150-5250 AADT	4050-4850 AADT	4050-4200 AADT	4050-4200 AADT
"E" LOS	"A" LOS	"D" LOS	"D" LOS
V/C: 0.45	V/C: 0.14	V/C: 0.43	V/C: 0.46

ROUTE CONCEPT

- Route 199 should remain basically a 2-lane, conventional highway with passing lanes, maintained and rehabilitated as necessary. Widening should be considered in conjunction with future rehabilitation projects.
- The concept level of service for this Route is "D".

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ROUTE CONCEPT REPORT

ROUTE 199

I. ROUTE DESCRIPTION AND PURPOSE

Description

Route 199, from Route 101 north of the City of Crescent City to the Oregon Border, is approximately 36 miles in length. Ultimately, the Route leads to Interstate 5, in Grants Pass, Oregon. The post mile description of this Route (within California) is: 1-DN-199-T0.5/36.4.

Originating at Route 101 north of Crescent City in Del Norte County, Route 199 generally follows the Smith River Canyon in a northeasterly direction to the Oregon State Line. The Route passes through the community of Gasquet (population approximately 400), however, most of the area is sparsely populated. At approximately post mile DN-199-4.4, the Route intersects with Route 197, a Rural Major Collector. The Route is wholly within the Six Rivers and Klamath National Forests from approximately DN-199-6.2 to the Oregon State Line.

Route Purpose

Route 199 is functionally classified as a Rural Principal Arterial. It is a Federal Aid Primary Route, and is a part of the California Freeway and Expressway System. Route 199 is a National Park road, and is eligible for designation as a Scenic Highway, but has not been officially designated. Route 199 is one of the most important State highway routes in northern California, and is essential for the interregional movement of goods (primarily forest related) within California, and the interstate movement of goods between California and Oregon. It serves for delivery of goods needed by residents in Del Norte County and the north coast, by linking Route 101 to I-5 and the Grants Pass/Medford area. It is a SHELL route, and as such is designated for use by extra legal (permit) loads. However, Route 199 is not part of the national network for STAA trucks and is not designated for use by STAA trucks (kingpin to rear axle length of up to 40').

Route 199 is a principal recreational route, passing through the northern portion of the Redwood National Park. Jedediah Smith Redwoods State Park, also along Route 199, and included within the National Park boundaries, is one of the most popular state parks in northwestern California. Route 199 provides access to the Smith River which is world renowned for its sport fishing. In addition, Route 199 serves as a local service route for the community of Gasquet and other smaller communities located along the Route.

The Route experiences generally light non-motorized traffic, with concentrations around the Jedediah Smith State Park and the community of Gasquet.

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II. Local & Regional Issues

Land Use

Land use adjacent to Route 199 in District 1 is expected to remain basically as it is now (open space, park land, and agricultural/timber products). Minimal development, primarily recreational/tourist oriented, is expected in and adjacent to existing communities. The Route currently experiences substantial recreational traffic, and this traffic is expected to continue to increase.

No substantial long-term right of way needs are anticipated for Route 199 in District 1. Some right of way may be needed for construction of passing lanes, storm damage reconstruction, maintenance, rehabilitation, or safety/operational improvements.

Environmental Considerations

Primary environmental considerations for Route 199 include the following:

- The Smith River is included in the Wild and Scenic River System, with a designation of recreational. Further, the Smith River is considered significant fishery habitat, and supports a sizeable salmon fishery.
- Areas near the Communities of Hiouchi (DN-199-6) and Gasquet (DN-199-14) are archaeologically sensitive.
- Rare plants may exist near the Community of Gasquet.
- A number of old growth redwoods exist within Jedediah Smith State Park, on the westerly portion of Route 199.

Regional Transportation Planning

The Draft 1988 Del Norte County Regional Transpcrtation Plan, Action Element, lists "Continued interest in development of the State highway system, particularly Routes 1Cl and 199,...." as a significant regional transportation issue of particular interest to the Del Norte Local Transportation Commission (DNLTC). A curve correction project (DN-199-24.1/24.6) and a passing lane project (DN-199-9.3/10.1) are listed as the first and second priority operational improvement State highway projects.

In reviewing Caltrans' system planning products, the Del Norte Local Transportation Commission expressed the concern improvements called for on Route 199 are not commensurate with the route's functional classification as a Principal Arterial; however, the DNLTC does recognize the severe environmental constraints to major development cf the Route.

While the DNLTC would like to see more development of Route 199, their highest priority for State highway development lies with specific segments of Route 101. Their two highest priorities for new highway construction are on Route 101 south of Crescent City.

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III. EXISTING FACILITIES

Route 199 is generally a 2-lane conventional highway, traversing rolling to mountainous terrain. One segment (DN-199-13.0/19.8) is 4-lane conventional highway, and much of the segment near the Oregon border (DN-199-28.1/36.4) is 2-lane expressway with passing lanes. Lane width is generally 12', and paved shoulders typically range from 0- to 4-foot, however, lane and paved shoulder widths vary considerably over the Route. Actual lane, paved shoulder, and total paved width ranges are shown in the table below:

HIGHWAY WIDTH
ROUTE 199

Post Mile	Location	No. of Lanes-Highway Type	Lane Width	Paved Shoulder Width	Total Paved Width
DN-199-T0.5/13.0	Route 101 to One mile west of Gasquet	2-C	11'-12'	0'-10'	22'-92'
DN-199-13.0/19.8	One mile west of Gasquet to two mi. west of Patricks Cr.	4-C	12'	4'	60'
DN-199-19.8/27.1	Two miles west of Patricks Cr. to Idlewild Maint. Sta.	2-C	11'-12'	0'-8'	24'-42'
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	2-C/E*	12'	1'-4'	26'-60'

* Several Passing Lanes in this segment.

Horizontal alignment on Route 199 in District 1 is generally curvilinear. The segment west of Gasquet to west of Patricks Creek (DN-199-13.0/19.8) has better alignment than the remainder of the Route, as it was constructed to 4-lane standards in the late 1960's. Vertical alignment is generally rolling, with some moderate to steep grades in the mountainous areas.

While the majority of right of way on Route 199 is 100 to 200 feet wide, some sections are as narrow as 60 feet wide. Much of the Route traverses Federal land, where the right of way has been provided to the State through special use permits, approved maps and easements. Most other right of way is either State owned, or the State has acquired an easement.

The entire length of Route 199 within District 1 is served by Greyhound Bus Lines. Buses make trips daily between Grants Pass, Oregon and Crescent City, California.

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No State-owned park and ride lots have been developed along Route 199.

Route 101, a principal arterial, intersects Route 199 north of Crescent City. Route 101 is the California Northcoast's primary highway access route. Route 199 is also intersected by Route 197, about four miles east of Route 101.

Ward Field, a public use airport in the Gasquet area, is served by Route 199. This is a small airport, with only two based aircraft and approximately 2000 aircraft operations annually. No railroads parallel or cross Route 199 within California.

IV. OPERATING CONDITIONS

Traffic Information

The following table summarizes projected Annual Average Daily Traffic (AADT) volumes for the 1988 year, and includes projections of future AADTs for the year 2010 on the major segments of Route 199. Also included are 20-year growth factors, truck volumes expressed as percent of AADT, and the present (1988) peak hour volume to capacity (v/c) ratio.

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TRAFFIC DATA
ROUTE 199

Post Mile/ Location	AADT Present (1988)/ Future (2010)	Present Peak Hour Volume[1]	Percent Trucks In AADT[2]	Average V/C Present (1988)/ Future (2010)	20-Year Growth Factor
DN-199-T0.5/13.0 (Rte. 101 to 1 mi. west of Gasquet)	2500-3100/ 4150-5250	350-400	10-17	.28/.45	1.60
DN-199-13.0/19.8 (1 mi. west of Gasquet to 2 mi. west of Patricks Cr.)	2450-2850/ 4050-4650	350	10-17	.08/.14	1.60
DN-199-19.8/27.1 (2 mi. west of Patricks Cr. to Idlewild Maint. Station)	2450-2600/ 4050-4200	350	10-17	.26/.43	1.60
DN-199-27.1/36.4 (Idlewild Maint. Station to the Oregon state line)	2450-2600/ 4050-4200	350	10-17	.27/.46	1.60

Peak month Average Daily Traffic volumes for Route 199 average approximately 135% of AADT. Peak hour volumes on Route 199 range from 12 to 14 percent of the AADT.

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[1] Calculated based on "1987 Traffic Volumes on California State Highways".

[2] Weighted average from "1986 Annual Average Daily Truck Traffic on California State Highways".

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Level of Service

The following chart identifies the present and future levels of service along Route 199:

LEVEL OF SERVICE
ROUTE 199

Post Mile	Location	Present (1988)	Future (2010)
DN-199-T0.5/13.0	Route 101 to one mile west of Gasquet	D	E
DN-199-13.0/19.8	One mile west of Gasquet to two miles west of Patricks Cr.	A	A
DN-199-19.8/27.1	Two miles west of Patricks Creek to Idlewild Maint. Sta.	C	D
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	C	D

Accident Rates

For the period 7-1-85 through 6-30-88, actual reported accident statistics for Route 199 were compared with the expected Statewide average for similar facilities. Based on the segmentation listed in the table on the following page, no segments have accident rates greater than 1.5 times (150% of) the expected Statewide average. However one segment (DN-199-19.8/27.1) has an accident rate which slightly exceeds the statewide average. Further, specific locations may exist with poor accident experiences. The District has an established accident surveillance and monitoring process which investigates and recommends safety improvements for specific locations with historically poor accident records as they are identified.

Actual accident rates and expected Statewide average accident rates (both expressed as accidents per million vehicle miles) are shown in the table on the following page:

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ACCIDENT RATES
ROUTE 199

Post Mile	Location	Accident Rate	Statewide Average	Accident Rate As a Percent of Statewide Average
DN-199-T0.5/13.0	Route 101 to One mile west of Gasquet	2.08	2.57	81%
DN-199-13.0/19.8	One mile west of Gasquet to two mi. west of Patricks Cr.	0.50	2.08	24%
DN-199-19.8/27.1	Two miles west of Patricks Cr. to Idlewild Maint. Sta.	2.94	2.46	120%
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	0.99	1.72	58%

Historic Maintenance and Road Closure Locations

In late March of 1989, a heavy truck collided with the superstructure of the Smith River Bridge (#1-6) near Hiouchi, causing major structural damage. Route 199 was closed and through traffic re-routed over State Route 197. This detour of Route 199 is expected to continue through the summer of 1990, pending replacement of the structure.

No other chronic maintenance or road closure locations have been identified on Route 199.

V. PROGRAMMED IMPROVEMENTS

Only one improvement on Route 199 is included in the 1988 State Transportation Improvement Program (STIP). This project involves replacement of Smith River Bridge #1-6 near Hiouchi (DN-199-4.2). This project is programmed for the 1992/93 fiscal year and is expected to cost approximately $5.7 million in 1988 dollars. However, due to structural damage to this bridge, the project will be expedited, with construction in 1990.

VI. ROUTE CONCEPT AND RATIONALE

Concept for Route Improvement

Route 199 is important, particularly regionally, for interstate travel, recreational use, and the movement of goods. However, this Route experiences relatively low traffic volumes, and development costs are generally high (principally due to the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon). Further, environmental concerns include old growth redwood groves in Jedediah Smith State Park,

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and the ecological sensitivity of the Smith River Canyon. These concerns make Route 199 a poor candidate for extensive upgrading.

ROUTE 199 SHOULD REMAIN BASICALLY A 2-LANE, CONVENTIONAL HIGHWAY, WITH PASSING LANES. ADDITIONAL PASSING LANES SHOULD BE DEVELOPED, ESPECIALLY IN SEGMENTS WHICH DO NOT MEET THE CONCEPT LEVEL OF SERVICE (WITHIN ENVIRONMENTAL AND FINANCIAL CONSTRAINTS).

Level of service on Route 199 currently ranges from "A" to "D" during peak hour periods. With projected traffic increases, level of service is expected to decrease to "D" and "E" on all two lane segments by the year 2010 if no improvements are made. Although this is less than desirable, it is not considered sufficient justification to plan for improvement to a 4-lane facility (necessary to assure a "B" or "C" level of service), in view of environmental constraints and the competition for projected revenues from highways of greater significance than Route 199 (primarily Route 101). Considering this, and the Routes Rural Principal Arterial status, A "D" CONCEPT LEVEL OF SERVICE HAS BEEN ESTABLISHED.

While passing lanes will be considered for segments which do not meet the concept level of service, these improvements may not generate sufficient capacity to meet the concept level of service.

Concept For Rehabilitation

ROUTE 199 SHOULD BE MAINTAINED AND REHABILITATED AS NECESSARY.

Based on current rehabilitation standards (3-R) in the Caltrans Highway Design Manual, existing roadway widths on Route 199 should be adequate to allow rehabilitation at the present width over most of the Route. However, consideration should be given to widening in conjunction with future rehabilitation projects where necessary to provide an adequate paved shoulder. Cost effectiveness and environmental considerations will need to be evaluated on a project by project basis.

Safety and Operational Improvement Concepts

Safety does not appear to be a significant factor in considering the need for improvement of Route 199, since the Route has no segments with accident rates exceeding one and one-half times the Statewide average based on similar facilities. However, safety improvements at spot locations will be considered as necessary.

Bridge replacement, storm damage, and operational improvement projects will also be considered as necessary. These projects, in addition to safety projects, should be constructed to appropriate State and/or Federal standards.

Caltrans is currently barrier striping two-lane highways to comply with Federal standards. This will reduce the number of passing opportunities (and the level of service) on most two-lane highways (including Route 199). A number of barrier stripe mitigation projects have been identified within District 1, including one on Route 199. A passing lane candidate from 0.9 to 1.7 miles south

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of Hardscrabble Creek (DN-199-9.3/10.1) is considered to be a barrier stripe mitigation candidate. It has been included in the 1989 PSTIP.

Route Concept Function

This Route Concept should serve as a guide for long range planning of improvements to Route 199. It will protect the State's investment in the Route, while recognizing environmental and financial constraints which will not allow the to programming of extensive improvements for this highway.

Alternative Concepts Considered

Two alternative level of service concepts were considered for Route 199 in District 1. The previous (1985 cycle) concept level of service for this Route, as well as all other Rural Principal Arterials in District 1 (except Route 101) was "C". The District considered retaining the "C" concept level of service, however this did not appear prudent since all two-lane segments of the route are expected to fall below a "C" level of service by the year 2010.

Reduction to an "E" level of service would subordinate Route 199 to all other Rural Principal Arterial routes in District 1, in terms of level of service. Further, local officials interested in improving Route 199 already feel that the limited projects included in the STIP reflect a lack of concern by Caltrans. And, a reduction in level of service would reduce the number of segments on which passing lanes would be considered as a means of improving the level of service. Therefore, a "D" concept level of service was established for Route 199.

VII. Areas of Concern

The following considers areas of concern on Route 199 based on an analysis of level of service and accident history. A segment is considered to be an "area of concern" if:

1. The concept level of service will not be achieved under present or future traffic conditions, or the segment operates at capacity during peak hour.

2. The total accident rate exceeds one and one-half the Statewide average for similar facilities.

On the chart on the following page, an "X" indicates a concern based on these criteria:

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AREAS OF CONCERN
ROUTE 199

Post Mile	Location	Level of Service Present (1988)	Level of Service Future (2010)	Accident Rate
DN-199-T0.5/13.0	Route 101 to One mile west of Gasquet	____	X	____
DN-199-13.0/19.8	One mile west of Gasquet to two mi. west of Patricks Cr.	____	____	____
DN-199-19.8/27.1	Two miles west of Patricks Cr. to Idlewild Maint. Sta.	____	____	____
DN-199-27.1/36.4	Idlewild Maint. Sta. to the Oregon State line	____	____	____

VIII. ULTIMATE TRANSPORTATION CORRIDOR

It is anticipated that the Route 199 will remain basically a 2-lane conventional highway with passing lanes. No substantial long term right of way needs are anticipated, as shown on the following chart:

RIGHT OF WAY REQUIREMENTS
ROUTE 199

Post Mile	Ultimate Transportation Corridor	Local Master Plan
DN-199-T0.5/13.0	Existing R/W (80' minimum, much of existing R/W obtained through easements)	None Shown
DN-199-13.0/19.8	Existing R/W (100' minimum, most 150'& through special use permits or easements)	None Shown
DN-199-19.8/27.1	Existing R/W (generally R/W not described - special use permit from Forest Service)	None Shown
DN-199-27.1/36.4	Existing R/W (80' minimum, generally substantially more)	None Shown

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IX. IMPROVEMENTS NECESSARY TO ACHIEVE THE ROUTE CONCEPT

Improvements necessary to achieve the concept level of service on Route 199 would include the provision of additional passing lanes in segments which do not meet the concept level of service.

It is anticipated that such passing lane improvements will cost an estimated $3 million.

Safety and operational improvements should be considered as necessary.

X. COORDINATION WITH THE DISTRICT 1 LONG RANGE OPERATION PLAN

No operational improvements for Route 199 are proposed in the District 1 Long Range Operations Plan (October 1985).

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DOTP SUMMARY

DISTRICT 1 ROUTE 199
ROUTE CONCEPT REPORT SUMMARY
1-HUM-199-T0.5/36.4

		ROUTE CONCEPT		RIGHT OF WAY REQUIREMENTS	
RCR Segment	Post Mile	LOS	Facility	Ultimate Transportation Corridor	Local Master Plan
1	DN-199-T0.5/13.0	D	2-C with pass. ln.	Existing R/W (80' min.)	None Shown
2	DN-199-13.0/19.8	D	2-C with pass. ln.	Existing R/W (100'min., generally 150' or more)	None Shown
3	DN-199-19.8/27.1	D	2-C with pass. ln.	Existing R/W (generally R/W not described)	None Shown
4	DN-199-27.1/36.4	D	2-C with pass. ln.	Existing R/W (80' min., generally much greater)	None Shown

CONCEPT RATIONALE:

This concept was selected based on the Route's function as a Rural Principal Arterial, environmental and financial constraints, and competing priorities from other routes in the District.

AREAS OF CONCERN

Current (1988): None

Future (2010): PM DN-199-T0.0/13.0 LOS Concern

IMPROVEMENTS

It is anticipated that passing lanes costing an estimated $3 million, will be required to meet the Route Concept. However, concept LOS may not be maintained through the year 2010 by these improvements.

Safety and operational improvements should be considered as necessary.

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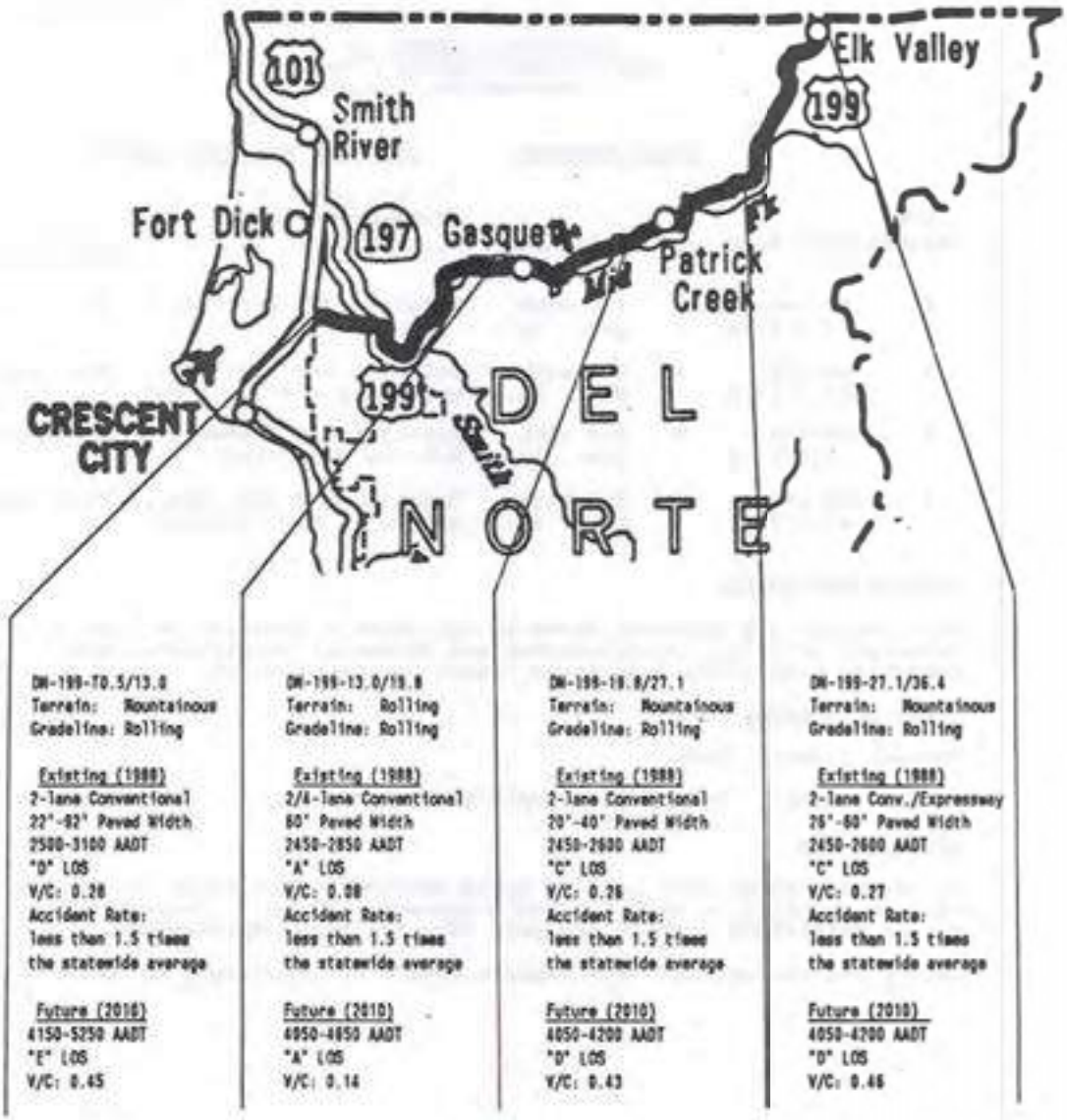
PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 199



DN-199-T0.5/13.0	DN-199-13.0/19.8	DN-199-19.8/27.1	DN-199-27.1/36.4
Terrain: Mountainous	Terrain: Rolling	Terrain: Mountainous	Terrain: Mountainous
Gradeline: Rolling	Gradeline: Rolling	Gradeline: Rolling	Gradeline: Rolling
Existing (1988)	Existing (1988)	Existing (1988)	Existing (1988)
2-lane Conventional	2/4-lane Conventional	2-lane Conventional	2-lane Conv./Expressway
22'-82' Paved Width	80' Paved Width	20'-40' Paved Width	26'-80' Paved Width
2500-3100 AADT	2450-2850 AADT	2450-2600 AADT	2450-2600 AADT
"D" LOS	"A" LOS	"C" LOS	"C" LOS
V/C: 0.28	V/C: 0.08	V/C: 0.26	V/C: 0.27
Accident Rate:	Accident Rate:	Accident Rate:	Accident Rate:
less than 1.5 times	less than 1.5 times	less than 1.5 times	less than 1.5 times
the statewide average	the statewide average	the statewide average	the statewide average
Future (2010)	Future (2010)	Future (2010)	Future (2010)
4150-5250 AADT	4050-4850 AADT	4050-4200 AADT	4050-4200 AADT
"E" LOS	"A" LOS	"D" LOS	"D" LOS
V/C: 0.45	V/C: 0.14	V/C: 0.43	V/C: 0.46

ROUTE CONCEPT

- Route 199 should remain basically a 2-lane, conventional highway with passing lanes, maintained and rehabilitated as necessary. Widening should be considered in conjunction with future rehabilitation projects.
- The concept level of service for this Route is "D".

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Att 22

ROUTE CONCEPT REPORT

ROUTE 197

1-DN-197-R0.0/7.1

All information in this Route Concept Report is subject to change as conditions change and new information is obtained.

I approve this Route Concept Report to guide today's route development decisions and/or recommendations.

Approval Recommended:

JERRY HAYNES Date
Deputy District Director
Office of Project Development
and Construction

Approval Recommended:

RICK KNAPP 9/25/87 Date
Deputy District Director
Office of Planning
and Programming

Approved:

E. F. POCH 9-29-89 Date
District Director
of Transportation
District 1

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ROUTE CONCEPT REPORT

Statement of Planning Intent

The Route Concept Report (RCR) is a planning document which describes the Department's basic approach to development of a given route. Considering reasonable financial constraints and projected travel demand over a 20-year planning period, the RCR defines an appropriate type of facility and level of service for each route. The objective of the effort is to provide a better basis for the development of the State Transportation Improvement Program and for determination of the appropriate concept for future highway projects.

Route Concept Reports are prepared by District staff in cooperation with local and regional agencies. They will be updated as necessary as conditions change or new information is obtained.

Route Concept Reports are a preliminary planning phase that lead to subsequent programming and the project development process. As such, the specific nature of proposed improvements (i.e., roadway width, number of lanes, access control, etc.) may change in later project development stages, with final determinations made during the project report and design phases. Roadway widths, as discussed in Route Concept Reports, are used for the purpose of estimating improvement costs, and may change depending upon operating conditions and design standards at the time of actual project development.

Assumption

The following assumptions form the basis for the development of Route Concept Reports:

1. The relative importance of State highways in the District can generally be established based on the functional classification of the routes. In general, higher priorities will be given to major improvements on principal arterial routes as compared to minor arterials and collectors.

2. For routes the District can reasonably expect to improve (generally Principal Arterials), realistic concept LOS must be established for each route in order to have route concepts and route development plans which are possible to achieve, given a forecast of future revenues. A concept LOS is not established on routes which will only be rehabilitated and/or maintained.

3. Level of service and capacity calculations are based on the 1985 Highway Capacity Manual. Previous Route Concept Report level of service and capacity calculations were based on the 1965 Highway Capacity Manual.

4. The 1985 Highway Capacity Manual Chapter addressing two-lane highways does not set a maximum limit on the level of service attainable based on restricted design speed. District 1 uses the table in Chapter 5 page 15 to limit the level of service attainable due to restricted design speed. Further, District capacity calculations include a factor to increase capacity based on the length of passing lanes in two-lane segments.

5. Determinations of future LOS for the routes in District 1 are based in part upon Statewide and District forecasts of State highway travel developed by Caltrans.

6. Route concepts are generally uniform for an entire route, unless there is a major change in function along the route.

7. Major projects will be developed to meet standards acceptable to the Federal Highway Administration in order to receive Federal funding for projects. Otherwise, a "design exception" will be prepared during the project development process.

8. For all routes, safety projects will be pursued on an on-going basis in order to be responsive to safety problems as they are identified.

9. No planned or programmed improvements were assumed to be complete in analyzing present and future operating conditions. Section V of the Route Concept Report details programmed improvements in the 1988 STIP, with all costs in 1988 dollars.

10. An environmental document will not be required for Route Concept Reports. However, individual improvement projects identified in Route Concept Reports will follow the appropriate environmental process as required by law.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

SUMMARY

ROUTE CONCEPT REPORT FOR ROUTE 197

1-DN-197-R0.0/7.1

ROUTE DESCRIPTION

Route 197 connects Route 101 with Route 199, following the northeasterly side of the Smith River in northwestern Del Norte County. The Route is a Federal Aid Secondary Rural Major Collector, approximately 7 miles in length. This route functions as a connecting link between Route 101 and Route 199 for through traffic, and serves local residents living along the Route.

Route 197 is not included in the State's Freeway and Expressway System, however, it is eligible for designation as a Scenic Highway (but has not been officially designated).

The existing State highway facility is a 2-lane conventional highway with 12-foot wide lanes and 0- to 4-foot wide paved shoulders. Horizontal and vertical alignments are generally good, except between postmile R2.6 and 6.1 where there are several short radius curves. Traffic volumes range from 1,600 to 1,700 AADT, and truck volumes range from 8% to 9% of the AADT. Peak month average daily traffic is approximately 140% of the AADT.

OPERATING CONDITIONS

Route 197 currently operates at a "B" to "C" level of service. With projected traffic increases, level of service is expected to fall to "C" and "D" levels by the year 2010.

Accident rates on Route 197 are over twice the Statewide average (based on similar facilities) for a large portion of the Route (postmile R2.6/7.1). No chronic maintenance or road closure concerns have been identified on Route 197.

1

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

ROUTE CONCEPT/RATIONALE

Route 197 should remain a 2-lane conventional highway, maintained as necessary at its existing width and on existing alignment.

Since the concept for Route 197 is maintain only, no concept level of service has been established. Further, it is anticipated that the Route will operate at or above a "D" level of service through the year 2010.

Operational improvements should be considered on an exception basis and safety improvements should be made as necessary.

This Route Concept for Route 197 was selected based on the Route's functional classification, generally high Route improvement costs, and competing priorities from other more important routes in the District.

CONCERNS

No level of service or maintenance concerns have been identified on Route 197. Safety is a concern on the postmile R2.6/7.1 segment.

IMPROVEMENTS NEEDED TO ACHIEVE ROUTE CONCEPT

No capacity improvements will be necessary to achieve the route concept (maintain only) for Route 197.

Safety improvements should be made as necessary and operational improvements should be considered on an exception basis.

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 197

DN-197-R2.6/7.1
Terrain: Rolling
Gradeline: Rolling

Existing (1988)
2-lane Conventional
24'-32' Paved Width
1,600-1,700 AADT
"C" LOS
V/C: 0.21
Accident Rate:
over 1.5 times the statewide average

Future (2010)
2,650-2,800 AADT
"D" LOS
V/C: 0.34

DN-197-0.0/R2.6
Terrain: Rolling
Gradeline: Flat

Existing (1988)
2-lane Conventional
32' Paved Width
1,600-1,700 AADT
"B" LOS
V/C: 0.14
Accident Rate:
less than 1.5 times the statewide average

Future (2010)
2,650-2,800 AADT
"C" LOS
V/C: 0.23

ROUTE CONCEPT

o Route 197 should remain a 2-lane, conventional highway maintained as necessary. Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

o No concept level of service has been established for this Route.

...

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

ROUTE CONCEPT REPORT

ROUTE 197

I. ROUTE DESCRIPTION AND PURPOSE

Description

Route 197 (known as North Bank Road) originates at Route 199, near the community of Hiouchi, approximately 4 miles east of the Route 101/199 junction. The Route proceeds in a generally northwesterly direction, following the north bank of the Smith River to Route 101, approximately three miles south of the community of Smith River. The Route is approximately 7 miles long and is entirely within Del Norte County. The post mile description of the Route is 1-DN-197-R0.0/7.1.

Route Purpose

Route 197 is functionally classified as a Rural Major Collector, and is a part of the Federal Aid Secondary System.

The Route is not included in the State's Freeway and Expressway system, however it is not eligible for designation as a Scenic Highway (but has not been officially designated). Route 197 is not designated as a SHELL Route for use by trucks carrying extra legal loads and is not included in the national network for STAA trucks. Further, STAA trucks (kingpin to rear axle length of up to 40') are not allowed on the Route.

This Route functions as a connecting link between Route 101 and Route 199 for through traffic, generally making trips with origins or destinations in the vicinity of the community of Smith River or on the Southern Oregon Coast. In addition, Route 197 serves a number of local residents, including those living along the north bank of the Smith River. And, Route 197 also serves as a detour for westerly Route 199 (DN-199-T0.5/4.4) as necessary.

There are no cities or communites located along Route 197, and the Route experiences generally light non-motorized traffic.

II. Local & Regional Issues

Land Use

Land use adjacent to Route 197 is generally a combination of open space and rural residential. It is anticipated that these land uses will continue, with some additional rural residential development.

1

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Environmental Considerations

The Smith River is included in the Wild and Scenic River System, with a designation of recreational. The Smith and its tributaries are important salmon and steelhead spawning habitat.

In addition to water quality and visual impact concerns, the Route is archaeologically sensitive and vulnerable to flooding in low areas.

Regional Transportation Planning

The Action Element of the 1986 Del Norte County Regional Transportation Plan states the Del Norte Local Transportation Commission's concern that Route 197 should be functionally classified as a Minor Arterial rather than its present Major Collector classification. The Del Norte Local Transportation Commission feels that improvements to the postmile R2.6/6.1 segment could then be pursued.[1]

III. EXISTING FACILITIES

Route 197 is a two-lane conventional highway, with 0- to 4-foot wide paved shoulders. No passing lanes exist on Route 197. Actual lane, paved shoulder, and total paved width ranges are shown in the table below:

HIGHWAY WIDTH
ROUTE 197

Post Mile	Location	No. of Lanes Highway Type	Lane Width	Paved Shoulder Width	Total Paved Width
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	2-C	12'	4'	32'
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	2-C	12'	0'-4'	24'-32'

[1] 1986 Del Norte County Regional Transportation Plan, Action Element, Roads Section, page 30.

2

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Terrain traversed by Route 197 is generally rolling. Horizontal alignment is generally good, except between postmile R2.6 and postmile 6.1, where there are a number of short radius curves. Vertical alignment is generally good throughout the Route, with no sustained grades.

Right of way for Route 197 in District 1 is generally State owned or through easements for the postmile R0.0/R2.6 segment. Much of the right of way on the remainder of the route is through prescriptive right. Right of way widths vary throughout the route.

Route 197 is not served by public transit. No State-owned park and ride lot exists adjacent to this Route. No Railroad lines parallel or intersect Route 197. No airports are located adjacent to this Route.

Route 197 intersects with Route 199 near the community of Hiouchi, approximately 4 miles east of the Route 101/199 junction. Route 197 also intersects with Route 101 approximately three miles south of the community of Smith River. Route 101 is the north coast's primary highway access route.

IV. OPERATING CONDITIONS

Traffic Information

The table on the following page summarizes Annual Average Daily Traffic (AADT) volumes for the 1988 year, and includes projections of future AADTs for the year 2010 on the major segments of Route 197. Also included are 20-year growth factors, truck volumes expressed as percent of AADT, and peak hour volume to capacity (v/c) ratios.

3

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

TRAFFIC DATA
ROUTE 197

Post Mile/ Location	AADT Present (1988)/ Future (2010)	Present Peak Hour Volume[2]	Percent Trucks In AADT[3]	Average V/C Present (1988)/ Future (2010)	20-Year Growth Factor
DN-197-R0.0/R2.6 (Route 199 to 0.4 mi. west of Low Divide)	1600-1700/ 2650-2800	300	8-9	.14/ .23	1.6
DN-197-R2.6/7.1 (0.4 mi. west of Low Divide to Route 101)	1600-1700/ 2650-2800	300	8-9	.21/ .34	1.6

Peak month average daily traffic volumes for this Route average approximately 140% of AADT. Peak hour volumes on Route 197 are approximately 18% of the AADT.

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[2] Calculated based on preliminary data to be used in the preparation of "1988 Traffic Volumes on Califonria State Highways".

[3] From "1987 Annual Average Daily Truck Traffic on California State Highways".

4

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Level of Service

The following chart identifies the present and future levels of service for Route 197:

LEVEL OF SERVICE
ROUTE 197

Post Mile	Location	Present (1988)	Future (2010)
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	B	C
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	C	D

Accident Rates

For the period 6-30-85 through 6-30-88, actual reported accident statistics for Route 197 were compared with the expected Statewide average for similar facilities. One segment of Route 197 has an accident record which exceeds one and one-half times the expected Statewide average, based on similar facilities (a curve correction project in this segment is programmed in the 1988 State Transportation Improvement Program for DN-197-3.5/3.6). Additional specific locations may exist with poor accident experiences. The District has an established accident surveillance and monitoring process which investigates and recommends safety improvements for specific locations with historically poor accident records as they are identified.

Actual accident rates and expected Statewide average accident rates (both expressed as accidents per million vehicle miles) are shown in the table below:

ACCIDENT RATES
ROUTE 197

Post Mile	Location	Accident Rate	Statewide Average	Accident Rate As a Percent of Statewide Average
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	2.17	2.40	90%
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	5.52	2.42	228%

5

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Historic Maintenance and Road Closure Locations

No chronic maintenance or road closure locations have been identified on Route 197.

V. PROGRAMMED IMPROVEMENTS

One improvement on Route 197, the previously noted curve correction, is included in the 1988 State Transportation Improvement Program (STIP). It is estimated to cost approximately $0.6 million, and is programmed for the 1990/91 fiscal year. No new facility or capacity increasing operational improvement projects for Route 197 in District 1 are programmed in the 1988 STIP.

VI. ROUTE CONCEPT AND RATIONALE

Concept for Route Improvement

Route 197 is important as a connecting link between Route 101 and Route 199 for through traffic. Further, the Route serves a number of local residents, including those living along the north bank of the Smith River.

However, while Route 197 is important to the area, it cannot effectively compete for funds with other more important Routes in the District (generally Rural Principal Arterials).

Therefore, ROUTE 197 SHOULD REMAIN A 2-LANE CONVENTIONAL HIGHWAY ON ITS EXISTING ALIGNMENT.

Route 197 currently operates at a "B" to "C" level of service during peak hour periods. With projected traffic increases, the level of service on the Route is expected to fall to "C" and "D" levels of service by the year 2010. Although this is less than desirable, it is not considered sufficient justification to plan or program future capacity improvements in view of the competition for projected revenues from highways of greater significance than Route 197. Therefore, NO CONCEPT LEVEL OF SERVICE HAS BEEN ESTABLISHED FOR ROUTE 197.

Concept For Rehabilitation

Based on functional classification, traffic volumes, and maintenance service levels, ROUTE 197 SHOULD BE MAINTAINED AT ITS PRESENT WIDTH AND ON EXISTING ALIGNMENT (Portions of the Route may be rehabilitated on an exception basis, when maintaining the facility would be less cost effective than rehabilitating it).

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

Safety and Operational Improvement Concepts

One segment of Route 197 has accident rates exceeding one and one-half times the Statewide average, based on similar facilities. A curve correction project has been programmed within this segment. Further, additional safety improvements at spot locations which are competitive in the safety program will be considered as necessary.

Bridge replacement and storm damage projects will also be considered as necessary, and operational improvement projects will be considered on an exception basis. These projects, in addition to safety projects, should be constructed to appropriate State and/or Federal standards (rather than to the present width concept).

Caltrans is currently barrier striping two-lane highways to comply with Federal standards. This will reduce the number of passing opportunities (and the level of service) on most two-lane highways (including Route 197). The impact of barrier striping is expected to be less severe on Route 197 than on some other Routes within the District, since relatively few passing opportunities existed prior to barrier striping. Further, while a number of barrier stripe mitigation projects have been identified within District 1, to date none have been identified on Route 197. Barrier stripe mitigation projects such as turnouts may be identified at spot locations on Route 197 at some time in the future.

Route Concept Function

This Route Concept will protect the State's investment in this Route while recognizing financial constraints which will not allow the programming of extensive improvements for all highways.

Alternative Concepts Considered

No alternative route concepts were considered fcr Route 197.

VII. Areas of Concern

The following considers areas of concern on Route 197 based on an analysis of level of service and accident history. A segment is considered to be an "area of concern" if:

1. The concept level of service will not be achieved under present or future traffic conditions, or the segment operates at capacity during peak hour.

2. The total accident rate exceeds one and one-half the Statewide average for similar facilities.

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

On the chart below, an "X" indicates a concern based on these criteria:

AREAS OF CONCERN
ROUTE 197

Post Mile	Location	Level of Service Present(1988)	Level of Service Future(2010)	Accident Rate
DN-197-R0.0/R2.6	Route 199 to 0.4 miles west of Low Divide	____	____	____
DN-197-R2.6/7.1	0.4 miles west of Low Divide to Route 101	____	____	X

VIII. ULTIMATE TRANSPORTATION CORRIDOR

Since extensive development is not currently planned for the Route 197 corridor, it is anticipated that the Route will remain as it exists (a 2-lane conventional highway). No substantial long term right of way needs are anticipated, as shown on the following chart:

RIGHT OF WAY REQUIREMENTS
ROUTE 197

Post Mile	Ultimate Transportation Corridor	Local Master Plan
DN-197-R0.0/R2.6	Exist. R/W (generally 60' minimum width, and State-owned or easement)	None shown
DN-197-R2.6/7.1	Exist. R/W (generally through prescriptive right, with some State-owned near Route 101)	None shown

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

IX. IMPROVEMENTS NECESSARY TO ACHIEVE THE ROUTE CONCEPT

No new facility improvements are necessary to achieve the route concept (maintain only with some rehabilitation) through the year 2010.

Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

X. COORDINATION WITH THE DISTRICT 1 LONG RANGE OPERATION PLAN

No operational improvements for Route 197 are proposed in the District 1 Long Range Operation Plan (October 1985).

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Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

DOTP SUMMARY

DISTRICT 1 ROUTE 197
ROUTE CONCEPT REPORT SUMMARY
1-MEN-197-R0.0/7.1

		ROUTE CONCEPT		RIGHT OF WAY REQUIREMENTS	
RCR Segment	Post Mile	LOS	Facility	Ultimate Transportation Corridor	Local Master Plan
1	DN-197-R0.0/R2.6	None	2-C	Exist. R/W (generally 60' minimum width, and State owned or easement)	None shown
2	DN-197-R2.6/7.1	None	2-C	Exist. R/W (generally through prescriptive right, with some state owned near Route 101)	None shown

CONCEPT RATIONALE:

This Route Concept for Route 197 was selected based on the Route's functional classification, and competing priorities from other more important routes in the District.

AREAS OF CONCERN

Current (1988): 1-DN-197-R2.6/7.1 - Accident Rate 2.3 times Statewide average (a curve correction project is programmed in this segment in the 1989 STIP as DN-197-3.5/3.6).

Future (2010): None

IMPROVEMENTS

No new facility improvements are necessary to maintain the route concept (maintain only) through the year 2010.

Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 22

PRESENT AND FUTURE OPERATING CONDITIONS
ROUTE 197

DN-197-R2.6/7.1
Terrain: Rolling
Gradeline: Rolling

Existing (1988)
2-lane Conventional
24'-32' Paved Width
1,600-1,700 AADT
"C" LOS
V/C: 0.21
Accident Rate:
over 1.5 times the statewide average

Future (2010)
2,650-2,800 AADT
"D" LOS
V/C: 0.34

DN-197-0.0/R2.6
Terrain: Rolling
Gradeline: Flat

Existing (1988)
2-lane Conventional
32' Paved Width
1,600-1,700 AADT
"B" LOS
V/C: 0.14
Accident Rate:
less than 1.5 times the statewide average

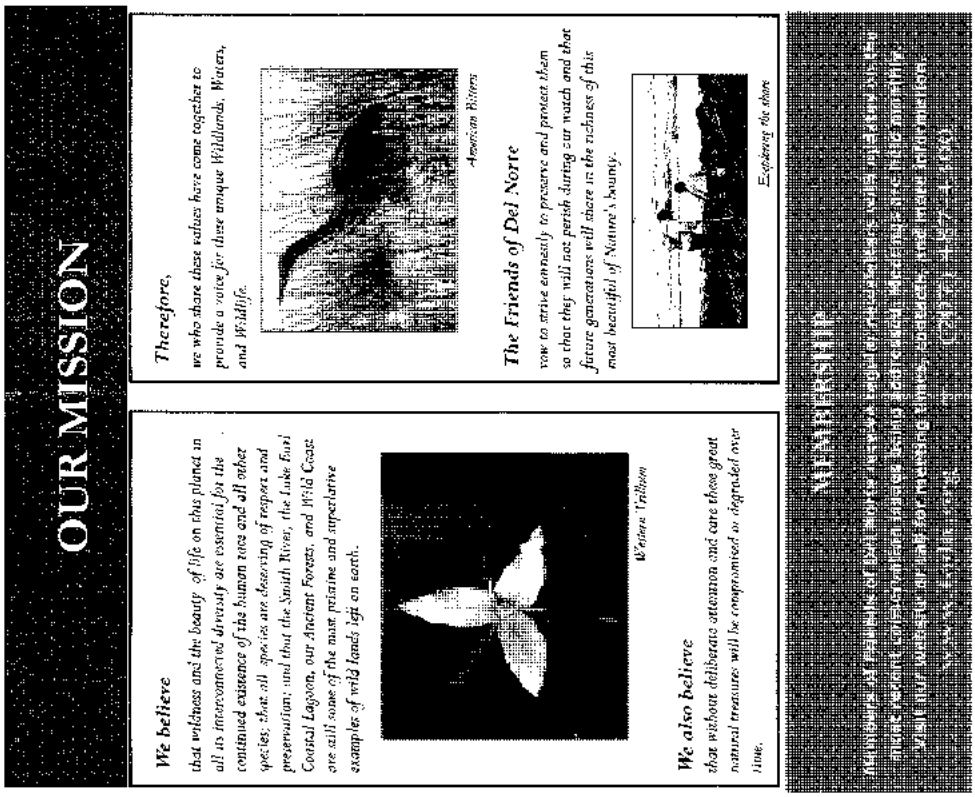
Future (2010)
2,650-2,800 AADT
"C" LOS
V/C: 0.23

ROUTE CONCEPT

o Route 197 should remain a 2-lane, conventional highway maintained as necessary. Safety improvements should be made as necessary, and operational improvements should be considered on an exception basis.

o No concept level of service has been established for this Route.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 23



OUR MISSION

Therefore,

we who share these values have come together to provide a voice for these unique Wildlands, Waters, and Wildlife.

American Bittern

The Friends of Del Norte

vow to strive earnestly to preserve and protect them so that they will not perish during our watch and that future generations will share in the richness of this most beautiful of Nature's bounty.

Exploring the shore

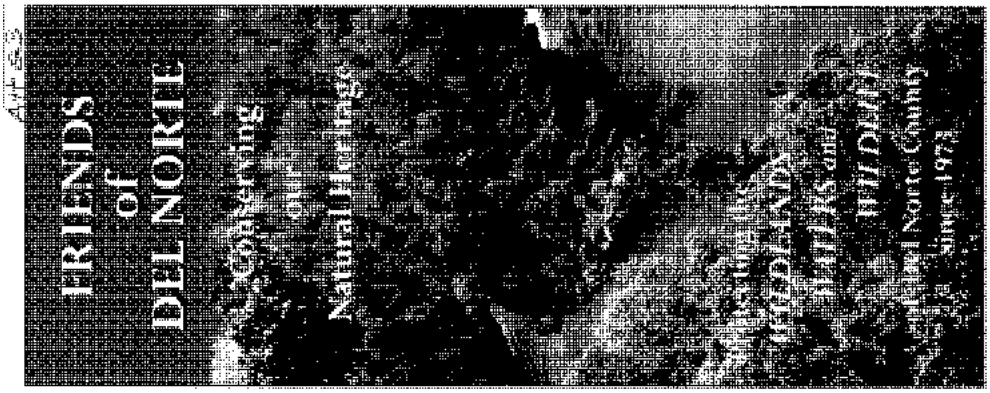
We believe

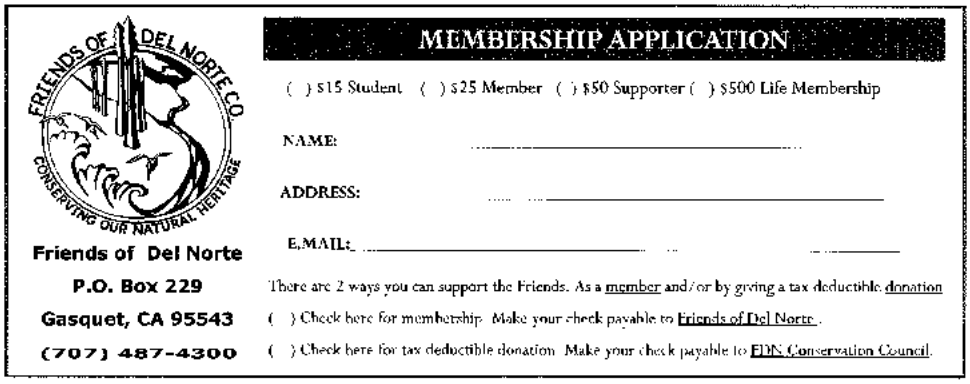
that wildness and the beauty of life on this planet in all its interconnected diversity are essential for the continued existence of the human race and all other species; that all species are deserving of respect and preservation; and that the Smith River, the Lake Earl Coastal Lagoon, our Ancient Forests, and Wild Coast are still some of the most pristine and spectacular examples of wild lands left on earth.

Western Tribbon

We also believe

that without deliberate attention and care these great natural treasures will be compromised or degraded over time.





MEMBERSHIP APPLICATION

( ) $15 Student ( ) $25 Member ( ) $50 Supporter ( ) $500 Life Membership

NAME: _____

ADDRESS: _____

E.MAIL: _____

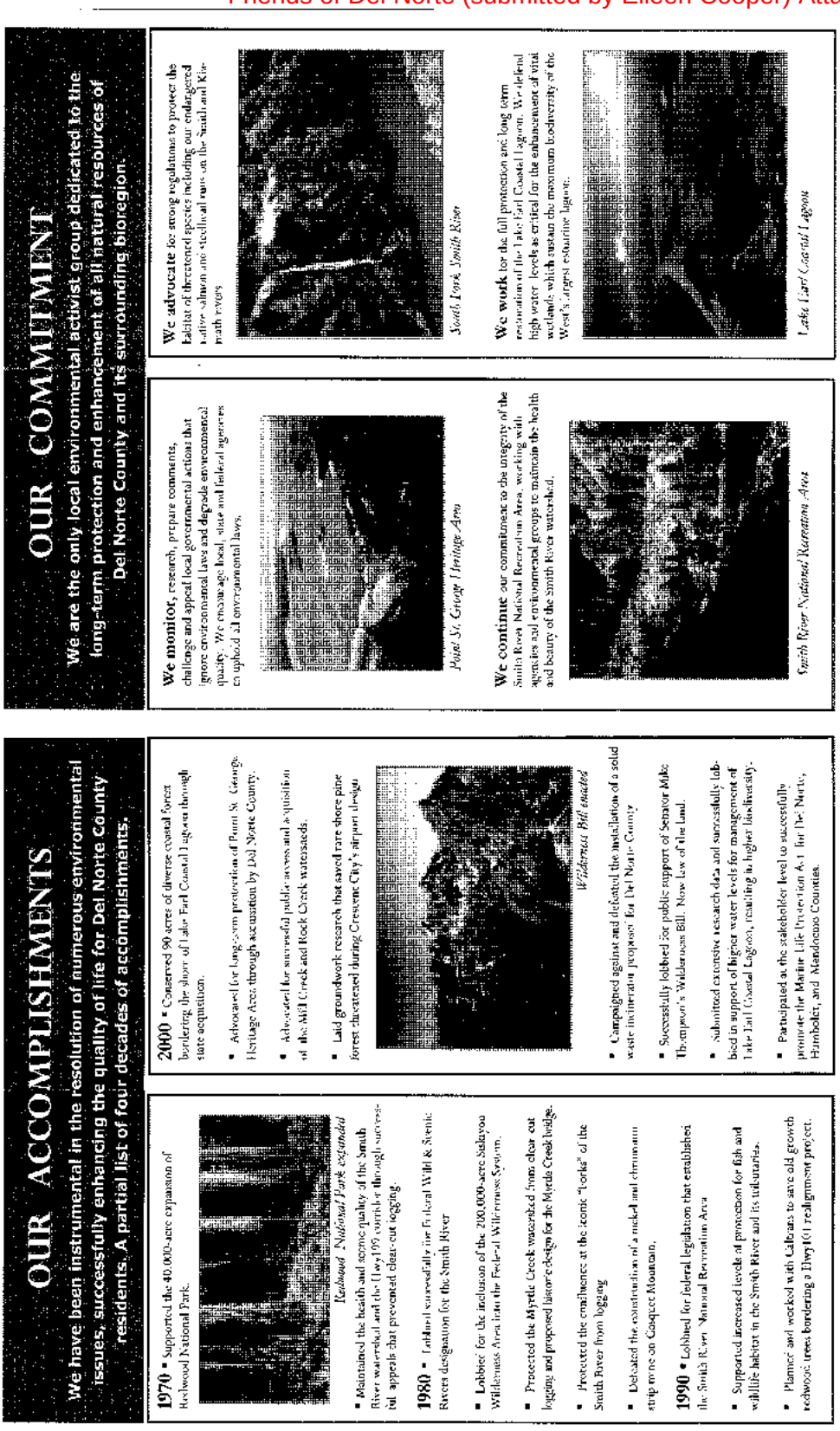
Friends of Del Norte
P.O. Box 229
Gasquet, CA 95543
(707) 487-4300

There are 2 ways you can support the Friends. As a member and/or by giving a tax deductible donation

( ) Check here for membership. Make your check payable to Friends of Del Norte.

( ) Check here for tax deductible donation. Make your check payable to FDN Conservation Council.

Friends of Del Norte (submitted by Eileen Cooper) Attachment 23



OUR ACCOMPLISHMENTS

We have been instrumental in the resolution of numerous environmental issues, successfully enhancing the quality of life for Del Norte County residents. A partial list of four decades of accomplishments.

1970 • Supported the 40,000-acre expansion of Redwood National Park.

Redwood National Park expanded

- Maintained the health and scenic quality of the Smith River watershed and the Hwy 199 corridor through successful appeals that prevented clear-cut logging.

1980 • Lobbied successfully for Federal Wild & Scenic Rivers designation for the Smith River

- Lobbied for the inclusion of the 200,000-acre Siskiyou Wilderness Area into the Federal Wilderness System.
- Protected the Myrtle Creek watershed from clear cut logging and proposed historic design for the Myrtle Creek bridge.
- Protected the cruciferous at the iconic "forks" of the Smith River from logging
- Dedicated the construction of a rocket and chromium ship motor on Gasquet Mountain.

1990 • Lobbied for federal legislation that established the Smith River National Recreation Area

- Supported increased levels of protection for fish and wildlife habitat in the Smith River and its tributaries.
- Planned and worked with Caltrans to save old growth redwood trees bordering a Hwy101 realignment project.

2000 • Conserved 90 acres of diverse coastal forest bordering the shore of Lake Earl Coastal Lagoon through state acquisition.

- Advocated for long-term protection of Point St. George Heritage Area through acquisition by Del Norte County.
- Advocated for successful public access and acquisition of the Mill Creek and Rock Creek watersheds.
- Laid groundwork research that saved rare shore pine forest threatened during Crescent City's airport design

Wilderness Bill enacted

- Campaigned against and defeated the installation of a solid waste incineration proposal for Del Norte County
- Successfully lobbied for public support of Senator Mike Thompson's Wilderness Bill. Now law of the land.
- Submitted extensive research data and successfully lobbied in support of higher water levels for management of Lake Earl Coastal Lagoon, resulting in higher biodiversity.
- Participated as the stakeholder level to successfully promote the Marine Life Protection Act for the North, Humboldt, and Mendocino Counties.

OUR COMMITMENT

We are the only local environmental activist group dedicated to the long-term protection and enhancement of all natural resources of Del Norte County and its surrounding bioregion.

We advocate for strong regulations to protect the habitat of threatened species including our endangered native salmon and steelhead runs on the South and Klamath rivers

South Fork Smith River

We work for the full protection and long term restoration of the Lake Earl Coastal Lagoon. We defend high water levels as critical for the enhancement of vital wetlands which sustain the maximum biodiversity of the West's largest estuarine lagoon.

Lake Earl Coastal Lagoon

We monitor, research, prepare comments, challenge and appeal local governmental actions that ignore environmental laws and degrade environmental quality. We encourage local, state and federal agencies to uphold all environmental laws.

Point St. George Heritage Area

We continue our commitment to the integrity of the Smith River National Recreation Area, working with agencies and environmental groups to maintain the health and beauty of the Smith River watershed.

Smith River National Recreation Area

Responses to Friends of Del Norte (Eileen Cooper)

Response to Comment 1 through 23

The Department does not dispute the facts brought forth in these comments, and thus will not discuss them individually here. However, the Department reasoned to a different conclusion.

Frost Free Coastal Route:

This letter lays out an argument for additional impacts associated with diversion of traffic from I5 to a US 199/US 101 route due to winter weather closures at Siskiyou Pass. This phenomena likely already occurs for CA-Legal vehicles. However, this detour would add approximately 50-60 miles and approximately 2 hours of drive time to a trip between Oregon and the Bay Area. The additional miles are committing the truck driver to the narrow winding route of US 101 and US 199, a two lane conventional highway with occasional passing lanes, versus I 5 which is a Principal Arterial/Interstate four-lane freeway. The I 5 route will still be the preferable route for through traffic. The Department does not anticipate major changes in national transportation routes for through traffic between California's Bay Area and Oregon.

There is the potential for diversion of through traffic due to winter weather, road closures and chain restrictions. In addition to Siskiyou Pass, there are other passes I 5 north of Grants Pass which are subject to winter conditions. If a true frost free route is pursued it is likely that truck driver's will consider bypassing all the passes and heading to the coast from Eugene along ORE 126, then taking US 101, which would not increase traffic on US 199/SR 197. Thus if drivers were to bypass winter weather on a coastal route, US 199 would not be the most favorable bypass route. Even so, the additional traffic associated with a winter weather diversion would be an occasional event, occurring only a few times a year. While traffic levels would be increased during the event, based on approximations from Comment 14, this would only lead to an annual increase of approximately 1% above the current traffic levels. Overall maintenance costs would not increase based on a 1% increase in annual traffic.

Pavement Management System and Maintenance:

The comment also expresses concern that the Department is not meeting the standards of the Pavement Management System and that there will be additional maintenance costs associated with increased truck traffic on the roadway. The Department does not follow the Pavement Management System, but follows a similar system to calculate the structural and materials parameters of the roadway. The current specifications allow for a higher volume of traffic than what is estimated based on the traffic study.

Mara Feeney Comment Letter:

These comments stated concerns about the truck traffic analysis, economic analysis, safety, recreational resources and cumulative impacts. None of the comments in the letter were comments on the RDEIR/SEA. Please see Group Response #9 for traffic study errors, see Group Response #8 for safety concerns, see Group Response #5 for concerns about the Wild and Scenic River, see Group Response #2 for effects to tourism, and see Group Response #1 for a discussion of the purpose and need.

No revisions to the Draft EIR/EA were necessary.

Other Comments:
For safety concerns please see Group Response #8. It is difficult to make estimates about future collision rates along the route based on potential traffic volumes and road conditions (winter weather I 5 diversion). Any forecasts on collision rates would be speculative in nature.

Response to Comment 24
This comment states that the Traffic Study failed to survey through traffic for the route. The Department does not anticipate that the project would change major shipping routes, and that I 5 will remain the major north-south shipping route.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 25
This comment states concern for maintenance costs and design standards. The Department does not anticipate additional maintenance costs, see Form Letter 2012 #1 Comment #12. For concerns about traffic safety and design see both Group Response #8 and the response to the EPIC 2012 Smith Letter.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 26
This comment states concern for winter safety, please see the response to Form Letter 2012 #1 Comment #4.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 27
This comment states concern for safety, please see Group Response #8.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 28
This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #6.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 29
This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #5.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 30
This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #9.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 31
This comment states concern for safety, please see Group Response #8 and the response to Form Letter 2012 #1 Comment #5.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 32
This comment states concern for safety, please see Group Response #8.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 33
This comment states concern for the design exceptions. Please see the response to the EPIC 2012 Smith Letter.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 34
This comment states concern for geologic stability. Please see Group Response #10.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 35
This comment states concern for communities in Oregon. The DEIR/EA and RDEIR/EAS are both NEPA documents available to communities in Oregon along SR 199.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 36 and 37
This comment states concern for spills in the river. Please see the response to Vern Powers Comment #1.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 38
This comment states that pavement designs should consider impacts to trees. The Department is aware of the adverse impacts of roads and compaction on tree root systems. The Department has minimized impacts to tree roots where possible, as described in the PRDEIR/SEA and updated in the FEIR/EA Section 2.3.1.3.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 39
This comment states that the department failed to adequately disclose increased traffic levels to trustee agencies. The Department used the traffic volumes estimated in the 2010 Fehr and Peers

study as well as Department expertise to develop estimates of future traffic levels. The Department believes these estimates to be scientific and reasonable. Please see Group Response #9.

No revisions to the Draft EIR/EA were necessary.

Response to Comment 40

This comment summarizes the arguments brought forth in the body of the letter. The Department does not anticipate major impacts from induced traffic from I 5, see the response to comments 1-23.

No revisions to the Draft EIR/EA were necessary.

4.3 Individuals

Following is the index to 21 individual written comments. All written comments submitted by the following individuals can be found in alphabetical order by last name.

- Bertrand, Wendy
- Bowman, Bill
- Bruce, Donald
- Bruce, Doreen
- Campbell, Bruce
- Cipolla, James
- Estefan, Lars
- Evermoore, Eileen
- Harestad, Patrick
- Hughes, Gary
- Hunt, Ann
- Johansen, Ralph
- Lips, Stu
- Lotus, Trisha (10/12/2012)
- Lotus, Trisha (10/25/2010)
- Moses, Todd
- Pappalardo, Sue
- Tays, Kimberly
- Zegart, Margaret Kettunen
- Zuehlke, John

Bertrand, Wendy

Comments to Caltrans for Recirculated Draft EIR/EA for construction projects on Hwy 199/197 specifically to encourage STAA truck access.

October 22, 2012 From:
Wendy Bertrand, Gasquet Resident
eyeonplace@gmail.com

Attention: Jason Meyer jason_meyer@dot.ca.gov
California Department of Transportation,
North Region Environmental, Unit E1 P.O. Box 3700 Eureka, Ca. 95502-3700

I am speaking as a citizen of California concerned about Caltrans spending increasing large truck traffic, and lack of quality environmental impact reports. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our heart felt and pertinent concerns. 1

The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County, however, STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit, particularly in winter. 2 3

The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public and the decision makers into believing that there will be insignificant increases in traffic (See an estimate re this increase at bottom of page) when there will be many significant impacts as stated below:

1. Safety hazards will greatly increase, particularly from the significant increased truck traffic during the very hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197. 4

2. Even with the proposed safety improvements, the rural winding canyon road following the Wild and Scenic Smith River remains a geography that is not appropriate for large trucks and the moving of oversized goods.

3. In this plan, safety is incomplete and therefore inadequate, because no improvements for Hwy 199 between Hiouchi and Gasquet which has the highest accident rate is addressed. 5

4. Speed management with lower speed limits is not addressed, yet many safety issues can be improved with lower speeds. This plan does not include speed management but needs to. 6

5. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway they should be addressed in comparison to the project being studied. 7

1

Bertrand, Wendy

Comments to Caltrans for Recirculated Draft EIR/EA for construction projects on Hwy 199/197 specifically to encourage STAA truck access.

6. Hwys 199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and many other animals that are part of the ecology of the area including the only drinking water source for the human population Crescent City and most of Del Norte County. 8

7. The DEIR/EA has failed to resolve the project impact to visitors to the National Recreation Area, the Redwood National & State Parks and local businesses who will be unnecessarily endangered by traffic especially during the winter fishing season, and summer tourist season. Local residents, using these roads everyday, will suffer the most frequent and constant increased traffic hazard risks and the loss to the quality of rural life with increased noise, dirt and congestion. 9 10

8. Specific significant increased hazards will impact the many current residences with driveways directly accessing onto Hwy 197 due to increased truck traffic that will come from making changes that encourage STTA trucks and not quantitatively accounting for this in the DEIR/EA.

9. The DEIR/EA has failed to engage the communities along the Hwy 199/197 project boundaries as well as the communities in Oregon on the same route in spite of significant and planned negative impacts to their well being and concerns. 11

10. Maintenance of the existing infrastructure is the currently adopted California Transportation Policy Priority, so this project with its capital improvement is out of step with priorities and should be reviewed at higher levels and in the DEIR/EA. Significant acceleration in maintenance projects will also substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River and should be reviewed for accumulative environmental and cultural impacts. 12 13

11. There will be a significant, impractical and long term economic and social burden and endangerment of the public welfare in trying to enlarge Hwy 199, because heavy truck traffic combined with the geologically unstable Hwy 101 (Last Chance Grade) has cumulative impacts that have been ignored by Caltrans project developers and the DEIR/EA when it should be addressed fully and fairly to the people of California. 14

Sincerely requesting your attention to the above points when redoing this DEIR/EA

Wendy Bertrand
695 Gasquet Flat Road, Gasquet California 95543

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed. 15

2

Response to Wendy Bertrand

Response to Comment 1
This is not a comment on the RDEIR/EA.

Response to Comment 2
This comment states concern for the fiscal costs of the project, please see Grouped Response #2 for a discussion on costs and benefits. This comment states that there is negligible local economic benefit from the project. Please see Group Response #1 and #2 for discussions of the purpose and need, and the costs vs. benefits of the project.

Response to Comment 3
This comment states concern for increased traffic due to winter weather closures on I5 at Siskiyou Pass. While there may temporary spikes in traffic when the pass closes, these temporary high traffic periods will not lead to other significant impacts. This concern was addressed in detail in the response to Friends of Del Norte 2012 comment.

Response to Comment 4
This comment states concern for safety hazards associated with winter conditions, increased traffic (due to I5 winter weather closures), and larger trucks. The 197/199 route was evaluated for STAA truck access, and this project was initiated based on geometric deficiencies in the roadway. Upon completion of this project, STAA trucks will be able to safely navigate the route without crossing the center lane. Please see the response to EPIC/Smith Comment for a full discussion of the safety of large trucks along the route. Please see Group Response #8 for concerns about safety, and Friends of Del Norte 2012 for a discussion of the safety implications of increased traffic during diversions.

Response to Comment 5
This comments states concern over the lack of improvements between Hiouchi and Gasquet. Please see Grouped Response #8, and EPIC response #15 for discussions of how sites were selected for the project.

Response to Comment 6
This comment states speed management should be used. Please see Group Response #8 for a discussion of how speed limits are set.

Response to Comment 7
This comment states that collision rates on US 101 are higher than state averages. This is outside the project area, but the project does have the potential to affect travel volumes on US 101. The Department acknowledges the fact that the actual collision rates are higher than the statewide average collision rates south of Crescent City. This segment of highway 101 traverses through Redwood National and State Parks, coastal area, and a historic landscape district. The area is an environmentally sensitive and resource rich area, and thus creates numerous challenges for standard geometric improvements.

The Department has implemented a number of non-conventional strategies to reduce collisions and minimize impact on the areas resources. This balance of safety and resources has been

challenging. Although there has been a reduction in collisions, we strive to further decrease the number of collisions in the area.

Response to Comment 8

This comment states there will be potential water quality issues. Please see DEIR/EA and FEIR/EA Section 2.2.2 for water quality concerns. The project is not anticipated to increase the potential for spills. Please see Vern Powers Response 1 for concerns about spills.

Response to Comment 9

This comment states that there are unresolved issues with tourism. The Department consulted with the National Park Service, County Parks and the Forest Service for potential impacts to recreational resources. Please see FEIR/EA Section 4.3 for 4(f) consultations and concurrence letters. Potential effects were determined to be de minimus or temporary occupancy for all project locations.

Response to Comment 10

This comment states concern for public safety on SR 197 due to increased truck traffic. Please see Group Response #8 for a discussion of safety.

Response to Comment 11

This comment states concern for community cohesiveness and safety due to increased traffic and states that the DEIR/EA failed to engage the communities. Effects to communities were analyzed in the DEIR/EA 2.1.3 and determined to be less than substantial. Please see EPIC response #8 for additional discussion on community impacts. There was a public meeting on April 17, 2008 in Crescent City. There was an official Notice of Preparation and scoping meeting in 2008, a public hearing 2010 during the circulation of the full DEIR/EA, notices of availability were published in local papers for these meetings and the circulation of the DEIR/EA and Recirculated DEIR/EA. The department has followed the CEQA guidelines for notification and engagement of the public throughout this process.

Response to Comment 12

This comment states that the California Transportation Policy Priority is to maintain existing infrastructure rather than construct new projects. Please see Group Response #1 and #2 for discussions of purpose and need, and cost vs. benefits of the project.

Response to Comment 13

This comment states that there will be an increase in maintenance projects that will impact riparian vegetation. Caltrans does not anticipate an increase in maintenance due to this project. Maintenance projects to not generally cause additional impacts to riparian vegetation. This project is not anticipated to have effects on riparian vegetation other than the direct removal described in the DEIR/EA and FEIR/EA 2.3.1.

Response to Comment 14

This comment states that there will be an economic burden to maintain US 199 and US 101 due to the increased impacts from increased heavy truck traffic. The weight limit on STAA trucks is the same as the current California Legal trucks. The additional traffic is not anticipated to be

substantial. Thus the increased maintenance costs associated with the implementation of this project and opening the route to STAA trucks is not anticipated to be substantial.

Response to Comment 15

This comment states concern over the increased traffic volume due to diversion of traffic due to the closure of I5 at Siskiyou Summit. While there may a temporary increase in traffic volume during the event, the overall increase in annual volume will not be significant. Please see response to Friends of Del Norte 2012 response to comments 1-23 for a full discussion.

Bowman, Bill

260 Monument Drive
Crescent City, CA 95531
bowman269@charter.net
October 24, 2012

Rec'd 10-29-12

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

Dear Mr. Meyer

I live on Hwy 199 in Hiouchi. The picture below is at the top of my driveway as I enter Hwy 199. It is already extremely dangerous to enter or leave my driveway. If the planned STAA "improvements" are implemented, then this situation will go from bad to aweful! 1

That's not the only problem I see. The Hwy Patrol found the main cause of most accidents on Hwy 199 is because of SPEED. To straighten out a few corners and allow more and larger trucks on this road is only to invite more accidents. And just in case it has slipped your attention, there is a wild and scenic river that parallels Hwy 199 through most of the most dangerous areas of the road. 2

And WHY would you want to do this? 3

- There is limited or **no economic** benefit for Crescent City I can see. Your report even said so!
- It will tie up the road for years with for construction.
- During winter, it could invite hundreds of STAA trucks stuck on the high pass near Ashland to take a detour over to Hwy 101 using the Hwy 199 corridor. Can you imagine what that would do to our little community!!!!

Please don't waste precious tax dollars on something nobody wants!

Bill Bowman

Bill Bowman

Response to Bill Bowman

Response to Comment 1

This comment states concern for driveway access to US 199 near Hiouchi. The increase in traffic is not anticipated to significantly affect safety, please see Group Response #8.

Response to Comment 2

This comment states speed is the primary safety concern in this area. Please see Group Response #8 for a discussion of safety and setting speed limits. Please see Group Response #5 for a discussion of Wild and Scenic Rivers.

Response to Comment 3

This comment questions the purpose and need, construction time and potential for induced traffic from I 5 during winter weather. Please see Group Response #1 for a discussion of the purpose and need. Please see Groups Response #2 for a discussion of the costs and benefits, particularly disturbance from construction. Please see the response to Friends of Del Norte 2012 for a discussion of the potential effects of induced traffic from I 5 during winter weather.

Bruce, Donald

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

November 3, 2012

Received 11-6-12

Jason Meyer
California Department of Transportation
North Region Environmental Unit 1
P. O. Box 3700
Eureka, CA 95502

Comments on the Recalculated Draft EIR Document dated September 2012 for the 197/199 Safe STAA Access Project

Dear Jason Meyer:

1 I support the no build alternative to the CalTrans 197/199 STAA Access Project The project will not make 197/199 safe enough for STAA trucks due to the long wheelbase of the truck tractor. Too many additional tight curves and short sight distances would remain even after the proposed project is completed

I note that none of my previous concerns were addressed in the Recirculated Draft report. Therefore, I am restating some of them here.

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

Bruce, Donald

The DEIR of June 2010 did not address the concerns in a letter to Kimberly Hayler dated September 16, 2008 regarding the following: How residents on North Bank Road (HWY 197) will be able to safely ingress and egress 197 from their driveways. And how will the road accommodate pedestrians, bicycles, and school buses with STAA trucks moving swiftly through. Additionally, no guardrails are being placed on the section of 197 that drops straight to the river with no shoulders on either side. It is undercut bank and is questionable whether it can withstand the weight of STAA trucks. At the April 2008 CalTrans public meeting in Crescent City, Kevin Church, Project Manager, stated there would be no reduction of the speed limit anywhere upon completion of the project. A study on "sight distances" also needs to be done more thoroughly on 197 and 199, as there are many areas with very limited visibility. 3

The accident rate between Hiouchi and Gasquet is very high. That information was submitted with the September 16, 2008 letter to Kimberly Hayer. Why was this not taken into consideration and discussed in the DEIR of June 2010? What mitigating factors are present to ignore this? 4

The DEIR of June 2010 also did not address specifics on how emergency vehicles will be accommodated while the construction phase is taking place. The heavy traffic on 199 will result in long lines during construction making it a serious impediment for emergency vehicles. Also, what is the plan concerning the transportation of high security inmates from Pelican Bay State Prison? Level 4 and SHU inmates (the highest level of inmates in the State) are routinely transported to the Rogue Valley for medical appointments. Also the California Department of Corrections uses 199 to transport busloads of inmates to and from Pelican Bay State Prison from other California prisons. Will this practice continue? If so, what additional security measures will be implemented to protect the public during the construction phase? 5

In addition, the DEIR of 2010 does not address the effect the construction phase will have on tourist dollars to Del Norte County, which could last up to five years and possibly longer. The extensive length of time of construction as well as delays and closure periods may result in many people avoiding the area. Many people from the Rouge Valley that routinely visit Del Norte County may curtail their visits resulting in a loss of revenue. Why hasn't this been considered, especially when the reason touted for STAA trucks is for an economic benefit? 6

Another area of concern is the impact of increased STAA trucks using this route when the Siskiyou Summit has snowstorms. Many may take the "coastal route" to avoid the hazardous mountain conditions and to avoid "chaining up." 7

Lastly, a review of a supporting document used in the DEIR titled "Traffic Analysis Report," which recorded the responses of businesses, revealed that only three claimed any significant benefit to having a STAA route on 197/199. It appears this is a tax-subsidized project for a few select businesses. If not illegal, it is certainly inappropriate given that there is no compelling reason to have a STAA route on highways 197 or 199. 8

None of these concerns has been addressed. 9

Respectfully submitted,

Donald Bruce

Response to Donald Bruce

Response to Comment 1
This comment states support for the no project alternative and states concern over safety of STAA trucks on the route. Please see the response to EPIC/Smith letter for concerns over roadway geometry and safety of the route.

Response to Comment 2
This comment was addressed in Donald Bruce 2010 Comment 1.

Response to Comment 3
This comment was addressed in Donald Bruce 2010 Comment 2.

Response to Comment 4
This comment was addressed in Donald Bruce 2010 Comment 3.

Response to Comment 5
This comment was addressed in Donald Bruce 2010 Comment 4.

Response to Comment 6
This comment was addressed in Donald Bruce 2010 Comment 5.

Response to Comment 7
This comment states concern for increased traffic due to I 5 closing. Please see the response to Friends of Del Norte 2012.

Response to Comment 8
This comment was addressed in Donald Bruce 2010 Comment 6.

Bruce, Doreen

Doreen Bruce
550 Sierra Wood Road
Gasquet, CA 95543

Rec'd 11-6-12

Jason Meyer
California Department of Transportation
North Region Environmental Unit E1
PO Box 3700
Eureka CA 95502

November 3, 2012

COMMENTS ON THE SEPTEMBER 2012 RECIRCULATED DRAFT EIR/EA FOR THE 197/199 STAA TRUCK ACCESS PROJECT

Dear Jason Meyer,

I support the no build alternative to the CalTrans Hwy 199/197 STAA Access Project. The project has significant and cumulative negative impacts on the environment, and public health and safety. The DEIR/EA failed to identify and evaluate the cumulative impacts of increased STAA traffic diverted around the Siskiyou Summit in winter snow conditions, and it did not identify and evaluate the cumulative impacts of creating a permanent STAA truck loop over Hwy 199/197 and Hwy 101 south. The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic. The potential of toxic, illegal, unregulated, or non inspected materials hauled on STAA trucks traveling through Del Norte County, via this truck loop in bad weather and in route diversions, are of great concern. Present monitoring and response to commercial truck compliance, vehicular infractions and accidents already stretches the California Highway Patrol's resources too thin on Hwy 199/197. Also, the Agricultural Inspection Station at the Hwy 199 California/Oregon border is closed most of the time due to budget cuts, and whatever monitoring support they provide is very limited. 1

The DEIR/EA failed to address the concerns and questions I submitted during prior public comment periods. (Please refer to the enclosed letters to Kim Hayler dated August 20, 2010, September 17, 2008, September 16, 2008, and Attachments: (1) 199/197 STAA Truck Improvements, (1A) Collision date from 1/1/1998 to 12/31/2008, (1B) Mile Post Location Reference Sheet, (2) Changes Necessary for Public Safety If Highways 199 and 197 Becomes a STAA Truck Route. I am resubmitting all of these documents for inclusion into the Comments to CalTrans for RECIRCULATED Draft EIR/EA FOR STAA Truck access on Hwy 199/197. 2

Sincerely,

Doreen Bruce

Doreen Bruce

Bruce, Doreen

Doreen Bruce
550 SierraWood Road
Gasquet, CA 95543

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

August 20, 2010

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

3

Dear Kim Hayler,

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

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

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

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

Bruce, Doreen

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

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

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

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

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

3 cont.

Bruce, Doreen

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

3 cont.

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

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

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

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

Sincerely,

Doreen Bruce

Doreen Bruce

Bruce, Doreen

Donald and Doreen Bruce
550 Sierra Wood Road
Gasquet, CA 95543
(707) 457-3078

September 17, 2008

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

Regarding the proposed 197/199 Safe STAA Access Project

Dear Kim Hayler,

My wife and I are residents of Gasquet, California in Del Norte County and want to inform you we support the no build alternative number 2 as we are opposed to the proposed implementation of a STAA truck route on Highways 199/197 in Del Norte County. We are not opposed to improvements on Hwy's 199 and 197, but believe the proposed road widening projects by Caltrans would not transform the Hwy's into suitable STAA routes. Much of Hwy's 199/197 will remain narrow with no shoulders and there are many additional numerous tight curves. As you probably know, STAA trucks have longer wheelbases and need more room to maneuver. They can easily "over track" into other lanes on sharp curves. Other parts of the Hwy's 199/197 have no shoulders with a rock cliff or mountain on one side and the pristine Smith River on the other. The Caltrans study dated May of 2007 does not address any areas other than the few proposed project sites. One proposed widening site (mile post 20.50) discussed in the Caltrans study states in part, "Widening will require excavating an approximately 100-foot-high slope face. This slope is comprised of unconsolidated boulders, coble and dirt. Excavation of the slope face will likely result in future perennial rock-fall and shedding, and is not recommended by Geotechnical and Maintenance staff."

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We have talked to many people who are not in favor of having Hwy's 199/197 STAA accessible. Residents on 197 are particularly concerned about accessing 197 from their residences as the visibility is very limited in most areas due to the curvy nature of the road. My wife and I visited some of these homes while gathering signatures for the petition and it was indeed very precarious and scary entering onto 197 from the driveways. Caltrans has not addressed this issue at all. In fact, at the April 17 public hearing in Crescent City, project manager Kevin Church, when questioned about this, stated there was no plan to reduce the 55 mile per hour speed limit on 197 or to do anything else to mitigate the increased danger from more and larger trucks. School buses, R.V's, bicycles, pedestrians, and local residents use this rural road. Also, Brookings, Oregon residents use this route to access the Rogue Valley and I-5. Adding STAA trucks would certainly be a dangerous mix.

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The residents we talked to in Gasquet have the same concerns. Almost everyone agrees that an alternate route for STAA trucks is the only solution that makes sense as there far too many places on Hwy 199 that realistically cannot be altered to make it a safe route for residents and tourists. Yes, by widening some curves it may legally meet the minimal specifications for a STAA route, but 197 and 199 will remain incompatible for longer trucks. Additionally, many don't believe that a STAA truck route is compatible with the wild and scenic designation of the Smith River corridor. Others have further pointed out

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Bruce, Doreen

that Gasquet gets it's drinking water from the junction of the middle fork and north fork and Crescent City from the lower river. Hiouchi and the community of Smith River also use the Smith river as their drinking source. Increased truck traffic can only increase the odds that a spill of hazardous substances could end up in our drinking water. 11

The proposed Caltrans project appears to be for the benefit of the few businesses (Lily Growers Association, Hambro Forest Products, Dahlstrom, and the Watt Bulb Farm) cited in the "action plan" dated April 25, 2007 by the Del Norte Local Transportation Commission (DNLTC) titled *"Achieving STAA Route Status for the highway 197/199 corridor."* (Page 18 of the document under the heading "Impediments to growth) Also stated in this section is that "the growth of retail business is similarly impeded." "Home Depot opened a store in Crescent City in 2006 – along with Wal-Mart, the only big box store in the county – but it's trucks must re-load their cargo in Oregon from 70 to 45 foot trailers prior to traveling through Del Norte County." It's interesting to note that Home Depot and Wal-Mart chose to locate in Crescent City without a STAA route over 199/197. That doesn't make it appear that a lack of a STAA route over 199/197 impeded growth. (Wal-Mart does have STAA access from 101 north) Also, a price comparison between Wal-Mart, Crescent City, and STAA accessible Wal-Mart in Cottage Grove, Oregon (directly on I-5 20 miles south of Eugene, Oregon) shows that prices are identical for almost all items. (See enclosed *Report on Price Comparison by Two Residents of Del Norte County March 23, 2008).* The DNLTC study did not provide any studies or documentation that an STAA route would benefit the average citizen of Del Norte County. Nor did Caltrans or anyone else at the April 17 and September 16 Caltrans public meeting in Crescent City provide any documentation or figures that an STAA route on 197/199 would benefit the citizens of this county. Many we have talked believe it would actually hurt tourism in the long run because the reason people come here is for the beauty of the area, not to drive with huge trucks. 12 13 14

We have lived in Del Norte County for 20 years now and have observed steady slow growth. For many, that is the appeal of this county. Crescent City will no doubt continue to grow as it is one of the last towns of its size on the western coast that hasn't had it's quality of life diminished by urban sprawl. Contrary to what a few special interests in this county are saying, an STAA route, or the absence of, on 197/199 will not make or break the county. Please keep highways 197 and 199 safe for residents, tourists, school buses, and pedestrians and for the pristine Smith River. 15

Sincerely,

Donald Bruce

Doreen Bruce

Donald and Doreen Bruce

Bruce, Doreen

Donald and Doreen Bruce
550 Sierra Wood Road
Gasquet, CA 95543
(707) 457-3078

September 16, 2008

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

PROPOSED 197/199 SAFE STAA ACCESS

Dear Kim Hayler:

The proposed Caltrans 197/199 project has significant and cumulative negative impacts on the environment, and public health and safety. The following studies need to be completed to determine the feasibility of proceeding with this project: 16

Highway 197 has over 70 residential driveways and intersecting roads, which have very limited visibility and blind spots. (These areas are not within the proposed Ruby 1 and 2 project sites) 17
A study needs to be done to demonstrate how safe ingress and egress for the residents, school buses, pedestrians and bicycles can be accomplished.

A review of traffic collisions using statistics from the California Highway Patrol (Crescent City Area) from Jan. 1998 to Dec. 2008, reveals that **the majority of accidents on Highway 199 occur between the Hiouchi Bridge and Gasquet.** Studying the CHP report showed at least 390 accidents above and below the proposed Caltrans project area on Highway 199. (Hwy 197 was not counted for this report although there are additional accident numbers on that route) There were at least 300 accidents from Mile Post (MP) 4.5 at the Hiouchi Bridge to MP 20. There were approximately 203 accidents between MP 7 and MP 12 alone. From MP 20 to MP 27, in which small portions are proposed to be widened, in the project, approximately 201 accidents were noted in the statistics by the CHP. So, many of these accidents were probably not in the proposed project area as the project does not cover the entire road between MP 20 to MP 27. **In addition, a review of the CHP accident statistics reveals 2 accident deaths occurred within the proposed project area between Jan. 1998 and Dec. 2008 while 17 occurred outside the project area. In addition, the CHP report revealed that the number one cause of accidents on Hwy 199 was excessive speed.** Any prudent and reasonable person would understand that increased truck traffic, especially larger trucks, would exacerbate the hazards resulting in more accidents. 18
A study needs to be done to determine solutions on how to mitigate accidents on the vast majority of Hwy 199 that is not being "fixed" or addressed. 19

The Smith River will be adversely affected by the cumulative impact of increased truck traffic, which will cause additional contaminants – oil, diesel, tire, rubber antifreeze and other leaking contaminants and or toxic substances – to run off the road into the Smith River. ***A study needs to be done to ascertain the harmful effects on the health of the fish, other aquatic species, wildlife, plants, and human use and consumption of the river water.*** 20

Bruce, Doreen

The Smith River is the drinking source for Gasquet, Hiouchi, Crescent City, and Smith River. A study needs to reveal how these negative impacts will be eliminated or mitigated to the point of having no significant affect. 21

A study needs to be done to demonstrate how toxic substances can be transported safely along the river with a comprehensive plan to monitor and enforce the safe transportation of toxic substances. In addition a study needs to outline a spill response plan and how it will be financed. 22

The proposed project will span several years – therefore –
A disaster evacuation plan needs to be prepared detailing specifics on how the plan would be implemented, who is responsible for carrying out the plan, how the public will be informed and educated about the process, agencies involved, etc., and how the plan will be financed. This will require a specific study to address this issue. 23

Is the roadway, and the remaining bridges on Highway 199 and 197 currently built to withstand the increased weight load of STAA trucks? (Per page 2 of the "Notice of Preparation" by Caltrans) "The existing roadway of US 199 within the project limits was built in the early 1920's." 24
Heavier trucks will put greater stress and wear on the roads, bridges, and increase erosion into the river. A study needs to be done to determine these effects on future maintenance, repair, and construction costs, how it will be financed and who will pay for them. 25

Years of road construction, ***delays, congestion, and hassles along Highways 199 and 197 will detract from the wild and scenic appeal and desirability for tourists to visit Del Norte County. Additionally, once these highways are made into STAA truck routes, tourists will have to negotiate these roads with larger, heavier, and longer trucks will diminish visibility, enjoyment, and change the rural driving experience. A study examining these factors and how they negatively impact tourism needs to be conducted.*** 26

Crescent City already has STAA truck route access from Highway 101 North and South. Prices of basic food and household commodities are comparable to other towns of similar size and demographics (see "A Report on Price Comparisons by two Residents of Del Norte County", March 23, 2008). The Action Plan done by the Del Norte Local Transportation Committee, dated April 2007, inadequately addressed the economic benefit to the average resident of Del Norte County. Only a few businesses such as Hambro Forest Products, and Dahlstrom have publically supported the STAA project. Del Norte County has experienced an appreciable growth rate without having Highways 199 and 197 as STAA truck routes. 27
A study needs to be done showing specifically how, and who (residents, consumers, and businesses), and to what extent the economic advantage will benefit residents in Crescent City, Hiouchi, Gasquet, Klamath, and Smith River. 28

Sincerely,

Donald Bruce
Doreen Bruce

Donald and Doreen Bruce

Bruce, Doreen

197/199 STAA TRUCK IMPROVEMENTS

A review of the accident statistics provided by the California Highway Department for the dates **1/1/1998 to 12/31/2008** reveals the following:

The total number of accidents was 591.
Note: The actual total will be higher. Some were not counted yet as the actual location (mile post) was not known by this writer at the time of this report. (Example: Cable Rock Road; these will be added later when the mile post location is determined). This report covers the area from the Hiouchi Bridge on Highway 199 up to the Collier tunnel. It does not include Highway 197.

The total number of accidents that fell within the proposed STAA Truck Improvement areas was 49.

The number of accidents OUTSIDE the proposed STAA Truck Improvement areas was 542. This number will be slightly higher when other cross street mile post locations are identified.

The obvious **conclusion is that the STAA Truck improvements will not be helping the areas where the vast majority of accidents happen.**

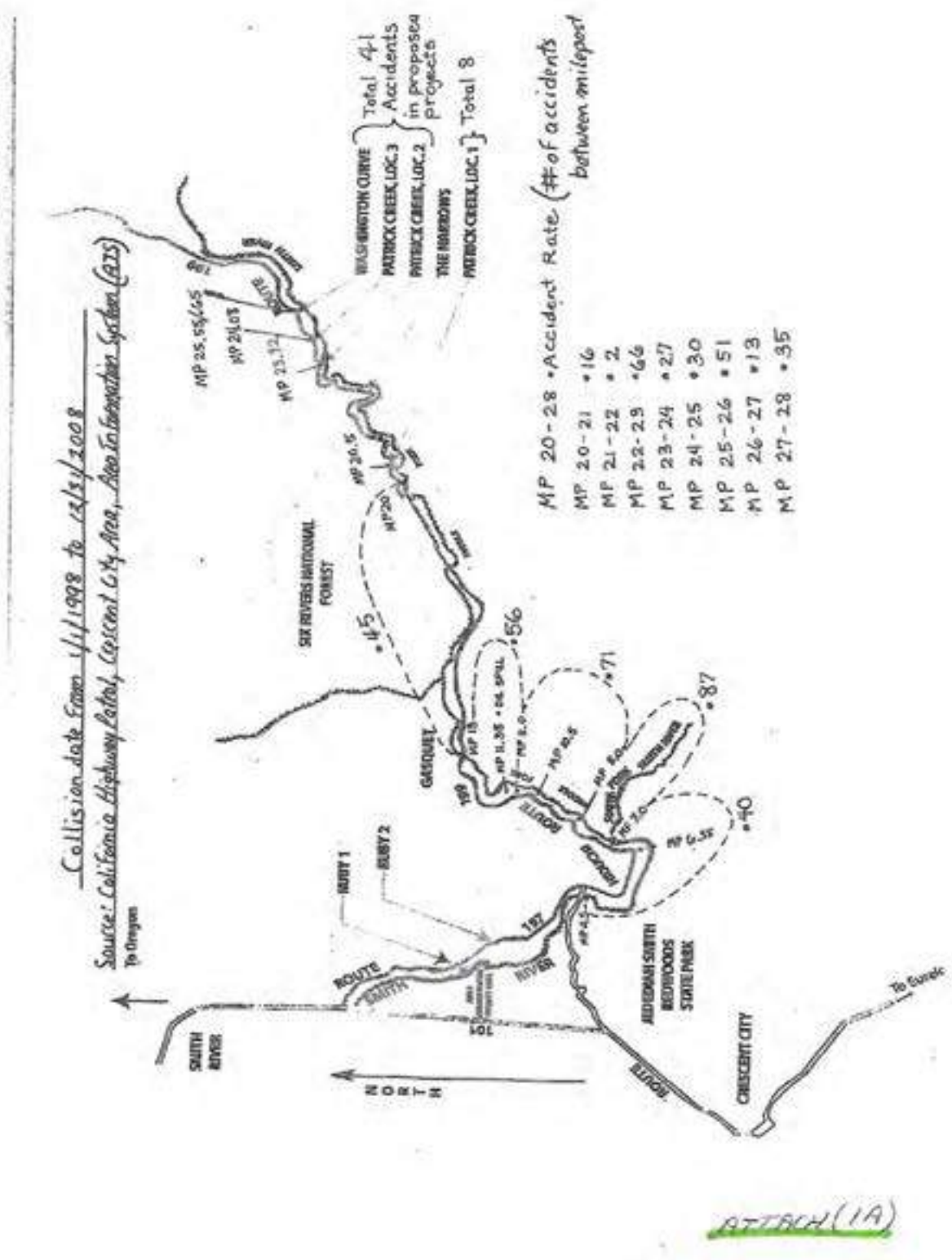
Further review of the California Highway Department accident report from 1998 to 2008 reveals **the top six causes of accidents on highway 199 were as follows:**

247 accidents were attributed to SPEEDING
110 accidents were attributed to UNSAFE TURNING MOVEMENT
74 accidents were attributed to DRIVING TO THE LEFT OF SOLID DOUBLE LINE
62 accidents were attributed to reasons OTHER THAN DRIVER
57 accidents were attributed to UNDER THE INFLUENCE
56 accidents were attributed to FAILURE TO MAINTAIN

The proposed Caltrans curve widening project for the (5) locations sited in the Project Study Report will allow the increased commercial truck traffic, the newly legal STAA (larger, longer, heavier) trucks, and the general motorist to negotiate these newly "fixed" curves at greater rates of speed. Since by far the greatest cause of accidents (247) are already due to excessive rates of speed, this Caltrans "fix" may actually increase the accident rates, and not make Highway 199 safer, however it will be STAA Truck Route accessible!

ATTACHMENT (1)

Bruce, Doreen



Bruce, Doreen

MILE POST LOCATION REFFERENCE SHEET

Hiouchi Bridge traveling East on Highway 199 to the Collier Tunnel

Mile Post #	Location/ landmark	Comments
4.5	Hiouchi Bridge	
5.0	Redwood State Park	Posted 50 MPH
5.5	Entering Hiouchi Hamlet	
6.18	Beginning Serpentine Slide	Posted 55 MPH
6.55	End of curve Serpentine Slide area	
7.0	South Fork Road	
8.0	Passing lane (old weigh station)	
8.68	Curves	
10.42	Long straight stretch close to river	
11.2	Bridge replacement Hard Scrabble Ck	
11.38	Diesel spill area	
11.81	17N49 Forest Service Road	OHV parking
12.23	French Hill Road	
12.5	Shaded area along river	Slippery in Winter
13.0	Valley View Rd & Gasquet Flat Rd	
14.5	Six Rivers NRA Forest Station	
15.0	Lado Del Rio Rd	
16.50	Pioneer Rd	
16.75	Panther Flat C.G.	
18.35 – 18.49	4 lane rock slide area	
19.0	Grassy Flat C.G.	
20.0	End of 4 lanes	
20.0	Howard Griffin Bridge	
20.71	Rock fall before Sandy Beach	
20.85 – 20.92	Sandy Beach	
22.0	Patrick Creek Rd	
23.0	Out rock out cropping	
24.08	Middle Fork Bridge	
24.75	Little Jones Creek	
25.3	Siskiyou Fork Rd	
25.96	Bar-O- Boys Ranch	
26.50	Very tight long curve	
27.3	Just past construction stop light	
28.11	Idlewild Maint. Station	
30.07	Knopki Creek Rd	
31.31	Oregon Mountain Rd	
32.4	Collier Tunnel	

ATTACH (18)

Bruce, Doreen

CHANGES NECESSARY FOR PUBLIC SAFETY IF HIGHWAY'S 199 AND 197 BECOME A STAA TRUCK ROUTE.

GASQUET

1. Reduce speed limit through Gasquet to 35 MPH from Mile Post 13.0 to Six Rivers NRA Forest Station Mile Post 14.5.
2. Provide crosswalks across Highway199 at the intersections of Gasquet Flat Road, Firehouse Road, and Middle Fork Road.
3. Caution signage for pedestrians, bicyclists, and congestion through Gasquet.
4. Caution light at the intersection of Gasquet Flat Road due to congestion, and the short sight distance to the north on Highway 199 making ingress and egress very dangerous.

NOISE ABATEMENT MEASURES

1. Erect sound barriers through residential areas through Gasquet.
2. Signage prohibiting engine compression braking through Gasquet.
3. Signage prohibiting unmuffled motorcycles through Gasquet.

WATER QUALITY SAFETY (The Smith River is the drinking water source for Gasquet, Hiouchi, Crescent City, and Smith River. In addition, the Smith River is critical habitat for Chinook and endangered Coho salmon)

1. Trucks carrying pesticides and other toxic chemical be prohibited along the proposed STAA truck route to prevent the possibility of contamination of the Smith River.
2. An enforcement plan needs to be in place to monitor any illegal transport of toxic chemicals.

OTHER

1. Need guard rails along all sections of the river that come near the highway.
2. Have Highway 197/199 designated as a one-way STAA route with the route being primarily on the non-river side.
3. Have additional California Highway Patrol Officer(s) assigned to Highway 199/197 for monitoring and enforcement..

ATTACHMENT (2)

Response to Doreen Bruce

Response to Comment 1
This comment states concern for induced traffic from I 5 during poor winter weather conditions. Please see the response to Friends of Del Norte 2012 response to comments 1-23 for a discussion of potential induced traffic.

Response to Comment 2
This comment states there are additional comments attached to the letter.

Response to Comment 3
This comment is the letter submitted during the circulation of the DEIR/EA, please see the response to Doreen Bruce 2010.

Response to Comment 4
This comment states support for the no project alternative.

Response to Comment 5
This comment states that the route will not be suitable to STAA trucks, even after completion of the project. The project was initiated and designed to be suitable for STAA vehicles. Please see the response to EPIC 2012/Smith for a discussion of the design parameters and suitability of the route for STAA vehicles.

Response to Comment 6
This comment states that the project does not address other areas of concern. Please see Grouped Response #8 and EPIC 2010 response to #14 and #15 for a discussion of why other areas were not included in this project. The comment also states that there is an unstable slope at mile post 20.50. Geotechnical recommendations were followed in the design decisions at this site. See FEIR/EA Section 2.2.3 for discussions of geotechnical information.

Response to Comment 7 and 8
This comment states concern for residential access along SR 197 after the project. Please see response to Donald Bruce 2010 comment #2.

Response to Comment 9
This comment states concern for public safety in Gasquet. Please see EPIC 2010 response #8 for a discussion of community impacts, and Group Response #8 for a discussion of safety.

Response to Comment 10
This comment states concern for the Wild and Scenic Smith River. Please see Group Response #5.

Response to Comment 11
This comment states concern about spills in the Smith River affecting the quality of downstream drinking water supplies. Please see Vern Power's comment #1 about spills.

Response to Comment 12, 13 and 14

This comment questions the purpose and need, and potential benefits of the project. Please see the Grouped Responses #1 and #2 for discussions of the purpose and need, and cost vs. benefits of the project.

Response to Comment 15

This comment addresses the purpose and need of the project. Please see Grouped Response #1 for a discussion of the purpose and need.

Response to Comment 16 through 28

These comments were submitted during the scoping period and were considered during the design and environmental analysis of the project. These are not comments on the Recirculated Draft EIR/EA.

Campbell, Bruce

Bruce Campbell
<madroneweb@aol.com>
11/05/2012 12:35 PM
Please respond to
<madroneweb@aol.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

First, I would like to compliment Caltrans for the work actually done thus far on the Smith River -- with the possible exception of excessive lanes northeast of Gasquet. Some curves have been dealt with, and the highway is absolutely perfect as is to go at a reasonable pace near the gleaming aquamarine jewel of the Smith River. 1

This project is dangerous to the environment and serves no purpose unless the goal is to get a swarm of many interstate trucks diverted from Hwy. 5 to Hwy. 101 (and then onto 197 and 199. There is already STAA truck access since the project to expand Hwy. 299 had been funded. 2

Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 3

I call for no more waste of taxpayer money, so please abandon this preposterous and disturbing project immediately! If Caltrans does not abandon the project, certainly an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. This project clearly will have a deleterious impact on many species and scenery for tourists. 4

An EIS must consider the impact of the proposed highway project (as well as ongoing use of the proposed expanded highway) on the "DESIGNATED OUTSTANDINGLY REMARKABLE ECOLOGICAL VALUES" of the Smith River relating to the National Wild and Scenic Rivers Act. 5

As I recall, there have already been serious truck accidents heading over the side into the Smith River -- sometimes with toxic chemical loads. The Smith River is already toxic enough downstream due mostly to the bulb farms, so we do not need additional risk threatening anadramous fisheries. Please discuss scenarios of how an STAA vehicle may or may not be able to be extracted from the Smith River. 6

Also, quit making ridiculous claims that there will not be increased truck traffic with the Smith River project. Admit that a substantial chunk of Bay Area to Northwest truck traffic would travel Hwy. 101 and then 197 and 199 and on to the Northwest, and dissect such in detail in your documents. 7

Your evaluation of anadramous fisheries must also consider the impact of erosion / sedimentation on its habitat, as well as the impact that the overall highway project may have on the prey for such fishes. 8

When considereding the state-endangered Marbled Murrelet, please consider whether the project interferes with nesting, social activity, or recovery potential for this sea and forest bird. There is too much fragmentation 9

Campbell, Bruce

already in highway and some campground areas going through ancient redwoods. Examine how further fragmentation can impact nesting, survival, social activity, and potential for recovery for the marbled murrelet. 9 cont.

In regards to the Northern Spotted Owl, please examine not only the Smith River plans, but other North Coast STAA-access plans which further eliminate flatter "turnout"-type areas which can serve as habitat for voles and mice and other prey for the northern spotted owl. 10

I am sick of Caltrans piece-mealing and acting like the STAA projects are unrelated. Quit cavalierly violating the law and seriously discuss currently proposed projects on murrelet and northern spotted owl! 11

This project would have significant negative impacts on: 12

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be: 13

- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 14

Abandon this project and focus on maintaining the existing road infrastructure. If you maintain your stubborn bureaucratic ways, then you must do a full EIS on the series of currently proposed STAA-access projects. 15

If you don't appreciate the staggeringly beautiful Smith River and vicinity, then personally move out of this special area and trash the earth elsewhere! 16

Sincerely yours,

Bruce Campbell
3520 Overland Ave. # A 149
Overland Ave #A149
Los Angeles, CA 90034

Response to Bruce Campbell

Response to Comment 1
This comment expresses gratitude for the Departments maintenance of the highways along the Smith River. The Department appreciates the comment.

Response to Comment 2
This comment questions the purpose and need of the project. Please see Group Response #1 for a discussion of the purpose and need of the project.

Response to Comment 3
This comment states that it would be better for the Department to construct safety improvements. Please see Grouped Response #1 for a discussion of purpose and need.

Response to Comment 4
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Response to Comment 5
This comment states that the Department must consider impacts to the Wild and Scenic Smith River. Please see Grouped Response #5 for a discussion of the Wild and Scenic Smith River.

Response to Comment 6
This comment states concern about toxic chemical spills in the Smith River. Please see the response to Vern Powers Comment #1.

Response to Comment 7
This comment states there would be a substantial increase in truck traffic. There is no evidence that there would be a substantial change in routing patterns for the trucking industry. Overall mileage from the Bay Area to Portland, Oregon is approximately 699 miles along US 101/SR 197/US 199/I 5 and 633 miles along the I 80/I 5 route. The coastal US 101/US 199 route is longer and most of the route is curvy mountainous 2-lane highways, thus it is not likely to be the preferred route for through trucks, compared to the 4-lane interstate highway I 5.

Response to Comment 8
This comment states additional concerns over impacts to anadromous fish. The Department follows Clean Water Act regulations through the North Coast Regional Water Quality Board which ensure that no sediments or erosion from project enters waterways untreated. A small amount of riparian habitat will be removed at the Patrick Creek Narrows Location 2 bridge site, which would result in a small decrease in food availability to fish in the river. Impacts to anadromous fish were reviewed in consultation with the National Marine Fisheries Service and the agency concurred with the Departments finding that the project may affect, but it not likely to adversely affect Coho salmon or their critical habitat. There are minor temporary adverse impacts to Essential Fish Habitat (EFH), which are offset by measures included in the project, see Section 2.3.5.4.

Response to Comment 9

This comment states concern for marbled murrelet and forest fragmentation. Please see both DEIR/EA Section 2.3.5, the Biological Assessment and Biological Opinion for more information on Marbled Murrelet. The project is not likely to interfere with nesting activities because the stands within which the project is planned are not high quality nesting habitats. Construction activities have the potential to disturb murrelets using the river corridor to migrate between nesting sites and the ocean, and thus there are temporal restrictions on construction activities. The forests adjacent to the project activities are already fragmented and the project will not increase the level of fragmentation. The Biological Opinion from USFWS states that the project may affect, not likely to adversely affect marbled murrelet.

Response to Comment 10

This comment states concern for spotted owls and the removal of potential foraging habitat in turnouts. The flat turnouts adjacent to the roadway are not high quality foraging for owls, nor are they high quality habitat for prey of owls.

Response to Comment 11

This comment questions whether other STAA access projects are related, and expresses concern for marbled murrelet and northern spotted owl. STAA access projects along the north coast of California are related as the various routes do connect, and separated because the routes have specific termini. Thus access to the south on US 101 is a separate project than access to the north along SR 199/US 199. The cumulative impacts analysis and economic growth analysis did consider the other projects for overall impacts. Impacts to marbled murrelets and spotted owls were seriously discussed in the DEIR/EA Section 2.3.5 and in consultation with USFWS.

Response to Comment 12 through 15

These comments are from the Form Letter 2012 #2, please see the responses to that letter.

Response to Comment 16

This is not a comment on the RDEIR/EA.

Cipolla, James

Oso Lindo
<osolindo@rocketmail.com>
10/10/2012 08:25 PM
Please respond to
Oso Lindo
<osolindo@rocketmail.com>

To "jason_meyer@dot.ca.gov" <jason_meyer@dot.ca.gov>
cc
bcc
Subject STAA truck access on Hwy 199/197 and related parts of Hwy 101

Mr. Meyer,

Please assist in abolishing any plans to expand traffic on the above named highways to STAA trucks, or any other plan that would increase traffic through these dangerous routes of travel. These highways are already overtaxed with traffic that lead to a higher than average number of accidents. 1

Since the current plans have no plan to change the section between Hiouchi and Gasquet, the dangerous winding roads between these two areas will exacerbate the already precarious driving conditions that currently exist under normal traffic conditions. To even think to apply these additional-sized trucks during winter conditions would be a gross oversight in considering the safety of residents that need these roads for travel for day to day use. All in all, these mountainous areas are not conducive to STAA truck traffic regardless of measures thought to accommodate such traffic. The dangerous winding roads will remain regardless of any measure that is taken to allow STAA trucks to traverse these highways. Considering the plan to allow STAA trucks, no one can justifiably argue that adequate safety measure will be in place to prevent an increase in hazards to current forms of traffic in addition to the truckers that will drive the STAA trucks. 2

Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway. It is more eventual than hypothetical that travel of STAA trucks through these dangerous areas will prove to increase these accident statistics. 3

Hwy 199 follows the Smith River though out much of its length. Spilling of cargo during accidents on Hwy 199 would compromise water sources for residents and wildlife. A high volume spill could possibly render Crescent City's water supply as toxic. 4

Let's not think of Hwy 197 in terms as one would think of most other highways in California. Route 197 is a rural residential road with over 70 driveways directly entering onto the road. How many STAA trucks currently travel the State on residential roads?? 5

The fact that the State has little money, and due to the content 6

Cipolla, James

of the California Transportation Policy Priority, one cannot allow the spending of money to accommodate STAA trucking as a prudent venture. Those who control and endorse such use of tax money are not congruent with public interest. 6 cont.

My address and phone number are confidential data. However, if you require such to process this transmission for support of abolishing the plan, please return mail stating the need for such information and I will supply. 7

James Cipolla
Crescent City, CA.
osodelnully@hotmail.com

Response to James Cipolla

Response to Comment 1
This comment states opposition to the project and concern for safety. For safety concerns please see Group Response #8.

Response to Comment 2
This comment states concerns over safety, please see Group Response #8 for a discussion of safety.

Response to Comment 3
This comment states that there will be a safety concern on US 101 south of Crescent City due to STAA truck access. This area is currently open to STAA vehicles. Please see Group Response #8 for a discussion of how collision rates inform safety projects.

Response to Comment 4
This comment states concern for toxic chemical spills. Please see Vern Powers response to comment #1 for a discussion of spills.

Response to Comment 5
This comment states that SR 197 is a rural residential road. State Route 197 is defined in the route Concept Report as a 2-lane conventional highway, and classified as a Rural Minor Arterial.

Response to Comment 6
This comment questions the purpose and need of the project, please see Group Response #1.

Response to Comment 7
This is not a comment on the REIR/EA.

Estefan, Lars

Lars Estefan
<larsonest@gmail.com>
10/12/2012 11:40 AM
Please respond to
<larsonest@gmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

The project would have significant impacts on the Smith River, old-growth Redwoods and Douglas Fir trees, endangered species including Coho and Chinook Salmon and Steelhead, Marbled Murrelets, and Northern Spotted Owls. 2

Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park would be impacted. 3

There would be increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove). Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply. 4

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 5

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 6

Abandon this project and focus on maintaining the existing road infrastructure. 7

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

Sincerely,

Lars Estefan
24675 Moon Ave
Lomita, CA 90717

Response to Lars Estefan

Response to Comment 1
This comment states the project is unnecessary. Please see Group Response #1 for a discussion of purpose and need.

Response to Comment 2
This comment states there would be significant impacts to various resources. The DEIR/EA, RDEIR/EA, and FEIR/EA clearly state that all impacts were avoided, minimized or otherwise mitigated to less than significant levels. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species.

Response to Comment 3
This comment states there would be significant impacts to tourism and parks. Please see Group Response #2 for a discussion of impacts to tourism and parks. See also DEIR/EA Appendix B: Resources Evaluated Relative to the Requirements of Section 4(f) for an evaluation of effects to public resources.

Response to Comment 4
This comment states that there would be an increase in truck traffic from Grants Pass, Oregon to the Bay Area, and there would be safety hazards due to spills. Section 2.1.5 discusses the increase in truck traffic associated with this project. There is no anticipated safety hazard associated with the project. Please see Group Response #8 for safety concerns and Vern Powers Response #1 for a discussion of spills and water quality.

Response to Comment 5
This comment cites the Route Concept Reports for SR 197 and US 199. These routes will remain a "2-lane, conventional highway, with passing lanes" after the project. There are no plans for extensive upgrading of this facility to a 4-lane highway at this time.

Response to Comment 6
This comment states that STAA access already exists on other routes and questions the funding allocation. Please see Group Response #1 for a discussion of purpose and need, and Group Response #2 for a discussion of the cost vs. benefits of the project.

Response to Comment 7
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Evermoore, Eileen

Eileen Evermore <eileenevermore@gmail.com >
11/01/2012 05:02 PM

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject DEIR for proposed changes to Hwy 199/197 to accommodate longer trucks

Dear Sir

I have lived in Gasquet, CA and worked in Crescent City,CA. for 38 years. During that time, I have driven Hwys 199 and/or 197 at least twice a day, 4-6 days a week. I therefore consider myself to be well-qualified to comment on the inadequacy of the Draft Environmental Impact Report on the proposed changes to enable longer trucks on those two narrow winding canyon roads. 1

As it is, the current "shorter" trucks already are a safety hazard: they drift over the double line on a regular basis. To safely drive the Highways, you always have to keep an eye on on-coming truck traffic to give them room to negotiate the curves. This is a problem from the top of the canyon, "The Narrows," to the bottom of the canyon where 199 intersects 101. This includes areas not targeted for improvements. 2

I have had to stop and wait behind a "shorter" truck in front of me, because the driver knew he could not make the curve without running into on-coming traffic. While I applaud his caution, his stopping on the winding road is an equal hazard
without adequate warning to cars following him on blind curves. A car behind me almost slammed into my rear end while I was waiting for the truck, who was waiting for the oncoming traffic to clear.

If we are already experiencing safety problems with the "shorter" trucks. How much more risk are we facing with the "longer" ones? The DEIR does not tells us.

The DEIR fails to address these safety hazards in the following ways:

(1) fails to identify and evaluate the cumulative impact of diverting 15 truck traffic to 199-197. 3
(2) fails to address the increased safety hazards to winter weather when this 15 diversion will be heaviest 4
(3) fails to address these safety hazards in areas with highest accident rate (between Gasquet and Hiouchi) with no
improvements to mitigate the effects. 5
(4) fails to address the increased risk of truck cargo spills threatening the only water supply for Gasquet and Crescent
City--not to mention the pollution of the pristine Smith River, a Wild and Scenic River, protected as a National
Recreation Area, and one the last unobstructed Salmon runs in the Pacific North West. 6

The DEIR also fails to point-out that the Del Norte County local economy will have a negligible 7

Evermoore, Eileen

benefit to off-set the potential risks and hazards that the local residences and businesses will suffer as the result of these dangerous trucks using our pristine and protected canyon as a main thoroughfare to promote their businesses outside of our county. 7 cont.

This DEIR is yet another example of a few business men who are motivated solely by profit without any regard for law, safeguards, people, or the environment. 8

Eileen Evermore
P.O.Box 460
Gasquet, CA. 95543

Response to Eileen Evermoore

Response to Comment 1
This is not a comment on the RDEIR/EA.

Response to Comment 2
This comment states there is a current safety hazard with CA Legal trucks on the route. Please see Group Response #8 for a discussion of safety.

Response to Comment 3
This comment states that diverted traffic from I 5 was not evaluated. The DEIR/EA Section 2.1.5 discusses the project's impacts on traffic. Please see the response to Friends of Del Norte 2012.

Response to Comment 4
This comment states that increased traffic from I 5 during winter weather will be a safety hazard. Please see the response to Friends of Del Norte 2012.

Response to Comment 5
This comment states concern over the area between Hiouchi and Gasquet. Please see the response to EPIC 2010 Comment 14 and 15, as well as Group Response #8.

Response to Comment 6
This comment states concern for spills and water quality. Please see the response to Vern Powers Comment #1 for a discussion of spills.

Response to Comment 7
This comment states there would be negligible benefits to residents of Del Norte County. Please see Group Response #1 for a discussion of purpose and need, and Group Response #2 for a discussion of the cost vs. benefits of the project.

Response to Comment 8
This is not a comment on the RDEIR/EA.

Harestad, Patrick

Dear Ms. Meyer,

I am writing to you today concerning something very important to me. That is the environmentally distructive and region inappropriate plan to widen parts of Hwy 199. The Smith River is one of the last unspoiled Rivers in the contiguous U.S. It is more precious to me than any dollar amount I may save on goods due to "more effecient" trucking. 1

I do not live with my head buried in the sand, I know there are very powerful forces behind this push to widen everything. 2

Please realize that the majority of people in this country are waking up to the importance of wild and scenic rivers, and they will fight for them. 3

The River is more important than the goods you want bring in!!! 4

Leave the Smith alone. 5

Thank You

Patrick Harestad

Response to Patrick Harestad

Response to Comment 1 through 5

These comments express concern for the Smith River and general opposition to the project. This is not a comment on the RDEIR/EA.

Hunt, Ann

Ann Hunt
<ahuntca@sbcglobal.net>
10/19/2012 03:55 PM
Please respond to
<ahuntca@sbcglobal.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. 2

The project would have significant impacts on all the scenic and recreational positives of this route without adding significant advantages... Once lost these impacts can not be recovered. It would appear from this request and the Richardson Grove project that they are more interested in providing for construction related paychecks than providing service to already existing roads and road beds... 3 4

It seems that everyone except our industrial (including CAl -trains) and business leaders recognize that our greatest assests now and into the future lie in working with our natural environment and not imposing our will upon it. Abandon this project and focus on maintaining the existing road infrastructure. 5 6

Sincerely,

Ann Hunt
1610 3rd Street, #11
Eureka, CA 95501

Response to Ann Hunt

Response to Comment 1
This comment states that the project is not necessary. Please see Grouped Response #1 for a discussion of the purpose and need.

Response to Comment 2
This comment states that STAA access already exists for Crescent City. Please see Group Response #1 for a discussion of the purpose and need for the project. Please see Group Response #2 for a discussion of the cost vs. benefits of the project.

Response to Comment 3
This comment states that there would be significant impacts to scenic and recreational resources. Please see Group Response #2 for discussion of impacts to tourism and parks. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River.

Response to Comment 4
This comment questions the purpose and need for the project, please see Group Response #1.

Response to Comment 5
This is not a comment on the RDEIR/EA.

Response to Comment 6
This comment states that the project should be abandoned.

Johansen, Ralph

Ralph Johansen
<mdriscollrj@charter.net>
10/29/2012 09:02 PM

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject changes to 197 and 199

We on the coast neither want nor need this invasion of this historic route. Stop this nonsense.

Ralph Johansen

Response to Ralph Johansen

Response to Comment 1

This comment states general opposition to the project. This is not a comment on the RDEIR/EA.

Lips, Stu

stu lips
<stulips@hotmail.com>
09/28/2012 09:38 PM
Please respond to
<stulips@hotmail.com>

To <kimberly_hayler@dot.ca.gov>
cc
Subject Stop the Highway 199 widening now!

The "Safe STAA Access Project" in Del Norte County recently submitted by Caltrans should not be approved. 1

The project is unnecessary and only caters to a few large corporate interest groups.

Widening and realigning Highways 199 & 197 through a wild and scenic river corridor and through ancient redwood groves will damage the root and canopy structures of ancient redwood trees, and will negatively affect one of the last undammed rivers in the US. 2

The environmental assessment is too broad and includes too many locations to serve as the basis for a single environmental analysis. Please seek all of the different alternatives proposed in this project! 3

stu lips
dana
berkeley, CA 94705

Response to Stu Lips

Response to Comment 1 throught 3

These comments were from the 2010 Form Letter, please see the responses to the 2010 Form Letter in Section 3.5 of this volume.

Lotus, Trisha (October 12, 2012)

Trisha Lee
<trishale@sonic.net>
10/12/2012 01:12 AM
Please respond to
<trishale@sonic.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject No Build is safe for 197/199 Safe STAA Access Project

Here we go again. Caltrans needs to consider alternatives to harming old growth redwoods and all of the environment, they need to not harm endangered Marbled Murrelets, Northern Spotted Owls, and Caltrans needs to not harm the Scenic Smith River. This project should not happen. Just keep up the SR 199 and SR 197 to make it safe for everyone and the current large enough trucks. The largest over 65 feet STAA Big Rigs will have 299, they are already going through to the north and with exceptions they are already going through Richardson Grove State Park. Just keep the exceptions, and don't let this be an alternative to the I-5 ... a designated Interstate Highway. 1

These sensitive roads like 197/199 can not tolerate these larger and larger trucks, and we don't need them clogging Eureka and other cities that avoid bypassing as they know business will drop. 2

In addition, we need to develop alternatives such as short sea shipping on barges and just keep the same people employed. Larger Trucks equals fewer jobs, true or false? 3

Spend the $35 million keeping our Highway 101 and Highway 199 and 197 open and more safe for our current transportation and tourist travelers. Highway 299 is being opened to larger trucks, and maybe they can put a train over that way. 4

This is one of narrowest and steepest highways in California. Have you come to drive these amazing roads, through Richardson Grove State Park and through the Smith River Canyon? Or do you just love to harm the environment with your big money projects and Federal money you feel you must spend on these destructive projects. Have you not done enough damage? Can you leave one piece of paradise alone? You gain seekers need to jump in the river and slow down before you ruin the few beautiful spots in California that are left. 5

If Caltrans does not listen to reason and chose the no-build option and alternatives, then an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. The project would have significant impacts on the pristine Wild and Scenic Smith River, the Old Growth Redwoods and other trees, the endangered Northern Spotted Owls, and the fish we need to save like Chinook and Coho Salmon, and the trout fish. 6

The Smith River and Hiouchi areas are famous for Tourism and recreational opportunities to include the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park. 7

Please keep in mind, the steep and geologically unstable Smith River Canyons are crumbling. Increased weight in truck traffic will make these roads more subject to failure, and increase the risk of spills. This can put this most pristine river in more danger. The lily farmers are already harming the Smith River and that needs to stop too. 8

Isn't it true that Caltrans themselves conclude that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 9

Please focus on maintaining the existing road infrastructure. 10

Sincerely, 11

12

Lotus, Trisha (October 12, 2012)

Trisha Lotus

Trisha Lee
2425 C Street
Eureka, CA 95501

Response to Trisha Lotus (October 12, 2012)

Response to Comment 1
This comment states that alternatives to impacts to various resources. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species.

Response to Comment 2
This comment states general opposition to the project, and is not a comment on the RDEIR/EA.

Response to Comment 3
This comment states that there are alternative routes for STAA vehicles. Please see Group Response #1 for a discussion of the purpose and need for the project.

Response to Comment 4
This comment states concern for the roadway, traffic congestion and suggests short sea shipping as an alternative. Please see the response to EPIC's Smith letter for a discussion of the adequacy of the roadway. Please see DEIR/EA Section 2.1.5 for a discussion of how traffic congestion and Level of Service are not anticipated to change due to the project.

Response to Comment 5
This comment questions whether larger trucks will lead to fewer jobs. Please see Group Response #2 for a discussion of the economic costs and benefits of the project.

Response to Comment 6
This comment states that the funding should be used for maintenance and safety projects. Please see Group Response #1 purpose and need.

Response to Comment 7
This is not a comment on the RDEIR/EA.

Response to Comment 8
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

This comment also states that the project would have significant impacts on various resources. The DEIR/EA, RDEIR/EA, and FEIR/EA clearly state that all impacts were avoided, minimized or otherwise mitigated to less than significant levels. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species. Please see Group Response #2 for discussion of impacts to tourism and parks. Please see Group Response #10 for a discussion of geological issues.

Response to Comment 9

This comment expresses concern for tourism and recreation. Please see Group Response #2 for a discussion of impacts to tourism and parks.

Response to Comment 10

This comment states concern for geologic instability, potential spills and lily farmers. Please see Group Response #10 for geologic stability concerns. Please see the response to Vern Powers Comment #1 for a discussion of spills. Concerns about lily farming techniques are not a comment on the RDEIR/EA.

Response to Comment 11

This comment cites the Route Concept Reports for SR 197 and US 199. These routes will remain a "2-lane, conventional highway, with passing lanes" after the project. There are no plans for extensive upgrading of this facility to a 4-lane highway at this time.

Response to Comment 12

This comment requests maintenance of existing facilities. This is not a comment on the RDEIR/EA.

Lotus, Trisha (October 25, 2012)

Attention: Jason Meyer, CA Department of Transportation
North Region Environmental, Unit E1
PO Box 3700
Eureka, CA 95502-3700

Page 1 of 2 Trisha Lotus

RCVD
10.29.12

October 25, 2012

RE: Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am writing to express my many concerns over the Caltrans Smith River SR 199/197 project. After reading the EIR and the re-circulated Environmental Impact Report, I am urging you to choose the no-build alternative so that no harm will come to the old growth redwood and other trees, the habitat, the endangered species and plants, and so no further harm will come to the Wild and Scenic Smith River. 1

Even the re-circulated EIR shows this project will be destructive in so many ways, it should not be allowed to proceed or it will cause harm beyond measure. The public does not realize the amount of irreversible damage this project will cause in harm to the environment, increase heavy truck damage to roads, harm to the marbled Murrelet's in their nesting patterns, harm to the already endangered Northern Spotted Owls (to name just a few) and it will take away from the peaceful experience of traveling this amazing Scenic Smith River route to Oregon, which I travel frequently. 2

The Lily farmers with their pesticides need to stop polluting the Smith River, and this project needs not to start. The protected riparian vegetation and aesthetics along the Wild and Scenic Smith River are second to none, and they need to be protected, not removed with the promise of buying up some other private land somewhere. Nothing can replace this passage. The old growth trees hold the mountain together. Further logging will cause more instability, and further environmental damage, as even the EIR admits. Any further damage is unacceptable. 3 4

Just keeping Highway 101 and SR 199 and 197 open during the storms, will take a lot of money and keep Caltrans busy from now until doomsday, unless they are allowed to hurry doomsday along by ruining our treasures for the material gain of a few already wealthy business people. There will be no trickle down or gain to the people, and only loss to the people who know this place is sacred. 5

Have you consulted the Native American people with the full disclosure, giving them time to understand? They will tell you of their sacred places. I have seen one sacred place, where waterfalls flow off the mountainsides, and the boulders so large and water so clean and deep to dive into. I have seen where the Native American peoples have lived in the summer months. The old campfires are still there. You have to dig down but they are still there. These are sacred grounds you are intending to mess with, and these are places that can't be replaced, ever. 6

The Wild and Scenic Smith River, is the only untapped river in California that is not completely degraded, and I feel shocked this plan has gone this far without the public really knowing. Caltrans is very good and strategic about issuing the EIR's all at once, keeping things out of the news, or issuing the Draft EIRS and Final EIRS when people are involved, notices in mid-week papers; it feels calculated to the point of feeling like corruption to me. This is a very narrow, winding canyon road in a very rural area with breath-taking beauty. The people come from all over the world to see the magnificent beauty of this little piece of paradise, still pristine, and unlike any other place on earth. I will not sit by and do nothing. Anyone knowing the truth and having a love for this area like I do, would not allow this project to continue. 7 8

Lotus, Trisha (October 25, 2012)

To log all the old growth listed in the EIR, and numerous other old growth trees, and all the other trees (all depending on each other through their root structures) will cause harm beyond measure. This project will cause native plants to be killed. Cutting into the steep and narrow passage ways will cause more run off into the Wild and Scenic Smith River, already threatened by the Lily Farmers. 9

This is a Scenic State Route and not meant for more and more of these larger and larger trucks to pass. STAA heavy truck traffic will increase when the STAA trucks choose Highway 101 to 199 when it is snowing on the Siskiyou Summit on I-5. Increase in spills will also be a tragic result. 10

The communities all along this SR 199 have not been engaged in what will result if this project is allowed to go ahead. Geologically this is very unstable territory. It is very discouraging that Caltrans continues to ignore our attempts for the EIR to address the cumulative impacts, and the public is still not being properly informed. To only re- issue part of the Environmental Impact Report, is yet another way of keeping the truth from people and another way to confuse people who are trying to understand how it all fits. 11

Let's get moving with the short sea shipping on barges, you have Highway 299 to destroy as you wish. Hey, why not build a railroad to the east and ruin all those old growth redwoods there. Either way, landslides are going to happen as a result. However, you already have Highway 299, and you can't stop with that? 12

I am not trying to stop commerce, but let's get smart about transportation. Times are changing, and we need to change with the times and get the trucks off the roads utilizing the short sea shipping and keep the CA Legal Trucks and the jobs. Aren't those jobs important? For every STAA, you take away jobs from local trucking firms. 13

Nothing short of an EIS is acceptable, due to the irreparable harm this project promises to create. If it is working, don't fix it. Under the National Environmental Policy Act (NEPA), and EIS must be prepared when a project "may" have a significant impact on the environment. Your document clearly states there will be significant impacts on the environment. 14

Please just keep the existing road up and running in the storms that promise to throw boulders off the cliffs in the Smith River Canyon narrow stretches. Just the current truck traffic is damaging, and more and larger trucks will only cause more safety issues and more damage. 15

Thank you for considering my opinion,

Trisha Lotus

Trisha Lotus
2425 C Street
Eureka, CA 95501
trishale@sonic.net

Response to Trisha Lotus (October 25, 2012)

Response to Comment 1
This comment states support for the no project alternative. This would not meet the purpose and need of the project, please see Group Response #1.

Response to Comment 2
This comment states concern for the roadway, marbled murrelets, spotted owls and the scenic route. The STAA vehicles, while slightly longer, are not heavier than CA Legal vehicles. Increased truck traffic is not anticipated to be significant. Thus no additional impacts to the roadway are anticipated. Impacts to marbled murrelets and spotted owls were addressed in the DEIR/EA Section 2.3.5, as well as the Biological Assessment, and Biological Opinion from USFWS. The anticipated increase in traffic is not expected to be substantial enough to affect the visitor experience of the scenic area.

Response to Comment 3
This comment states concern for pesticides, water quality in the Smith River, riparian vegetation and old growth trees. Pesticide use by lily farmers is not within the scope of this RDEIR/EA. Impacts to riparian vegetation are discussed in DEIR/EA Section 2.3.1, and determined to be less than significant. Please see Group Response #3 for a discussion of visual impacts.

Response to Comment 4
This comment states that old growth trees provide geologic stability. Please see Group Response #4 for concerns about large trees and Group Response #10 for concerns about geologic stability.

Response to Comment 5
This comment states concern for maintenance and lack of benefits of the project. This project is not anticipated to cause an increase in maintenance. For concerns about benefits, please see Group Response #2 cost vs. benefits.

Response to Comment 6
This comment states concern for cultural resources. DERI/EA Section 2.1.7 discusses impacts to cultural resources and Native American Consultation. No cultural resources were identified within the Area of Potential Effects.

Response to Comment 7
This comment states there was not full disclosure in the NEPA and CEQA processes. Initial scoping meetings were held in 2008, the DEIR/EA was circulated in 2010 and there was a public meeting during the circulation. A Notices of Preparation was filed and Notices of Availability were published. Please see FEIR/EA Section 4 for descriptions of the public participation process. The Department releases environmental documents when they are determined to be complete, and according the regulations within NEPA and CEQA.

Response to Comment 8
This comment reiterates the scenic and tourism value of the area. This is not a comment on the RDEIR/EA.

Response to Comment 9
This comment states concerns over large old trees, please see Group Response #4.

Response to Comment 10
This comment states that the route is a Scenic State Route not meant for large trucks and that traffic will increase due to redirected traffic from I 5 during winter weather. The route is eligible for designation as a State Scenic Highway, however this designation does not restrict use by large trucks for goods movement. Please see the response to Friends of Del Norte 2012 for a discussion of induced traffic from I 5 during winter weather.

Response to Comment 11
This comment states concern for public involvement, geologic stability, and cumulative impacts. This project has conducted full public involvement, please see the response to 2012 From Letter #1 comment #10. For concerns about geologic stability, please see Group Response #10. Cumulative impacts were analyzed in the DEIR/EA Section 2.5. The proposed project would not result in significant cumulative impacts to any resources under the preferred alternatives.

Response to Comment 12
This comment proposes short sea shipping and a railroad as alternatives to meet the purpose and need of the project. Alternative shipping technologies are speculative and not a reasonably foreseeable alternative to this project.

Response to Comment 13
This comment questions the economic cost and benefit in local trucking jobs. Job losses for local truck driver does not appear to be great, and overall, the project is expected to provide a small amount of economic growth for the county. Please see the DEIR/EA and FEIR/EA Section 2.1.3.1 for a discussion of potential economic impacts.

Response to Comment 14
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Response to Comment 15
This comment states that the increased truck traffic will damage the roadway. The STAA vehicles, while slightly longer, are not heavier than CA Legal vehicles. Increased truck traffic is not anticipated to be significant. Thus no additional impacts to the roadway are anticipated.

Moses, Todd

Todd Moses
<tmoses@everlink.com>
10/15/2012 11:13 AM
Please respond to
<tmoses@everlink.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I may now live in Pennsylvania but I was born and raised in northern California and I know this road well, having last traveled it only two years ago. I am 63 years old now and my family goes back in California well over a hundred years. I plan to return to this part of California when I retire. 1

Please leave this road alone and spend scarce funds to maintain it and the river and the redwoods for future generations. Not everything for commerce please. 2

Sincerely,

Todd Moses
Californian

Todd Moses
1327 Pelham Road
Harrisburg, PA 17110

Response to Todd Moses

Response to Comment 1

This comment is not a comment on the RDEIR/EA.

Response to Comment 2

This comment states general opposition to the project.

Pappalardo, Sue

Robin Byrd
<robinbyrd2@yahoo.com>
11/01/2012 02:29 PM
Please respond to
Robin Byrd
<robinbyrd2@yahoo.com>

To "jason_meyer@dot.ca.gov" <jason_meyer@dot.ca.gov>
cc
bcc
Subject 197/199 Safe STAA Access Project

Jason Meyer:

I am opposed to the 197/199 Safe STAA Access Project. These highways traverse a wild, scenic, and pristine area. Redwood State and National Parks is one of the few World Heritage sites. The Smith River is exceptionally clean and a world class fishery. The project activities and the ensuing increase in truck traffic will cause environmental damage to these areas and disturb their peace and tranquility. We should not risk damage to them for an unnecessary project such as 197/199 Safe STAA Access Project. Please abandon this project. 1

Thank you,
Sincerely,

Sue Pappalardo
Gasquet, CA
robinbyrd2@yahoo.com

Response to Sue Pappalardo

Response to Comment 1

This comment states that the project would cause environmental damage. The Department appreciates the public input and involvement on this project. Please see the DEIR/EA, PRDEIR/SEA and FEIR/EA (available at: http://www.dot.ca.gov/dist1/d1projects/197-199_staa/) for extensive discussion of potential environmental damage.

Tays, Kimberly

Kimberly Tays
<ktays@suddenlink.net>
10/23/2012 06:46 PM
Please respond to
<ktays@suddenlink.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I do not support this project, as I believe the environmental impacts will be too great on this magical stretch of road with its scenic river beauty and old-growth redwood trees. Some places are too precious to tamper with, and this stretch of highway is one of them. 1

If smaller trucks need to use this stretch of highway, then so be it; the reality is that certain places are going to be difficult to get into and out of. Many of us like it this way; that we live in this remarkable, hard-to-reach area--it feels like you are somewhere different when you enter Del Norte and Humboldt County--we don't want to look like everywhere else--we want to remain rural and scenic and beautiful.

Opening up this area to more STAA truck traffic will negatively impact our communities and quality of life. CA Legal trucks are perfectly adequate to move goods in and out of this region in conjunction with the STAA trucks that can travel on Hwy 299 and Hwy 101 (from Oregon). There is nothing in the law that requires that STAA trucks must have perfect access to a region; only that they have access to a main terminal, and they currently have that. 2 3

Again, I am asking Caltrans to abandon this horribly destructive project and respect the wishes of the public, for once. 4

Sincerely,
Kimberly Tays

Kimberly Tays
P.O. Box 75
Trinidad, CA 95570

Response to Kimberly Tays

Response to Comment 1
This comment states concern for environmental impacts and general opposition to the proposed project. This is not a comment on the RDEIR/EA.

Response to Comment 2
This comment states the project would negatively affect communities and way of life. Community impacts are anticipated to less than significant, please see DEIR/EA and FEIR/EA Section 2.1.3.

Response to Comment 3
This comment states STAA access is not legally required. Please see Group Response #1 for a discussion of the purpose and need of the project.

Response to Comment 4
This comment requests that the Department abandon the project.

Zegart, Margaret Kettunen

Katt Kettunen Zegart
<kattz@aol.com>
11/06/2012 12:24 PM

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Recirculated Draft EIR/ EA

Dear Mr. Meyer: A tragedy! I just opened by mail and found that this letter had mis-typed address and did not reach you. yesteray. Hopefully my comments can be included on the
Margaret Kettunen Zegart

November 5, 2012
Jason Meyer
California Department of Transportation, North Coast Environmental Unit E1
P. O. Box 3700
Eureka, CA 95502-3700

Dear Mr. Meyer

Once again I write to remind CAL Trans that the Smith River is a federal Scenic River, a special space that draws visitors, seasonal fisher people who now provide the economic life blood for Del Norte, long suffering the loss of lumbering and a fishing industry; port activities on a small to serve the community. The required set back for future construction from the top of the river bank would not allow permit for any necessary, even minimum widening. 1

This plan for STAA truck access on Highway 199/197is not well conceived. 2

This plan to have a 199-197 project that would allow large truck traffic adversely affects all of Del Norte and especially the residents along 199 in small communities like Gasquet and Hiouchi Hamlet and Douglas Park 3
Even the noise adverse impact of the trucks today as the grade changes or they slow to maneuver the curves is detrimental. There is a specific impact to the camp grounds on the Smith River National Forest ... and the impact to wildlife has not been noted. Endangered species habitat and construction traffic 4
"mud" would affect the spore transmittal of sudden oak syndrome (soon to spread into Del Norte) as well as the intrusive Port Orford Cedar blight. 5

River quality is a significant impact that can not be mitigated. Non-point pollution from increased road surface (especially during rain season.) Salmon habitat on the remaining wild river is adversely impacted. Hiouchi, the Pelican Bay Prison and the town of Crescent City and some rural residences use this river as its only direct potable water source. 6

I recall when a copper/nickel mining project was evaluated in Gasquet that winter there was 256" " of rain. Climate change anticipates more sustained storms that not only will increase slides and impacted water quality but on the "stretches" of 197 and from Crescent City South along the shore, inundation, more tsunami impacts that will deface the road itself. 7
Seasonally, winter and severe rain storm closures affect any consistent truck traffic. Climate change shall increase severe storm events.

This Highway 199 is not an arterial for commercial traffic link, nor can it successfully be one. This, in fact is a rural road, a connector with 72 driveways entering the road. It cannot be re-designed for safety necessary to avoid road hazards., because of the river contours, the unstable geological cliffs and, for example, the Serpentine Cliffs. 8

Zegart, Margaret Kettunen

Historically, two scouts from Jedediah Smith's party in 1826 crossed the (Hawkins) now Hiochi flats and viewed from te Serpentine Cliff the south fork entrance into the middle fork - and determined to go northward along Myrtle Creek - just beyond this formidable rock formation. 9

State and National Redwood Redwood Parks and the Ocean shore / beach access and especially the Six Rivers Nation National Recreation Area will have significant impacts that cannot be corrected. 10

An alternative may be to construct a connection in Oregon, or return to the mid-twentieth century bi-pass and use the High Road avoiding a road use along a Scenic River.(Once a road mapped and accepted for transit, it can be legally retrieved as such I have been told). 11

Certainly, though, before any conceptual connection between Highway 5 and Highway 101 is even considered, the Envionmental Impact Reports should evaluate the 8 plus times severe injury and accident rate of Highway 101 south of Crescent City and the ratio of accidents per vehicle use on the dangerous 199. 12

Ongoing rock slides, significant trees or groves of trees removal (Richardson Grove evaluation is a parallel to Redwood, Port Orford cutting impacts) are an inpass. 13

There is no actual benefit to economic well being of the community - it is pass through from Highway 5 / Grants Pass to Eureka; at best a quick meal at a fast food restaurant and its "pit" stop respite, 14

I am sure you have heard from many that the accident rate here - with deaths and severe injuries. 15

There is no time line for repairs. In the late 1960's the alternate route to connect 101 with Highway 5 - on the opposite of Bar O Ranch juvenile faciity and crossing to the northerly side and along the high areas north or Serpentine Cliff and access along Ashford was a right of way you sold to private parties. In the future a connection would be better from 16

Highway 101 between Crescent City and Trinidad has many hazardous curves; portions of the road that require closures during winter season - and climate change anticipates more severe storm surges and resulting increased slides. There is no alternate detour. Highway 199 has extreme safety hazards on this narrow winding canyon road.
Thank you and sincerely,
Margaret Kettunen Zegart
kettz@aol.com
378 Douglas Park Drive
Crescent City, CA

Response to Margaret Kettunen Zegart

Response to Comment 1
This comment states concern over the Scenic River and tourism. Please see Group Response #5 for concerns about the Wild and Scenic Smith River. Please see Group Response #2 for concerns about the potential impacts to tourism.

Response to Comment 2
This comment states concern for residents and the community. Please see EPIC 2010 Comment response #8 for community impacts, and Group Response #8 for the safety aspect of traffic impacts to the community.

Response to Comment 3
This comment states that there are noise impacts. Traffic levels are not anticipated to increase due to the project, thus there are no anticipated increases in noise levels associated with the project. The DEIR/EA and FEIR/EA Section 2.2.6 and 2.4.11 discuss noise impacts and minimization measures.

Response to Comment 4
This comment states that there is an impact to Forest Service campgrounds. Noise impacts to Patrick Creek Campground from the Patrick Creek Narrows Location 2 site are discussed in Appendix B: Resources Evaluated Relative to the Requirements of Section 4(f) Section B.4.2.2. These impacts are temporary disturbance due to blasting, and would occur a few times per day, during daylight hours. These impacts were determined to be temporary and less than significant.

Response to Comment 5
This comment states there would be impacts to wildlife, endangered species habitat, and spread of sudden oak syndrome and Port Orford Cedar blight. The DEIR/EA and FEIR/EA Section 2.3.4 and 2.3.5 discuss potential impacts to wildlife and endangered species. For effects to endangered species see the DEIR/EA and FEIR/EA Section 2.3.5, and Chapter 4 of the FEIR/EA for consultations with USFWS and NMFS. Spread of Sudden Oak Death and Port Orford Cedar root disease are addressed in the Natural Environment Study (Caltrans 2010) Section 4.6. Best Management Practices included in Appendix E: Minimization and/or Mitigation Summary include the following: washing heavy equipment before and after ground disturbing activities, removing Port Orford Cedar from road areas, directing water runoff away from Port Orford Cedar areas, and using pathogen free water for dust control.

Response to Comment 6
This comment states that there will be significant impacts to water quality and salmonids. The DEIR/EA and FEIR/EA Section 2.2.2 and 2.3.2 discuss impacts to and minimization and avoidance measures for water quality, stormwater run-off and waters. These impacts were determined to be less than significant. Potential impacts to and minimization and avoidance measures for salmonids were addressed in the DEIR/EA and FEIR/EA Section 2.3.4 and 2.3.5 as well as the Biological Assessment and Letter of Concurrence from the National Marine Fisheries Service.

Response to Comment 7
This comment states concern about climate changes, increasing rainfall and tsunami effects. The project areas are outside of the tsunami zone and sea level rise zones. Potential effects on the hydrology of the Smith River are discussed in DEIR/EA and FEIR/EA Section 2.2.1.

Response to Comment 8
This comment states that the route is not suitably for commercial truck traffic. Both SR 197 and US 199 are currently in use for commercial truck traffic. The Route Concept Reports list these routes as 2-lane conventional highways. After implementation of this project, the routes will meet the necessary specifications of for designation as STAA accessible. For as a discussion of highway design see the response to the EPIC 2012 Smith letter. Please see Group Response #10 for a discussion of geologic stability.

Response to Comment 9
This comment is not a comment on the RDEIR/EA.

Response to Comment 10
This comment states that various parks will have significant impacts. There will be no permanent impacts to parks. There may be temporary impacts to accessibility of parks during construction due to traffic delays and construction at Ruby Van Deventer County Park. The temporary impacts were determined to be less than significant. Please see the DEIR/EA and FEIR/EA Section 2.1.1.4 and 2.4.2.3 for more information on potential impacts to parks.

Response to Comment 11
This comment states that the Department should construct access along an alternate route. Please see Group Response #6 for a discussion of alternate routes.

Response to Comment 12
This comment states concern for safety on US 101 south of Crescent City. This area is outside the project area. Please see the response to Form Letter 2012 #1 Comment #6.

Response to Comment 13
This comment states concern about rock slides and large trees. Please see Group Response #4 for concerns about large trees, and Group Response #10 for concerns about geologic stability.

Response to Comment 14
This comment states that there will be little economic benefit to the local community. Please see Group Response #2 for a discussion of costs vs. benefits.

Response to Comment 15
This comment states concern for safety. Please see Group Response #8 for a discussion of safety concerns.

Response to Comment 16
This comment discusses alternative routes. Please see Group Response #6 for a discussion of alternative routes.

Zuehlke, John

Received
11.6.12

01 November 2012

Mr. Jason Meyer, Environmental Coordinator
California Department of Transportation,
North Region Environmental, Unit E1
P. O. Box 3700
Eureka California 95502
Email: jason_meyer@dot.ca.gov

Re: Comments on the 197/199 Safe STAA Access Project and Supplement

Dear Mr. Meyer:

The "Draft Environmental Impact Report" for the "197/199 Safe STAA Access Project" (hereinafter "Original DEIR") released by the California Department of Transportation (hereinafter "CalTrans") is egregiously deficient in addressing the major safety, economic, and environmental deficiencies of the planned projects. Furthermore, the instant "Partial Recirculation of Draft Environmental Impact Report / Supplemental Environmental Assessment" (hereinafter "Supplement") fails to address most of the objections officially filed by the public with regard to the "Original DEIR." 1 2

The important issues which CalTrans ignores include, but are not limited to, the following:

I. Negative Economic Impact of Proposed Projects on Crescent City and Del Norte County:

In promoting these projects designed to bring STAA trucks into Del Norte County, CalTrans alleges that their completion would prove beneficial to the economy of the county, and specifically, to Crescent City. CalTrans further stated that, by allowing STAA trucks into the County, economies would result from the elimination of the need to transfer cargo between the STAA trucks and smaller, California-legal vehicles. 3

That is not in fact the case. Since STAA trucks are banned from operating along all except a very small number of specially-designated highways, cargo shipped or delivered via STAA trucks would have to be transferred to and/or from standard California-legal trucks to reach most locations in Crescent City.

1

Zuehlke, John

CalTrans must correct this serious misstatement of fact in their draft EIRs and specifically identify which of the businesses that are located on STAA-accessible highways intend to utilize, and will benefit from the utilization of, STAA trucks. 4

Moreover, CalTrans must also figure into their economic calculations the increased costs to Del Norte County for the additional maintenance which will be required to maintain these roads in view of the increased heavy-truck traffic. 5

II. Negative Impact of the Proposed Projects on Safety in Crescent City and the Smith River:

An important maxim of good engineering practice is that major truck traffic SHOULD NEVER be allowed alongside an important river because of the catastrophic consequences that a spill, whether due to accident or malice, could have on the river. The Smith River absolutely qualifies as an important river, not only because of (1) its scenic beauty as the last wild river system in California and (2) the importance its fish play in the local economy and tourism business, but also because (3) its pristine waters supply the municipal water to Crescent City. 6

Patently, by attempting to make the narrow mountain road designated as US199 and the winding two-lane country road designated as SR197 (North Bank Road), both of which run alongside or very near to the Smith River, into a major east-west connector for STAA trucking, CalTrans is cavalierly violating good engineering practice!

CalTrans' egregious and unconscionable disregard for the safety of Crescent City and the Smith River is clearly demonstrated by the following facts:

1) None of the CalTrans proposals provide for a wall or a very heavy duty guard rail to prevent out-of-control trucks (up to and including the STAA behemoths) from leaving the highway and crashing down the slopes toward the river and/or its tributaries. 7

2) Furthermore, none of the CalTrans proposals require that the entire roadway and shoulders be fully paved, sealed, and shaped so that they will contain any spills and to prevent said spills from leaching into the soil near the river. All access points, such as connecting roads and driveways, must be designed so as not to breach that containment. 8

3) Moreover, none of the CalTrans proposals ban the transport of significant quantities of hazardous materials. 9

4) Most significantly, none of the CalTrans proposals outline any contingency plans to protect Crescent City, the Prison, and the residents living near the road in the event that toxic material(s) do escape into the river or near-by lands. 10

2

Zuehlke, John

III. Negative Impact of the Proposed Projects on Vehicular and Pedestrian Safety of the Residents Living along North Bank Road near the "Ruby 2" site:

Thankfully, to the present date there have been no fatal accidents recorded along North Bank Road, but the proposed projects will tend to increase both the speed and the volume of traffic along this winding two-lane road. The introduction of "extra legal" STAA trucks trying to negotiate the curves of this road contributes an additional safety hazard. CalTrans itself asserts that "Large trucks are involved in a disproportionate percentage of fatal collisions." 11

Remarkably, while CalTrans insists that their projects would increase the safety of the people living near the site they designate as "Ruby 2, DN 197-PM 3.2-4.0 (01-454900)" (hereinafter "Ruby 2"), at least one of their proposals clearly demonstrates that CalTrans knows that their assertion is not true. To wit, in at least one of their proposals, they indicate that all of the residents' mail boxes are to be relocated to a point beyond the group of houses located near "Ruby 2." Apparently, after the CalTrans construction project is completed, it will be too dangerous for mail delivery vehicles to stop at mail boxes located alongside the resident's driveways! To make matters worse, the residents then will be forced to walk up to about one-quarter of a mile along this newly hazardous road to retrieve their daily mail! This does not bode well for some senior and/or disabled residents. 12

IV. Negative Impact on the Forest:

CalTrans tries to represent their projects as having negligible impact on the trees and the wild life that depends on the trees. All three of CalTran's proposals for the "Ruby 2" site purport to be relatively minor changes to the roadway, and CalTrans has indicated that all of the land that they are requiring for "construction easements" would, after completion of construction, be returned to its original condition. 13

However, hidden in each of the alternative proposals are Trojan horses: CalTrans proposes to seize a large swath of land from the residents along North Bank Road as a "right-of-way." At the "Ruby 2" site this land appears to entail the seizure of at least one ancient "old-growth" redwood tree. This seizure extends far beyond the roadway and the "temporary construction easements" proposed for any of CalTrans' currently proposed projects. CalTrans provides no explanation nor justification for this massive and exorbitant confiscation of property. 14

3

Zuehlke, John

Conclusions:

The proposed "Safe STAA Access Project" along US199 and North Bank Road are poorly engineered, very unsafe for both the near-by residents and Crescent City, and are economically unjustified. CalTrans' "Original EIR," both originally and as amended, are grossly deficient in evaluating the potential adverse impacts that this project can have on Crescent City and the surrounding area. 15

This fatally flawed project should be abandoned, or, at a minimum, completely re-engineered and analyzed with a completely new Environmental Impact Study and Report. 16

Respectfully submitted by:

John Zuehlke

John Zuehlke, Trustee

The Zuehlke Family Trusts
5526 Murietta Avenue
Sherman Oaks, California
91401-5709

Hebe Barrera

Hebe Barrera, Attorney at Law

4

Response to John Zuehlke

Response to Comment 1
This comment states the DEIR/EA is deficient. Individual issues are listed and discussed below.

Response to Comment 2
This comment states the RDEIR/SEA failed to address comments on the DEIR/EA. The RDEIR/SEA was produced and circulated to the public to disclose new information the Department had collected in regards to impacts to trees and plants. The Department does not have additional information to circulate to the public and has prepared responses to comments in this document.

Response to Comment 3
This comment states concerns about the economic and physical need for STAA access. Please see Group Response #1 for a discussion of the purpose and need.

Response to Comment 4
This comment states individual businesses should be listed in the DEIR/EA. Please see Group Response #1 for a discussion of the purpose and need for the project.

Response to Comment 5
This comment states that increased maintenance costs should be considered. There are no increased maintenance costs associated with this project, because STAA vehicles have the same weight limits as CA Legal vehicles and the anticipated increase in truck traffic is not substantial enough to affect maintenance costs.

Response to Comment 6
This comment states an opinion about “good engineering practice”. Many highways across the state and nation are alongside rivers. Please see Group Response #5 for concerns about the Wild and Scenic River, DEIR/EA and FEIR/EA Section 2.3.4 and 2.3.5 for concerns about salmonids, and the response to Vern Power’s Comment #1 for concerns about spills. These routes are designated as conventional 2-lane highways.

Response to Comment 7
This comment states that there should be walls to prevent vehicles from leaving the highway and falling into the river. The project implements metal beam guard rails where appropriate to ensure vehicles remain on the roadway. The project will also provide improved sight distance and improved shoulder widths in areas to enhance safety.

Response to Comment 8
This comment states the roadway should be designed to contain any spills. Please see the response to Zuehlke 2010 comment #6.

Response to Comment 9
This comment states that Caltrans does not ban the transport of hazardous materials. This is correct, this project does not change the status of Hazardous Materials transportation routes currently approved.

Response to Comment 10

This comment states that there is no contingency plan for a spill response. Please see the response to Transcribed Comment 8-1 for a discussion of spill response. The Department's District 1 Spill Contingency Plan is available at the District 1 Office at 1656 Union Street in Eureka.

Response to Comment 11

This comment states concern for safety along SR 197. Please see Group Response #8 for a discussion of safety.

Response to Comment 12

This comment states concern for safety along SR 197 and residential mailbox access. Caltrans coordinated with the Post Office to find reasonable, safe and convenient locations for the mailboxes.

Response to Comment 13

This comment states concern for the Right of Way construction easements. For an explanation of Right of Way and construction easements please see EPIC 2010 Comment #8 and Zeuhlke 2010 Comment #7.

Response to Comment 14

This comment states concern for large redwoods within the Right of Way. Please see Group Response #4 for concerns about large trees.

Response to Comment 15

This comment reiterates the above comments on engineering, safety, economic justification and deficiency of the DEIR/EA and RDEIR/SEA. These comments were addressed by the responses above.

Response to Comment 16

This comment states that the project should be abandoned or redesigned. The Department is satisfied with the current design and environmental analysis.

4.4 Form Letters

4.4.1 Form Letter #1

A total of 16 form letters #1 were received, five of which were modified from the original form letter. One representative copy of the form letter is presented below along with each modified copy of the form letter that contained additional, unique comments.

- Brown, Scott
- Brown, Susan
- Dahlhoff, Patricia
- Griffin, Judith
- Kennedy, Barbara
- Olsen, Donna (Tri-City Ecology Center)
- Pieffer, Gordon
- Powers, Nancy
- Reynolds, Stephanie
- Roope, G
- Souza, Ted

Form Letters with Additional Commentary

- Boyer, Tracy +
- Castor, Inez +
- Cooper, Eileen +
- Quigley, April +
- Rhodes, Joanne +

Form Letter #1

I-5 at Ashland, Siskiyou Summit chain up area

Updated Jan 5 2009 3:25PM Looking South

Elevation 2090 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

Liberty

Return Address:
Scott Bracon
16429 Hwy 101 South
Brookings, OR 97415

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Form Letter #1

DATE:

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County. 2

2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)* 3
This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197. 4

4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.

5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate. 5

6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway. 6

7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity. 7

8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season. 8

9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic. 9

10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.** 10

11. The currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as the state has little money and an overload of maintenance projects. 11

12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR. 12

13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River. 13

Sincerely,

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed. 14

Responses to Form Letter Commenters

Response to Comment 1
This comment expresses concern for safety and old growth trees. Please see Group Response #4 for concerns about trees and Group Response #8 for a discussion about safety.

Response to Comment 2
This comment states that there is negligible economic benefit to Del Norte County from this project. Please see Group Response #1 and #2 for discussions of the purpose and need, and the costs vs. benefits of the project.

Response to Comment 3
This comment states that there will be an increase in traffic due to diversion of traffic around Siskiyou summit during winter conditions. The Department does not anticipate significant effects due to traffic diversion, please see the response to Friends of Del Norte 2012 for a discussion on the potential amount and effects of diverted traffic.

Response to Comment 4
This comment states concern for safety hazards associated with winter conditions, increased traffic (due to I5 winter weather closures), and larger trucks. The 197/199 route was evaluated for STAA truck access, and this project was initiated based on geometric deficiencies in the roadway. Upon completion of this project, STAA trucks will be able to safely navigate the route without crossing the center lane. Please see the response to EPIC/Smith Comment for a full discussion of the safety of large trucks along the route. Please see Group Response #8 for concerns about safety, and Friends of Del Norte 2012 for a discussion of the safety implications of increased traffic during diversions.

Response to Comment 5
This comments states concern over the lack of improvements between Hiouchi and Gasquet. Please see Grouped Response #8, and EPIC response #15 for discussions of how sites were selected for the project.

Response to Comment 6
This comment states that collision rates on US 101 are higher than state averages. This is outside the project area, but the project does have the potential to affect travel volumes on US 101. The Department acknowledges the fact that the actual collision rates are higher than the statewide average collision rates south of Crescent City. This segment of highway 101 traverses through Redwood National and State Parks, coastal area, and a historic landscape district. The area is an environmentally sensitive and resource rich area, and thus creates numerous challenges for standard geometric improvements.

The Department has implemented a number of non-conventional strategies to reduce collisions and minimize impact on the areas resources. This balance of safety and resources has been challenging. Although there has been a reduction in collisions, we strive to further decrease the number of collisions in the area.

Response to Comment 7
This comment states concern for water quality through the potential for spills of hazardous chemicals. The project is not anticipated to increase the potential for spills. Please see Vern Powers response #1 for a discussion.

Response to Comment 8
This comment states concern for public safety. Please see Grouped Response #8 for a discussion of safety.

Response to Comment 9
This comment states concern for public safety on SR 197 due to increased truck traffic. Please see Group Response #8 for a discussion of safety.

Response to Comment 10
This comment states concern for community cohesiveness and safety due to increased traffic and states that the DEIR/EA failed to engage the communities. Effects to communities were analyzed in the DEIR/EA 2.1.3 and determined to be less than substantial. Please see EPIC response #8 for additional discussion on community impacts. There was a public meeting on April 17, 2008 in Crescent City. There was an official Notice of Preparation and scoping meeting in 2008, a public hearing 2010 during the circulation of the full DEIR/EA, notices of availability were published in local papers for these meetings and the circulation of the DEIR/EA and Recirculated DEIR/EA. The department has followed the CEQA guidelines for notification and engagement of the public throughout this process.

Response to Comment 11
This comment states that the California Transportation Policy Priority is to maintain existing infrastructure rather than construct new projects. Please see Group Response #1 and #2 for discussions of purpose and need, and cost vs. benefits of the project.

Response to Comment 12
This comment states that there will be an economic burden to maintain US 199 and US 101 due to the increased impacts from increased heavy truck traffic. The weight limit on STAA trucks is the same as the current California Legal trucks. The additional traffic is not anticipated to be substantial. Thus the increased maintenance costs associated with the implementation of this project and opening the route to STAA trucks is not anticipated to be substantial.

Response to Comment 13
This comment states that there will be an increase in maintenance projects that will impact riparian vegetation. Caltrans does not anticipate an increase in maintenance due to this project. Maintenance projects to not generally cause additional impacts to riparian vegetation. This project is not anticipated to have effects on riparian vegetation other than the direct removal described in the DEIR/EA and FEIR/EA 2.3.1.

Response to Comment 14
This comment states concern over the increased traffic volume due to diversion of traffic due to the closure of I5 at Siskiyou Summit. While there may a temporary increase in traffic volume

during the event, the overall increase in annual volume will not be significant. Please see response to Friends of Del Norte 2012 for a full discussion.

Boyer, Tracy

I-5 at Ashland, Siskiyou Summit chain up area

Updated Jan 5 2009 3:25PM Looking South

Elevation 2090 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov

Or by postal service: Due by Nov 5, 2012.

Return Address:

Tracy Beyer
21827 Beaconcrough Drive
Bend, OR 97701-8820

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Boyer, Tracy

DATE: 10/22/12

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.
2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*

This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.
4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.
5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate.
6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.
7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.
8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.
9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.
10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**
11. The currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as the state has little money and an overload of maintenance projects.
12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR.
13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

1 cont.

Sincerely,

We have a Vacation Home on South Bank Rd in Crescent City - this is very important to us.

2

2 cont.

** NOTE: If only 10% of Hwy 1-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed.

1 cont.

Responses to Tracy Boyer

Response to Comment 1

This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2

This comment states that they have a vacation home on in the area. This is not a comment on the RDEIR/EA.

Castor, Inez

I-5 at Ashland, Siskiyou Summit chain up area

Updated: Jan. 5 2008 3.25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov

Or by postal service: Due by Nov 5, 2012.

Return Address:

Inez Castor
1850 Hancock Ln
Crescent City CA 95531

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Castor, Inez

RUD
10-30-12

DATE:

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.
2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*

This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.
4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.
5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate.
6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.
7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.
8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.
9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.
10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**
11. The currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as the state has little money and an overload of maintenance projects.
12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR.
13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

1 cont

Sincerely,

Inez Castor

Inez Castor
1450 Hamrick Ln
Crescent City CA 95531

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed.

Castor, Inez

10/27/12

RCVD 10-30-12

To Those who make choices:

Please remember who has to live with the choices you make — like me and the Smith River. I was learning to drive when the Collier tunnel was built. I drive that road to see friends in the valley, for Costco, for medical care. 2

Years ago I was involved with shipping lily bulbs out of this area and know that drivers of even short trucks don't belong on that road, especially if they come from "the flat lands." 3

They could only hit and kill me once, and I'm too damned old to be useful any way, but what a spill of toxic material could do to the world's most beautiful river — it doesn't bear thinking about. 4

Please don't try to do this. You Know the money isn't there to do it right!! You simply can't create a safe way to bring "big trucks" down 199. And 101 at Wilson Creek? You've got to be kidding! Please tell me you don't intend to attempt this impossibility. 5

Inez Castor

Inez Castor
1450 Hancock Ln
Crescent City CA 95531

Responses to Inez Castor

Response to Comment 1
This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2
This comment states that the area is important to the commenter and is not a comment on the RDEIR/EA.

Response to Comment 3
This comment states that the lily farm trucks should not be on this road. These trucks are currently using this road, and the improvements proposed will make the road safer for these trucks. Please see Group Response #8 for a discussion of safety.

Response to Comment 4
This comment states concern for toxic spills in the Smith River. Please see Vern Powers Response #1 for a discussion of potential spills in the river.

Response to Comment 5
This comment states concern over funding and safety of big trucks on the route. Please see Grouped Response #1 for purpose and need, Grouped Response #2 for cost vs. benefits, and Grouped Response #8 for Safety.

Cooper, Eileen

I-5 at Ashland, Siskiyou Summit chain up area
Updated: Jan 5 2008 3:25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov
Or by postal service: Due by Nov 5, 2012.

Most recent 2

Del Norte Triplicate — Saturday, November 3, 2012 — A3

One more spill of Cargo on 199 for the record

Hwy. 199 closed by truck rollover

The northbound lane of U.S. Highway 199 near the Oregon border was closed for nearly a day as a result of a semi-truck rolling over.

Juan Calles, 40, of Happy Valley, Ore., was heading north in a truck loaded with frozen seafood around 5:30 p.m. Wednesday when he lost control of the truck going around a curve, according to the California Highway Patrol.

The truck overturned, blocking the northbound lane. It remained closed until noon Thursday.

— *Del Norte Triplicate*

Return Address:
Eileen Cooper
2644 Roy Ave
Crescent City CA 95531

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Cooper, Eileen

DATE: Nov 5 2012

RECEIVED
NOV 05 2012

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.
2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*

This is of great significance for the following reasons:

3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.
4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.
5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate.
6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.
7. There will be a significant increase in risk of truck cargo spills along Hwys.199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.
8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.
9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.
10. **The Hwy 199/197 project involves substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities.**
11. The currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as the state has little money and an overload of maintenance projects.
12. There will be a significant and impractical economic burden and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 at Last Chance Grade under such heavy truck traffic increases. This cumulative impact has been ignored by Caltrans project developers and the EIR.
13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

Sincerely,

Eileen Cooper

1 cont.

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed.

Cooper, Eileen

ATTACHMENT: Explanation of approximate estimate of induced traffic from I-5 diversions:

3

Fehr and Peers, Figure 9, current average daily heavy truck traffic data:

Hwy 197 carries (1800 x .15) = 270
Hwy 199 carries (2800 x .17) = 476
Hwy 101 south carries (4200 x .13) = 546
Hwy I-5 south of Grants Pass carries (35200 x .21) = 7392
Hwy I-5 north of Grants Pass carries (25400 x.26) = 6604

If only 10% of Hwy I-5 daily heavy truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of:

Hwy 197: ~ 270% increase
(between 740/270 = 2.74 or a 274% increase, **and** 660/270 = 2.44 or a 244% increase; adding latent demand identified by Fehr and Peers local users results in slightly greater increases)

Hwy 199: ~ 150% increase
(between 740/476 = 1.55 or a 155% increase **and** 660/270 = 1.39 or a 140% increase; adding latent demand identified by Fehr and Peers local users results in slightly greater increases)

Hwy 101south: ~ 130% increase
(between 740/546 or a 136% increase **and** 660/546 = 1.21 or a 121% increase; adding latent demand identified by Fehr and Peers local users results in slightly greater increases)

Responses to Eileen Cooper

Response to Comment 1
This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2
This comment states that there was a recent spill on US 199. This is not a comment on the RDEIR/EA. For concerns about spills see Vern Powers Response #1.

Response to Comment 3
This comment states concern over induced traffic from I 5 due to winter weather at Siskiyou Pass. This concern is addressed in the response to Friends of Del Norte 2012 comment letter.

Quigley, April

I-5 at Ashland, Siskiyou Summit chain up area

Updated Jan 5 2008 3:25PM Looking South

Elevation 2060 **TripCheck.com** Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

I am speaking up for my safety & the old growth trees that may fall for these highway projects. Thanks to EPIC's lawsuit on Caltrans' Richardson Grove State Park widening project, we are taking advantage of this short window of opportunity to submit our concerns. 1

Comments via email to: jason_meyer@dot.ca.gov

Or by postal service: Due by Nov 5, 2012.

Return Address:

April Quigley
3600 Lake Earl Dr.
Crescent City, CA 95531

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

Quigley, April

DATE: 10-18-12

Dear Mr. Troyer —

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.
2. STAA (Extra Long) truck traffic is likely to significantly increase as a result of creating an STAA truck loop over Hwy 199/197 and Hwy 101 that diverts I-5 truck traffic around Siskiyou Summit in winter. The DEIR/EA has failed to identify and evaluate this cumulative impact. ** The DEIR/EA misleads the public into believing that there will be insignificant increases in traffic *(See an estimate re this increase at bottom of page)*
This is of great significance for the following reasons:
3. Safety hazards will greatly increase from such significant increased truck traffic during the most hazardous rainy winter conditions along an already very challenging and dangerous route such as Hwy 199/197.
4. Even with the proposed safety improvements, a narrow, rural winding canyon road remains, following the Wild and Scenic Smith River.
5. In this plan safety is inadequately addressed on Hwy 199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate.
6. Hwy 101 south of Crescent City already has Fatality-Plus-Injury and Total Collision Rates at eight and eleven times the statewide average for a similar highway.
7. There will be a significant increase in risk of truck cargo spills along Hwys 199/197, threatening the water quality of the Wild and Scenic Smith River, a refuge for California's last salmon, and the only drinking water source for Crescent City. The City has very limited reserve water capacity.
8. Visitors to the National Recreation Area as well as Redwood National & State Parks will be endangered, as will all local residents using these roads, especially during the winter fishing season.
9. Hwy 197 is currently a rural residential highway with 72 driveways directly entering onto the road. There will be a significant increased safety hazard to the residents along this road due to increased truck traffic.
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Sincerely,

April Quigley

April Quigley
3900 Lake Earl Dr.
Crescent City, CA 95531

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2

1 cont

Responses to April Quigley

Response to Comment 1

This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2

This comment states that US 101 would not support the increased traffic associated with this project. The increase in traffic due to this project is not anticipated to be substantial. The STAA trucks have the same maximum weight limitations as the CA Legal trucks and thus there are no additional impacts per truck on the roadway. The small increase in truck volume is not substantial enough to cause additional impacts on the roadway.

Rhodes, Joanne

I-5 at Ashland, Siskiyou Summit chain up area

Updated: Jan 5 2008 3:25PM Looking South

Elevation 2080 TripCheck.com Milepost 13.00

ATT: Jason Meyer

Comments to Caltrans for Recirculated Draft EIR/EA for STAA truck access on Hwy 199/197

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Comments via email to: jason_meyer@dot.ca.gov

Or by postal service: Due by Nov 5, 2012.

WILMINGTON DE 197

30 OCT 20 2 PM L

Equality

Joanne E. Rhodes
109 Pine Dr
Milton, DE 19968-9796

Attention: Jason Meyer

California Department of Transportation,

North Region Environmental, Unit E1

P.O. Box 3700

Eureka, Ca. 95502-3700

95502#3700 3012

Rhodes, Joanne

DATE: 10/29/12

Our Concerns are many, including:

1. The current Draft EIR/EA shows that there is a negligible local economic benefit for Del Norte County.
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13. There will be a significant acceleration in maintenance projects that will substantially degrade riparian vegetation and aesthetics along the Wild and Scenic Smith River.

Sincerely, Joanne E. Rhodes Longterm Resident DNC (25 years)

Extra long trucks on 101 south of C.C and 199 along the windy dangerous SR corridor is ludicrous & absurd & totally not cost effective. Think of the long term damage to these roads & expense to fix!!

** NOTE: If only 10% of Hwy I-5 large truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of the daily number of large trucks currently on Hwy 197 during the winter by about 270%, or almost triple the number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. (DEIR 199/197, Fehr & Peer, Figure 9). If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed, is needed to evaluate this situation. A real assessment of the impacts is needed.

Leave DNC out of the loop.!! How could truckers possibly save gas $$ by making such a huge loop – or time?? This could destroy the Wild & Scenic DNC we love !!

Responses to Joanne Rhodes

Response to Comment 1

This is the Form Letter 1. Please see the main comment responses.

Response to Comment 2

This comment states that allowing STAA trucks on US 199 and US 101 is not cost effective or safe. Please see Group Response #1 for purpose and need, Group Response #8 for safety concerns and the response to EPIC's 2012 Smith Letter for the suitability of the route for STAA vehicles.

Response to Comment 3

This comment questions the purpose and need for the project, please see Group Response #1 for a discussion. This comment also states concern for the Wild and Scenic River, please see Group Response #5.

4.4.2 Form Letter #2

A total of 358 Form Letter #2 were received, 10 of which were modified from the original or contained additional comments. One representative copy of the form letter is presented below along with each modified copy of the form letter that contained additional, unique comments.

- Hughes, Gary
- Absher, Jonathan
- Adkins, Julia
- Alarie, Angélique
- Alexander, Joshua W
- Allaway, Theresa
- Allen, Beth
- Allenstein, Gudrun
- Allison, Bill
- Anderson, Christeen
- Anderson, Mary Ella
- Anderson, Wayne
- Angulo, Kathleen
- Armin-Hoiland, Joel
- Armstrong, Rebecca
- Ausman, Candi
- Bailey, Gary
- Barsotti, Susy
- Beard, David
- Beauchamp, S
- Bechmann, Elisabeth
- Becker, Carol
- Beinlich, Brian
- Bell, Stacey
- Betz, Erik
- Bien, Michael

- Binnie, Stanley
- Bodine, Josh
- Bohn, Jennifer
- Borges, Maria
- Borrege, Sharon
- Bottorff, Ron
- Brandtner, Jamie
- Brown, Ashley
- Brown, Joanne
- Bryant, Ellen
- Bsh, Sakina
- Burtis, David
- Burton, Julia
- Buslot, Chantal
- Butterfield, Lisa
- Cain, Constance E
- Carlson, Warren
- Carpenter, Gary
- Carro, Lina
- Chague, Stephenie
- Chandler, Daniel
- Christopher, Stephanie
- Churchill, Holly
- Ciancutti, Francesca
- Claudine, Bos
- Cole, Corrine
- Collins, Brenda
- Connors, Chuck
- Corbett, Craig
- Cornelis, Chantal

- Corviday, Morgan
- Cowan, Jodie
- Curtis, James
- Daniel, Donna
- Daniels, Patricia
- Darling, Dawson
- Davidson, Laura
- Davie, Dennis
- Davies, Sue
- De Rooy, Sylvia
- DeJac, Loreli
- Denton, Valerie
- Derden, Jim
- Dietrich, Beate
- Diggs, Linelle
- Dombrowski, Bonnie
- Dreyer, Sharyn
- Durant, Monica
- Durchslag, Jimmy
- Durkee, Carrie
- Durston, Robin
- Dyche, Norman
- Edison, Miranda
- Edwards, Bruce A.
- Edwards, Virginia
- Eis, Tamara
- Elerick, Paul
- Elkhart, Rio
- Ellis, Rhea
- Elvine-Kreis, Brenda

- Erdman, Barbara
- Eschelbach, Claire
- Evans, Simon J
- Farmer, Tim
- Fast, Yvonne
- Felter, Bob
- Felter, Virginia
- Fergus, Jeri
- Filipelli, Deborah
- Flewelling, Tim
- Flowers, Bobbie
- Flowing, Flo
- Foot, Susie and Jimmy
- Force, Tom
- France, Jeanne
- Frazee, Cary
- Frediani, Jodi
- Freedom, Rea
- Freiman, Howard
- Gingrich, Nancy
- Gladstone, Jean
- Glavic, Danijela
- Goff, Paul
- Goodell, Barbara
- Grant, David
- Grant, John
- Graves, Caryn
- Green, Jacqueline
- Green, Jason
- Grobe, Nicola

- Gross, Margo
- Groth, Nancy
- Grove, Alyssa
- Guerreiro, Mike
- Guldin, Laura
- Gustafson, Amberlee
- Gutierrez, Freddy
- Haje, Paul
- Halbe, Denise
- Halliday, Janice
- Hanna, Franchesca
- Harrington, Roxie
- Harris, Karen
- Harvey, Rob
- Hatton, Ayris
- Hayes, Tim
- Haywood, Russell
- Helsel, Daniel
- Herbelin, Margaret
- Hergenrather, Harry
- Herr, Jeff
- Hertz, Cade
- Hill, Joe
- Hinant, Susanna
- Hire, Kathleen
- Hoffman, Laurel
- Holt, Jennifer
- Hoppenbrouwers, Bart
- Hostetter, Paul
- Houston, Joyce

- Howard, Tim
- Hrusa, Fred
- Hughes, Heidi
- Iodice, BellaDonna
- Jackson, Dennis
- Jarocki, Gail
- Jarocki, Paul
- Jochimsen, Travis
- Johnson, Debbie
- Jones, Bradley
- Jurkowski, Julie
- Karaba, Kelly
- Karno, Rachel
- Kavoyianni, Sandy
- Kay, Rena
- Kegler, John
- Kegler, Lori
- Kegler, Robin
- Kegler, Tyler
- Keisner, Cheri
- Kellogg, Marlena
- Kennedy, Barbara
- Kessler, D
- Kirk, Kristin
- Kisio, Michal
- Koessel, Karl
- Kohr, Chery
- Kowalak, Amy
- Krause, Debra
- Kreider, Philip

- Laiti, Jared
- Landis, Linda
- Lapointe, Jocelyn
- Lasko, Angelina
- Latham, Peggy
- Laurence, Henot
- Lautaro, Gabriel
- Ledden, Dennis
- Lee, Carol
- Lee, Ryan
- Lennard, S
- Lerner, Shaina
- Letton, Frank
- Lieb, Louise
- Lieber, Jean
- Lieber, Robert
- Lind, Pat
- Lindemann, Stephen
- Lips, Stu
- Little, Judith
- Little, Sandra
- Loberg, Neville
- Logan, Theresa
- Louchard, O' Neill
- Low, Grant
- Luna, Jaclyn
- Luther, Steve
- MacLeod, Nancy
- Madrone, Rose
- Manela, Sara Prentice

- Mangels, Francis
- March, Sara
- Marie, Lynne
- Marseille, Tanya
- Marshall, Aquaea
- Martinson, Tim
- McCain, Rachael
- McCann-Sayles, Alan
- McCann-Sayles, Daniel
- McEwen, Eric
- McGee, Eileen
- Mcguire, Will
- McLaughlin, Michael
- Mcsweeney, Charles Otter
- Mefford-Hemauer, Apryl
- Melerzanov, Vadim
- Merriman, Joan
- Metz, Ellen
- Mikalson, Amanda
- Mikasi, Ayani
- Miller-Wolf, Lorraine
- Moller, Jay
- Mone, Carol
- Moore, Melissa
- Morey, Patricia
- Morgan, Linda
- Morison, Mariel
- Morris, Teresa
- Morton, Margaret
- Mountjoy, Bob and Jan

- Murnig, Guido
- Murnig, Guy
- Murnig, Lacey
- Nayyar, Rena
- Nelson, Bill
- Nelson, Christine
- Nelson, Kevin
- Oberweiser, Ed
- Oliver, Lauren
- Ornelas, Bob and Susan
- Owen, Chris
- Pace, Felice
- Patton, Gary
- Patton, Jason
- Penfield, Ralph
- Perricelli, Claire
- Peterson, Davin
- Petrone, Mary
- Pollock, Janelle
- Preston, Patricia
- Quesnel, Nathalie
- Ragland, Hannah
- Rashall, Rosa
- Ratcliff, Philip
- Ratzlaff, Karen
- Raybee, Elizabeth
- Reese, Heather
- Rennacker, Ann
- Rich, Barbara
- Richardson, Matt

- Rinne, Fred
- Ristow, Barbara
- Roach, Gabrielle
- Roche, Maureen
- Rosati, Allison
- Schaefer, John
- Scher, Sarah
- Schillo, Noah
- Schneider, Sarah
- Schümmer, Sue
- Scott, Celia
- Scott, Peter
- Shearer, Robert
- Sheidler, Richard
- Sherman, Lauryn
- Shomer, Forest
- Silvernale, Dana
- Simpson, David
- Slotnick, Scott
- Smith, Donald
- Smith, Doug
- Smith, Phillip
- Smith, Suzanne
- Smits, Josine
- Snow, Annette
- Sorensen, Anna
- Spenger, Constance
- Spitz, Jon
- Spitzer, Mandy
- Sreiber, Andrea

- Stansfield, Lesley
- Stebbings, Barrie
- Stenberg, Anna Marie
- Stender, Bill
- Stephanos, Marika
- Stewart, Billie
- Stewart, John
- Stewart, Tyler
- Stuchlikova, Kristyna
- Sunstein, Sara
- Taylor, Jennifer
- Teitelbaum, Geraldine
- Tellez, Kim
- Terry, Patricia
- Thiel-Silver, Judi
- Thompson, Ann
- Thompson, Donna
- Thompson, Jon
- Tomcak, Clay
- Tonn, David
- Tonsing, Timothy
- Van Rijn, Gerda
- Vandegriff, James
- Vanderbroek, Laura
- Vanderbush, Terry
- Vega, Elizabeth
- Velasco, Stephane
- Wadsworth, Myndy
- Walker, James
- Ward, Pamela

- Waters, Michelle
- Weber, Nicole
- Weil, Helene
- Welling, Anne
- Werner, Elizabeth
- West, Barbara J.
- West, Paul
- White, Ann
- White, Katherine
- Wieland, Leslie
- Wilke, Lorraine Devon
- Williams, F
- Williams, Joseph and Diane
- Williams, Lawrence
- Wilson, Jane
- Wilson, Kelpie
- Winkler, Mark
- Wojcik-Tremblay, Kassi
- Wolter, Manuela
- Womack, Kristin
- Wood, Wendell
- Zimmer, Judy
- Zuehlke, John

Form Letters with Additional Commentary

- Akerman, Fred +
- Anaya, Zachary +
- Gardiner, John +
- Hall, Daniel +
- Livingston, John +
- Macy, Nancy and Ken +

- McCombs, Robert +
- Pappalardo, Sue +
- Raymer, Terry +
- Thomas, Julia +

Form Letter #2

Gary Hughes
<gary@wildcalifornia.org>
10/11/2012 12:26 PM
Please respond to
<gary@wildcalifornia.org>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment. 3

The project would have significant impacts on: 4

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be: 5

- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes." 6

Abandon this project and focus on maintaining the existing road infrastructure. 7

Sincerely,

Gary Hughes
145 G St.
Suite A

Response to Gary Hughes

Response to Comment 1
This comment states that the project is not necessary. Please see Grouped Response #1 for a discussion of the purpose and need.

Response to Comment 2
This comment states that STAA access already exists for Crescent City and questions the funding decisions in regards to safety. Please see Group Response #1 for a discussion of the purpose and need for the project. Please see Group Response #2 for a discussion of the cost vs. benefits of the project. The proposed improvements will provide safety enhancing features for all drivers.

Response to Comment 3
This comment states that an Environmental Impact Statement (EIS) is the appropriate NEPA document for this project. The Department conducted an Environmental Assessment (EA) under NEPA and determined that there are no significant impacts, and proceeded to prepare a Finding of No Significant Impact (FONSI).

Response to Comment 4
This comment states that the project would have significant impacts on various resources. The DEIR/EA, RDEIR/EA, and FEIR/EA clearly state that all impacts were avoided, minimized or otherwise mitigated to less than significant levels. Please see Group Response #5 for a discussion on the Wild and Scenic Smith River. Please see Group Response #4 for a discussion of large tree impacts. Please see Section 2.3.4 and 2.3.5 for information about protected species. Please see Group Response #2 for a discussion of impacts to tourism and parks. Please see Group Response #10 for a discussion of geological issues.

Response to Comment 5
This comment states that there will be increases in truck traffic and safety hazards. Section 2.1.5 discusses the increase in truck traffic associated with this project. There is no anticipated safety hazard associated with the project. Please see Group Response #8 for safety concerns and Vern Powers Response #1 for a discussion of spills and water quality.

Response to Comment 6
This comment cites the Route Concept Reports for SR 197 and US 199. These routes will remain a “2-lane, conventional highway, with passing lanes” after the project. There are no plans for extensive upgrading of this facility to a 4-lane highway at this time.

Response to Comment 7
This comment states that the project should be abandoned in favor of maintenance. This is not a comment on the RDEIR/EA.

Ackerman, Frank

Frank Ackerman
<ackermanjay@juno.com>
10/11/2012 07:41 PM
Please respond to
<ackermanjay@juno.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers.

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

We don't need a highway for a few big trucks that are paid for by the rest of us and destroys the beauty we enjoy. It is so easy to destroy and so hard to protect what makes life a joy. 2

Abandon this project and focus on maintaining the existing road infrastructure. 1 cont.

Sincerely,

Frank Ackerman
1325 Henry St.
Berkeley, CA 94709

Response to Frank Ackerman

Response to Comment 1

These comments were addressed in detail in the Form Letter #2 responses.

Response to Comment 2

This comment questions the purpose and need, please see Grouped Response #1.

Anaya, Zachary

Zachary Anaya
<za7@humboldt.edu>
10/11/2012 08:26 PM
Please respond to
<za7@humboldt.edu>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers.

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure. Please refrain from undermining the ecological integrity of the Smith River basin. We truly should focus investment on structures that are already in place and oppose spending when losses expand widely with little long-term return. 2

Sincerely,

Zachary Anaya
3216
Alliance Rd
Arcata, CA 95521

Response to Zachary Anaya

Response to Comment 1

These comments were addressed in detail in the Form Letter #2 responses.

Response to Comment 2

This comment states that the project should be abandoned in favor of maintenance. This is not a comment on the RDEIR/EA.

Gardiner, John

John Gardiner
<john.l.gardiner@gmail.com>
10/11/2012 10:02 PM
Please respond to
<john.l.gardiner@gmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I'm a 66-yr old Professional Engineer with a lifelong career in River basin Management. I live in Cave Junction, and have traveled this road many, many times indeed in perfect safety. As a PE, I can readily assess the damage that widening this road will do to the landscape. This project is dangerous to the environment, particularly the last really pristine river, the Smith, and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through the treasured Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure; such will be the outcry that it will never get built and you will have completely wasted taxpayers' money on years of abortive work. 3

Sincerely,

John Gardiner
PO Box 2451
327 Millie Street
Cave Junction, OR 97523

Response to John Gardiner

Response to Comment 1
This comment generally states that the project is dangerous to the environment. This is not a comment on the RDEIR/EA.

Response to Comment 2
These comments were addressed in detail in the Form Letter #2 responses.

Response to Comment 3
This comment states that the project should be abandoned in favor of maintenance. This is not a comment on the RDEIR/EA.

Hall, Daniel

Daniel Hall
<danielhall333@gmail.com>
10/15/2012 10:28 AM
Please respond to
<danielhall333@gmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Cancel 97/199 Safe STAA Access Project

This project is very likely to harm important economic, social, and environmental values, and is also completely unnecessary. 1

It is my understanding that STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Thus the project is not only unnecessary, but will also divert funding away from other potential uses that will actually offer real economic, social, and environmental benefits. The opportunity cost of using $35 million on the unnecessary 97/199 STAA project should be assessed as part of the NEPA analysis before the project moves forward. 2

The NEPA analysis should also examine the project's cumulative impacts, including on climate change and values affected by climate change, due to potentially increased truck traffic and associated greenhouse gas emissions. 3

Likewise, the NEPA analysis needs to examine the likely impacts on: 2

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

The likely impacts on tourism and related social values should be examined thoroughly. The Smith River corridor is a significant scenic attraction, and the current highway's narrow, winding character makes it attractive to motorcyclists and other motorists who enjoy driving on scenic roads, and who surely contribute substantially to the local economy. Straightening and widening the highway, and increasing large truck traffic on the highway will make the route substantially less attractive to motorists and tourists, and thus likely significantly harm local tourism based businesses and economies. 4

As a fifth generation Californian (currently living out of state, but who regularly returns to visit) and someone who greatly values the Smith River highway corridor for its current character, and would find that character to be seriously harmed by projects that widen and straighten the road, I urge you to abandon this project -- and the implicit assumption that bigger, wider, and straighter is better. One needs only look at the freeway system in Southern California -- and how utterly unlivable that landscape is -- to see the fallacy in that assumption. 5

Sincerely,

Daniel Hall
6857 N Michigan
Portland, OR 97217

Response to Daniel Hall

Response to Comment 1
This comment questions the purpose and need of the project, please see Group Response #1.

Response to Comment 2
These comments are addressed in the Form Letter #2 responses.

Response to Comment 3
This comment states that the document should evaluate cumulative impacts and greenhouse gases. Please see DEIR/EA and FEIR/EA Section 2.5 for a discussion of cumulative impacts. Please see DEIR/EA and FEIR/EA Section 3.2.4 for a discussion of greenhouse gases and climate change.

Response to Comment 4
This comment states that the project will have negative impacts on tourism and scenic values. Please Group Response #2 for a discussion of impacts to tourism. See DEIR/EA and FEIR/EA Section 2.1.6 for discussion of visual impacts.

Response to Comment 5
This comment states concern over the character of the route. The current character of the route will remain largely unchanged after the project is implemented. See DEIR/EA and FEIR/EA Section 2.1.6 for discussion of visual impacts.

Livingston, John

John Livingston
<Livingstonjohn@att.net>
10/11/2012 09:11 PM
Please respond to
<Livingstonjohn@att.net>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I grew up in Eureka and have travelled along the Smith River probably 15 times. I am a retired licensed geotechnical engineer with 37 years of experience in California. This project is dangerous to the environment and is completely unnecessary. We do not need to expand our infrastructure, damage our environment, and create maintenance and expenses for future people to fund. Please leave this highway alone. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

John Livingston
2378 Waldon Street
Redding, CA 96001

Response to John Livingston

Response to Comment 1

This comment generally states that the project is dangerous to the environment. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Macy, Nancy and Ken

Nancy & Ken Macy
<nbbm@cruzio.com>
10/29/2012 02:09 PM
Please respond to
<nbbm@cruzio.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

This project is dangerous to the environment and is completely unnecessary. We LOVE that winding road through that remote area and it would be a travesty to destroy the beauty of the route, and devastate the Smith River and ancient redwoods along with it. We travel it regularly and feel the changes would be both stupid and wrong. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

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- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Nancy & Ken Macy
15485 Bear Creek Rd.
Boulder Creek, CA 95006

Response to Nancy and Ken Macy

Response to Comment 1

This comment generally states disapproval of the project. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

McCombs, Robert

Robert McCombs
<bobmcc@humboldt1.com>
10/18/2012 10:52 PM
Please respond to
<bobmcc@humboldt1.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

We don't need or want your "improvements" and it's a complete waste of taxpayer dollars. 1

This project is dangerous to the environment and is completely unnecessary. 2

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers.

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

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- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Robert McCombs
PO Box 4175
164 Deer Fern Ln. Bayside (NO MAIL!)
Arcata, CA 95518

Response to Robert McCombs

Response to Comment 1

This comment generally states opposition to the project. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Pappalardo, Sue

Sue Pappalardo
<robinbyrd2@yahoo.com>
10/13/2012 08:30 PM
Please respond to
<robinbyrd2@yahoo.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I live in Gasquet, near Highway 199. I do not want increased truck traffic in the area. It would create more hazardous road conditions, generate more noise pollution and environmental pollution, and degrade the beauty and serenity of the area. Additionally, I do not want old-growth trees to be harmed. 1

This project is dangerous to the environment and is completely unnecessary. 2

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers.

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

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- The steep and geologically unstable Smith River canyons

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Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Sue Pappalardo
P.O. Box 313
Crescent City, CA 95531

Response to Sue Pappalardo

Response to Comment 1

This comment states concern for increased truck traffic, noise and air pollution, safety hazards and impacts to large trees. Truck volume increases are expected to be small and not significant, see DEIR/EA and FEIR/EA Section 2.1.5. Please see DEIR/EA and FEIR/EA Section 2.2.5 Air Quality and 2.2.6 Noise and Vibration for associated concerns. Please see Group Response #4 for concerns about large trees.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Raymer, Terry

Terry Raymer
<twraymer@hotmail.com>
10/14/2012 06:23 PM
Please respond to
<twraymer@hotmail.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

I travel this road numerous times per year (6-12, more some years). This project is dangerous to the environment and is completely unnecessary. 1

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

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- The steep and geologically unstable Smith River canyons

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Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure. thabk you for your consideration of this letter.

Sincerely,

Terry Raymer
2146 Tina Court

Arcata, CA 95521

Response to Terry Raymer

Response to Comment 1

This comment generally states that the project is dangerous to the environment. This is not a comment on the RDEIR/EA.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.

Thomas, Julia

Julia Thomas
<jthmosaic@aol.com>
10/12/2012 02:56 PM
Please respond to
<jthmosaic@aol.com>

To <jason_meyer@dot.ca.gov>
cc
bcc
Subject Abandon the 197/199 Safe STAA Access Project

CALIFORNIA CAN NOT AFFORD THIS RIDICULOUS PROJECT!!!!!!!! WE ARE CUTTING FOOD PROGRAMS, HOSPITALS AND EVERYTHING ELSE THAT PEOPLE NEED TO SURVIVE. WE DO NOT NEED CALTRANS OFFICIALS TO MAKE MORE MONEY DESTROYING OUR ENVIRONMENT. WE CANNOT AFFORD CALTRANS OFFICIALS WHO CREATE PROJECTS LIKE THIS!!!!! 1
This project is dangerous to the environment and is completely unnecessary.

STAA access already exists for the area from Highway 101 to the north and Highway 299 to the south. Instead of spending $35 million on a project that is designed to allow the largest trucks on the road to travel down one of the narrowest and steepest highways in California, spend that money making Highway 199 safer for all drivers. 2

If Caltrans does not abandon the project, an Environmental Impact Statement (EIS) must be prepared under the National Environmental Policy Act (NEPA). By law, an EIS must be prepared when a project "may" have a significant impact on the environment.

The project would have significant impacts on:

- The pristine Wild and Scenic Smith River
- Old-growth Redwoods and Douglas Fir trees
- Endangered Marbled Murrelets, Northern Spotted Owls and anadromous fish including Coho and Chinook Salmon, and Steelhead
- Tourism and recreational opportunities along the Smith River National Recreation Area, Six Rivers National Forest, Redwoods National and State Parks, Jedediah Smith Redwoods State Park, and Ruby Van Deventer County Park
- The steep and geologically unstable Smith River canyons

There would be:
- Increases in truck traffic as a result of an alternate travel route for STAA trucks being created between Grant's Pass, Oregon and the Bay Area by way of Highway 101 (and through Richardson Grove).
- Increases of safety hazards from increased truck traffic including truck cargo spills that threaten water quality and endanger the drinking water supply.

Caltrans' own Route Concept Report acknowledges, "the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon" and concludes that environmental concerns and ecological sensitivities make State Route 199 a "poor candidate for extensive upgrading." That report recommended leaving SR 199 "basically a 2-lane, conventional highway, with passing lanes."

Abandon this project and focus on maintaining the existing road infrastructure.

Sincerely,

Julia Thomas
375 Alabama
San Francisco, CA 94110

Response to Julia Thomas

Response to Comment 1

This comment questions the purpose and need for this project. Please see Group Response #1 for a discussion of why this project is necessary.

Response to Comment 2

These comments are addressed in the Form Letter #2 responses.