WILLITS BYPASS

MENDOCINO COUNTY

KP R69.4/KP 84.2 (PM R43.1/52.3) [EA26200]

FINAL ENVIRONMENTAL IMPACT STATEMENT / ENVIRONMENTAL IMPACT REPORT

October 2006

VOLUME 2 OF 4
RESPONSES TO COMMENTS

United States Department of Transportation
Federal Highway Administration

California Department of Transportation

Responses to Comments

The May 2002 Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) was circulated to the public from June 10, 2002 to August 10, 2002, and then extended to August 26, 2002 to accommodate a delayed Federal Register filing. Caltrans and FHWA received 625 letters from the general public. Of these letters, 444 were form letters, 150 were original letters, and 31 were email communications. Caltrans and FHWA also received one petition with 175 signatures. At the July 24, 2002 open house, 58 members of the public submitted comment sheets and 24 members of the public dictated comments to the court reporter. Ten organizations submitted comment letters, and 27 local, state, and federal government agencies submitted comment letters. The large number of comments received from the general public attests to the awareness of the local community about this project and the community's interest in having its concerns heard and addressed.

1.1 How to Use the Responses to Comments Volume

Each comment received on the DEIS/EIR has been assigned a reference number and is organized into one of the following categories: Federal Agencies (Nos. 1 – 4), State Agencies (Nos. 5 – 8), Local and County Agencies (Nos. 9 – 25), Organizations (Nos. 26 – 36), Individuals (Nos. 37 – 234), Open House Comments (Nos. 235 – 305), and Petitions (No. 306). An index of comment letters and corresponding reference numbers is provided at the beginning of each section, directly before the responses, for use in locating a particular comment letter.

Due to the length of time that has passed since the initial comment period and the subsequent identification of the Least Environmentally Damaging Practicable Alternative (LEDPA), every effort has been made to provide the most current information in the responses to comments made during the public review period for the May 2002 DEIS/EIR.

1.2 General Responses

As the majority of letters from the general public were form letters, many of the comments focused on a select number of issues and topics that raised similar concerns regarding the Willits Bypass project. To facilitate the review of the Responses to

Comments volume and to provide a comprehensive response to the common issues raised, General Responses have been prepared to address the most frequently expressed concerns. Sections 1.3 through 1.14, below, provide detailed responses for the following recurrent themes:

- **General Response 1.3:** Support for a Hybrid Alternative L/C with Truck Scales Interchange (also referred to in some letters as Elsie/Wild Oat Canyon alternative).

- **General Response 1.4:** Suggestion that a Willits Creek restoration would mitigate impacts of Alternative L/C, thus qualifying it for the LEDPA.

- **General Response 1.5:** Suggestion that a Willits Creek restoration would improve operation of the City's wastewater treatment plant.

- **General Response 1.6:** Suggestion that a Truck Scales Interchange (also referred to as Wild Oat Canyon interchange) would accommodate a future Brooktrails access while a Quail Meadows Interchange would not.

- **General Response 1.7:** Concerns that the Quail Meadows Interchange (Alternatives LT, J1T, and Modified J1T) would impede efforts by emergency services providers.

- **General Response 1.8:** Suggestion that the Quail Meadows Interchange (Alternatives LT, J1T, and Modified J1T) would worsen congestion and reduce traffic safety at the high school and at the Sherwood Road/Main Street (existing U.S. 101) intersection.

- **General Response 1.9:** Support for a center valley interchange, in addition to the north and south interchanges.

- **General Response 1.10:** Suggestion that the DEIS/EIR should include an analysis of a two-lane bypass.

- **General Response 1.11:** Disagreement with DEIS/EIR conclusions regarding resource impacts (such as noise, visual, farmland, biological resources, business).

- **General Response 1.12:** Concern about growth at interchanges.

- **General Response 1.13:** Suggestion that further reduction in median width would reduce environmental impacts.

- **General Response 1.14:** Suggestion that the mitigation measures presented in the Draft EIS/EIR were too conceptual in nature.

1.3 Support for Hybrid Alternative L/C

Comment: *We support the Alternative L/C proposal (comment letters also refer to this alternative as the Elsie Alternative or Wild Oat Canyon Alternative).*

The Draft EIS/EIR (Volume 3: Sections S.5 and 5.7.1.2, and Appendix H) explains that because of the project's impacts to wetlands and other waters of the U.S., which are subject to U.S. Army Corps of Engineers (ACOE) jurisdiction, a Section 404 (Clean Water Act) permit is required prior to start of construction. ACOE will issue a Section 404 Permit only for the Least Environmentally Damaging Practicable Alternative (LEDPA). To evaluate which alternative would be the LEDPA, Caltrans prepared a Section 404(b)(1) Alternatives Analysis. The Final Alternatives Analysis (Appendix G, FEIS/EIR) concluded that Modified Alternative J1T meets Clean Water Act Section 404(b)(1) criteria and is, therefore, eligible to receive a Section 404 permit from ACOE. Both USEPA and ACOE issued concurrences that the Modified Alternative J1T is the LEDPA and that Alternatives E3, C1T, LT, as well as the hybrid L/C, do not meet Clean Water Act Section 404(b)(1) criteria for their overall environmental impacts (Appendix C, FEIS/EIR).

The following discussion summarizes the Final Alternatives Analysis conclusions for Alternative L/C.

Alternative L/C

Section 7.2 of the Final Alternative Analysis discusses in detail why the hybrid Alternative L/C does not meet Section 404(b)(1) criteria to be considered as the LEDPA. The Alternatives Analysis for Alternative L/C demonstrates that the hybrid alternative would have substantial overall environmental impacts, including adverse impacts to

wetlands and habitat for federally-listed fish species. The impacts of Alternative L/C are summarized as follows:

- Would have the largest direct impact to jurisdictional aquatic resources. Alternative L/C would impact approximately 48.5 ha (119.9 ac) of wetlands and other waters of the U.S. These impacts are nearly twice that of Alternatives J1T and Modified J1T, which would impact approximately 22 ha (54.6 ac) and 25.9 ha (64 ac), respectively, of wetlands and other waters of the U.S.

- Would require the realignment of approximately 400 m (1,300 ft) of Mill Creek and a 1,600 m (5,250 ft) reach of Outlet Creek bordering the east side of the Northwest Pacific Railroad tracks, in the northern portion of Little Lake Valley. This realignment would result in direct impacts to three federally listed fish species.

- Would fill large areas of wetland habitat (29.9 ha [74.9 ac], 31.6 ha [78.3 ac] of wet meadow and 16.1 ha [39.8 ac] and 13.8 ha [33.9 ac], respectively, of riparian woodland and scrub habitats), which has the potential to directly and indirectly alter surface and groundwater hydrologic conditions of several flood basins in Little Lake Valley that provide habitat for several special-status species.

Due to its overall environmental impacts, Alternative L/C would not be eligible for a Section 404 permit (from ACOE). This permit is required for construction of the project.

1.4 Mitigate Alternative L/C's Wetland Impacts by Restoring Willits (Mill) Creek

Comment: *Willits Creek (also referred to as Mill Creek) was originally connected to Outlet Creek. Early settlers may have severed the connection in their efforts to improve drainage for agricultural activities. In addition, when the Northwest Pacific Railroad from Willits to Eureka was constructed in the early 20th century, Willits Creek was separated into two branches on either side of the railroad. The restoration of Willits Creek (reconnecting it to Outlet Creek) should have been studied in the DEIS/EIR as a mitigation measure for Alternative L/C. The comment states that NMFS, CDFG, and ACOE support a Willits Creek restoration.*

A creek restoration could be considered as in-kind or out-of-kind mitigation for impacts due to any of the build alternatives. However, a Willits Creek restoration could not be

considered in determining which alternative is the LEDPA. Clean Water Act Section 404(b)(1) Guidelines direct that the evaluation of practicable alternatives must consider the impact to waters of the U.S. that would result from the alternative *before* compensatory mitigation (such as creek restoration).

The resource agencies have stated that the creek restoration would not be sufficient mitigation for them to consider issuing a permit for construction for Alternative L/C[1]. This is due to the magnitude of the hybrid alternative's direct adverse impacts to the diverse variety of wetland types and other waters of the U.S. as well as its direct impacts to habitat for federally listed fish species. A Willits Creek restoration itself could result in both direct and indirect impacts to habitat for federally listed fish species. Considerable study would be required to determine the feasibility of such a restoration project.

1.5 Willits Creek Restoration for the City's Wastewater Treatment Plant

Comment: *Increased water flows from a Willits Creek restoration would help the City's wastewater treatment plant achieve mandated discharge ratios.*

This comment refers to the required ratio of creek water to treated wastewater that is released into Willits (Mill) Creek. The required ratio is 100:1, but the City has a temporary exception to release treated wastewater at a 25:1 ratio. Meeting the lower 25:1 ratio is not possible during the summer months due to extremely low creek flows. Excess treated wastewater is either stored or used in controlled irrigation. Higher flows in Willits Creek would make it easier to achieve the required release ratio without having to create large storage ponds or increasing the area being irrigated with treated effluent.

Including a component into the project for the purpose of improving operation of the wastewater treatment plant is outside of the scope of a Willits bypass project.

1.6 Brooktrails Township Second Access Road

Comment: *The Truck Scales Interchange on Alternative L/C is needed for a Brooktrails Township Second Access Road at Wild Oat Canyon.*

[1] The adverse impacts to waters of the U.S. and to listed fish species occur at the north segment of both Alternatives C1T and L/C.

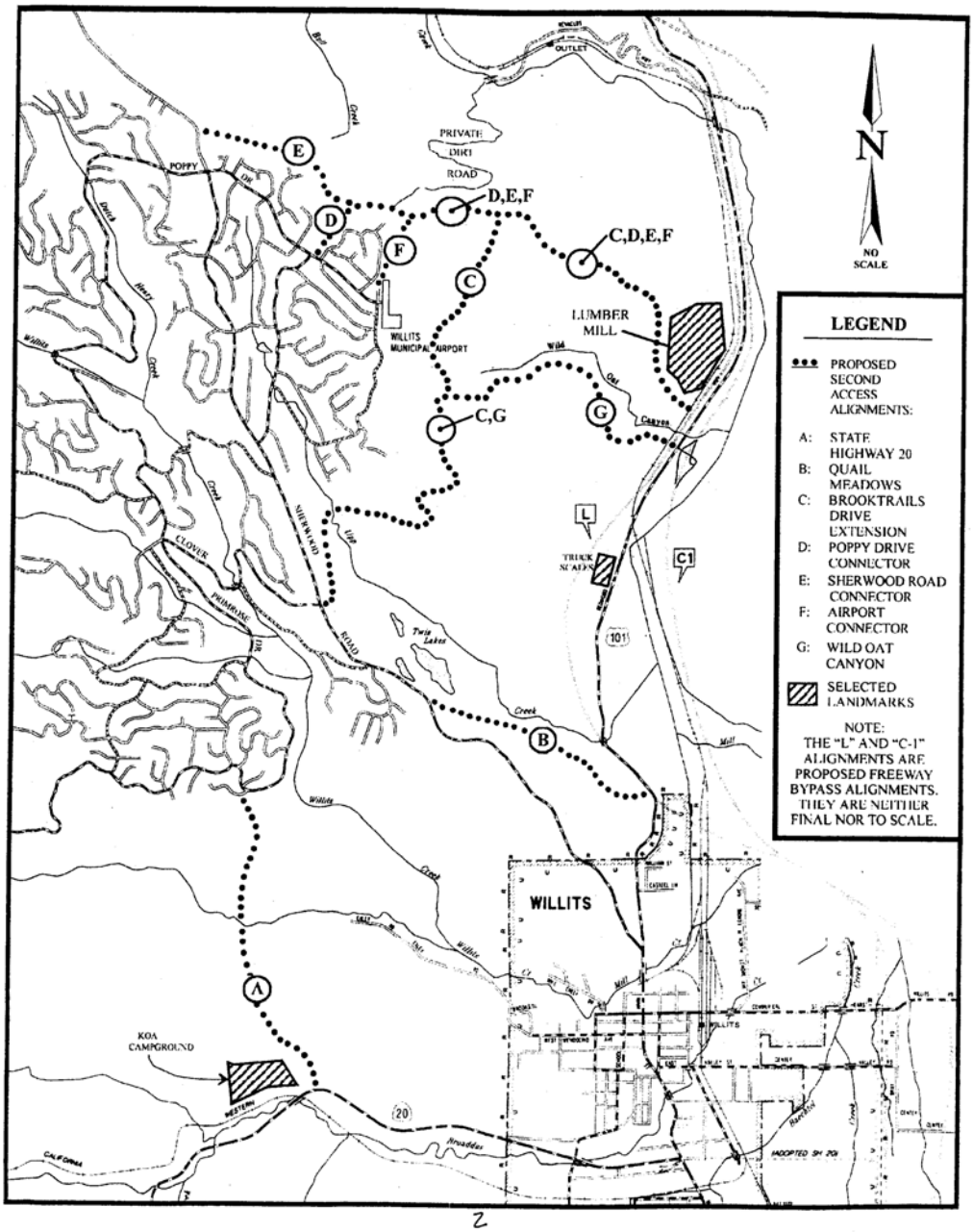
Many letters, including those from emergency services providers, communicated support for the hybrid Alternative L/C based principally on an understanding that only a Truck Scales Interchange would accommodate a connection to a future Brooktrails Township second access road.

The Brooktrails Township currently has one access from U.S. 101 at the Sherwood Road intersection. Due to capacity and emergency service access concerns regarding Sherwood Road, the township is actively studying various alternatives to provide a second access to the community from U.S. 101.

Any of the proposed build alternatives considered in the DEIS/EIR would accommodate a connection to a Brooktrails Township second access road. With a Quail Meadows Interchange (Alternatives J1T, Modified J1T, and LT), the most likely connection to a Brooktrails Township second access road would be with a relinquished portion of U.S. 101, north of the Quail Meadows Interchange, which would become a county frontage road. Brooktrails traffic using the second access road would travel on the frontage road to enter U.S. 101 at the Quail Meadows Interchange. This connection would eliminate the need for an at-grade intersection and would eliminate the need for a railroad crossing for a Brooktrails second access. This connection would not require a change to project design and would not affect operation of the bypass. See Map 27b of the DEIS/EIR Environmental Atlas, which shows possible future Brooktrails access to the Quail Meadows Interchange from the relinquished portion of U.S. 101.

Since public circulation of the DEIS/EIR, Mendocino County Department of Transportation and Brooktrails Township Community Service District have affirmed that a Quail Meadows Interchange (Alternatives LT, J1T, and Modified J1T) will accommodate a connection to a future Brooktrails second access road. Currently, Brooktrails Township CSD is still investigating alternative second access road alignments (Figure 1).

FIGURE 1
ALTERNATIVE ALIGNMENTS - BROOKTRAILS SECOND ACCESS ROUTES



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1.7 Northern Interchange: Emergency Services

Comment: *It is imperative for public safety to select the ELSIE/Wild Oat Canyon (L/C with Truck Scales Interchange) proposal to facilitate emergency services in both Willits and Brooktrails.*

Two interchanges were proposed at the northern end of the proposed project for the valley alternatives – a Truck Scales Interchange (Alternatives C1T and L/C) and a Quail Meadows Interchange (Alternatives J1T, Modified J1T, and LT). Many letters, including those from emergency services providers, communicated support for the hybrid Alternative L/C based principally on an understanding that only a Truck Scales Interchange would accommodate a connection to a Brooktrails Township second access road and that the Quail Meadows Interchange (Alternatives J1T, LT, and Modified J1T) would increase congestion at the high school and at the Sherwood Road/Main Street (existing U.S. 101) intersection.

At a June 2003 meeting with emergency service providers and school representatives (Chapter 4, FEIS/EIR), Caltrans explained that the bypass would provide emergency services providers with an alternate route to access north and south Willits. Main Street (existing U.S. 101) would remain in operation; however, the reduced congestion with the bypass would improve response times for in town incidents.

Either of the northern interchanges (Quail Meadows Interchange or Truck Scales Interchange) would improve conditions for emergency services providers. Without a bypass, congestion on existing U.S. 101 through downtown would continue to hinder emergency vehicles and response times. A bypass, on any of the proposed build alternatives, would provide an alternate route, which would improve response time during periods of congestion.

The Quail Meadows Interchange would require less out of direction travel than the Truck Scales Interchange for northbound vehicles desiring to access the north end of Willits. For example, northbound emergency vehicles that use the bypass and are responding to an incident in the Brooktrails Township would travel out of direction 1.1 km (0.7 mi) from the Quail Meadows Interchange to Sherwood Road, as compared to 3.0 km (1.9 mi) from the Truck Scales Interchange.

1.8 Quail Meadows Interchange: Traffic Operations and Local Traffic

Comment: *Quail Meadows Interchange will create greater traffic congestion and safety concerns at Sherwood Road and in front of the High School.*

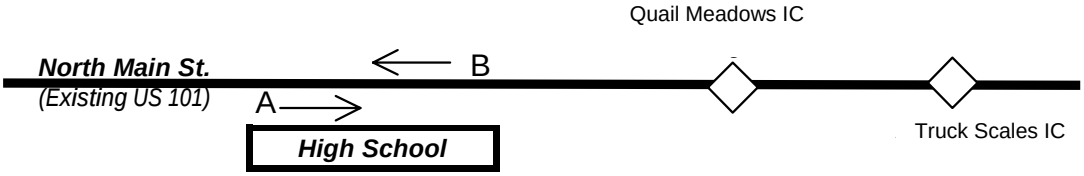
Traffic studies that were performed for the bypass included all traffic on U.S. 101, including Brooktrails Township traffic. Traffic studies concluded that any of the proposed build alternatives considered in the DEIS/EIR would remove traffic from, and therefore reduce congestion as well as the number of congestion-related collisions, on Main Street, in front of the high school and at the Sherwood Road/Main Street (existing U.S. 101) intersection.

The Willits Traffic Study illustrates that each of the bypass alternatives will improve traffic conditions by reducing traffic volumes in front of the high school below 1998 levels. Without a bypass, traffic volumes in front of the high school are projected to increase by 32 percent in 2028.

Figure 2 (below) graphically depicts the traffic-reducing benefits of all of the valley alternatives. The benefits shown for Alternative J1T and LT would be the same for Modified Alternative J1T.

Figure 2. Traffic Conditions, Comparison of Alternatives

Traffic Passing Willits High School



	A - Northbound	B - Southbound	Total Traffic	% Change
Existing (1998)	570	390	**960**	-
No-Bypass 2008	*670*	*460*	***1130***	***15%***
No-Bypass 2028	*840*	*570*	***1410***	***32%***
Alt. L-J 2008	365	320	685	-29%
Alt. C 2008	290	370	660	-36%
Alt. L-J 2028	460	460	920	-4%
Alt. C 2028	410	405	815	-15%

Traffic on Sherwood Road may increase as a result of growth in the Brooktrails community but not as a result of bypass construction.

The Highway Capacity Manual (HCM) method for analysis of signalized intersections was applied to the Sherwood Road/Main Street (U.S. 101) intersection using the traffic volumes from the 2028 J1T/LT Alternatives (Willits Traffic Study 2000). Figure 3 (below) depicts Average Daily Traffic (ADT) and Peak Hour Intersection Volumes for Alternative J1T. The volumes that are reflected in this figure would be the same for Alternatives LT, as well as for Modified Alternative J1T. The results of the analysis indicate that the intersection has the capacity to accommodate future Brooktrails traffic.

However, the HCM method could not factor in the delay that would be caused by the odd angle right turn from southbound U.S. 101/Main Street to Sherwood Road. Additional analysis was completed using the micro-simulation traffic modeling software package TSIS 5 (CORSIM). The slow speed required to navigate the oblique turn at Sherwood Road was included in the model. The results of the modeling show that no significant queues develop on Sherwood Road or U.S. 101. With appropriate signal timing, all vehicles are able to clear the intersection during the green light. Based on these results, no unacceptable delays would occur at the Sherwood Road/Main Street intersection under future traffic conditions (see Figure 4, Highway Capacity Manual Analysis Summary). Results from the CORSIM model confirm traffic in front of the high school will decrease with construction of the bypass.

Figure 3. ADT & Peak Hour Intersection Volumes for Alternative J1 Year 2028 (also applicable to Modified J1T)

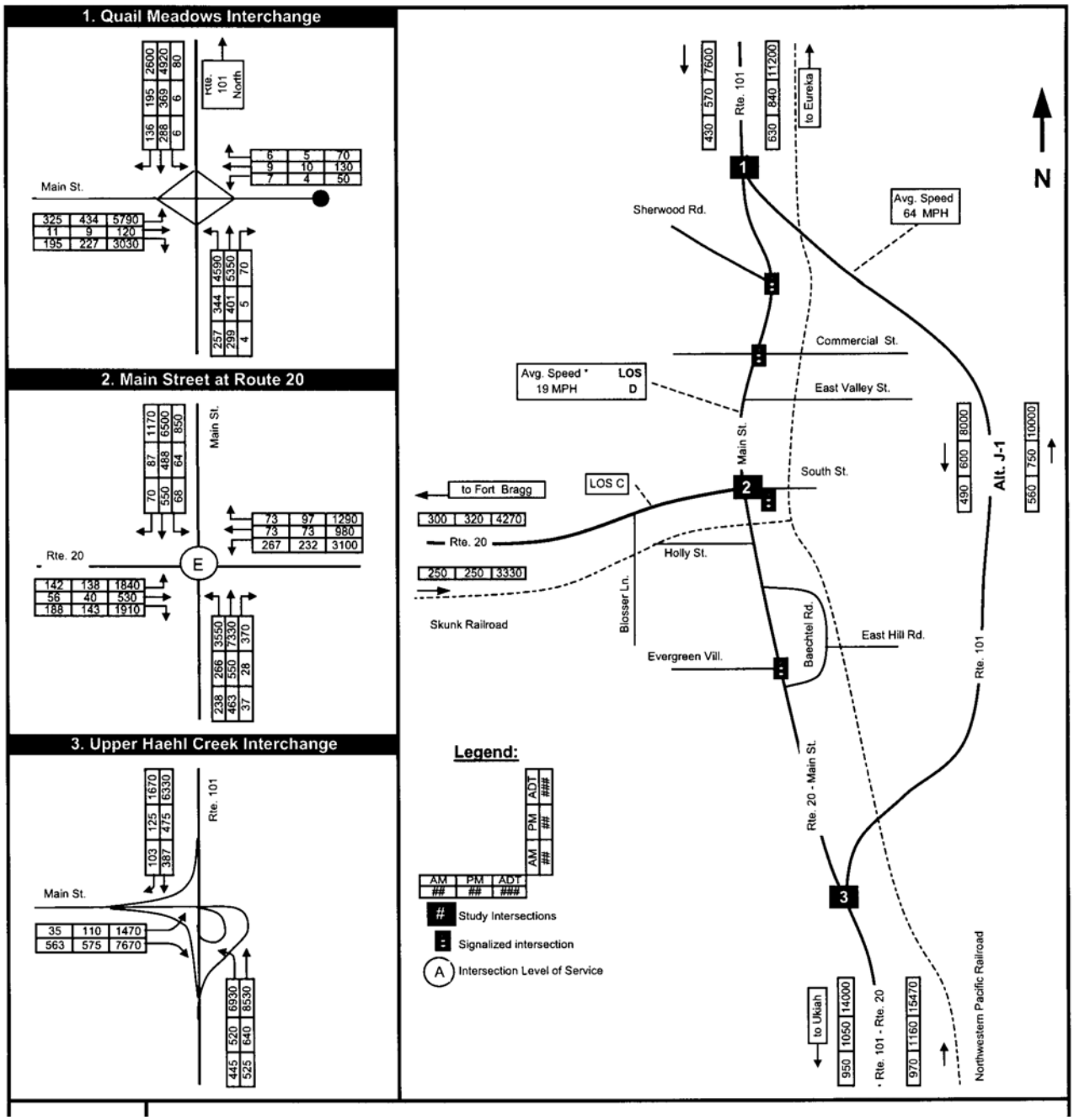


Figure 4. Highway Capacity Manual Analysis Summary

2028 Alternative J & L
Caltrans
PM Peak Hour
Analysis Duration: 60 minutes

Sherwood/Old US 101
09/19/2002
Case: Wil-Sherwood101-2028
Area Type: CBD

Lanes			Geometry: Movements Serviced by Lane and Lane Widths (feet)											
	Approach	Outbound	Lane 1		Lane 2		Lane 3		Lane 4		Lane 5		Lane 6	
EB	1	0	LR	12.0										
WB	0	1												
NB	2	1	L	12.0	T	12.0								
SB	2	1	T	12.0	R	12.0								

	East			West			North			South		
Data	L	T	R	L	T	R	L	T	R	L	T	R
Movement Volume (vph)	100	0	215	0	0	0	270	360	0	0	220	245
PHF	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
% Heavy Vehicles	1	2	1	2	2	2	2	2	2	2	2	2
Lane Groups		LR					L	T			T	R
Arrival Type		3					3	3			3	3
RTOR Vol (vph)		1			0			0			1	
Peds/Hour		0			0			0			0	
% Grade		-5			0			0			0	
Parkers/Hour		---			---			---			---	
Buses/Hour		0			0			0			0	

Signal Settings: Pretimed Optimization Analysis Cycle Length: 60.0 Sec Lost Time Per Cycle: 8.0 Sec

Phase:	1	2	3	4	5	6	7	8	Ped Only
EB	L P								
WB									
NB		LT							
SB		TP							
Green	22.7	29.3							0
Yellow	2.3	2.3							
All Red	1.7	1.7							

	Capacity Analysis Results								Approach:	
App	Lane Group	Cap (vph)	v/s Ratio	g/C Ratio	Lane Group	v/c Ratio	Delay (sec/veh)	LOS	Delay (sec/veh)	LOS
EB										
	* LR	455	0.290	0.378	LR	0.767	30.5	C	30.5	C
NB										
	* L	484	0.303	0.488	L	0.620	18.7	B	15.3	B
	T	819	0.239	0.488	T	0.488	12.7	B		
SB										
	T	819	0.146	0.488	T	0.298	10.2	B	10.9	B
	R	696	0.190	0.488	R	0.389	11.5	B		

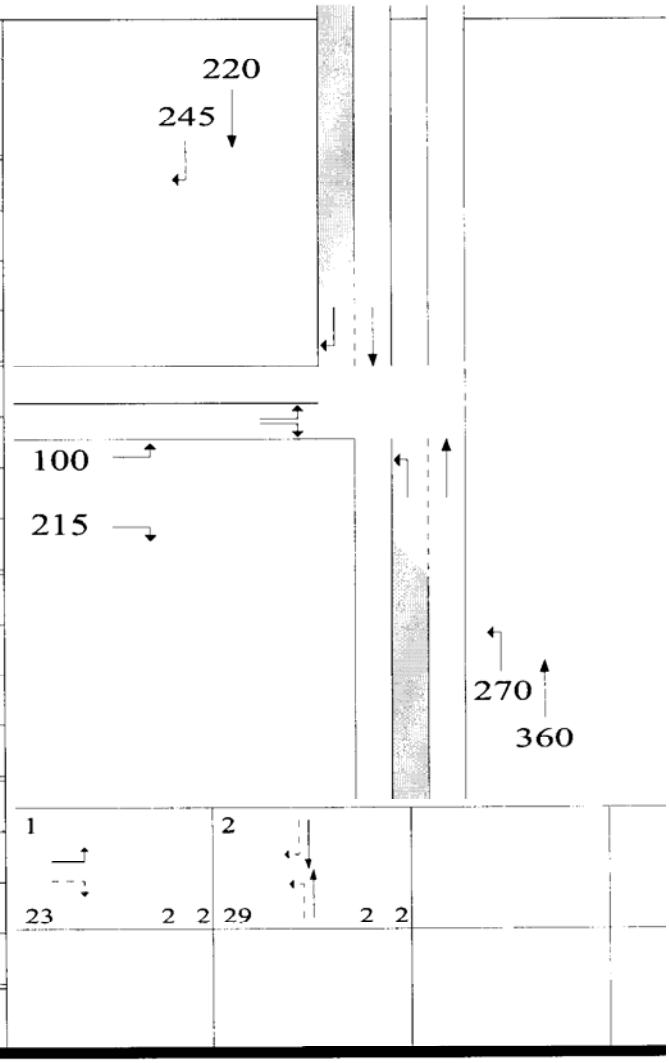
Intersection: Delay = 17.2 sec/veh Int. LOS=B X_c= 0.68 * Critical Lane Group Σ (v/s)Crit= 0.59
SIG/Cinema v2.12 Page 1

Figure 4, continued

2028 Alternative J & L
Caltrans
PM Peak Hour

Sherwood/Old US 101
09/19/2002
Case: Wil-Sherwood101-2028

App	Lane Grp	v/s	Lane Group X v/c	Lane Group Delay (sec/ veh)	Lane Group LOS	Approach Delay (sec/ veh)	Approach LOS
EB							
	*LR	0.29	0.77	30.5	C	30.5	C
NB							
	*L	0.30	0.62	18.7	B	15.3	B
	T	0.24	0.49	12.7	B		
SB							
	T	0.15	0.30	10.2	B	10.9	B
	R	0.19	0.39	11.5	B		
	Int.	0.59	0.68	17.2	B		



* Critical Lane Group

1.9 Center Valley Interchange

Comment: *A mid-bypass interchange with S.R. 20 would aid emergency vehicle access and alleviate traffic congestion in Willits. Willits businesses would benefit if an off ramp into the middle of town were provided.*

During the many years of planning and developing this project, Caltrans and its local partners discussed the feasibility of an S.R. 20 interchange as part of the bypass project. The 1988 Project Study Report for the project proposed a third mid-alignment interchange with S.R. 20 or with an S.R. 20 extension. The conclusion was that the cost of an S.R. 20 interchange on any of the valley alternatives would render the project infeasible. Further, an additional interchange in the center of a valley alignment does not meet the purpose and need of a Willits bypass. A center valley interchange could be constructed in the future as a separate project. The Mendocino Council of Governments (MCOG) and the Mendocino County Board of Supervisors support a four-lane bypass that does not include an S.R. 20/U.S. 101 interchange.

A center valley interchange connecting U.S. 101 (on the new bypass) with S.R. 20 was eliminated from consideration early in the project development process (Caltrans 1991 Issue Paper). In 1991, the Project Development Team, in coordination with the City of Willits and Brooktrails Township CSD, eliminated consideration of a center valley interchange for several reasons:

- Additional interchanges beyond those proposed in the current project are outside the scope of the bypass project.

- A center valley interchange probably would be located in the floodplain and the footprint of the interchange would create additional impacts related to biological resources, visual resources, noise, etc. that the current design avoids or minimizes.

- An interchange in the middle of Little Lake Valley could induce population and housing growth in undeveloped areas, causing additional environmental impacts.

In addition,

- A center valley interchange could potentially cause a shift in commercial development patterns. Existing businesses that serve the traveling public on Main

Street (especially to the south) could see a decrease in business. These businesses and new businesses may be motivated to move operations to the road connecting to the S.R. 20 interchange.

All of the proposed build alternatives include a connection with S.R. 20. For Alternative E3, the connection is the middle interchange and is located on the west side of Willits. For the valley alternatives, the connection is at the Upper Haehl Creek interchange, at the south end of the project. Existing U.S. 101 from the Upper Haehl Creek interchange to the existing U.S. 101/S.R. 20 intersection would become S.R. 20.

In the event of a proposed future Center Valley Interchange on Modified Alternative J1T (the Preferred Alternative), interchange locations north of an easterly extension of S.R. 20 would be very costly and difficult to construct because the new ramps would connect to U.S. 101 on the floodway viaduct. Structure modifications necessary for these new ramps are difficult and expensive. In addition, biological impacts (wetlands) and the proximity of the railroad and Baechtel Creek would present constraints that would be difficult and costly to mitigate. An East Hill Road Interchange on Modified Alternative J1T would probably not present technical design difficulties. However, East Hill Road is only about 2 km north of the Upper Haehl Creek Interchange, which is less than the 3 km minimum spacing for interchanges in rural areas permitted in the *Highway Design Manual*. The proposed location of the southern interchange at Upper Haehl Creek, on the valley alternatives, is a logical location as this is where the alternatives diverge from existing U.S. 101.

1.10 Two-Lane Bypass

Comment: *The DEIS/EIR should include an analysis of a two-lane bypass.*

A two-lane bypass does not meet the purpose and need established for the project, which is to reduce delays, improve safety, and achieve at least a Level of Service (LOS) "C" for interregional traffic on U.S. 101 within the vicinity of Willits, through the 20-year design period (Chapter 2, DEIS/EIR). The following discussion elaborates on the DEIS/EIR (Chapter 2), which explains why a two-lane alternative was not considered.

Background

A four-lane bypass of the City of Willits was originally proposed in a project report dated June 22, 1962, and adopted by the California Highway Commission on February 27, 1963. By the late 1960s, a project to construct the adopted route was programmed, right-of-way acquisition was underway, and detailed plans nearly complete when funding cutbacks resulted in the project being deleted from the program.

In the early 1980s, Caltrans developed a "System Planning" tool to help guide the development of State highway routes. One of the primary components of System Planning is the "Route Concept Report," which is developed in cooperation with the Regional Transportation Planning Agencies, and includes a facility concept for each State highway. Since the initial U.S. 101 Route Concept Report in 1985, the facility concept for U.S. 101 in the Willits area has been a four-lane freeway or expressway.

The Willits bypass project was re-initiated in 1987 for essentially the same conditions identified in the original project report of 1962: Existing U.S. 101 is Main Street for the City of Willits, and there are no other parallel through streets in the City.[2] High volumes of interregional traffic (especially during the summer months) are interrupted by local cross traffic and turning movements, resulting in long queues and collision concentrations along Main Street (U.S. 101).

In 1992, the California Transportation Commission (CTC), recognizing the importance of the Willits Bypass, programmed $60.5 million for the project. Due to limited funding available for new projects, the CTC programmed only the funding for an initial two-lane expressway within an ultimate four-lane freeway right of way. The two-lane Willits Bypass, programmed in 1992, was envisioned as an undivided highway with at-grade intersections, access control, and right-of-way for a four-lane facility.

Caltrans recommended a four-lane facility over the programmed two-lane facility because of the improved safety and reduced delays offered by a four-lane freeway. Statewide average collision rates for four-lane divided facilities are substantially lower

[2] The City of Willits was awarded a Community Based Transportation Planning Grant (California Department of Transportation) to study alternative transportation corridors in the city limits that will help relieve local traffic congestion. The study (Baechtel Road/Railroad Avenue Corridor Community Design Study, 2003) will be used to obtain funding for planning and design of a preferred alternative.

(0.45 accidents per million vehicle miles) than for two-lane conventional highways (1.17 accidents per million vehicle miles).

A four-lane Willits Bypass is consistent with historic planning efforts including Caltrans System Planning, the Mendocino Council of Governments Regional Transportation Plan, and the North Coastal Counties' Supervisors Association's transportation facility priority lists. These historic planning efforts have been supported by both Mendocino County and the City of Willits, and are noted in the draft environmental document for the 2001 Mendocino County Regional Transportation Plan.

There is no local or regional agency support for a two-lane facility. The City, the County, the Mendocino County Council of Governments (MCOG), and the North Coastal Counties Supervisors Association (representing the eight northwestern counties in California) recommended that funding be provided to construct an ultimate four-lane freeway because a four-lane freeway would meet the following objectives:

- Is consistent with State and regional planning
- Provides passing opportunities
- Provides excellent level of service
- Eliminates safety concerns as a result of at-grade intersections
- Eliminates the possible need for traffic signals
- Avoids impacting the community and resources a second time when upgrading to a four-lane facility

Responding to input from Caltrans and other agencies, organizations, and the general public, the CTC changed the project facility in the 1998 STIP from a two-lane undivided expressway with at-grade intersections to a four-lane access-controlled freeway with median and interchanges, thus committing additional funding to the project. Legislation (Senate Bill 45, enacted during the 1997-98 regular session) gave Regional Transportation Planning Agencies (RTPAs) responsibility for programming 75 percent of the funding for new highway improvements. In 1998, Mendocino Council of Governments chose to commit nearly all of its available funding ($17 million) to the Willits Bypass project to fully fund a four-lane freeway. (The 2002 STIP includes approximately $116 million for construction and right-of-way for the project[3].)

[3] As noted in Section 1.2 of the FEIS/EIR, additional State and regional funds will be required to fully fund construction of the project.

Purpose and Need

A project's "Need" is an identified transportation deficiency or problem and its "Purpose" is the set of objectives that will be met to address the transportation deficiency. A reasonable range of alternatives is developed and evaluated based on these objectives. The Purpose and Need Statement meets the requirements of federal (40 CFR 1502.13) and State regulations (14 CCR 15123(b)). Additionally, pursuant to the NEPA/404 (Clean Water Act) Memorandum of Understanding (see Appendix G, DEIS/EIR), the Purpose and Need Statement, modal choice, and range of alternatives were agreed to by local partners and stakeholder resources agencies. The stated purpose of the Willits Bypass project is to "…reduce delays, improve safety, and achieve at least a Level of Service (LOS) "C" for interregional traffic on U.S. 101 within the vicinity of Willits, through the 20-year design period….". Based on Caltrans' analysis, a four-lane alternative would achieve the project's "Purpose" as follows:

- Reduce Delays: The four-lane alternatives would reduce delays over both the existing facility and a two-lane alternative by providing guaranteed passing opportunities, higher operation speeds, and less peak hour congestion.

- Improve Safety: Based on statewide averages, collision rates on freeways are significantly lower than those on two-lane highways.

- Achieve at least LOS "C": All of the four-lane alternatives would meet or exceed LOS "C" through the 20-year design period, based on anticipated traffic increases. The existing facility currently operates at LOS "F" (forced flow with long queues) during peak periods. A two-lane conventional highway would provide LOS "D" (unstable traffic flow) upon construction. The updated analysis shows that a two-lane conventional highway would remain at LOS "D" throughout the project design life (2028).

Request for Two-Lane Study

In the spring of 1999, following a presentation/workshop by Mr. Dan Burden of Walkable Communities Incorporated, stakeholder groups (such as the Willits Environmental Center) became interested in reducing the scale of a Willits bypass. The following year, after all technical studies were completed for the four-lane alternatives under consideration in the DEIS/EIR, the Willits Environmental Center asked the project

development team (PDT) to study a two-lane bypass alternative on "one of the valley alignments" for consideration in the DEIS/EIR.

Proponents of a two-lane bypass alternative have cited reduced cost and reduced environmental impacts as major benefits of this strategy, and they have solicited support at numerous public meetings. There is some support within the community of Willits for a two-lane bypass.

Caltrans traffic studies demonstrated that a two-lane facility would not meet the purpose and need for the project. Based on the purpose and need criteria, as well as support for a four-lane facility from the City of Willits, Mendocino County, the Mendocino County Council of Governments (MCOG), and the North Coastal Counties Supervisors Association, Caltrans did not pursue the development of one or more two-lane alternatives for the Willits Bypass project.

Response to Request for Two-Lane Study

A number of factors have contributed to Caltrans' decision not to include a two-lane Willits bypass alternative for consideration in the DEIS/EIR, as follows:

<u>Operation on a two-lane facility</u>

Section 3.6.2 of the Draft EIR/EIS (Volume 3) explains that a two-lane facility is an infeasible alternative because it does not meet the purpose and need established for the project (defined in Chapter 2, DEIS/EIR). Some of the reasons a two-lane facility does not meet the purpose and need for the project are: (1) poor Level of Service (LOS) and lack of passing opportunities; (2) safety concerns; and (3) possible need for traffic signals.

Section S.3.1 (page S6, DEIS/EIR) states that the LOS for a two-lane facility would not be adequate: "A two-lane facility would provide a LOS "D" at peak hour upon construction (2008), and would diminish to LOS "E" by the year 2028. Thus, a new two-lane highway would be functionally obsolete within the 20 year design period" (see Figure 5 for a depiction of the highway traffic conditions associated with each LOS rating, "A" through "F", for two-lane highway facilities).

The LOS for a two-lane bypass was originally calculated using the 1997 version of the Highway Capacity Software (HCS3), which incorporated the 1985 Highway Capacity Manual (HCM) two-lane highway LOS methodology and standards (see Figures 6 and 7, which are HCS3 analysis summaries for a two-lane facility for Year 2008 and 2028 respectively).

A new methodology and LOS standards have subsequently been incorporated into the HCM 2000 and a new HCS 2000 program. A new analysis using the new HCM software was completed to ensure that the LOS for a two-lane facility is accurately reported in the study (refer to Figures 8 and 9, which are HCS2000 analysis summaries for a two-lane facility for Year 2008 and 2028). The results of the new analysis indicate that the LOS for a two-lane facility would be LOS "D" in 2008 and 2028. The change in 2028 LOS "E" to LOS "D" is a direct result of a change in the LOS standards in the HCM 2000. In either case, LOS "D" still does not meet the need and purpose of the project.

It should be further noted that LOS criteria for a rural two-lane highway and a freeway are based on different performance measures and driver expectations. The HCM 2000 states, "…level of service represents a range of operating conditions and the driver's perception of those conditions." LOS is a qualitative assessment of driver perception based on a quantitative analysis of roadway capacity and on facility type. The discussion of two-lane highways contained in the Highway Capacity Manual 2000 (HCM 2000) states that "A two-lane highway is an *undivided* (emphasis added) roadway with two lanes, one for use by traffic in each direction" (p.12-13, HCM 2000). The concept that has been suggested by proponents of a two-lane Willits bypass is for a *divided* two-lane highway with a median barrier. The HCM 2000 methodology for analyzing two-lane highways can be applied to a divided two-lane facility to determine capacity; however, the barrier in combination with a narrow median would negatively affect driver perception of the facility's performance. Considering this effect on driver perception, LOS for a two-lane facility with a median barrier would be *less* than indicated by the HCM 2000 analysis results.

From a traffic analysis perspective, a two-lane highway cannot accurately be compared to a four-lane freeway as being equivalent in terms of LOS. Driver perception and driver expectations must also be considered. As stated in the HCM 2000, LOS is a "quality measure describing operational conditions within a traffic stream, generally in terms of such service measures as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience" (p.2-2, HCM 2000). A four-lane freeway,

under the future traffic conditions described in the DEIS/EIR, will provide higher speeds, better travel times, more freedom to maneuver, fewer traffic interruptions, more comfort and convenience, greater flexibility during regular maintenance or in response to emergencies, and it will be safer than a two-lane facility.

Brooktrails Township: Projected Trips and Potential for Expansion

The "Willits Bypass Origin and Destination Survey" described in the "Willits Bypass Traffic Report" (November 2000) includes information on through trips with origins in Brooktrails and destinations to the south of Willits. This Survey noted that 40 percent of average daily southbound traffic and 28 percent of peak hour traffic from Sherwood Road near existing U.S. 101 made trips through Willits and continued south. Most of this traffic is expected to use the freeway bypass.

As described in Section 4.3.2 (Existing Land Use, DEIS/EIR), Brooktrails Township was initially envisioned as a community of vacation or second homes. It has become a community of permanent residents, many of whom commute to work destinations to the south of Willits. Further, only about 1,250 of the 6,000 lots in Brooktrails Township are developed. While there are community services issues that may impact future development, the potential for development exists. Further development of the Brooktrails area could impact safety, delay, and level of service on a two-lane bypass.

Additional Disadvantages of a Two-Lane Bypass

One of the two-lane concepts suggested by the two-lane advocates was a center median, with shoulders meeting Caltrans standards, and interchanges both south and north of Willits. Such a facility would result in the following conditions:

- No legal passing opportunities.
- Reducing the four-lane bypass to two lanes would not reduce the footprint and corresponding environmental impacts by half due to the fact that the necessary design components (such as median, shoulders, embankment slopes, and drainage areas) would remain the same for a two-lane facility as it would for a four-lane facility.
- Four lanes would still be required at interchanges (due to safety concerns with traffic merging on the through facility to use interchange ramps).

Figure 5. Level of Service Ratings for *Two-Lane* Highways

LEVELS OF SERVICE

for Two-Lane Highways

Level of Service	Flow Conditions	Operating Speed (mph)	Technical Descriptions
A		55+	Highest quality of service. Free traffic flow with few restrictions on maneuverability or speed. **No delays**
B		50	Stable traffic flow. Speed becoming slightly restricted. Low restriction on maneuverability. **No delays**
C		45	Stable traffic flow, but less freedom to select speed, change lanes or pass. **Minimal delays**
D		40	Traffic flow becoming unstable. Speeds subject to sudden change. Passing is difficult. **Minimal delays**
E		35	Unstable traffic flow. Speeds change quickly and maneuverability is low. **Significant delays**
F			Heavily congested traffic. Demand exceeds capacity and speeds vary greatly. **Considerable delays**

Source: 2000 HCM, Exhibit 20-2, LOS Criteria for Two-Lane Highways in Class 1

Figure 6. Highway Capacity Software (HCS3) Analysis Summary for a Two-Lane Facility for Year 2008

```
1985 HCM:TWO-LANE HIGHWAYS
*************************************************************

   FACILITY LOCATION.... MEN-101-Willits
   ANALYST............... Caltrans Planning
   TIME OF ANALYSIS..... 2008
   DATE OF ANALYSIS..... 07-26-2002
   OTHER INFORMATION.... 2-Lane Alternative


A) ADJUSTMENT FACTORS
   -------------------------------------------------------------
   PERCENTAGE OF TRUCKS........................  10
   PERCENTAGE OF BUSES.........................  0
   PERCENTAGE OF RECREATIONAL VEHICLES.........  5
   DESIGN SPEED (MPH)..........................  60
   PEAK HOUR FACTOR............................  .95
   DIRECTIONAL DISTRIBUTION (UP/DOWN)..........  57 / 43
   LANE WIDTH (FT).............................  12
   USABLE SHOULDER WIDTH (AVG. WIDTH IN FT.)...  6
   PERCENT NO PASSING ZONES....................  50

B) CORRECTION FACTORS
   -------------------------------------------------------------
   LEVEL TERRAIN

              E      E      E      f      f      f
   LOS         T      B      R      w      d      HV
   ---      -----  -----  -----  -----  -----  -----
    A         4      3    3.2      1    .96     .71

    B         4    3.4    3.9      1    .96     .65

    C         4    3.4    3.9      1    .96     .65

    D         4    2.9    3.3      1    .96     .66

    E         4    2.9    3.3      1    .96     .66

C) LEVEL OF SERVICE RESULTS
   -------------------------------------------------------------
   INPUT VOLUME(vph):  920
   ACTUAL FLOW RATE:   968
          SERVICE
   LOS   FLOW RATE    V/C
   ---   ---------   -----
    A        133      .07
    B        330      .19
    C        608      .35
    D        921      .52
    E       1629      .92

   LOS FOR GIVEN CONDITIONS: D
```

Figure 7. Highway Capacity Software (HCS3) Analysis Summary for a Two-Lane Facility for Year 2028

```
1985 HCM:TWO-LANE HIGHWAYS
*************************************************************

   FACILITY LOCATION.... MEN-101-Willits
   ANALYST............... Caltrans Planning
   TIME OF ANALYSIS..... 2028
   DATE OF ANALYSIS..... 07-26-2002
   OTHER INFORMATION.... 2-Lane Alternative


A) ADJUSTMENT FACTORS
   -------------------------------------------------------------
   PERCENTAGE OF TRUCKS........................  10
   PERCENTAGE OF BUSES.........................  0
   PERCENTAGE OF RECREATIONAL VEHICLES.........  5
   DESIGN SPEED (MPH)..........................  60
   PEAK HOUR FACTOR............................  .95
   DIRECTIONAL DISTRIBUTION (UP/DOWN)..........  57 / 43
   LANE WIDTH (FT).............................  12
   USABLE SHOULDER WIDTH (AVG. WIDTH IN FT.)...  6
   PERCENT NO PASSING ZONES....................  50

B) CORRECTION FACTORS
   -------------------------------------------------------------
   LEVEL TERRAIN

              E      E      E      f      f      f
   LOS        T      B      R      w      d     HV
   ---     -----  -----  -----  -----  -----  -----
    A        4      3     3.2     1     .96    .71

    B        5     3.4    3.9     1     .96    .65

    C        5     3.4    3.9     1     .96    .65

    D        5     2.9    3.3     1     .96    .66

    E        5     2.9    3.3     1     .96    .66

C) LEVEL OF SERVICE RESULTS
   -------------------------------------------------------------
   INPUT VOLUME(vph):  1150
   ACTUAL FLOW RATE:   1211
          SERVICE
   LOS   FLOW RATE    V/C
   ---   ---------   -----
    A        133      .07
    B        330      .19
    C        608      .35
    D        921      .52
    E       1629      .92

   LOS FOR GIVEN CONDITIONS: E
```

Figure 8. Highway Capacity Software 2000 (HCS2000) Analysis Summary for a Two-Lane Facility for Year 2008

```
HCS2000: Two-Lane Highways Release 4.1b

trans plan
Caltrans

Phone:                                  Fax:
E-Mail:

_________________Two-Way Two-Lane Highway Segment Analysis_________________

Analyst                  W. A. Davis
Agency/Co.               Caltrans - Planning
Date Performed           8/6/2002
Analysis Time Period     PM Peak Hour
Highway                  SR 101
From/To                  PM 43.3 to 51.3
Jurisdiction             Mendocino County
Analysis Year            2008
Description  Willits Bypass 2-lane Alternative Analysis

_____________________________________Input Data_____________________________________

Highway class  Class 1
Shoulder width        6.0     ft     Peak-hour factor, PHF       0.88
Lane width            12.0    ft     % Trucks and buses          10      %
Segment length        8.0     mi     % Recreational vehicles     5       %
Terrain type          Level          % No-passing zones          50      %
Grade:  Length                mi     Access points/mi            8       /mi
        Up/down               %

Two-way hourly volume, V    930      veh/h
Directional split        57  /   43  %

_____________________________Average Travel Speed_____________________________

Grade adjustment factor, fG                      1.00
PCE for trucks, ET                               1.2
PCE for RVs, ER                                  1.0
Heavy-vehicle adjustment factor,                 0.980
Two-way flow rate,(note-1) vp                    1078    pc/h
Highest directional split proportion (note-2)    614     pc/h

Free-Flow Speed from Field Measurement:
Field measured speed, SFM                         -      mi/h
Observed volume, Vf                               -      veh/h
Estimated Free-Flow Speed:
Base free-flow speed, BFFS                       60.0    mi/h
Adj. for lane and shoulder width, fLS            0.0     mi/h
Adj. for access points, fA                       2.0     mi/h

Free-flow speed, FFS                             58.0    mi/h

Adjustment for no-passing zones, fnp             1.6     mi/h
Average travel speed, ATS                        48.0    mi/h

___________________________Percent Time-Spent-Following___________________________

Grade adjustment factor, fG                                    1.00
PCE for trucks, ET                                             1.1
PCE for RVs, ER                                                1.0
Heavy-vehicle adjustment factor, fHV                           0.990
Two-way flow rate,(note-1) vp                                  1067    pc/h
Highest directional split proportion (note-2)                  608
Base percent time-spent-following, BPTSF                       60.9    %
Adj.for directional distribution and no-passing zones, fd/np   9.5
Percent time-spent-following, PTSF                             70.3    %

_________________Level of Service and Other Performance Measures_________________

Level of service, LOS                                          D
Volume to capacity ratio, v/c                                  0.34
Peak 15-min vehicle-miles of travel, VMT15                     2114    veh-mi
Peak-hour vehicle-miles of travel, VMT60                       7440    veh-mi
Peak 15-min total travel time, TT15                            44.1    veh-h
_____________________________________________________________________________

Notes:
1. If vp >= 3200 pc/h, terminate analysis-the LOS is F.
2. If highest directional split vp >= 1700 pc/h, terminate
   analysis-the LOS is F.
```

Figure 9. Highway Capacity Software 2000 (HCS2000) Analysis Summary for a Two-Lane Facility for Year 2028

```
HCS2000: Two-Lane Highways Release 4.1b

trans plan
Caltrans

Phone:                                  Fax:
E-Mail:

____________________Two-Way Two-Lane Highway Segment Analysis____________________

Analyst                  W. A. Davis
Agency/Co.               Caltrans - Planning
Date Performed           8/6/2002
Analysis Time Period     PM Peak Hour
Highway                  SR 101
From/To                  PM 43.3 to 51.3
Jurisdiction             Mendocino County
Analysis Year            2028
Description  Willits Bypass 2-lane Alternative Analysis

_____________________________________Input Data_____________________________________

Highway class  Class 1
Shoulder width       6.0     ft     Peak-hour factor, PHF       0.88
Lane width           12.0    ft     % Trucks and buses          10      %
Segment length       8.0     mi     % Recreational vehicles     5       %
Terrain type         Level          % No-passing zones          50      %
Grade:  Length               mi     Access points/mi            8       /mi
        Up/down              %

Two-way hourly volume, V    1160    veh/h
Directional split       57  /   43  %

____________________________Average Travel Speed_____________________________

Grade adjustment factor, fG                    1.00
PCE for trucks, ET                             1.1
PCE for RVs, ER                                1.0
Heavy-vehicle adjustment factor,               0.990
Two-way flow rate,(note-1) vp                  1331    pc/h
Highest directional split proportion (note-2)  759     pc/h

Free-Flow Speed from Field Measurement:
Field measured speed, SFM                       -      mi/h
Observed volume, Vf                             -      veh/h
Estimated Free-Flow Speed:
Base free-flow speed, BFFS                     60.0    mi/h
Adj. for lane and shoulder width, fLS          0.0     mi/h
Adj. for access points, fA                     2.0     mi/h

Free-flow speed, FFS                           58.0    mi/h

Adjustment for no-passing zones, fnp           1.2     mi/h
Average travel speed, ATS                      46.5    mi/h

___________________________Percent Time-Spent-Following___________________________

Grade adjustment factor, fG                                    1.00
PCE for trucks, ET                                             1.0
PCE for RVs, ER                                                1.0
Heavy-vehicle adjustment factor, fHV                           1.000
Two-way flow rate,(note-1) vp                                  1318   pc/h
Highest directional split proportion (note-2)                  751
Base percent time-spent-following, BPTSF                       68.6   %
Adj.for directional distribution and no-passing zones, fd/np 7.0
Percent time-spent-following, PTSF                             75.6   %

_________________Level of Service and Other Performance Measures_________________

Level of service, LOS                                          D
Volume to capacity ratio, v/c                                  0.42
Peak 15-min vehicle-miles of travel, VMT15                     2636    veh-mi
Peak-hour vehicle-miles of travel, VMT60                       9280    veh-mi
Peak 15-min total travel time, TT15                            56.7    veh-h
_____________________________________________________________________________

Notes:
1. If vp >= 3200 pc/h, terminate analysis-the LOS is F.
2. If highest directional split vp >= 1700 pc/h, terminate
   analysis-the LOS is F.
```

Operational Advantages of a Four-Lane Facility

A four-lane facility would have a number of operational advantages over a 2-lane facility, particularly during routine maintenance activities, storms, or incidents such as collisions. These operational advantages on a four-lane facility include reduced interruptions to traffic flow when lane closures are required by allowing one lane in a specific direction to remain in operation.

Anticipated Scale of Reduction in Cost and Environmental Impacts

Intuitively, it would seem that a two-lane facility would reduce cost and environmental impacts by half. However, with a median, median shoulder, merge lanes, and interchanges, a two-lane facility would not reduce cost or environmental impacts considerably. In addition, both the four-lane and two-lane facility would require allowances for roadside maintenance areas and lateral drainage facilities.

The 2001 Mendocino County Regional Transportation Plan draft environmental document[4] states that a two-lane alternative would result in more traffic congestion than a four-lane alternative. It also notes the possibility that the increased traffic congestion could be of equal or greater significance than the biological and other impacts of a four-lane facility.

Noise Impacts

The volume of vehicles using the bypass would be the same on both the two- and four-lane facilities. Noise generated from traffic could be lower at times on the two-lane facility when traffic speeds are reduced during periods of congestion. However, the anticipated difference between noise levels is negligible.

Public's Expectation That New Facilities be Constructed to a High Standard

The United States Code, USC Section 109 (a)(1), states "each proposed highway project must adequately serve the existing and planned future traffic of the highway in a manner that is conducive to safety, durability, and economy of maintenance." As a steward of public funds, Caltrans is responsible for ensuring that the public receives a good value for

[4] 2001 Mendocino County Regional Plan Draft EIR, Mendocino Council of Governments, Page 183, Leonard Charles and Associates.

capital expenditures. Given that the Willits Bypass would be a relatively expensive facility on a principal arterial focus route on the National Highway System, it should meet public expectations by providing a high level of service with minimal delays and minimal traffic congestion.

Global Environmental Issues

Caltrans has been criticized for not recognizing the finite nature of fossil fuels and the impacts of fossil fuel use on global warming. Caltrans is concerned with these issues, and always encourages alternatives to the single occupancy motor vehicle. However, Caltrans does not support intentional limitations on transportation facility capacity or service as a means to encourage alternative transportation.

1.11 Impact Conclusions and Recirculating EIS/EIR

Comment: *The DEIS/EIR does not identify a number of unavoidable significant impacts a bypass will have on Willits and the Little Lake Valley; the environmental document should be recirculated with this information.*

The lead agencies for this project prepared the DEIS/EIR with a sufficient degree of information to enable the public, resources agencies, and other stakeholders to evaluate and compare the impacts of the alternatives and to aid in the selection of a preferred alternative.

A supplement or addendum to an EIS/EIR is only required if the agency makes substantial changes in the proposed action that are relevant to environmental effects or if there are significant new circumstances or information relevant to the environmental concerns that bear on the proposed action or its impacts (NEPA 40 CFR 1502.9(c)(1); and CEQA Guidelines 15163, 15164). Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The “rule of reason” applies when reviewing the adequacy of an EIS and EIR. Under the rule of reason, the EIS must set forth sufficient information for the public to make an informed evaluation and for the decision-maker to fully consider the environmental factors involved and select a preferred alternative. The rule of reason requires only that an EIR show that an agency has made an objective, good-faith attempt at full disclosure (CEQA Guidelines Sec. 15151).

Significant unavoidable impacts are identified in Section 6.4 (DEIS/EIR). The impact conclusions disclosed in the DEIS/EIR are based on studies that Caltrans performed for each environmental issue. Caltrans technical specialists in each discipline used professional judgment, professional standards, and regulatory requirements to determine the level or magnitude of impact before and after mitigation for each alternative. Technical studies for each environmental issue addressed in the document are listed on page 1-8 of the DEIS/EIR as well as the location where they are available to the public for review.

The DEIS/EIR (see Summary Section S.5) concluded that Alternatives J1T and LT would have the least overall environmental impacts compared to the other alternatives. However, after public circulation of the DEIS/EIR, the public expressed strong objections to Alternative J1T because of its impacts to important community resources and resource agencies objected to Alternative LT because it had greater wetlands impacts than Alternative J1T. Further coordination with resource agencies and local partners resulted in the development of Modified Alternative J1T (See General Response 1.3 regarding development of Modified Alternative J1T).

Caltrans technical staff conducted studies of Modified Alternative J1T to determine its impacts to resources. Modified Alternative J1T would not result in any impacts to resources that were not disclosed in the DEIS/EIR nor would it result in a greater magnitude of the impacts presented in the DEIS/EIR. Therefore, a supplement or addendum to the DEIS/EIR is not required. The FEIS/EIR (Chapters 2 and 3) identifies Modified Alternative J1T as the LEDPA/preferred alternative, describes the modified alternative, and summarizes the technical studies that were prepared for this alternative. Since identification of the preferred alternative, Caltrans has been able to develop alignment-specific avoidance, minimization, and mitigation measures (Appendix A) and the terms and conditions of the USFWS and NMFS biological opinions (Appendix D) are specific to Modified Alternative J1T.

The lead agencies for this project have prepared the Willits Bypass FEIS/EIR with a sufficient degree of information to enable decision-makers to evaluate the project while taking into consideration its environmental effects.

1.12 Growth at Interchanges

Comment: *Commercial growth at the interchanges could impact existing businesses in Willits, particularly those along the Miracle Mile. Also, commercial development at the interchanges, much of which is located in the County, could impact the City's tax revenue.*

The potential for commercial development at the interchanges is constrained by a number of factors. The following text discusses the issues constraining development at the proposed interchanges.

The southern interchange (Haehl Creek Interchange) is proposed as a diamond configuration. The interchange would accommodate access to an adjacent ranch to the east. The 20-foot wide access opening to the ranch would be gated; any future requests for changes to access from the interchange to the property would require approval by both Mendocino County and the California Transportation Commission. To the west, Caltrans would acquire full access control between the interchange and the bridge over the railroad.

At the northern interchange (Quail Meadows Interchange), geotechnical constraints (e.g. soft soils) and biological constraints (e.g. wetlands) would constrain commercial development. Agriculture dominates land uses to the east. The parcels next to the southwest quadrant of the interchange are within the city limits. These parcels are zoned C-1 (Commercial), so commercial uses at these locations would be consistent with current City planning goals. The City would review any permit applications to determine land use consistency and what potential impacts, such as traffic congestion, could occur, prior to issuing permits. Commercial development of these parcels could occur with or without construction of the bypass.

Existing U.S. 101, both north and south of the proposed Quail Meadows Interchange would be relinquished to the County in this area. The County would make any decisions on access. The relinquished road would probably remain a conventional highway, with driveways to parcels with frontage. The current zoning is Suburban Residential at the parcels to the west of the existing U.S. 101 adjacent to the interchange. Commercial development in this area would require a zoning change by the County. Most of this area has a significant cut slope adjacent to the highway. Flat terrain on each parcel is limited, which could pose difficulties in maximizing development of these parcels for commercial use. There is no infrastructure to some of the parcels. While there may be some potential

for commercial development at the northern interchange, any large-scale commercial development would be constrained by the preceding factors, so an impact on the City's tax revenue is not anticipated. The Mendocino County Local Agency Formation Commission (LAFCO) accepts applications from cities seeking to annex land within the County that would benefit City plans and goals.

1.13 Further Reduction to Median Width

Comment: *Could Caltrans design a byass with a narrower median – a 10-foot-wide median, for example?*

The proposed median is narrower than current highway design standards. Title 23 of the U.S. Code, Federal Highways Act, Chapter 1, Section 109 states that facilities must "adequately serve the existing and planned future traffic of the highway in a manner that is conducive to safety, durability, and economy of maintenance."

The current highway design standard for median width is 18.3 m (60 ft). The proposed median would be 13.8 m (46 ft). In District 1, the median on existing U.S. 101 varies. The median for much of U.S. 101 in District 1 is less than the proposed 13.8 m (46 ft). However, from several miles south of Ukiah to near the junction of S.R. 20 near Calpella, the median is 13.8 m (46 ft), and segments of U.S. 101 near Eureka have medians at or greater than 13.8 m (46 ft). The existing short freeway section south of Willits has a median that is 18.3 m (60 ft) wide.

A wider median provides a greater recovery area for errant vehicles than a narrower median. According to Figure A.5 of the AASHTO Roadside Design Guide, for design speed of 70 mph, the probability that an errant vehicle will encroach on an area 24 feet away is about 26 percent, while the probability that it will encroach on an area 46 feet away is only about 9 percent. A 24-foot median would likely warrant placing a median barrier, thus reducing the clear distance to 11 feet. (A concrete barrier is 2 feet wide; thus, placing a 2-foot wide barrier in a 24-foot median reduces the distance to the barrier to 11 feet.) The probability that an errant vehicle would encroach in an area 11 feet away is about 43 percent.

Many urban freeways are narrower than the proposed section. These are usually older freeways constructed before the importance of a wide median was recognized for providing room for errant vehicles to recover without impacting fixed objects or

oncoming vehicles. The construction of a new freeway is required to meet current design standards for level of service, safety, operation and maintenance.

Median barriers are installed where cross median collisions are prevalent. While the barriers eliminate virtually all cross median collisions, they result in collisions with fixed objects that otherwise might not occur when errant vehicles, which might recover in a wide median, strike the barrier. The Ridgewood Grade barrier has been effective in reducing the incidence of cross median accidents but many vehicles have collided with it. Based on this experience, it is the design policy of Caltrans to design medians wide enough to reduce head-on type collisions and minimize the use of barriers.

Caltrans has the authority to issue design exceptions for specific project components that do not meet minimum design standards prescribed in the *Highway Design Manual*. As stated in the Draft EIS/EIR, each of the alternatives proposed include exceptions to minimum design standards. The highway design criteria and policies in the Highway Design Manual provide a guide for the engineer to exercise sound judgment in applying standards, consistent with Caltrans project development philosophy. The design standards used for any project should equal or exceed the minimum given in the Manual to the maximum extent feasible, taking into account costs, traffic volumes, traffic and safety benefits, right of way, socioeconomic and environmental impacts, etc. The philosophy provides for use of lower standards when such use best satisfies the requirements of a given situation. Caltrans believes the proposed cross section strikes a reasonable balance between environmental impacts, cost, and safety.

1.14 Mitigation Plan for Impacts to Biological Resources

Comment: *The mitigation measures in the Draft EIS/EIR are too vague for the public to know exactly how impacts to biological resources will be mitigated and whether mitigation will be successful. The public should have an opportunity to review the mitigation measures once they have been finalized.*

The Draft Conceptual Mitigation Plan (DCMP) presented in the DEIS/EIR was prepared to discuss the general approach to mitigation of biological impacts associated with the Willits bypass. The DCMP was prepared in this manner to identify impacted resources associated with each of the proposed alternatives and the general types of mitigation proposed for each impacted resource.

With the selection of the Modified Alternative J1T as the preferred alternative, a Final Conceptual Mitigation Plan (CMP) has been prepared in consultation with the state and federal resource agencies (FEIS/EIR, Volume 1 - Appendix L). The CMP contains detailed information about the biological resources identified within the project area; how these resources would be impacted by the proposed project; the avoidance and minimization measures to be employed; and a conceptual plan for the compensatory mitigation of project-related impacts. A final Mitigation and Monitoring Plan will be developed in concert with state and federal resource agencies, during the design phase of the project. This plan will identify specific locations to be used for mitigation and will include plans and specifications for implementation. In addition, Caltrans will comply with the terms and conditions detailed in the NMFS and USFWS Biological Opinions (FEIS/EIR, Volume 1 – Appendix D).

ORDER OF COMMENT LETTERS:

FEDERAL AGENCIES

1 Army Corps of Engineers (USACE)
2 National Marine Fisheries Service (NMFS)
3 United State Environmental Protection Agency (USEPA)
4 United States Fish and Wildlife Service (USFWS)
4A Natural Resources Conservation Service (NRCS)
4B Federal Emergency Management Agency (FEMA)

STATE AGENCIES

5 California Department of Fish and Game (CDFG)
6 California Department of Forestry and Fire Protection (FFP)
7 California Environmental Protection Agency Department of Toxic Substances Control (DTSC)
8 California Regional Water Quality Control Board (RWQCB)

LOCAL GOVERNMENT AGENCIES

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

MENDOCINO COUNTY AGENCIES

18 Mendocino Council of Governments
19 Mendocino County Air Quality Management District
20 Mendocino County Board of Supervisors
21 Mendocino County Department of Planning and Building Services
22 Mendocino County Farm Bureau
23 Mendocino County Office of the Sheriff-Coroner
24 Mendocino Emergency Services Authority
25 Mendocino Transit Authority

ORGANIZATIONS

26 California Oak Foundation
27 California Native Plant Society
28 Employers Council of Mendocino County
29 Mendocino County Democratic Central Committee
30 Mendocino Forest Watch
31 Mendocino Land Trust
32 Save All the Valley Eternally
33 Sierra Club, Mendo-Lake Group
34 Willits Citizens for Good Planning
35 Willits Environmental Center
36 Willits Environmental Center and Willits Citizens for Good Planning (Rose Zoia, Attorney)

INDIVIDUALS

37 Mair Alight
38 Dawna Allen
39 Cindy Ammendolia
40 Sylvia Anderson
41 James Angell
42 Scott Angell
43 Warren Archer
44 John Arlich
45 Holly Barnard
46 Frank and Erla Barr
47 Carol Kuhling Barrett
48 Andrea Beene

49 Virginia Belt
Barden, Fred
Belt, Robert
Belt, Virginia
Belt, Bonita and Steven Drake
Borras, Tania
Braden, Delores
Cunningham, Alice and Jack
Fenton, Patricia, Jack and Willy
Roddick, Gertel
Wolfe, Jeanne
Yee, Brenda
Zimmerman, Paul

50 Trish Benedict

51 P. A. Blakley
Bender, Jennifer and Geoffrey
Blakley, Patricia
Kirkpatrick, Kathleen and Robert
Schlichting, Ursula

52 Marilyn Boosinger

53 Betsy Robinson Bosch

54 Robert E. Bouley
Bouley, Robert
Dudley, George
Kirisella, Pam and Larry
Page, Darrold
Persico, Charles
Smith, Gail
Thomen, David

55 George and Ann Brott
56 Myrtle Brown
57 Robert and Lisa Burgess
58 Bruce Burton
58A R. Edward Burton
59 Gregg Byers
60 Dean Cail
61 Gladys L. Campbell
62 Martha Carol
63 George & Louise Carter
64 P. Cartwright
65 Lea Cassady
66 Lorene Cave
67 Colleen [last name illegible]
Jacobs, Kathy
LeFan, John
Long, Freddie
Marianchild, Kate
Rhodes, Judi
Strong, Madge
Withey, Lori
Woolsey, Ron
[last name illegible], Colleen

68 Carol Cox
69 Fred G. Crampton
70 Bill Cronk
71 Lee Davis
72 D. Deines

73 Mary Delaney
Abbott, Jeanene
A'Dair, Mike
Anchordoguy, Rosalie
Bear, Don
Bird, Rosalie
Bruce, Erica
Byers, Gregory
Byers, Susan
Camp, Jane and Walter
Caraway, Vicki
Caraway, William
Carni, Peter
Cornell, Patricia
Craig, Paul
Craig, Thayer
Dale, Eric
DeBisschop, Scott
De Beauvoir, Milana
Diamond, Jed and Carlin
Downing, Karla
D'Terra, Donna
Estabrook, Sarah

Ferri-Taylor, Brian
Forbes, Lucie
Gossett, Cliff
Goyer, Jessica
Halsted, Richard
Howell, Kathy
Jane, Cora
Jeavons, John
Jordan, Cheryl
Jordan, Leah
Kanne, Mary
Kaplan, Morris
Lacey, Joseph and Carol
Laib, Caroline
Lightfoot, Leigh
Mallon, Kevin
Marill, Jim
Martin, Christopher
McFadden, Elizabeth
Monteleone, Susan
Morninglight, Cindy
Nicolaus, Kathleen
Norris, Kitty
Norris, Michael
Pappas, Sally
Parkinson, Sue Ellen
Phillips, Russell
Pierre, Cheri
Pollard, Chela
Pollard, Douglas
Rede, Patricia
Ross, Cypress
Saijo, Leonor
Schurle, Chris
Schuyler, Sarah
Senerchia, Samuel
Senerchia, Spring
Sharp, Lucy
Shebitz, Henry
Shelly, Judy
Silva, Josephine
Silva-Doyle, Alexis
Sison, Anita
Springer, Leon
Strachan, Anne
Strong, Tom and Sandy
Tad, Anne
Trevey, Marta
Trevey, Mary Anne
Varney, Dobbe
Vest-Volz, Ruthanne
Vogel, Willie
Wadman, Carolyn
Wagner, Kristin
Walter, Kiersten
Wilkinson, Brian
Willens, Barbara
Willow, Susan
Yonan, Lauren

74 Thomas DeMarchi
75 Marisela de Santa Anna
76 Larry Desmond
77 Dorotheya Dorman
78 Bob Doty
79 Robert and Carol Doty
80 Ellen Drell
81 Steve and Lana Eberhard
82 Arthur Eck
83 Amy and Neil Elliott
84 Richard Estabrook
85 J. A. Faerigan
86 Kathleen Ferri-Taylor
87 John and Gerry Figg-Hoblyn
88 John and Charline Ford

89 Inez Fowler
90 Patricia Freeman
91 Beda Garman
Linda Hiott
Less Middleton
Joe Sutton
Sharon Jainan
Gaye Orvis
Janice Gendreau

92 Norene Gilstrap
93 Jerramy Gipson
94 Eric Glassey,
Leon Springer
Gerald Jordan

95 Glen Green
96 Catherine Glyer
98 Robin Goldner
Komer, Marc

99 James Gordon
100 Margaret and Richard Graham
101 Karen Gridley
102 Pauline Grzanich
103 Jane Gurko
104 Renee Haase-Thatcher
105 Lawrence and Susan Hammer
106 Marvin Hansard
107 Ray Hebrard
108 Edna Heidebrink
109 Richard Hill
110 Karen Holden
111 Robert Houtz
112 Robert and Linda Huck
113 David and Geri Hulse-Stephens
114 Roland Hulstein
115 Bill Jack
116 Richard Jeske
117 Lynn Dee Johnson
118 Diane Joyce
119 Eve Jursch
120 Bernard Kamoroff
121 Gregory Kanne
122 James F. King
123 Jeanne H. Koelle
124 Patricia Kovner

125 Lynda LaCount
126 Beth Lang
127 Gura Lashlee
128 John LeFan

Breitlow, Betty
Coyner, C.
Crossman, Steve
Dale, Eric
Hall, Bill, Thelma, and John
Ivancich, Larry
Janusz, Allen
Jolley-Crawford, Yvonne
Kovner, Steve
Long, Freddie
McEdwards, Don
McNair, Marilyn
Peterson, Mazie
Shorba, Mary
Sinnott, Lauren
Tjepkes, Harriet
Tjepkes, Robert
Turnbull, Fred
Waters, Gloria
Welker, Mara
Weller, Ann
Wertheimer, Susan
Weston, Jeri
Wolfe, Jeanne
Woolsey, Ron

129 John and Betty Lemmer
130 Monty Levenson
131 Michael Lightrain
132 Charles Lindelef and Trisha Benedict
133 David Lisle
134 Joyce Lane
135 Linda MacDonald
136 Andy Mackey
137 Lynne and Keith Matheny
138 Boyd Mathias
139 Karina McAbee
140 Roni McFadden
141 Joyce Lane
142 Patricia McKilliean
143 Arnie Mello

Adams, Buffalo
Anderson, Bonnie
Angius, John
Avilla, Betty
Avilla, Joe
Axell, Deborah
Bailey, Margo
Baker, Nikki
Bays, Bettye
Beck, Martha
Beers, Marilyn
Bell, Louise
Bouley, Brian
Buckley, Janice
Cail, Dean
Cannon, Jacqueline
Case, Mark
Chattler, Cathy
Coller, R. D.
Collins, Tom
Collins, Janet
Count, Patricia
Crespo, Olga
Cunningham, Carolyn
David, John
Davis, Marcia
Davis, Robert
Davison, Charles

Decker, Anita
Dill, Carmen
Don, Monica
Downing, Edgar
Duste, Leon
Edwards, Tammy
Faulkner, Margaret
Ferrante, Kristen
Glanders, Carrie
Goldner, George
Golightly, Nancy
Graham, Karen
Grimm, Margaret
Handls, Sue
Hansen, Tina
Hart, Callista
Harter, Pearl
Hill, Richard and Claudia
Huffman, Ray
Hunter, Sylvia
Jackson, Jeanne
Jayne, Carol
Johnson, Rudy
Kelleher, Elena
Kelly, Linda
Knight, John
Kroner, Rosina
Kuns, R. A.
Lacy, Jeff
Lacy, Connie
Lapote, Sandra
Lawrence, Al
Lourde, Thoman
Lyon, Lorain
Mack, Barbara
Martin, Dave
Mastrian, Karen
McAfee, Vicki
Mello, Arnie
Mitchell, Barbara
Moore, Nadine
Myer, Jerry
O'Neill, Margaret
Orenstein, Ron
Palmgren-Steele, Edette
Perez, Angel
Peterson, Danny
Pool, Richard
Potter, Eugene
Potter, Celeste
Ragsdale, Lynette
Reaney, Dave
Renicle, Jamie
Rex, Barbara
Schenk, Timothy
Schenk, Lisa
Schunan, Edwin
Schwartzmeyer, John
Shannan, Kelley
Shellenberger, Edward
Silva, Jacqueline
Simms, Kert
Skinner, Hayden
Smith, Mike and Brenda
Smoak, Alfred and Joyce
Spady, Donn
Spatzer, Eleanor
Stayer, Doris
Steele, Frederick
Stewart, Michael
Stuart, Mary
Swanson, Charles
Thomas, Katherine
Thurman, Andrea
Uppinghouse, Kathleen
Uppinghouse, Ronald
Van Meter, Dennis
Vaughn, Mary
Waddell, Elder
Waddell, Justin
Walker, Ardis
Wallace, Gordon
Waters, Joyce
Watkins, Al
Webb, Della
Webb, Jim
Weller, Cindy
Williams, Janet
Wilson, John and Beverly
Young, S.

144 Jason Minton

145 Glen Minyard
Minyard, Glen
Minyard, Susan
146 Michael and Ina Miyahira
147 Patricia Moeller
148 Joanne Moore
149 Marilyn Mooshie
150 Jacqueline Morninglight
151 Don Morosi
152 David Morrow
153 Barbara Muller
154 Nick and Linda Nichols
155 Linda Nichols
156 Tom Norman
157 Cathy O'Roke and Tim Howe
158 Janet and Tony Orth
159 Gary Owen
160 Robert Parker
161 Evelyn Parks and Jo Ann Flynn
162 Jill Peacock
163 Carol Perez
164 Rick and Kris Pierce
165 Jennifer Poole
166 Marcia Pratt
167 William Ray
168 David Reaney
169 This number intentionally left blank
170 Kenneth Rich
171 Aeryn Richmonde
Edwards, Isidora
Jacob, Jake
Jones, Jim and Lela
Leslie, Jay
Nissir, Sandra
Nissir, Stanley
Richmonde, Aeryn
Unsworth, Robert

172 Beverly Risch
173 Bob Roberts
Blake, John
Bricker, Paul and Daniel Logan
Bricker, Steve
Cassidy, William
Dall, James
Grossman, Lillian and Donald
Lewis, Sam
Lindquist, Fred
Mackin, Robert
McCarty, Jim and Julie
Olin, Glen and Melanie Grossman
Page, Robert
Patereau, Jani
Patereau, Kim
Roberts, Bob
Scarberry, Matthew, Sherman Mason, and Jeff Snider
Shuster, Keith
Shuster, Phillip
Shutz, Wes and J. R. Smith
Tucker, William
Wakeland, Don

Wilcox, Peggy and Tammy Edwards

174 Wolfgang Ronnefeldt
175 Gary Roussan
176 Hyman Rudoff
Campbell, Josephine

177 Keith Rutledge
Simpson, Nancy

178 Millie Sanchez
179 Donna Schindel
180 Ed and Erlyne Schmidbauer
181 Jane Selover and David Young
182 Lucy Shido
183 Barbara Sicard
184 Nayo Dawn Sicard
185 Robert Simonson
186 This number intentionally left blank
187 George Sirizzotti
188 George Skezas
Aleshire, Carole
DeBoer, Iris
DeBoer, Arlen
Robie, Richard and Gladys
Skezas, George
Skezas, Zelda

189 Pat Sloan
190 Sheryl Smith
191 John and Marianna Smoot
192 Mark Snedeker
193 Jennifer and Theresa Sookne-Mizell
194 This number intentionally left blank
195 Larry Stropes
196 Don and Dee Swain
197 Michael Sweeney
198 Matthew and Holly Taylor
199 Rick Thomas
200 John Thorslev
201 Clifford Tichenor
202 Warren Topp
203 Sylvia Tucker
204 Anita Turcotte
205 Dave Turner
206 Robert Turner
207 April Tweddell
208 Charles Ucker, Jr.
209 This number intentionally left blank
210 Catherine Wagenet

211 Gordon Wagenet
212 Hal Wagenet
213 Holly Wagenet
214 Rosie Wagenet
215 Nancy Wallace
216 Starla Warburton
217 Ted Coffee Warburton
218 Gerald Ward
219 Richard Wartell
McWhorter, Kenny
Sweet, James
Wartell, Angela

220 Dave Watts
221 Jenny Watts
222 John Weber
223 This number intentionally left blank
224 Carolyn J. Whitcomb
225 Donald Willis
226 Howard Wilson
227 Joanne Wimberly
228 Jeanne Wolfe
229 Charles and Darlene Woodbury
230 Glenn and Roberta Yokum
231 Marvin and Diana Zielinski
232 Paul Zimmerman
233 Melinda Zubak
Bell, Sulin
Berrett, Roger
Boland, Theresa
Bui, Viet
Colleton, Douglas
Coltrane, Mia
Coltrane-Briscoe, Serena
Copperfield, Kevin
Copperfield, Spencer
Copperfield, Wendy
Costa, Larry
Costa, Peggy
Crawley, Matt
Darlington, David
De La Cruz, Tatiana
Delaney, Mary
DeSmidt, Gabe
Elliott, Amy and Neil
Falkenberg, Shelley
Gibson, Lauren
Girdanskas, Tom
Gnatowski, Tad
Gotsch, Greg
Green, Jonas
Grossman, Ellen
Hendrickson, Eliz
Hernandez, Roselio
Holden, Karen
Horrocks, Nancy
Johnson, Cailean
Keyes, Judy
Kuhnert, Renate
Lacelle, Marie
Lightrain, Michael
Linney, Warren and Joan
Maglinte, Ann
Marill, Jim
Mason, Ryan
Misseldine, Mary
Mondo, Melissa
Moore, Pat
Nelson, Andrew

Norris, Maria
Open Circle, Employees (7)
Ostrander, Verne
Palmer, Sarah
Pennington, Ryan
Peterson, Robert
Phillips, John
Rhode, Matthew
Richmond, Margo
Robinson, David
Saijo, Rane
Sanborn, Patricia
Schuyler, Susan
Schwartz, Dawnna
Sison, Anita
Slocum, Ree
Stark, Matthew
Stephens, Jan
Verwey, Sullivan
Winkler, Scott
Zellachild, Mary
Zubak, Melinda

234 No name provided

OPEN HOUSE

235 Lorri Barker
236 Bill Barksdale
237 Don Bear
238 Sulin Bell
239 Charley Betsehoot
240 Betty Bird
241 Charles Bird, Jr.
242 Kenneth and Christine Brown
243 Pam Brown
244 Dan and Jeanne Chesser
245 Kevin Copperfield
246 Wendy Copperfield
247 Kevin Erich
248 Sharla Erich
249 Brian Ferri-Taylor
250 John and Charline Ford
251 Paul Futscher
252 Janice Gendreau
253 Rick Hawley
254 Erik and Brady Heiken
255 Tom Herman
256 Victor Hernandez
257 Richard Hincker
258 Ananda Johnson
259 Rosina Kroner
260 Renate Kuhnert
261 Howard Letovsky
262 Monty Levenson
263 Barbara Lincoln
264 Jerry Lindecef
265 Ron Lippert

266 Rita Mallon
267 Boyd Mathias
268 Ginger Pohlson
269 Lauren Raine
270 Carol Rosenberg
271 Lynda Schmidbauer
272 Judy Shelly
273 Steve and Sharon Short
274 Omaya Sisemore
275 Sheryl Smith
276 Bill and Lynda Southwick
277 Ken Trageser
278 April Tweddell
279 John Wagenet
280 Joanne Wimberly

OPEN HOUSE TRANSCRIPT

281 Rosnia Kroner
282 Claire Robertson
283 Marilynn Boosinger
284 John Arlich
285 Carol Rosenberg
286 Bill Barker
287 Delman Ford
288 Tony Orth
289 Michael Finegold
290 Ananda Johnson
291 Bill Bruneau
292 Howard Letovsky
293 John Almida
294 Robert Hamel
295 Doug Sawyers
296 Laura Stebbins
297 Gregg Stebbins
298 Harry Peters
299 Karina McAbee
300 David Hatton
301 Anthony F. Lopes, Jr.
302 Linda Breckenridge
303 John Almida
304 Walt Niesen
305 Edna Heiderbrish

PETITIONS
306 Petition