

**COMMENTS FROM**

**INDIVIDUALS**

**Letters 37 through 234**

### 37 Mair Alight

37-1 Main Street through Willits will continue to be available. Only a facility that bypasses the City of Willits will meet the purpose and need of the project. A "bypass" through town would not be a true bypass nor would it relieve traffic congestion. See General Response 1.10 regarding two-lane bypass.

37-2 Any of the bypass alternatives will reduce traffic in central Willits. See General Response 1.8 regarding traffic operations with Quail Meadows Interchange. To further address local traffic, 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. Regarding mitigation of impacts, the DEIS/EIR includes mitigation measures to reduce impacts of the proposed project.

37-3 See General Response 1.10 regarding two-lane bypass.

37-4 See General Response 1.12 regarding "growth at interchanges."

37-5 See response to Comment 37-3. See also Chapter 2 (DEIS/EIR) Purpose and Need for Project (a four-lane facility). A four-lane bypass has consistently received support from Willits City Council, Mendocino County Board of Supervisors, Mendocino Council of Governments, North Coastal Counties Supervisors Association, and the California Transportation Commission.

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

Re: Draft Environmental Impact Statement/Environmental Impact Report for the Willits Bypass

August 9, 2002

Dear Ms. Daniels:

I have many concerns about this report, a few of which I want to mention here, and that I request your reply. I have a retail business located on Highway 101 in downtown Willits, which has been here for eighteen years. I depend on drive-thru traffic, for many who see my shop as they drive by stop to buy. I depend on those added dollars each year.

37-1 I would most like to see a two-lane bypass and the Highway currently running through Willits to continue to do so.

37-2 I have noticed, and I believe your own studies indicate, that traffic increases when LOCAL TRAFFIC is engaged in school-related traffic, and morning/evening commuting. A four-lane would not alleviate these traffic conditions or address our local traffic concerns. I also understand that there are funds for local traffic alleviation possible. We are also taxpayers here, and have the right to say whether or not we are interested in a four-lane through our small valley. This is a rural area of natural beauty, and there is no way to mitigate a four-lane to address the impacts on us of loss of farmland, woodland, wetlands, the impact on local businesses, noise level increases and the visual impact. These are unavoidable significant impacts of a 4-lane that are not addressed in the report.

37-3 There is no inclusion for study of a two-lane alternative, which I understand is the choice for consideration highest in most of the citizens of this valley.

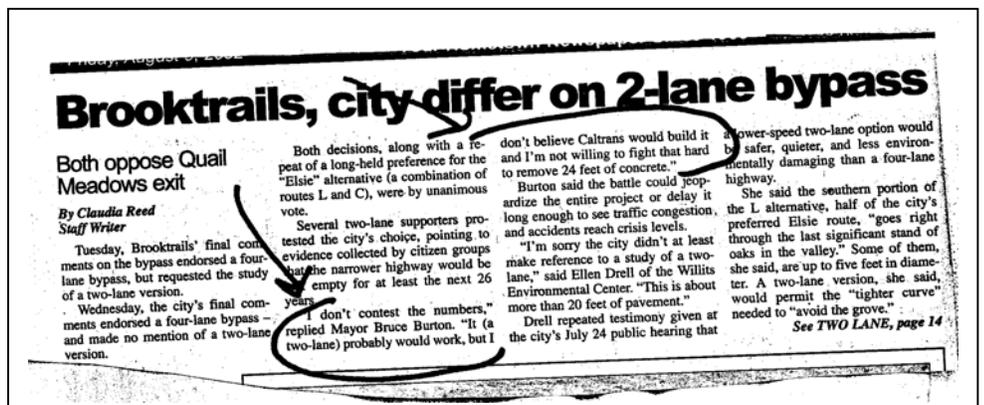
37-4 The report does not offer the purchase of conservation easements at the interchanges as a mitigation to prevent commercial sprawl out into the farmlands and rural area of this small valley.

37-5 The community as a whole just does not support a 4-lane. The city council members voted to support it ONLY BECAUSE THEY DON'T BELIEVE THEY HAVE A CHOICE, WHICH WE CITIZENS KNOW WE DO. (SEE ENCLOSED NEWSPAPER ARTICLE WITH ARROWS POINTING TO WHAT I AM REFERRING)

37-6 This report also does not analyze the impacts of a tie-in to the Brooktrails Second Access Road, a critical safety issue for the Brooktrails residents and all those on and served by Sherwood Road.

37-7 I am requesting that ALL of the above impacts and issues be addressed in the Final EIS/EIR.

Sincerely,  
  
Rev. Mair Alight, pastor of The I Am Peace Center, Willits Church of Religious Science, co-founder of Willits Compassion Connection, and owner/operator of The Natural Choice, 225 South Main Street, Willits, CA, 95490.



37-6 See General Response 1.6 regarding Brooktrails Township second access road.

37-7 The issues raised by the comment letter have been adequately addressed here, and no further discussion in the FEIS/EIR is necessary.

### 38 Dawna Allen

38-1 See General Response 1.10 regarding two-lane bypass. Removing interregional traffic, especially truck traffic, from Willits city streets will improve conditions for residents and visitors who use the area for jogging, riding bikes, and walking. Mitigation measures have been proposed to reduce impacts from the proposed project (Appendix A, FEIS/EIR).

Dawna Allen  
P.O. Box 23  
Willits, CA 95490  
(707) 459-1530

August 19, 2002

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

Dear Ms. MacKenzie:

38-1

I am a resident in the community of Willits. I am writing you to express my concern in regard to the proposed 4 lane by-pass through the middle of what is a beautiful and irreplaceable valley.

Many residents and visitors use this area for jogging, riding bikes, and walking. The area includes a large amount of livestock and grazing land. It will have a tremendous impact on the environment when a bypass is inserted in this area.

It is true that traffic has increased over the past 13 years that I have resided here. However, the traffic that will be removed from the city streets by the bypass will be very lonely on 4 paved lanes. The proposed bypass sites have enough room to add two more lanes to in 30 years if it ever becomes necessary. All around California Caltrans adds on to existing freeways, in circumstances much more difficult than what would exist in Willits if a 2 lane bypass were inserted, with an allowance to increase to a 4 lane if and when necessary.

Therefore, I strongly urge you to consider a 2 lane bypass.

Sincerely,

  
Dawna M. Allen

**39 Cindy Ammendolia**

Modified Alternative J1T has been identified as the Preferred Alternative for construction. See General Response 1.3 regarding Alternative L/C.

I would like the L-C route (Hal Wagenet's adaptation) to be the route chosen for the Willits bypass.

Cindy Ammendolia  
190 Bittenbender Lane  
Willits, CA 95490

**40 Sylvia Anderson**

Modified Alternative J1T has been identified as the Preferred Alternative for construction. See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails Township second access road.

Project phasing due to budget constraints would not necessarily assume construction of a two-lane alternative in the first phase. See Section 1.2 (FEIS/EIR) on Project Description, Funding, and Schedule. See General Response 1.10 regarding two-lane bypass.

Aug. 26, 02

Re the Willits Bypass:

I strongly urge you to use the LC (Elsie) plan as presented by Hal Wagenet. This will take care of a major problem of egress and entrance for the large population of the Brooktrails area, which will have to be settled later if not now.

If finances won't handle a 4 lane road, a 2 lane would be ample to meet the needs.

Sylvia Anderson  
P.O. Box 302  
Willits, CA 95490

## 41 James Angell

41-1 See General Response 1.9, which discusses why a center valley interchange is not being considered for this project. See also response to Comment 139-7 (Karina McAbee).

41-2 See General Response 1.8 regarding Quail Meadows Interchange. Quail Meadows Interchange would not require large cuts because it would be built predominately on fill.

41-3 See General Response 1.6 regarding Brooktrails Township second access road.

41-4 See response to Comment 34-61 (Willits Citizens for Good Planning). A Conceptual mitigation plan has been prepared for Modified Alternative JIT (the Preferred Alternative) (Appendix L, FEIS/EIR).

**JAMES ANGELL**  
Certified Public Accountant  
461 S. MAIN STREET, SUITE 100  
WILLITS, CA 95490  
707-459-4205  
FAX : 707-459-3240

July 8, 2002

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

Dear Ms. Daniels,

The following are my comments on the EIR for the Willits By-Pass.

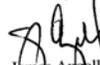
Alternative JIT & Alternative LT:

- 41-1 • Neither route has a Highway 20 interchange. Why build a by-pass that requires Hwy. 20 traffic to continue to go through town.
- 41-2 • Both alternatives have a Quail Meadows interchange (too close to town, the High School, and Sherwood Road. Also requires large cuts)
- 41-3 • Neither route allows for Brooktrails access.
- 41-4 • The mitigation measures in the EIR are vague to the point of being meaningless. Caltrans needs to address each item that needs mitigation and spell out what mitigation will take place. The following areas need to be addressed:

Noise  
Visual impact  
Loss of businesses  
Loss of farmland  
Dirt removal and cuts

In summary, I appose both JIT and LT as they are proposed. JIT is too close to Willits and would take too many businesses so it should be dropped. LT combined with CIT with a Highway 20 interchange and proper mitigation would be a route that I could support.

Sincerely,



James Angell

**42 Scott Angell**

42-1 While the Draft 404(b)(1) Alternatives Analysis concluded that Alternative LT and JIT were the Least Environmental Damaging Practicable Alternatives (LEDPA), the DEIS/EIR did not promote any particular alternative as the preferred alternative. Since public circulation of the DEIS/EIR, Modified Alternative JIT has been identified as the preferred alternative.

42-2 Modified Alternative JIT has been identified as the Preferred Alternative for construction. See General Response 1.3 regarding Alternative L/C. See General Responses 1.4 and 1.5 regarding Willits Creek Restoration. See General Response 1.6 regarding Brooktrails Township second access Road. See General Response 1.8 regarding Quail Meadows interchange. Regarding improving wetlands in the valley, the Final 404(b)(1) Alternatives Analysis concludes that, of the build alternatives, Alternative L/C would result in the highest magnitude of impacts to valley wetlands and other waters of the U.S.

42-3 Local citizens who have expressed support for the hybrid Alternative L/C appear to be based principally on an understanding that only a Truck Scales Interchange would accommodate a connection to a Brooktrails Township second access road. See General Response 1.6 regarding Brooktrails Township second access road. See also General Response 1.8 regarding traffic operations at Quail Meadows Interchange. The comment is correct that Mendocino County has pledged over \$17 million to the construction of a bypass; however, the County has not expressed its preference for any alternative but issued its support for Caltrans to study the Modified Alternative JIT.

July 19,2002

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

Attn: Nancy MacKenzie, Environmental Coordinator

Greetings,

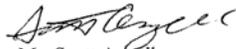
42-1 I am a resident of Brooktrails in Willits, California. I am concerned that the plans for a Willits Bypass as being promoted by Caltrans is not inclusive of a plan proposed and supported by many residents of this area.

42-2 This plan, known as the ELSIE/Wild Oat Canyon and Willits Creek Restoration Proposal, would appear to meet more of the needs of this community by providing a second access route to Brooktrails, an important safety issue. It would also relieve the congestion and dangers at the Sherwood Road – Highway 101 – Willits High School conjunction. This proposed plan also appears to provide endangered fish a bypass, enhance the new Willits Sewer Plan by providing increased flows, and improve the quality of wetlands in the valley.

42-3 The ELSIE/Wild Oat Canyon plan is supported by Brooktrails, the City of Willits, fire and safety officials, and a majority of local citizens. Mendocino County has pledged its entire \$17.1 million to get this project underway.

In light of the above, I ask that Caltrans adopt this plan for the Willits Bypass and Willits Creek Restoration. I am confident that by working together, this project will not only meet Federal and State requirements, but will more fully meet the needs and best interests of community, travelers and the local ecology.

Thank you,

  
Mr. Scott Angell  
P.O. Box 1074  
Willits, CA 95490

Cc: Hal Wagenet  
P.O. Box 422  
Willits, CA 95490

43 Warren Archer

43-1 Although all of the proposed build alternatives include a connection with S.R. 20, the comment refers to an extension of S.R. 20 from the current in-town intersection to a center valley interchange. See General Response 1.9 regarding center valley interchange.

43-2 Modified Alternative J1T has been identified as the Preferred Alternative for construction. Mr. Wagenet presented information concerning the hybrid Alternative L/C to the PDT on a number of occasions. See General Response 1.3 regarding Alternative L/C. See General Response 1.6 regarding Brooktrails Township second access road.

43-3 Comment noted.

43-4 The comment does not pertain to the proposed project.

43-5 See Section 1.2 (FEIS/EIR) for project schedule.

Aug. 26 2002 4  
2000 Hilltop Drive  
Willits Ca 95490

Dear Cal Trans Planning Staff:

What will help? Should I show my anger or plead with you to achieve some positive results? While I realize you have to deal with a certain unreasonable sector of our community (ie. - the 2 Lane Bonito Bandits) you should not push an inferior product on us just to say the project is completed. This affects our lives on an everyday basis.

43-1 In order of importance:  
I can not believe that you will not include a Hwy 20 interchange. This is equal to the ludicrousness of a 2 Lane bypass. Willits plans to build a new North South artery to the East of Safeway and extending Hwy 20 to the Freeway only makes sense. Does Cloverdale get Citrus Fair Drive only because it is closer to the center of Money & Power (Ditto for Sandwells)

43-2 Hal Wagenet is correct. Else (L-C is the only practical alternative. You have to know the details. The States cooperation is needed to achieve a quality 2nd access to brook trails which will keep commuter traffic on the Freeway. Or do you take the attitude that it is not your concern?

over

43-3 Any answers that use lack of money as a basis are void of any credibility. We watch state money go down the toilet 7 miles south of willits for 3 to 4 years! in order to reduce the area of 2 corners. While my girl friend is afraid to drive up to see me due to that pinball slot detour.

43-4 This town was promised the bypass in the year of my birth - 1953. which coincidentally is the elevation of the ridgewood summit.

43-5 It has been delayed so long that my mother may never get to ride on it. She is 90 yrs old in reasonably good health. It is our goal to give her a ride on it, so your help is needed.

Please get with it.

Warren Archer  
Warren Archer

**44 John Arlich**

44-1 Modified Alternative JIT has been identified as the Preferred Alternative for construction. See General Response 1.3 regarding Alternative L/C. General Response 1.10 discusses reasons a two-lane bypass does not meet the purpose and need of the project.

44-2 Comment noted. Caltrans traffic studies of existing conditions are the basis for the purpose and need for a proposed four-lane bypass.

44-3 Caltrans and FHWA appreciate the public's comments. To keep the public informed about the project, newsletters are mailed periodically. Also, check the District 1 Willits Bypass website for project updates <http://www.dot.ca.gov/dist1/d1projects/willits/index.htm>. To be added to the project mailing list, contact John Bulinski, Project Manager at (707) 441-5729.

Aug 18. 02 <sup>(37)</sup>

To Cher Daniels

I would like you to hear how I feel about the Willits Bypass.

Altho I am not one of those people that attend every meeting, I feel that you want to hear from those of us that are silent.

44-1 I am backing the L.C. Route. It seems the only route that makes sense. I do not support the two lanes bypass, I feel that is going back to horse and Buggy days.

44-2 We need a 4 lane bypass soon. The traffic is worse I have seen for a small town. I have lived here for 43 years and the bypass will come close to my home, but I am all for progress, I want people passing thru our town to remember our town, and not make remarks in news paper about how hard to ~~pass~~ pass thru.

44-3 I have enjoyed the news letters and will read more on internet.

Thank you  
John J. Arlich  
1101 Hearst Rd  
Willits, Ca 95490

## 45 Holly Barnard

45-1 Visual and noise studies concluded that the impacts are not significant and unavoidable. See General Response 1.10, which supplements the DEIS/EIR discussion on why a two-lane alternative does not meet the purpose and need for the project. Passing lanes would improve LOS on a two-lane facility; however, passing lanes would be required in both the northbound and southbound directions. A segment with a passing lane would necessarily require three lanes. The Willits Bypass alternative alignments are approximately 8-10 ha (5-6 mi) in length. According to the American Association of State Highway Officials (AASHTO) Green Book – a manual for highway facility design – passing lanes would need to be up to 3 ha (2 mi) in length to be effective. A two-lane bypass with passing lanes in both directions would require three lane segments for most of the the bypass length; consequently construction impacts and right of way requirements would be close to that of a four-lane facility.

Level of Service is explained in Section 2.2.2 (DEIS/EIR). See also response to Comment 34-11 (Willits Citizens for Good Planning). Support for a four-lane facility, which is listed in Section 2.6 (DEIS/EIR), has not changed.

Without a change in design speed, curves would be the same radii on a two-lane road as on a four-lane road. Caltrans believes that 110 km/h is the appropriate design speed for this highway. Thus, there is no reason to believe a two-lane bypass could “curve around existing ‘trouble spots’” any better than a four-lane could.

45-2 General Response 1.3 explains why Alternative E3 is not the preferred alternative for construction. Among these reasons are highly unstable soils and potential adverse impacts to fisheries, as noted in the comment. To minimize potential sediment discharge into the creeks for any of the alternatives, Caltrans is required to develop a Storm Water Pollution Prevention Plan (SWPPP) and implement Best Management Practices (BMPs) that are acceptable for the state and federal resources agencies.

Holly Barnard  
P.O. Box 565  
Willits, CA 95490

August 3, 2002

Cher Daniels, Chief  
Caltrans Office of Environmental Management S-1  
2800 Gateway Oaks Drive, Ste. 100  
Sacramento, CA 95833

Attn: Nancy MacKenzie, Environmental Coordinator

Re: Proposed Willits Bypass, EIR

There are a few comments I feel compelled to make regarding the Environmental Impact Report issued for the above bypass considerations.

45-1

There are unavoidable significant impacts inherent in any four-lane bypass around Willits, the primary ones being enormously increased noise levels throughout the entire valley and the negative visual impact of the structure (on- and off-ramps in particular) needed to accommodate the speeds of a four-lane freeway. It seems that the Level of Service (LOS) rating system is designed to favor four lane highways - why not a two-lane with passing lanes? While you state that in 1992 “there was no local support or regional support for a two-lane expressway” (3.6.2), I believe this would not still be the case, and after community review of this EIR it would be a very good time to revisit the question of community support. A scenic two-lane bypass which curves around existing “trouble spots” in the valley would definitely meet budget requirements while reducing all impacts and providing adequate LOS for passing traffic.

45-2

Specifically regarding the “Western Hills Route”(E3), I want to express for the record that there is tremendous resistance to this route but because of the general community perception that this is not a serious option, local people don’t seem to feel the need to speak up as much as some do about the valley routes. Please don’t interpret this relative silence as complacency.

E3 is an extremely dangerous option due to the high potential for landslides, even with special design mitigations. In the entire project area, eight faults have so far been located; of the five that do intersect with routes being proposed, **all five** cross E3. Likewise the situation with Zone Boundaries. The cut of slopes proposed are too steep for this type of terrain, landslides regularly occur and there is considerable erosion even **without** a highway carved into the hills. Were a significant earthquake to occur, the E3 bypass would disappear and the ensuing long-term ramifications would make travel a disaster around Willits

The experience at the Forsythe Creek crossing at Hwy 101 in Redwood Valley reminds us that all the stream crossings which E3 would require would likely result in unacceptable stream bed silting with the resultant damage to fish populations. The Dept. of Fish and Game verified a

45-3 Some mitigation measures including stream bank stabilization will begin prior to roadbed construction. The revised southern interchange will require some stream work at Haehl Creek near the bridges-lining the channel with rock slope protection, eliminating the large drop-off where the existing culvert discharges several feet above the stream bed, and possibly other stabilization work. Also, with Modified Alternative J1T approximately 2,800 feet of the ephemeral creek channel that drains north from the Schmidbaur's property, on the east side of the existing fill area, may be realigned. This is not a fish-bearing stream, nor does it flow into a fish-bearing stream, so NMFS does not have a concern (Tom Daugherty, pers. comm.). The reconstructed channel would be adequately designed to contain normal water flows and would be planted with riparian vegetation.

45-4 See response to Comment 45-2.

45-5 See response to Comment 45-2.

viable population of coho salmon spawning in Baechtel Creek this season. I hate to imagine what would happen to this population if E3 is chosen, with its "long culverts" and resultant silting and flow increases. We cannot afford to negatively impact this population. If the migration of fish is blocked, an entire generation of fish could be eliminated which would be an significant and unacceptable result of the E3 plan.

45-3

Regarding the necessity of protecting riparian cover for stream temperature control, why not do any stream realignment during the initial stages of construction, perhaps even years before the entire construction process is underway and all right-of-way is purchases? It should be possible to get some new riparian vegetation growing and thriving and stabilizing those new banks, as soon as an alternative is chosen and before actual stream realignment is undertaken.

45-4

The noise consideration is extremely disturbing. As stated in the EIR, "E3 would include truck climbing lanes on a large, steep hill between Baechtel Creek and the proposed SR20/US 101 interchange." Of course there would be increased noise levels due to the breaking and downshifting when trucks descend the grade also. This impact would be significant to those of us who live in the area, and no other route alignment seems to include such a dramatic incline with its resultant noise problems.

45-5

Please take into serious consideration these concerns. They are shared by a large number of people, and if E3 comes to be chosen as the preferred alternative, there will be substantial community uproar and opposition - after the shock has passed. I sincerely hope we will not have to go through that battle.

Sincerely,



Holly Barnard

**46 Frank and Erla Barr**

46-1 See General Response 1.4 and 1.5 regarding Willits Creek Restoration.

46-2 See General Response 1.6 regarding Brooktrails Township second access road. Also, any of the valley alternatives will reduce congestion on Main Street and Redwood Highway, thus improving traffic conditions between Brooktrails and the bypass.

46-3 See response to Comment 12-16 (Brooktrails Community Services District).

Frank and Erla Barr, 1695 Lilac Lane, Willits, CA 95490 (Brooktrails)

Dear Cher Daniels,

Even if it takes more time to make very important decisions about the Willits Bypass it will be worth it to make the best possible ones as we will be living with them for many years.

Have the Caltrans and the North Federal Highway Administrations seriously considered:

- 46-1 a. returning Willits Creek to its original course before the railroad tracks were laid? This would be by constructing a channel between Outlet Creek and Willits Creek mitigating original objections to the truck scales interchange at a greatly reduced cost. Fish would have an enhanced waterway and environment and the Willits Wastewater Treatment plant would function better.
- 46-2 b. The truck scales interchange allows a much better second access to Brooktrails Township for people and trucks needing to travel between the bypass and Brooktrails. Wild Oat Canyon, very near the truck scales, is the preferred location of a new county road to Brooktrails not only for travel to the bypass, but also as the alternate to Sherwood Road as an escape route from the next forest fire while Sherwood Rd. is blocked by fire service vehicles.
- 46-3 c. Wild Oat Canyon is a closer, cheaper source for fill for the bypass. One of the Caltrans engineers at the last Caltrans informational openhouse at the Willits Community Center in July spoke of this source of fill. Even better, with the cooperation of Mendocino county engineers, he said that dirt removal for the Wild Oat Canyon Rd. could reduce the costs to both the county and the state by combining the projects.

Very sincerely,

*Frank E Barr*

*Erla S. Barr*

**47 Carol Kuhling Barrett**

47-1 See General Response 1.10, which supplements the DEIS/EIR discussion on why a two-lane alternative does not meet the purpose and need for the project.

47-2 See responses to Comments 33-12 (Sierra Club Mendocino Lake Group) and 59-2 (Greg Byers). No change to the DEIS/EIR is required.

47-3 See responses to Comments 30-1 and 30-3 (Mendocino Forest Watch). No change to the DEIS/EIR is required.

Carol Kuhling Barrett • 1900 Hilltop Drive • Willits, CA 95490 • 707-459-3857

July 27, 2002

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

Maiser Khaled, Chief  
District Operations - North  
Federal Highway Administration  
980 9<sup>th</sup> Street, Suite 400  
Sacramento, CA 95814

Dear Ms. Daniels and Mr. Khaled:

47-1

I have heard the comments and analysis of several intelligent, conscientious citizens of Willits who have studied the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Willits Bypass. Taking these comments and my own analysis of the situation into consideration, I feel strongly that it is essential that the two-lane bypass is considered as, not only a viable alternative, but the best alternative for our community.

47-2

I have lived in Willits for thirteen years and greatly value its unique rural character. In considering where to make our home and raise our children, the tranquility and serenity of the area were major factors, as I know is true for many families in our community. I am aware that the Willits Bypass will create a great deal of noise. Any increase in the existing noise level created by the bypass is a significant impact that will substantially alter the rural character of the Willits area, and impact the lives of those who live and work in the community. Section 5.11.2, states that the "Impact Threshold" for noise is "when the predicted noise levels exceed existing noise levels by 12 dBA, Leq(h)". From my understanding, a 12 dBA increase is about a 4-fold increase in the existing noise level. I adamantly disagree with this threshold. Any noise increase must be considered a significant impact. All of the alternatives offered will substantially increase the existing noise level. Noise must be listed as an "Unavoidable Significant Impact" for all alternatives in Chapter 6.

47-3

I enjoy the beautiful natural vistas that the Little Lake Valley offers daily and it saddens me to imagine that these could be significantly altered in order to satisfy

47-4 See response to Comment 34-48 (Willits Citizens for Good Planning). No change to the DEIS/EIR is required.

47-5 See response to Comment 34-47 (Willits Citizens for Good Planning). No change to the DEIS/EIR is required.

47-6 No abatement or mitigation measures were proposed for business loss or noise because Caltrans Community Impact Assessment and Noise studies concluded, respectively, that the impacts to these resources would be minimal. Mitigation measures proposed in the DEIS/EIR will reduce impacts to visual resources. Reducing the four-lane bypass to two lanes would not reduce the footprint by half because of necessary design components such as shoulders, side slopes and drainage facilities.

47-4

a plan that doesn't take into the considerations of the local community. The EIS/EIR lists 10 mitigation measures that will supposedly reduce visual impacts to less than significant. While I am pleased that Caltrans is making an effort to reduce the visual impacts of the bypass, it is impossible to build a four-lane freeway without having significant impact on the beauty of our valley. Regardless of Caltrans' efforts to mitigate visual impacts, a freeway going through Little Lake Valley will be quite visible and will significantly degrade the rural character and beauty of the area. **Visual impact must be listed as an "Unavoidable Significant Impact" for all alternatives in Chapter 6.**

I understand the EIS/EIR states "Under the worst-case scenario, Willits would lose the sales taxes of 17 percent of the businesses along U.S. 101." Apparently, Caltrans does not consider the loss of these businesses a significant loss since it does not appear as an "Unavoidable Significant Impact" in Chapter 6. **However, the loss of 26 businesses (according to the Economic Impact Report) is a significant impact on our community.** In addition to the loss of direct sales tax, there is the loss of approximately 100 jobs, conservatively assuming that each business has 4 employees. In a town the size of Willits, 100 jobs is a significant labor force. The increased commerce due to the construction of the bypass would be transient, lasting 4 years at the most. The EIS/EIR does not analyze what may occur after that.

47-5

In addition, the EIS/EIR conclusion is based on the experiences of Cloverdale after the bypass went into operation. Comparing Cloverdale with Willits is tenuous at best. First, Cloverdale has a middle interchange, whereas Willits will only have interchanges at the north and south ends of the Valley. Secondly, Cloverdale is supported by a very healthy economy with an expanding wine industry in Sonoma County. Willits has no significant new industry to offset the loss of these jobs. **The loss of local business must be listed as an "Unavoidable Significant Impact" for all alternatives in Chapter 6.**

47-6

Many of the "Unavoidable Significant Impacts" caused by a freeway bypass cannot be mitigated. For example, Caltrans offers no mitigation for noise impacts or business loss, and the mitigation measures for visual impacts would be largely ineffective. **A two-lane bypass, however, would significantly reduce noise by lowering vehicle speed, would significantly reduce visual impacts by reducing the "footprint" of the bypass by nearly one-half, and would significantly reduce economic impacts by drawing less tourist traffic out of town.**

47-7 See response to Comment 22-3 (Mendocino County Farm Bureau).

47-8 See response to Comment 34-11 (Willits Citizens for Good Planning). The Route Concept Report (RCR) is a concept for construction of highway improvements for the 20-yr planning horizon, and beyond. Two Route 101 segments of existing 2-lane highway are no longer proposed for improvement projects in the October 2002 RCR. These segments differ from the Willits Bypass in a number of ways, for example they traverse through State Parks, have relatively low traffic volumes, have little local road access needs, and little support exists for the expensive improvements required to upgrade these segments to 4-lanes. Finally, in the foreseeable future, we do not expect these segments to require 4-lanes due to increased traffic volumes. However, if conditions change, the RCR could change to address future needs.

47-9 See General Response 1.12 regarding "growth at interchanges."

47-10 See General Response 1.10, which supplements the DEIS/EIR discussion on why a two-lane alternative does not meet the purpose and need for the project.

47-7	In Chapter 3, it is stated that two-lane alternatives were dropped from consideration because they did not meet the "Purpose and Need". However, a two-lane bypass would "reduce delays and improve safety" virtually the same as a four-lane freeway bypass, with less impact to the noise level, environment, business and natural beauty of the area.
47-8	Even based on your projected traffic volumes for the year 2028, the Level of Service on a two-lane bypass would be similar to the Level of Service currently experienced on the two-lane section of 101 between the north City Limits and Reynolds Highway, which is quite acceptable. As you are aware, Caltrans has recently modified the Route Concept Report to allow some two-lane facilities along Highway 101 to operate at Level of Service "E", partly because of the area's high environmental sensitivity. Little Lake Valley has similar environmental sensitivities.
47-9	For many years there has been discussion among the citizens of Willits about prohibiting development around the interchanges to protect businesses in town. The EIS/EIR must include mitigation measures for Caltrans to establish conservation easements on all properties adjacent to the interchanges in order to protect the Willits business district from commercial sprawl outside the City of Willits. <b>If Caltrans cannot guarantee the establishment of conservation easements, then interchange development and the additional loss of local business as a result, must be declared as an unavoidable significant environmental impact.</b> Zoning is no guarantee against future development since the governing body can easily change zoning. Conservation easements are the only way to protect the properties in perpetuity.
47-10	<b>If a two-lane alternative can be constructed meeting the needs of the community and the local environment and save tax dollars in doing so, why would this not be the logical choice?</b>
<p>Sincerely, <i>Carol Kuhling Barrett</i> Carol Kuhling Barrett</p>	

**48 Andrea Beene**

48-1 Some of the construction activities performed in the late 1960's have had impacts to some of the drainage systems in the Willits Valley. Caltrans has initiated restoration projects to mitigate these impacts. Construction of the proposed bypass has a potential for additional impacts, however, there have been significant improvements to methods and technologies over the past 40 years in the field of erosion and sediment control. This project will incorporate some of these techniques to address these erosion concerns and, in addition, project monitoring will be used to identify and resolve failures or unanticipated problems that may occur. Furthermore, requirements from resource agencies, in particular the State Water Resources Control Board, require the installation of Best Management Practices to control and prevent erosion to protect water resources.

48-2 Mitigation Measure BIO-23 (DEIS/EIR) describes measures that will be taken to prevent the introduction and spread of toxic and invasive plant species.

48-3 Regarding success of oak tree mitigation, see responses to Comments 26-3 (California Oak Foundation) and 27-3 (California Native Plant Society).

48-4 The proposed viaducts, of over a mile in length, and bridged creek crossings will provide under-crossings for wildlife.

**Andrea Beene**

5940 E Woodland Ave  
Merced CA 95340  
209-726-3054

August 10, 2002

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

Maiser Khaled, Chief  
District Operation – North  
Federal Highway Administration  
980 9<sup>th</sup> Street, Suite 400  
Sacramento, CA 95814

Dear Ms. Daniels and Mr. Khaled:

48-1

This letter is in response to the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Willits Bypass. I am a landowner of the Shafer Ranch portion of the Schmidbauer Ranch and feel the EIS/EIR does not address the erosion problems that the highway bypass will create, specifically the Haehl Creek Entrenchment. The Schmidbauer/Schafer Ranch is located on the south end of Willits on the east-side of the highway.

On page 5-55 of the EIR the statement is made that there will be a low risk of additional damage to adjacent property. I find this statement false. Significant erosion has occurred in Haehl Creek at the proposed interchange location by previous practices of Cal-Trans. The previous practices have not only damaged this area but also contributed to an increase in sedimentation build up in our local rivers and streams. History has shown that construction on this highly sensitive soil creates an environmental disaster and the EIR does not address what CAL-Trans is going to do to prevent further erosion damage in the area. Looking at the past the amount of damage that resulted from the little bit of construction that took place in the Haehl Creek area, 35 years ago, and the amount of money currently being spent by Cal-Trans to deal with the erosion damage, I feel this issue must be addressed more thoroughly.

48-2

Secondly, the EIR does not satisfactorily deal with the botanical resources of the area. Highway projects compromise and damage pasture and rangeland when they introduce undesirable plant species, such as yellow star thistle. The EIR states that no means is sited to mitigate such damage in Mendocino County. The unmitigated impact of this project threatens the surrounding valley's range and pastureland. The mitigation for the loss of Oak Trees is also ridiculous, planting acorns to replace the loss of one hundred-year-old Oaks is foolish. The success rate of such a project is most likely unsuccessful. There will be significant impacts to oak woodlands, and this is minimized by the EIR document.

48-3

Thirdly, at the south end of the Willits Valley there is a large number of black-tail deer, which will be crossing back and forth at the railroad underpass and proposed highway. In the Haehl Creek area there most certainly should be a wildlife under-crossing to allow the deer and other species in the area access to the acreage and water on the west and east-side of the project. Not including a wildlife under-crossing will lead to the further slaughter of our black-tail deer by CAL-Trans improvement on highway 101.

48-4

Sincerely,



Andrea Beene

## 49 Virginia Belt

The following individuals submitted copies of the same form letter:

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

49-1 Modified Alternative J1T has been identified as the Preferred Alternative for construction. See General Response 1.3 regarding Alternative L/C.

49-2 See General Response 1.6 regarding Brooktrails Township second access road. See General Response 1.8 regarding traffic operations at northern interchanges.

49-3 See General Response 1.4 regarding Willits Creek restoration.

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

Dear Madam:

49-1

We live in Brooktrails. We support ELSIE/Wild Oat Canyon proposal. This uses the combined alternatives L1 in the south and C1T in the north, known as ELSIE. It would connect with a new county road to Brooktrails in Wild Oat Canyon. This combination is most direct, affordable and offers the best service to the community as a whole, including inter-regional traffic.

49-2

We currently have only one way to Willits by way of Sherwood Road. This road is congested and dangerous where it meets Highway 101.

Our county has decided to build a second access road from Brooktrails for daily convenience and emergency service. It will probably connect to Highway 101 at Wild Oat Canyon.

If Caltrans builds the Truck Scales Interchange, this new road will work perfectly for us and for any trucks that may need to go to Brooktrails or out Sherwood Road. This is a real safety issue.

But if you decide to build the Quail Meadows Interchange, we are sure traffic will worsen significantly at the intersection of Sherwood Road and Highway 101. This is because it would be much shorter to get to the freeway using Sherwood Road than by way of Wild Oat Canyon. There would be increased danger to commuters and school children because of the nearby high school. also, a southbound delivery truck or moving van and even some cars cannot turn onto Sherwood Road from Highway 101 because of the sharp angle. We do not see any discussion of Caltrans assisting us to mitigate the serious internal conflicts that would be created by the construction of the Quail Meadows Interchange.

49-3

We understand that the Truck Scales Interchange and Alternate C1T have negative environmental impacts. But we do not see any mention in the draft EIR of the Willits Creek Restoration proposal, which would solve the fish and wetlands impact problems.

If you used the mitigation measure known as the Willits Creek Restoration, C1T and the Truck Scales Interchange will be the preferred alternative, especially when you consider its positive features in contrast to the many problems with the Quail Meadows Interchange.

Sincerely,



**50 Trish Benedict**

50-1 Comment noted. General Response 1.3 explains why the hybrid Alternative L/C is not the preferred alternative for construction.

50-2 The project must be designed so that it does not result in changes in flood flow that would result in property damage or destruction. Portions of the bypass are on viaduct to avoid impacts due to floodplain encroachment and on structures where the facility crosses local roads. Page 5-50 (DEIS/EIR) explains the design measures, such as viaduct and equalizing culverts that will be incorporated into the project to avoid floodplain impacts such as flow obstructions. Please see Chapter 2 of the DEIS/EIR regarding the project purpose and need.

50-3 See response to Comment 50-2.

Below is the result of your feedback form. It was submitted by  
( ) on Tuesday, August 27, 2002 at 00:18:48

S1: August 26, 2002

Dear Cher Daniels and crew,

Thanks for bringing the Willits bypass exhibit to town last month. I really appreciated the number of bright, knowledgeable people who were involved and the amount of thought, energy, and money that has gone into the project. (Excellent refreshments, too!) I was impressed by its comprehensiveness, not to mention the sheer number of factors that need to be taken into consideration. It did a lot to dispel the mantra I keep hearing repeated that Caltrans doesn't care about the people of Willits or the effect of a bypass on the town. I spent the time trying to take in as much information as I could. I presented some of my thoughts and concerns to your reps and appreciated hearing their comments and constraints. I confess that the enormity of the project makes my head spin!

First, let me say that I have no particular agenda (other than going nuts in the summer fighting the RVs and lumber trucks). My husband and I moved to Brooktrails from Oakland 4 years ago and we do not personally know anyone who will be impacted by any of the proposed bypass routes. I appreciate the concerns of the Environmental Center folks and know that their hearts are in the right place, but find them sometimes on the fanatical side. Likewise, I appreciate Hal Wagenet's concerns, 'tho I have a problem with his pushing the L-C Alignment as "good for Willits" without ever issuing a disclaimer that his property would be seriously affected by the Quail Meadows interchange. (I am, however, impressed that instead of griping like everyone else, he's put serious effort into creating a solution, and I did vote for him in the last election as the least objectionable choice.)

50-1

Ok, so here's what I think. If a mega-freeway were to go through the beautiful valley and bisect this community, it would break my heart. When we moved here and heard about the bypass, I just assumed that since this is a small, rural community, it would be a 2- or 4-lane, ground level, limited access rural highway similar to what's on the Ridgewood Grade or the stretch of 101 between Novato and Santa Rosa, something to move the traffic around the bottleneck at the traffic lights—not an elevated 4-lane freeway. And I still don't understand the need for one.

50-2

No one I asked could give me a good reason why the road couldn't be ground level. Flooding in the valley was mentioned, but that's rare and traffic could be routed through Willits if that occurs. Or a dike-type of elevated roadbed could solve this problem. Wetlands were mentioned, but the freeway would go in the same place and be far larger, and its extensive construction (wider, higher, more materials, more men, more heavy equipment) would cause a far greater impact on the land than a 50 mph highway. And the amount of mitigation required would be far less.

50-3

50-4 The project would not impact community cohesiveness. Willits will continue to be the largest community in this area, and will continue to draw residents of outlying areas to its retail establishments, government facilities, and employment opportunities. Access to Willits from outlying areas will not be affected by the proposed project.

A bypass built to modern roadway standards would improve community cohesion within the City of Willits, particularly to users of Main Street north of the existing S.R. 20 intersection, by eliminating the noise and congestion associated with large trucks and through traffic.

50-5 See responses to Comment 9-2 (City of Willits Mayor's Office). General Responses 1.7 and 1.8 discuss traffic conditions at Sherwood Road and in front of the high school with and without the bypass.

50-6 General Response 1.3 explains why Alternative E3 is not the preferred alternative for construction. See General Response 1.10 regarding two-lane bypass. See response to Comment 50-2.

50-4

I'm sure that when you think of "Willits", you think of the town center, but Willits is the entire valley. We live in Brooktrails, but we also live in Willits. There's another large community of Willits residents in the valley and another across the valley in Pine Mountain. Willits is a relatively small valley that pulls the small communities together. Other bypassed towns like Ukiah and Cloverdale have much larger valleys that create a natural separation of the outlying communities from the town center. Putting a freeway through this beautiful valley would destroy our community, not to mention the tranquility that many of us sought here.

50-5

There are many other considerations with all of the valley alignments, such as the Hwy 20 traffic still not being dealt with, lack of a solution for getting southbound vehicles up Sherwood Road (if they get off the bypass north of town they have to negotiate the impossibly tight 40° right turn or go to the south interchange and fight their way back upstream to Sherwood.).

50-6

My husband enumerated all of these concerns in our letter, and we stated that E-3 was the alignment that made the most sense. But I just wanted to add that E-3 is the best \*freeway\* alternative, but I'd still prefer to see a smaller bypass. Either the 2-lane option or a ground level highway with limited-access cross traffic. A RURAL alternative.

Thanks for listening to my comments.

Trish Benedict  
PO Box 26  
Willits, CA 95490

**51 P. A. Blakley**

The following individuals submitted duplicates of the following letter:

Bender, Jennifer and Geoffrey  
Blakley, Patricia  
Kirkpatrick, Kathleen and Robert  
Schlichting, Ursula

Section 7.1, Final Alternatives Analysis (Appendix G, FEIS/EIR) concluded that construction of Alternative E3 would have the greatest potential to impact the overall environment; therefore, Alternative E3 is no longer under consideration for construction.

**Cher Daniels**  
**Office of Environmental Management**  
**Caltrans District 3**  
**2389 Gateway Oaks Drive**  
**Sacramento, CA 95833**  
**Attention: Nancy MacKenzie**

**July 5,2002**

**Dear Ms. MacKenzie:**

**We strongly urge that alternative E3 (western route) be rejected as the bypass route for the Willits area. It is over twice the cost of the other three alternates, 301 million, compared to \$130 million, \$151 million, and \$128 million.**

**Alternative E3 displaces 114 homes, almost five times the displacement of the other three alternates combined, 23. It also eliminates 713 acres, more than the number of acres of the other three alternates combined, 677.**

**Alternate E3 requires extensive realignment of Hael Creek on the south end of the bypass. It crosses hillsides classified as having a high erosion rate and you know the amount of work that has been required on the freeway south of Willits, which also crosses hillsides with high erosion rates. It would also cross and dramatically disturb large areas of what is now a relatively undisturbed wildlife habitat.**

**Sincerely,**



**P. A. BLAKLEY,**  
**960-A Exley Road**  
**Willits, California 95490**

## 52 Marilyn Boosinger

52-1 See response to Comment 30-1 (Mendocino Forest Watch).

52-2 See General Response 1.10, which supplements the DEIS/EIR discussion on why a two-lane alternative does not meet the purpose and need for the project. See response to Comment 73-5 (Mary Delaney).

52-3 See General Response 1.6 regarding Brooktrails Township second access road.

52-4 See General Response 1.12 regarding "growth at interchanges."

52-5 The issues raised by the comment letter have been adequately addressed in this Volume 2 Responses to Comments.

19 July 2002  
28110 Poppy Drive  
Willits, CA 95490

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

Dear Ms. Daniels,

Having reviewed the Draft Environmental Impact Statement/Environmental Impact Report for the Willits Bypass, I would like to submit the following comments:

- 52-1 • There are numerous unavoidable significant impacts that a four lane bypass would have on Willits and the surrounding region which are completely ignored in the EIS/EIR. Negative impacts would include elevated noise levels, loss of agricultural land, loss of native oak woodlands, loss of wetlands, offensive visual impacts, and deleterious effects on local businesses. The very character of this beautiful region, with its vital tourist industry, would be substantially debased as a result of the current routes proposed by Caltrans. We have lived and raised our four children here for 23 years and are dismayed at the potential for having the quality of life degraded to the point where we would be forced to move elsewhere.
- 52-2 • The EIS/EIR does not consider a two-lane alternative. There is evidence that a two-lane solution, in addition to mitigating many of the unavoidable significant impacts, would serve the Willits region more efficiently than the four-lane proposal. Four-lane freeways impel drivers to drive at high speeds. Considering that most of the through traffic in this area is comprised of vacationers whose destination is the redwood forest and other natural features of northern California, it is patently ridiculous to destroy these natural features in order to allow drivers to race by the remnants at breakneck speed. Besides, I-5 serves as a high speed corridor through central California. We don't need another one.
- 52-3 • The EIS/EIR fails to analyze a tie-in to the Brooktrails Second Access Road. The implications of the current Bypass proposals are enormous for Brooktrails. We have problems here from growth and poor planning which would be exacerbated by the implementation of these proposals.
- 52-4 • The EIS/EIR does not offer the acquisition of conservation easements at the interchanges as an abatement to the otherwise inevitable commercial sprawl.
- 52-5 As a resident of Brooktrails, Willits, and Mendocino County, I respectfully request that *all* of the above concerns be addressed in depth in the Final EIS/EIR. Thank you.

Sincerely,



Marilynn Boosinger  
marilynn@saber.net

## 53 Betsy Robinson Bosch

See General Response 1.10 for a discussion of a two-lane bypass and why it does not meet the purpose and need of the project. A 20-year design period is used to determine future traffic conditions. A two-lane facility will provide an LOS "D" at peak hour in 2008 and deteriorate with additional traffic. There are no long-term air quality impacts due to the project (see FEIS/EIR Section 3.12). The DEIS/EIR proposed mitigation measures for short-term construction impacts (Section 5.12, DEIS/EIR). See also FEIS/EIR Section 3.18.4 for short-term construction impacts to Air Quality.

I support the Willits 2-lane bypass alternative. It has been shown to handle the volume of regional traffic around Willits. 50-year projections are a joke. Go with what we need now and what two schools can afford and the  
~~are pollution air~~  
~~increased valley~~  
~~can reasonably~~  
~~tolerate.~~  
Betsy Robinson Bosch  
32201 Gordon Road  
Willits CA  
95490

**54 Robert E. Bouley**

The following individuals submitted the same or similar letter:

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

54-1 Modified Alternative J1T has been identified as the Preferred Alternative for construction. See General Response 1.3 regarding Alternatives C1T and L/C. The Final 404(b)(1) Alternatives Analysis concludes that both Alternatives C1T and L/C would result in adverse impacts to valley wetlands and other Waters of the U.S., as well as potentially adverse impacts to salmonids and their habitat.

54-2 Comment noted. Noise abatement is not being considered for Modified Alternative J1T (the Preferred Alternative). See Section 3.11 (FEIS/EIR) for the results of the Noise study for Modified Alternative J1T. If noise abatement (soundwalls) were proposed, consideration must be given to the opinions of the adjacent resident owners. Noise abatement is not provided if 50 percent or more of the affected residents do not want it.

54-3 Comment noted. Caltrans traffic studies of existing conditions are the basis for the purpose and need for the proposed four-lane bypass project.

54-4 Comment noted. Interchanges are proposed at Haehl Creek, at the south end of the project and at Quail Meadows, at the north end of the project. See General Response 1.9 regarding a center valley interchange.

POSTMARKED NO LATER THAN AUGUST 26TH, 2002

August 24, 2002

**Cher Daniels**  
Office of Environmental Management  
Caltrans District 3,  
2389 Gateway Oaks Drive  
Sacramento, CA 95833

Attn: Nancy MacKenzie

Reference the Route 101 Willits Bypass Draft Environmental Impact Statement (EIS) Environmental Impact Report (EIR).

54-1 I am/we are in favor of Route C which I/we believe will negatively affect the least number of dwellings. I/we believe it would cause the least amount of damage to the ecosystem.

54-2 I/we am also in favor of "No Sound Walls" because I/we don't believe that it is necessary.

54-3 I am/we are in favor of the 4-lane highway because whether or not many feel it would "serve our needs" now, we all know that it is something that will be mandatory in the near future so why have to do it over again. I/we believe that it would be cheaper to do it the first go around.

54-4 I am/we are also in favor of overpasses on each end of Little Lake Valley. I/we believe that there should be no special off-ramp for Highway 20.

NAME/S: ROBERT E BOULEY

ADDRESS: 1159 MAGNOLIA ST  
WILLITS CAL 95490

TELEPHONE: 459-2068

**55 George and Ann Brott**

55-1 The DEIS/EIR examined Alternatives LT and CIT using a nodal, or segmental, analysis (DEIS/EIR page 1-6). Because the segments of each alternative were examined at an equal level of detail, any recombined, or hybrid, alternative was examined sufficiently (see response to Comment 12-2 Brooktrails Township CSD). See General Response 1.3 regarding Alternative L/C. Modified Alternative JIT has been identified as the Preferred Alternative for construction.

See General Response 1.6 regarding Brooktrails Township second access road.

55-2 See response to Comment 55-1.

55-3 See General Responses 1.4 and 1.5 regarding Willits Creek Restoration.

55-4 See General Response 1.8 regarding traffic operations at the northern interchanges.

1573 Casteel Drive  
Willits CA 95490

August 4, 2002

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

Dear Ms. MacKenzie:

- 55-1 Caltrans has narrowed options for the proposed Willits freeway bypass. Not included is the "ELSIE"/ Wild Oat Canyon proposal which combines alternatives L1 in the south and CIT in the north and would connect with a new county road to Brooktrails in Wild Oak Canyon. As residents of Brooktrails we are very much concerned with this omission and wonder if full consideration has been given to the "ELSIE" proposal.
- 55-2 Has Caltrans taken into consideration the opinions of the residents of Mendocino County? "ELSIE" is supported by the Brooktrails Township Board of Directors, the City of Willits City Council, the Mendocino County Board of Supervisors and by a substantial number of the residents of the County.
- 55-3 Has Caltrans fully considered the environmental issues involved in adopting "ELSIE"? A channel between Willits Creek and Outlet Creek not only would resolve the mitigation issue but also would restore Willits Creek close to its original course, improve fish habitat and help the City of Willits meet required dilution standards for effluent released from the wastewater plant.
- 55-4 Has Caltrans evaluated the traffic consequences of a Quail Meadows interchange? Northbound Main Street traffic presently backs up waiting to turn on to Sherwood Road. Traffic exiting at a Quail Meadows interchange southbound will back up in front of the High School before making a 180 degree left turn on to Sherwood.
- 55-5 Has Caltrans considered the impact on local business and on Main Street traffic in abandoning any plan for a highway 20 interchange? Proposed routes will do little to relieve the bottlenecks presently impacting Main Street traffic flow which will only worsen in the future. You are invited to try the summer Friday evening commute from south of Willits to Brooktrails.
- 55-6 Has Caltrans considered the safety issues involved? A Quail Meadows interchange will increase traffic flow by Willits High School increasing danger to students. Commuters will obtain little relief from the dangers posed by the present heavy Main Street traffic. Failure to facilitate a connection with the proposed Wild Oat Canyon or any other

55-5 See General Response 1.9 regarding a center valley interchange. Construction of the bypass will remove interregional traffic from Main Street. To further address local traffic, 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. See response to Comment 37-2 (Mair Alight).

55-6 See General Response 1.8 regarding traffic operations with the Quail Meadows Interchange. See General Response 1.6 regarding Brooktrails Township second access road.

55-6 cont.

second access route for Brooktrails leaves the community with the threat of becoming another "Oakland Hills" in the event a fire requires evacuation.

The Willits Bypass has been almost 40 years in the planning stage. Now that Caltrans is in the position to move forward to construction it would be derelict in not being certain that the selected route is the best answer to the above questions.

Very truly yours,



George V. Brott  
Ann T. Brott

cc: Maiser Khaled, Chief, District Operations  
North Federal Highway Administrations  
980 9<sup>th</sup> Street, Suite 400  
Sacramento CA 95841

Governor Gray Davis  
State Capitol  
Sacramento CA 95814

Senator Wesley Chesbro  
State Capitol, Rm. 4081  
Sacramento CA 95814

Assemblywoman Virginia Strom-Martin  
State Capitol, Rm. 3146  
Sacramento CA 95814

### 56 Myrtle Brown

56-1 Comment noted. Caltrans traffic studies of existing conditions are the basis for the purpose and need for a proposed four-lane bypass. Section 1.2 (FEIS/EIR) discusses the current estimated project schedule.

56-1

TO CHER DANIELS, CHIEF  
MY NAME IS MYRTLE  
BROWN. I OWN PROPERTY  
ON REYNOLDS HWY IN WILLITS.  
I ATTENDED YOUR 9-24-2002  
MEETING AT THE WILLITS  
CITY HALL LAST NIGHT.  
MUCH AS I DISLIKE  
A FREEWAY PASSING  
AROUND WILLITS, I DO  
PREFER 4 LANES TO THE  
PROPOSED 2 LANES. IT  
IS SOMETHING CALTRANS  
HAS PROPOSED DOING FOR  
THE LAST 50 YEARS. IT  
NEEDS TO BE DONE NOW.  
Myrtle Brown

## 57 Robert and Lisa Burgess

57-1 In order for a historic building to be protected under CEQA or Section 106 of the National Historic Preservation Act, it must meet certain specific criteria for the California Register of Historic Places, the National Register of Historic Places, or as an important property under CEQA. These criteria must be met in terms of how significant it is architecturally or historically and whether or not it retains what is called the "integrity" of its original state, that is, whether it retains its original design or materials, among other factors. A qualified Caltrans architectural historian evaluated the Schmidbauer property in 1991. She visited the ranch to record the ranch buildings, conducted an oral history interview with Josephine Schmidbauer, and conducted other historic research on farms in the Willits area. She concluded that, while the house and property have a long history in Willits, it does not meet the level of historical or architectural significance required to be eligible for the California and National Registers. In addition, alterations over time have affected its original appearance, so that it no longer meets the technical criterion of "integrity," described above.

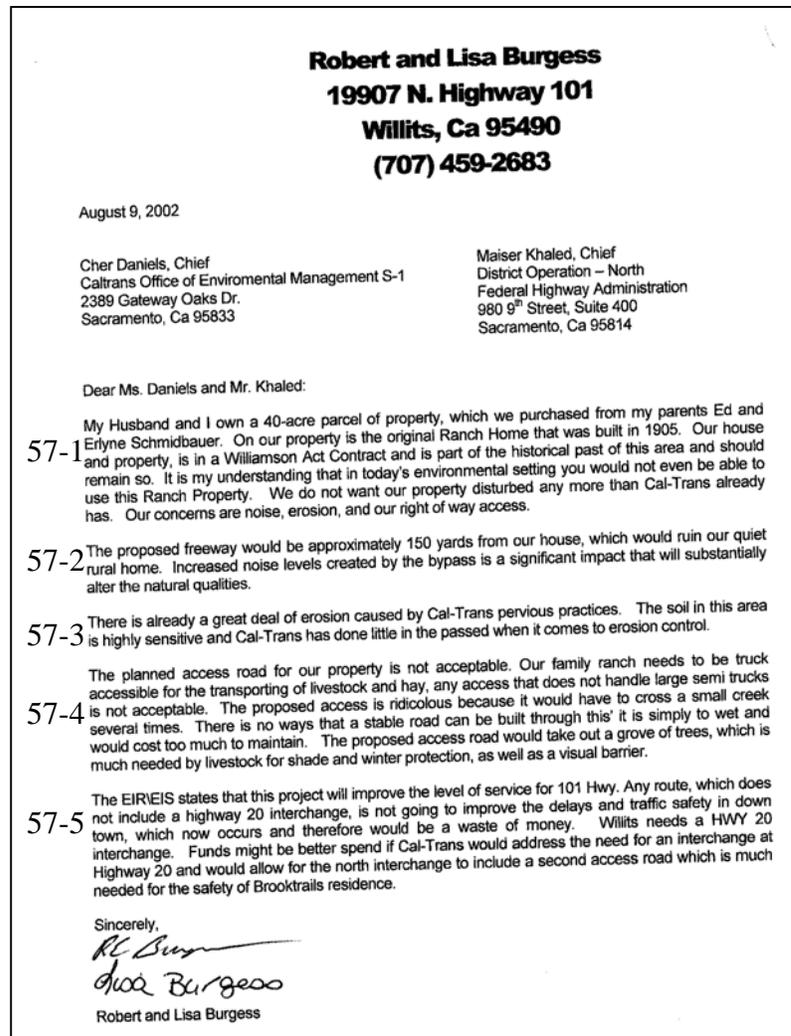
A subsequent review of the initial evaluation of this property was completed during the second phase of the Willits Bypass Project by a qualified Caltrans architectural historian in 2000. His review of the documentation concurred with the conclusions in the 1991 evaluation that the Schmidbauer property was not eligible for the National Register of Historic Places and was not a historical resource for the purposes of CEQA, as would be necessary to be considered for avoidance or mitigation.

57-2 Noise abatement was considered in areas where traffic noise impacts, above the required threshold, were predicted, and noise abatement was not considered *feasible and reasonable*. See also responses to Comments 73-5 (Mary Delaney) and 116-1 (Richard Jeske).

57-3 See response to Comment 48-1 (Andrea Beene).

57-4 The Upper Haehl Creek Interchange, for the valley alternatives, has been redesigned from a trumpet to a diamond-style interchange. The revision would allow access to the Schmidbauer Ranch from the east side of the interchange through an existing private road opening in access control.

57-5 See General Response 1.9 regarding a center valley interchange. Alternatives C1T, J1T, Modified J1T, and LT would reduce the amount of traffic on Main Street in Willits, which would also benefit traffic using S.R. 20. The Preferred Alternative (Modified Alternative J1T) will accommodate a second access to Brooktrails Township and, as with all the other alternatives that were considered, it removes interregional traffic from Main Street, thus reducing traffic and safety hazards in downtown Willits.



**58 Bruce Burton**

58-1 Although all of the proposed build alternatives include a connection with S.R. 20, the comment refers to an extension of S.R. 20 from the current in-town intersection to a center valley interchange. See General Response 1.9 regarding a center valley interchange.

58-2 See General Response 1.3 regarding Alternative L/C. Modified Alternative J1T has been identified as the Preferred Alternative for construction.

Of the proposed build alternatives, Alternative E3 rather than L/C would have the highest number of four-lane miles. The comment regarding impact on "Willits circulation" may be a reference to the Truck Scales Interchange versus the Quail Meadows Interchange. See General Response 1.8.

Aug 26 - 02

Caltrans.  
Regarding Willits Bypass.

I have several concerns regarding the Willits Bypass.

58-1 1. It seems unfunctional to build the freeway up to a highway 20 interchange. I strongly recommend that interchange be reconsidered. The cost could be offset by removing the north or south interchange.

58-2 2. I recommend an ELCIE alignment. It has the least negative impacts on Willits circulation and constructs the maximum number of 4 lane miles.

Thank you for the opportunity to address these matters  
Bruce Burton  
27

**58A R. Edward Burton**

58A We would like to express our sympathies regarding your wife's accident. See General Response 1.3 regarding Alternative L/C. Modified Alternative J1T has been identified as the Preferred Alternative for construction.

R. Edward Burton



(62)  
(707) 459-6219

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

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

RE: Willits Bypass

Dear Ms. Daniels and Mr. Khaled,

There are not many of us left that met with State Senator Collier in the early fifties to discuss the location of the Willits Bypass.

My wife Hattie (we have been married 56 years) was struck by a truck 6 years ago while crossing Main Street in a crosswalk. She has never fully recovered and now lives a restricted life fighting pain and the side effects of pain medication.

I have never heard any state agency personnel express concern or apologize for the "Paralysis by Analysis" that has delayed the bypass for 50 years. My Willits News Hydrology column points out that water makes wetlands out of almost any level ground. My Marsh Forest design called the Solar Powered Artificial Wetland (SPAW) operates a research demonstration model at the Willits Wastewater Treatment Plant. I invite you to visit it with me.

We who live on Sherwood Rd. strongly recommend the Elsie - Wild Oat Canyon and the Willits Creek Restoration.

I can not believe it has taken this long.

Sincerely,

R. Edward Burton  
EBC Company

222 Franklin Avenue • Willits, California 95490

## 59 Gregg Byers

59-1 See response to Comment 73-1 (Mary Delaney).

59-2 It is very difficult to quantify a “perceived” impact. To one individual any change in noise levels may be significant and to another individual a 15 dB or 20dB increase may be the level of significance. To help cope with this difference, a standard has been developed and all projects are subject to the same rules and levels.

59-3 Model calibration is only practicable on an existing highway where the alignment and profile are not expected to change significantly. The Leq(h) noise descriptor is the noise descriptor used on all projects nationwide where there are federal funds involved.

59-4 Sound32 does not take into account a number of variables including weather; at this time there are no approved noise models that can take into account these variables. Sound32 is based on the federal noise model contained in FHWA –RD-77-108 –FHWA Highway Traffic Noise Prediction Model

I have reviewed the Draft EIS-EIR for the Willits Bypass Project, and I have the following comments regarding noise as an unavoidable significant impact.

59-1 In the Willits Bypass Noise Report, prepared by Keith Pommerenck, we are told that the impact threshold for noise is 12 dBA, Leq(h). Yet on page 11 of the same report we read that for a line source such as a freeway, “the change in sound level is 3-dBA per doubling of distance”. Since decibels are expressed logarithmically, a 12 dBA increase in noise level is equivalent to comparing noise levels at two points, the quieter of which is 16 times farther from the source. For a “soft site” such as much of the Little Lake Valley, we are also told that due to ground absorption, the attenuation from doubling the distance from the source is 4.5 dBA. With this constraint, one could then approximate a 12 dBA attenuation by moving about 7 times farther from the source. No matter how you exemplify noise attenuation, this thought experiment should be sufficient, I believe, to suggest a 12 dBA increase represents a huge increase in perceived noise. To claim that noise increase becomes significant only when it reaches this threshold is patently absurd.

59-2 Moreover, we also read on page 9 of the noise report that “a doubling of sound energy, such as doubling the traffic on a highway results in a 3-dBA increase in the noise level”. Thus, if the ambient background noise at any location is matched by the equivalent level of sound energy from a freeway, the maximum measurable increase in overall noise level will only be 3 dBA. Yet this is a clearly discernable and significant addition to the soundscape. For instance, imagine that children playing in a park are measured at 50 decibels, and then add a 50 dBA drone from a freeway. The total measured level will only rise to 53 dBA, but the freeway sound is an equal partner with the children in producing that noise and is a clearly perceived component. From this perspective, it is clear that even an increase of 3 dBA will have a significant impact. In some circumstances, particularly when the ambient noise is largely of natural causes, even less than 3 dBA may have a psychologically significant impact on the environment.

59-3 Unfortunately, the noise model (Sound32) used for the report does not evaluate any measure of noise except Leq(h). If some of the other noise descriptors in Table 3-4, page 10 of the Noise Report, were considered (L10, for instance), we might reasonably conclude that the predicted Leq(h) is not the measure of most significance. As far as I can tell, traffic noise data were not measured in the Willits environment with the thoroughness necessary to assess even if Leq(h) is accurately measured for proper calibration of the model.

59-4 Another shortcoming of the Sound32 model is that it does not consider atmospheric variables, which we know can have significant influence on the results. In fact, it is reasonable to suspect that the prevailing winds from the West will bathe the middle and east sides of the valley with freeway noise many afternoons during fair weather. It is precisely these parts of the valley that currently enjoy a bucolic and pastoral absence of traffic noise. For many people, the valley and

59-5 NEPA and CEQA both have language allowing either the federal agency in the case of NEPA or the lead agency in the case of CEQA to set levels of significance. Downsizing the project and reducing the speed from 65 mph to 50 mph would reduce the noise level by 1 and 2 dBA, assuming the traffic volumes and mix remained the same. See response to Comment 73-5 (Mary Delaney).

59-5

its environs away from town represent "Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose." This quotation is a description of activity category A in Table 4-1 (page 13) of the Noise Report, and begs the question why activity category A is never used in assessing the results of the model. It also begs the question whether a sufficient number of receptor sites have been studied to the east of the proposed freeway.

Finally, I would like to point out that FHWA guidelines are immaterial to the question of whether under NEPA and CEQA the EIS-EIR finds noise to be a significant impact of the project. I find the Noise Report, though misleading and incomplete, nonetheless makes it clear to me that under NEPA and CEQA all the proposed routes will have unavoidable significant impacts on the noise environment. The only mitigation that is cost effective and will actually have a positive result is to downsize the project and build a two lane alternative. The reduced speeds of such an alternative can have a significant mitigating influence that is unmatched by any measures proposed in the EIS-EIR. It is completely irresponsible if Caltrans does not seriously consider such an alternative.

A handwritten signature in black ink, appearing to read "R. B. J.", is located below the text. The signature is stylized and cursive.

**60 Dean Cail**

60-1 Comment noted. Existing traffic conditions, as noted by the comment, as well as projected traffic conditions on Main Street in Willits support the need for a four-lane bypass.

60-2 See General Response 1.3 Alternative L/C (Wild Oat Canyon proposal) and General Response 1.10 regarding two-lane alternative.

60-3 See General Response 1.9 regarding a center valley interchange. See General Response 1.6 regarding Brooktrails Township second access road. Both S.R. 20 traffic and Brooktrails traffic were considered in the traffic studies conducted for the proposed bypass project. The Bypass will reduce overall traffic volumes on Main Street by up to a 40% in the future. S.R. 20 traffic will continue to travel on south Main Street through Willits; however, 70% of the traffic on south Main Street will be local traffic. See also responses to Comment 220-5 and 220-6 (Dave Watts).

5380 Wild Iris Lane  
Willits, Ca 95490  
Aug 10, 2002

Caltrans Environmental Management  
& Dist. Op., N. Federal Highway Adm.

Dear sirs,

I keep reading in the local Willits News that there is vast opposition to building the Freeway 101 Bypass through Willits.

60-1 I want to see the long promised bypass to relieve the bottleneck & pedestrian nightmare that Willits has become, especially Friday nights, all summer, & whenever people commute back to Brooktrails.

60-2 I signed Hal Wagonet's sensible Wild Oat Canyon road proposal. I do not want a money-wasting 2 lane alternative, which is not freeway by definition.

60-3 What I don't see yet is where the ROUTE 20 trucks & major traffic get their interchange. A bridge over the creek behind Safeway's lot would make the whole plan work. Any plan that has no answer for Route 20 traffic or Brooktrails traffic is missing a huge segment of our local congestions.

Thanks for your consideration  
Sincerely  
Dean Cail

**61 Gladys L. Campbell**

61-1 Comment noted. Caltrans traffic studies of existing conditions are the basis for the purpose and need for a proposed four-lane bypass. See response to Comment 34-11 (Willits Citizens for Good Planning) for a comparison of traffic conditions between a two-lane and a four-lane facility.

61-2 See General Response 1.3 regarding Alternative L/C. See Chapter 2 (FEIS/EIR) for a description of Modified Alternative JIT, the Preferred Alternative, which would result in the least overall environmental harm of the build alternatives, accommodate a connection to a Brooktrails Township second access road, and meets the purpose and need for the proposed bypass project.

61-3 Caltrans and FHWA appreciate the public's comments on the DEIS/EIR and the project.

Aug. 21, 2001

Nancy MacKenzie

I appreciate you letting me know the comment period has been extended.

I have read most of the articles in the Willits News for a couple of years now about all the different ideas about the bypass.

61-1 I don't feel a 2 lane freeway is going to accomplish much. There will still be road rage because of slower cars.

61-2 I feel a 4 lane freeway is very necessary & that what is called the "Elce" (not sure how it spelled) or Wagonets suggestions sound more logical.

61-3 Thanks for listening to my ideas.

Gladys L. Campbell



## 62 Martha Carol

62-1 See General Response 1.6 regarding Brooktrails Township second access road.

62-2 Any of the bypass alternatives will reduce traffic on Main Street thereby improving local traffic conditions. See General Response 1.3 regarding Alternative L/C. Modified Alternative J1T has been identified as the Preferred Alternative for construction.

62-3 See General Response 1.9 regarding a center valley interchange.

62-4 The peak hour volume of traffic in each direction of S.R. 20 will be between 200-300 vehicles. Between these relatively low volumes and bypass traffic that is diverted away from the intersection of Main Street and S.R. 20, the congestion should be substantially reduced. See General Response 1.10 regarding why a two-lane bypass does not meet the purpose and need of the project to serve interregional traffic within the project area.

62-5 The footprint of the bypass would not be 250 feet. See Section 3.3 (DEIS/EIR) and Chapter 2 of the FEIS/EIR for the project description. Two lanes of traffic plus shoulders would be constructed for each direction of traffic; the full width of each direction of paving would be about 11.7 m (about 38 ft) in width. These two roadbeds would be separated by a 10.8 m (35 ft) median, most of which would be unpaved, plus 1.5 m (5 ft) inside shoulders. The total width from the outside edge of the northbound pavement to the outside edge of the southbound pavement would be about 34.3 m (112 ft) including the unpaved median. The height of the roadway above the surrounding ground would establish the side slope width. The actual "footprint" of the roadway would generally be 27 to 36 m (90 to 120 ft). Added to this is width for drainage facilities, maintenance access, and buffer width to the right of way. Road crossings would have to be approximately 7 m (23 ft) high at Center Valley Road and Commercial Street. The viaduct will be its highest where it has to cross the railroad tracks at the north segment, approximately 13 m (42 ft). During detailed design, Caltrans will make every effort to minimize the height of the bypass.

With the exception of Alternative E-3, which would require the most earthwork of any of the alternatives, all other alternatives offer a variety of visual experiences. Each alternative contains segments of near grade alignment as well as raised sections and structures. The visual impacts of each segment were assessed with appropriate mitigation measures tailored to viewers of each area. Therefore, not all portions of an alternative were found to contain similar visual impacts. Additionally, the visual impacts of the current congested highway, along with more future congestion without the project, were weighed against the visual impacts of the proposed project.

See General Response 1.12 regarding "growth at interchanges."

Martha Carol  
21361 Locust St.  
Willits, CA 95490

August 8, 2002

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

Dear Ms. Daniels,

Thank you for the opportunity to read, evaluate and respond to your draft EIR of the Willits bypass proposal. There are more options than what is currently proposed and there are several concerns that need to be addressed. Fewer trucks on our downtown main street would be great, but the solutions proposed so far, do not deal with the entire problem at hand.

The problems:

62-1 1. Brooktrails residents comprise much of the interregional traffic--they need a 2nd roadway out of Brooktrails.

62-2 The proposed routes will not solve the internal problems created by Brooktrails residents and their needs. Please look at the option of the L-C combination.

62-3 2. Willits is a hub for travellers to the coast via Hwy 20--they need an interchange from the bypass directly connecting to Hwy 20 west.

62-4 The four-lane bypass will not serve these folks, unless there is a way to get from the bypass to Hwy 20. In fact, a four-lane highway is not even needed in the Willits area. The study showing the number of vehicles decreasing just north of Willits, illustrates that traffic basically ends in Willits. This does not warrant a four lane bypass. If a four-lane bypass is built it will only get travellers to the north end of Willits faster where the Hwy suddenly becomes 2 lanes again.

These two additions to your draft proposal would greatly benefit our community.

62-5 The natural beauty of our valley will be significantly impacted by a 4-lane bypass. I think a 4-lane bypass will destroy the quiet ambience of our community and there is just no way to hide a bypass of 250 ft width and 50 ft. up in the air. It is whimsy to think that a sound wall or new trees will create an effective barrier. Plus, the likely businesses that will find suitable land adjacent to the bypass will further destroy our valley's beauty. The thought of and visualization of a massive 250 ft wide roadway in our valley is appalling to me and I

62-6 A two-lane alternative is not under consideration for construction. See General Response 1.10 regarding a two-lane alternative. See also response to Comment 73-5 (Mary Delaney). Caltrans will investigate new pavement technologies to reduce noise as design proceeds.

62-7 Caltrans and FHWA are confident in the adequacy of the DEIS/EIR and that we have provided reasonable opportunity for public involvement during the planning and development of this project. Our coordination with our local partners is continuing and will remain an important component of the project through construction, mitigation, monitoring, and maintenance of the facility.

### 63 George and Louise Carter

63-1 Any of the bypass alternatives will reduce traffic on Main Street in Willits. To further address local traffic, 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. See General Response 1.8 regarding traffic operations with the Quail Meadows Interchange.

63-2 See General Response 1.6 regarding Brooktrails Township second access road.

hope it is to you also. Consideration for retaining as much of the tranquility as possible needs to be taken into account.

62-6 One of the other issues of great concern around town is the noise produced by a 4-lane bypass. However, a 2-lane bypass with its decreased speed, would produce less noise. Simple solution. Really, how can you build a 4-lane bypass and not have significant noise levels destroying the peace and serenity of our valley floor? What mitigations will help residents of Willits to hear less highway noise? A slower roadway is one solution.

Three more reasons to build a 2-lane bypass instead of a 4-lane bypass. Two lanes take up less space than four, which also means less maintenance. Two lanes cost less than four and that makes taxpayers very happy. Two lanes would help our community by attracting motorists into town, which promotes viability and lifestyle.

It's time to consider a 2-lane bypass.

62-7 This draft is already making a significant impact on our community. Please do not bypass our community by passing off this EIR as a finished product. There is still much work to be done before implementing this plan.

Please keep full public access during this entire project.

Thank you,

*Martha Carol*

Martha Carol

"George & Louise Carter"

<glcarter@direcway.com>

To: <nancy\_mackenzie@dot.ca.gov>

08/22/2002 05:02 PM

63-1 This is to express our strong support that Caltrans build the Highway 101 by-pass around Willits, BUT ONLY WITH THE FOLLOWING CONSIDERATIONS. We must lessen, not increase, traffic at the currently dangerous intersection of Hwy 101 (Main Street) and Sherwood Road. Traffic bottlenecks now occur several times each day. Sherwood Road is the only paved exit for the thousands who live in Brooktrails, northwest of the City of Willits, and an increase in congestion at the intersection will endanger our lives. Caltrans proposal #1 currently before us will dramatically increase the number of sharp left turns from Sherwood Road to enter 101, and sharp right turns from 101 to enter Sherwood Road thus causing untold risk and slowing of traffic.

63-2 A by-pass interchange north of Willits to connect with the proposed second Brooktrails access road is the only feasible plan that adequately addresses our concern.

George & Louise Carter  
4050 Ridge Circle  
Willits, CA 95490  
707-459-4545

See General Response 1.3 regarding Alternative L/C (Truck Scales Interchange) and General Response 1.8 regarding traffic operations with Quail Meadows interchange.

**64 P. Cartwright**

64-1 Comment noted. See General Response 1.10 regarding a two lane bypass.

64-2 Comment noted. It is the design policy of Caltrans to include, on freeways, medians wide enough to reduce head-on type collisions and minimize the use of barriers. A freeway facility with four-lanes and an appropriately sized median ensures adequate LOS and public safety.

"P Cartwright"  
<pcartwright@pacific.net> To: <nancy\_mackenzie@dot.ca.gov>  
08/25/2002 03:52 PM

I have been a resident of Willits almost all of my life and can't believe how long it has taken to get a Bypass around Willits and what is happening presently regarding it. My office is just above 101 Highway near the Hospital, and I witness congested traffic, crashes, fender benders, screeching brakes, road rage and the situation is getting worse each day. Not to mentioned when I HAVE to drive in it!!

64-1 Unfortunately, the silent majority just isn't speaking up. Well, I am now, and I am opposed to a two-lane highway. I can't believe it is even being considered and that some of those very people suggesting it are so interested in the beauty of our Valley that they would want an ugly concrete divider sticking up in a two-lane road running down the center of the Valley. Amazing!!

64-2 A four-lane highway with a center divided area with some type of landscaping is what we need! TIME!! It is now time to get serious and build the FOUR-LANE BYPASS! Enough!

P.J. Cartwright  
P.O. Box 1173  
Willits, Ca 95490

**65 Lea Cassady**

65-1 Significant unavoidable impacts associated with various alternatives are identified in Section 6.4 (DEIS/EIR). The Modified Alternative JIT would have no significant unavoidable impacts, as all significant impacts associated with this alternative would be mitigated to a less than significant level (see FEIS/EIR, Section 1.8). Caltrans is confident in the adequacy of the impact conclusions presented in the technical studies and DEIS/EIR prepared for this project. See General Response 1.11. See also Chapter 2 (FEIS/EIR), which describes Modified Alternative JIT, the preferred alternative. Of the build alternatives considered in the DEIS/EIR, Modified Alternative JIT has the least overall environmental impact.

65-2 Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included as an alternative in the DEIS/EIR. See General Response 1.10.

65-3 See General Response 1.6 regarding Brooktrails Township second access road.

65-4 See response to Comment 139-7 (Karina McAbee).

65-5 See General Response 1.12 regarding "growth at interchanges."

August 3, 2002

Cher Daniels, Chief  
Caltrans Office of Environmental Management S-1  
2389 Gateway Oaks Dr.  
Sacramento, CA 95883

Attn: Nancy MacKenzie, Environmental Coordinator

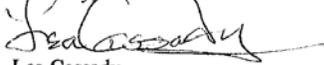
Dear Ms. Daniels:

I have reviewed the draft Environmental Impact Statement/Environmental Impact Report for the Willits bypass and wish to express my concern about important omissions. My comments are as follows:

- 65-1 1. It does not identify and address a number of unavoidable significant impacts a 4-lane bypass will have on Willits, Little Lake Valley, and the surrounding communities. These impacts include community safety, noise, loss of farmland, loss of oak woodlands on Alternative LT, loss of wetlands on Alternative LT and JIT, visual impacts, and impact on local business. All of these impacts will, if unmitigated, substantially degrade the character of the area and our quality of life.
- 65-2 2. The draft does not include a two-lane alternative as a way to mitigate many of these unavoidable significant impacts.
- 65-3 3. The draft does not analyze the impact of a connection to the Brooktrails second access road.
- 65-4 4. Highway 20 constitutes a significant and growing amount of through traffic, yet it is not addressed in a meaningful way and the impact of this omission is not considered. The current plan for the bypass will exacerbate the highway 20 problem, rather than alleviate it.
- 65-5 The draft does not offer the purchase of conservation easements at the interchanges as a mitigation to prevent urban sprawl.

I am requesting that all of the above impacts and issues be addressed prior to the preparation of the final EIS/EIR.

Sincerely,



Lea Cassady  
P.O. Box 1107  
Willits, CA 95490

**66 Lorene Cave**

66-1 Comment noted. Caltrans traffic studies of existing conditions are the basis for the purpose and need for a proposed four-lane bypass. The Modified Alternative J1T, which lies east of Willits, is the Preferred Alternative.

66-2 Caltrans and FHWA undertook a lengthy and detailed process with local and county representatives and with resource agencies to determine which alternative would have the least overall harm to the environment. See Chapter 5 (FEIS/EIR) Public Participation, Comments and Coordination.

66-3 Comment noted. See response to Comment 34-47 (Willits Citizens for Good Planning) regarding economic impacts of bypassing a community.

66-4 Comment noted.

66-5 The comment is correct in noting that delays in constructing the bypass result in increased cost due to factors such as inflation.

66-6 See General Response 1.8 regarding traffic operations with the Quail Meadows Interchange.

66-7 Alternative C1T is the only build alternative under consideration located east of Bray Road. General Response 1.3 explains why

Alternative C1T is not the preferred alternative for construction. Modified J1T, the Preferred Alternative, lies just east of Baechtel Creek, to the west of Bray Road.

Lorene Cave  
3901 Canyon Rd  
Willits CA 95490-8791

Aug 3 2002

Attn: Nancy Mackenzie

'As I have been a resident of Little Lake Valley for 30 years, I feel that a 4 lane By Pass East of Willits has been needed for 20 years and seems most sensible routing. (154)

Personally I am not qualified to make environmental or engineering recommendations, but some comments seem pertinent:

1. Environment seems to make adjustments to minor made changes if not too aggressive.
2. Downtown business in Willits appears to thrive - which is a good example of Bypassed communities - continued to thrive - which is a good example!
3. The communities of Willits is friendly & good to be a part of, and surrounding areas are attractive - a Bypass will not change that.
4. The sooner the Bypass is constructed the lower the cost.
5. Quail Meadows Access seems very A-S-B in many logical reasons.

I could ramble on but not much sense in that.

Don't build any nearer than slightly East of Bray Road.

Thank you for permitting so many citizens to make opinions known.

Lorene Cave

**67 Colleen [last name illegible]**

The following individuals submitted the same form letter:

Jacobs, Kathy  
LeFan, John  
Long, Freddie  
Marianchild, Kate  
Rhodes, Judi  
Strong, Madge  
Withey, Lori  
Woolsey, Ron  
[last name illegible], Colleen

67-1 The project proposes mitigation measures to avoid, minimize, rectify, reduce, and compensate for impacts to resources affected as a result of the project. See Appendix A, FEIS/EIR.

67-2 Significant unavoidable impacts are identified in Section 6.4 (DEIS/EIR). Caltrans is confident in the adequacy of the impact conclusions presented in the technical studies and DEIS/EIR prepared for this project. See General Response 1.11.

67-3. See General Response 1.10 regarding a two-lane bypass. See General Response 1.9 regarding a center valley interchange.

August 25, 2002

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

Attn: Nancy Mackenzie, Environmental Coordinator

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

Re: Highway 101 Willits Bypass EIS/EIR

Dear Ms. Daniels and Mr. Khaled:

67-1 Willits is a quiet rural town set in the natural beauty of Little Lake Valley. A four-lane freeway through that valley would drastically, permanently destroy those qualities.

67-2 The Draft EIS/EIR on the project is seriously deficient. It fails to identify several significant impacts of a 4-lane freeway, including:

- Noise - A high-speed freeway would unavoidably and undeniably create a roar heard throughout what is now a peaceful valley. This noise level is a major impact which cannot be mitigated.
- Loss of farmland - The swath of a 4-lane freeway would pave over significant farmlands regardless of any potential mitigation.
- Loss of oak woodlands and loss of wetlands are also significant impacts for which there is no adequate mitigation.
- Visual impacts - a huge 4-lane freeway rising 10 to 40 feet above the valley floor for six miles will dramatically, irreversibly change the rural beauty of the Willits area.

67-3 Given these substantial unavoidable impacts of a 4-lane freeway (all of which should be identified in the EIS/EIR), it is essential to evaluate feasible alternatives. A two-lane bypass offers many clear advantages, including less environmental impact and lower costs. It may also provide more design flexibility, including a possible interchange with Highway 20. My understanding is that it could adequately and safely handle the projected traffic volume through and beyond the planning period.

Please consider the two-lane bypass alternative to protect this peaceful, quiet rural community.

Sincerely,



**68 Carol Cox**

68-1 Noise levels will increase in some areas. How an individual perceives these noise levels varies and makes it impossible to determine, outside of comparing them with a given standard, what is or is not an impact. See also response to Comment 73-5 (Mary Delaney).

68-2 Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included as an alternative in the DEIS/EIR. See General Response 1.10.

Carol Cox  
5798 Ridgewood Rd  
Willits CA 95490-9730  
August 6, 2002

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

Dear Ms. Daniels:

I have reviewed the Draft Environmental Impact Statement/  
Environmental Impact Report (EIS/EIR) for the Willits  
Bypass, and I have the following comments:

NOISE

68-1

One of the reasons Willits is special is that it is still a beautiful, quiet, rural area. A four-lane Willits Bypass will significantly increase the noise level in this valley. Already, we can hear the noise of the trucks and the squealing of tires. Increasing speed on a four-lane road will result in increased noise. Noise must be listed as a significant impact in Chapter 6.

TWO-LANE ALTERNATIVES

68-2

Given the environmental sensitivities of the Willits valley, it would seem reasonable to explore the possibility of a smaller bypass that would reduce the noise impact, the visual impact, and the business impact. Two-lane alternatives should be explored.  
(over)

68-3 Caltrans is confident in the adequacy of the impact conclusions presented in the technical studies and DEIS/EIR prepared for this project. Significant unavoidable impacts are identified in Section 6.4 (DEIS/EIR). The preferred alternative, Modified JIT, would have no unavoidable significant impacts, as all significant impacts associated with this alternative would be mitigated to a less than significant level. See FEIS/EIR, Section 1.8. See also General Response 1.11.

68-4 See General Response 1.9 regarding a center valley interchange.

68-5 Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included as an alternative in the DEIS/EIR. See General Response 1.10.

### VISUAL IMPACT

68-3 While Caltrans has attempted to address the visual problems caused by a four-lane road with an enormous median, <sup>mitigation measures</sup> they are ~~totally~~ insufficient. A freeway running through the middle of the valley will RUIN the rural character and beauty of this area. "Visual impact" must be listed as an "unavoidable significant impact" in Chapter 6.

### ROUTE 20

68-4 I am mystified by the fact that Caltrans has not allowed for some sort of access to Route 20 that does not go through the middle of Willits.

68-5 A two-lane road with turn-outs or a passing lane at one or two points would be ample.

Sincerely,

Carroll Cox

**69 Fred G. Crampton**

A two-lane bypass is not considered a reasonable or feasible alternative for the proposed bypass project for a number of reasons. Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included as an alternative in the DEIS/EIR. See General Response 1.10.

Dear Chris Daniels: 8/3/02<sup>74</sup>  
I think a 3 lane by-pass for Willits should be included in your study of the various alternative routes being proposed. Sincerely,  
Fred G. Crampton  
1475 Baschtel Rd # K3  
Willits, Ca. 95490

③

**70 Bill Cronk**

70-1 Businesses that serve through customers will continue to serve drivers using U.S. 101 who need services, such as gas, food, and lodging. After construction of the Preferred Alternative (Modified Alternative J1T), tourist and truck traffic bound for S.R. 20 would continue to use south Main Street.

70-2 See General Response 1.9 regarding a center valley interchange.

 **"Bill Cronk"** To: "Lena Ashley" <Lena\_Ashley@dot.ca.gov>  
<[wcronk@pacific.net](mailto:wcronk@pacific.net)> CC:  
08/13/2002 10:45 AM Subject: Willits Bypass  
Please respond to "Bill Cronk"

70-1 There are many business people in town that do not want the bypass, myself included. We believe that the traffic could be handled without losing the potential money coming right through the middle of town. I don't believe our city council has considered the loss of revenue due to the bypass. None of them have a business that would be affected.

70-2 I have heard lately that an off-ramp may be added at Highway 20. That will be devastating to many of us. There should be two off ramps, one north and one south. We may be able to survive if we get some of the traffic going to Highway 20.

Thank you for your time.

Bill Cronk

## 71 Lee Davis

The two-lane segment of U.S. 101 north of Hopland and in front of the Retch industrial plant is no longer operating well. This segment of U.S. 101 is part of the Hopland Bypass project. Caltrans, MCOG and the local community are in support of improving this segment of U.S. 101 to four lanes because of high collision rates, operational conflicts and increasing traffic volumes.

Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included as an alternative in the DEIS/EIR. See General Response 1.10.

223

Dear Ms. McKenzie,

I am writing regarding the proposed Willits Bypass. I feel the 2 lane bypass is the best alternative, as this has worked well in front of RETECH south of Ukiah for the 24 years I have lived here. Alternatively, I favor the Elsie bypass.

Sincerely,  
Lee Davis

Modified Alternative JIT has been identified as the Preferred Alternative for construction. General Response 1.3 discusses why Alternative L/C (Truck Scales Interchange) is not the preferred alternative for construction.

## 72 D. Deines

Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included as an alternative in the DEIS/EIR. See General Response 1.10.

Regarding "disrupting the environmental integrity" of the valley, reducing a four-lane bypass to two lanes would not reduce the footprint substantially because of necessary design components such as shoulders, side slopes, and drainage facilities.

I am, and have been for many years in favor of a two-lane bypass for Willits. It would be more efficient and cost effective than disrupting the environmental integrity of the Willits valley and would improve the traffic flow through Willits for many years to come.

D. Deines  
32201 Condor Rd  
Willits CA 95498

**73 Mary Delaney**

The following individuals submitted the same form letter:

- 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

Name: Mary G. Delaney  
 Address: 23441 East Side Rd  
 City, State, Zip Code: Willits CA 95790  
 Phone: 707-459-4779

Date: 7/19/02

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

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

Dear Ms. Daniels and Mr. Khaled:

I have reviewed the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Willits Bypass, and I have the following comments.

**NOISE**

73-1

A very important reason I live in Willits is because of its unique rural character. In particular, the tranquility and serenity of the area in general are of great concern to me. I am aware that the Willits Bypass will create a great deal of noise. Any increase in the existing noise level created by the bypass is a significant impact that will substantially alter the natural qualities of the Willits area. Section 5.11.2, states that the "Impact Threshold" for noise is "when the predicted noise levels exceed existing noise levels by 12 dBA, Leq(h)". From my knowledge of noise levels, a 12 dBA increase is about a 4-fold increase in the existing noise level. I adamantly disagree with this threshold. Any noise increase (i.e., greater than 0) must be considered a significant impact. All of the alternatives offered will substantially increase the existing noise level. Noise must be listed as an "Unavoidable Significant Impact" for all alternatives in Chapter 6.

**VISUAL IMPACTS**

73-2

Little Lake Valley offers beautiful natural vistas that are an integral part of Willits' unique rural character. The EIS/EIR lists 10 mitigation measures which will supposedly reduce visual impacts to less than significant. While I am pleased that Caltrans is making an effort to reduce the visual impacts of the bypass, it is impossible to hide such an enormous facility. Regardless of Caltrans' efforts to mitigate visual impacts, a freeway going through Little Lake Valley will be quite visible and will significantly degrade the rural character and beauty of the area. Visual impact must be listed as an "Unavoidable Significant Impact" for all alternatives in Chapter 6.

- 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

73-1 The Federal guidelines state that a traffic noise impact occurs when one or more of the following occur: 1) a substantial noise increase (a noise increase is substantial when the predicted noise levels with the project exceed existing noise levels by 12 dBA, Leq (h)); 2) When predicted noise levels approach or exceed Noise Abatement Criteria. (approach is defined as being within 1 dBA of the Noise Abatement Criteria). A 12 dBA increase would be equal to a perceived increase of 130%, which would be slightly higher than twice as loud. Caltrans noise studies concluded that the project did not meet either of the two criteria. See Section 5.11 (DEIS/EIR). Caltrans is confident in the adequacy of the impact conclusions presented in the technical studies and DEIS/EIR prepared for this project. See General Response 1.11.

73-2 With the exception of Alternative E-3, which would require the most earthwork of any of the alternatives, all other alternatives offer a variety of visual experiences. Each alternative contains segments of near grade alignment as well as raised sections and structures. The visual impacts of each segment were assessed with appropriate mitigation measures tailored to viewers of each area. Therefore, not all portions of an alternative were found to contain similar visual impacts. Additionally, the visual impacts of the current congested highway, along with more future congestion without the project, were weighed against the visual impacts of the proposed project. See Section 5.10 (DEIS/EIR) Visual Resources. See also General Response 1.11 regarding adequacy of impact conclusions.

73-3 All of the proposed alternatives provide Brooktrails residents with a freeway bypass of the City of Willits. The comment suggests that the proposed project could hasten growth in Brooktrails, by reducing commute times between Brooktrails and employment centers south of Willits. However, Brooktrails Township currently contains the largest single area of undeveloped residential land in Mendocino County. Lower land prices and the availability of land will attract new development, whether or not the proposed project is constructed. The California Department of Finance projects that Mendocino County will grow by 25,000 residents between 2000 and 2020. If the proposed project is not constructed, development pressure will continue to favor Brooktrails Township, which can currently accommodate approximately 24 percent of this projected increase before reaching planned buildout.

73-3

**GROWTH INDUCEMENT IN BROOKTRAILS**

The possibility of growth inducement in Brooktrails as a result of the bypass is not addressed in Section 6.1. The rationale stated is that the bypass will not remove existing constraints which currently exist in Brooktrails such as lack of an adequate water supply and a second access road. However, it is also stated that "The bypass alternatives would provide a fairly substantial reduction in commute times for workers who pass through the city to work." It is clear that a reduction in commute times would make Brooktrails more attractive to commuters thereby placing an induced demand for housing in Brooktrails. Increased housing demands will result in either an increased housing supply if the constraints are removed, or an increased cost of housing if the housing supply remains constant.

Brooktrails is struggling, both financially and from poor planning when the subdivision was approved in the mid-1960's. Due to the lack of sales tax revenue and the high cost of providing services, growth inducement caused by the bypass will have a negative impact on public services and quality of life in Brooktrails and, therefore, must be listed as an "Unavoidable Significant Impact" for all alternatives in Chapter 6.

If Caltrans assumes a stagnant housing supply, then the socio-economic impacts of higher housing costs must be considered as "Unavoidable Significant Impacts" for all alternatives in Chapter 6.

**LOSS OF LOCAL BUSINESS**

73-4

The EIS/EIR states "Under the worst-case scenario, Willits would lose the sales taxes of 17 percent of the businesses along U.S. 101." Apparently, Caltrans does not consider the loss of these businesses a significant loss since it does not appear as an "Unavoidable Significant Impact" in Chapter 6. However, the loss of 26 businesses (according to the Economic Impact Report) is a significant impact on our community. In addition to the loss of direct sales tax, there is the loss of approximately 100 jobs, conservatively assuming that each business has 4 employees. In a town the size of Willits, 100 jobs is a significant labor force. The increased commerce due to the construction of the bypass would be transient, lasting 4 years at the most. The EIS/EIR does not analyze what may occur after that.

In addition, the EIS/EIR conclusion is based on the experiences of Cloverdale after the bypass went into operation. Comparing Cloverdale with Willits is tenuous at best. First, Cloverdale has a middle interchange, whereas Willits will only have interchanges at the north and south ends of the Valley. Secondly, Cloverdale is supported by a very healthy economy with an expanding wine industry in Sonoma County. Whereas, Willits has no significant new industry to offset the loss of these jobs. The loss of local business must be listed as an "Unavoidable Significant Impact" for all alternatives in Chapter 6.

By eliminating the need to drive through Willits in order to reach points south along U.S. 101, the proposed project would reduce commute times for Brooktrails' residents by approximately ten minutes. The nearest employment center south of Willits is Ukiah, currently about 47 minutes away. After construction of the Bypass, commute time from Brooktrails to Ukiah would be approximately 37 minutes, or 17 minutes longer than the average commute time for Mendocino County residents in 2000.

While the proposed project could increase Brooktrails' attractiveness, it is unlikely to result in unrestrained demand for property in the Township. The Brooktrails Specific Plan Final Environmental Impact Report states:

"Growth in a given area may be induced by removing infrastructural barriers, by providing new infrastructure and/or improving transportation access. The growth-inducing potential of new infrastructure within the Specific Plan area would be significant if the Specific Plan created the capacity to accommodate growth above and beyond what was envisioned under the Specific Plan itself."<sup>1</sup>

The proposed project does not alter infrastructure constraints within Brooktrails. The Specific Plan guides Brooktrails' development to buildout at 4,000 residential units. The proposed project would not affect this community's buildout population.

<sup>1</sup> Mendocino County / Brooktrails Township. *Brooktrails Specific Plan Final Environmental Impact Report*. February 1997. Page 4-2.

Furthermore, Brooktrails Township Specific Plan Housing Policy HC-5.1C states that the Township will “Develop a phasing plan which limits the number of building permits issued each year according to projected service and utility capacity for any given year based on a five-year average.” This policy ensures that housing growth will keep pace with the Township’s ability to provide needed services.

73-4 Employment losses may result temporarily because of the decrease in traffic. However, the Economic Impact Report prepared for this project anticipates that the long-term impact on the economy and employment will be beneficial, as a result of a more attractive downtown area and a substantial decrease in through traffic.

Like the Cloverdale Bypass, Alternative E3 includes a middle interchange that would allow a connection between U.S. 101 and Willits along S.R. 20. Unlike the Cloverdale Bypass, the valley alternatives would continue to route traffic through Willits along S.R. 20.

Additionally, Willits has more employment opportunities for its residents than Cloverdale. Willits’ economy has a greater capacity to absorb displaced workers than Cloverdale.

The comparison between Willits and Cloverdale is useful because both are similarly sized cities located on the U.S. 101 corridor in the same region. While employment patterns are substantially different – primarily varying with proximity to the major employment center in this area, Santa Rosa – the comparison is useful in demonstrating the possible impacts of a bypass as a result of the loss of through traffic.

73-5 Reducing the four-lane bypass to two lanes would not reduce the footprint by half because of necessary design components such as shoulders, side slopes, and drainage facilities.

Since a two-lane facility is not being considered, there are no specifics on geometric design, and thus, vehicle speed would be speculative. The difference in noise levels between a two-lane and a four-lane facility with a posted speed limit change from 65 mph to 50 mph would be between 1 and 2 dBA, assuming the traffic volumes and mix remained the same. Under controlled conditions in an acoustics laboratory, the trained healthy human ear is able to discern changes in sound levels of 1 dBA, when exposed to steady, single frequency (“pure tone”) signals in the mid-frequency range. Outside of such controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise. It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dBA. See General Response 1.10 for a discussion of why a two-lane alternative does not meet the purpose and need for the project and therefore, was not considered in the DEIS/EIR.

73-6 To assure the prudent application of public funds, a four-lane facility is proposed because it meets the purpose and need of the project over a 20-year design period. A two-lane facility would not achieve the same goal.

73-7 Regarding oak woodland, see response to Comment 26-1 (California Oak Foundation). Regarding feasibility of farmland mitigation measures, see responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning).

#### TWO-LANE ALTERNATIVES

73-5

Many of the “Unavoidable Significant Impacts” caused by a freeway bypass cannot be mitigated. For example, Caltrans offers no mitigation for noise impacts or business loss, and the mitigation measures for visual impacts would be largely ineffective. A two-lane bypass, however, would significantly reduce noise by lowering vehicle speed, would significantly reduce visual impacts by reducing the “footprint” of the bypass by nearly one-half, and would significantly reduce economic impacts by drawing less tourist traffic out of town.

In Chapter 3, it is stated that two-lane alternatives were dropped from consideration because they did not meet the “Purpose and Need”. However, a two-lane bypass would “reduce delays and improve safety” virtually the same as a four-lane freeway bypass. Level of Service “C” is an arbitrary, unsupportable (both technically and legally), and unnecessary condition.

Even based on your projected traffic volumes for the year 2028, the Level of Service on a two-lane bypass would be similar to the Level of Service currently experienced on the two-lane section of 101 between the north City Limits and Reynolds Highway, which is quite acceptable. As you are aware, Caltrans has recently modified the Route Concept Report to allow some two-lane facilities along Highway 101 to operate at Level of Service “E”, partly because of the area’s high environmental sensitivity. Little Lake Valley has similar environmental sensitivities.

#### WASTE OF TAX DOLLARS

73-6

On page 3-9, the EIS/EIR states “The decision to truncate or shorten these alignments was driven by the need to design a project within existing budget constraints.” However, even after the alignments were truncated, *all* of the proposals still exceed the budgeted amount by at least \$12 million. The EIS/EIR also projects that all the freeway alternatives will operate at a Level of Service “A” for the entire projected life of the project. This is a tremendous waste of tax dollars, especially at a time when the State’s budget crisis is resulting in staff cuts and a reduction of critical services. It is irresponsible for Caltrans, or any government agency to deliberately over-design a project funded by taxpayers. Caltrans and all other appropriate government agencies must return to the drawing board and present an appropriately designed facility that falls within the existing budget.

#### VALLEY OAK WOODLAND AND FARMLAND IMPACT

73-7

The EIS/EIR concludes that there are no significant impacts of Alternative L that cannot be mitigated. This is a false statement. Alternative L destroys the only significant area of valley oak woodland left in Little Lake Valley, and it buries under fill a significant portion of the beautiful and productive Coleman Ranch. In addition, mitigation measures “FRM-1” and “FRM-3”, are unfeasible and, therefore, cannot be considered as mitigation of farmland impacts. These impacts must be listed as “Unavoidable Significant Impacts” in Chapter 6. Without this disclosure, it is not possible to assess the comparative merits of the Alternatives.

73-8 See General Response 1.6 regarding Brooktrails Township second access road.

73-9 See General Response 1.12 regarding “growth at interchanges.”

The following individuals included additional comments with their letters:

**William Caraway**

73-10 Mitigation Measure VIS-10 (DEIS/EIR) addresses design treatments to structures and to highway appurtenances, such as guardrail.

73-11 General Response 1.9 discusses why a center-valley interchange is beyond the scope of this project. Furthermore, a center valley interchange would increase impacts to community and environmental resources.

73-12 Benefits of a bypass will be to reduce traffic congestion on local streets in Willits, which will improve conditions for pedestrians and bicyclists, as well as improving noise, visual, and air quality conditions in town. Removing U.S. 101 from Main Street will make it possible for the City to implement the goals and policies of its Bicycle and Pedestrian Specific Plan (1999) of safety, access, and quality of life. No change to the DEIS/EIR is necessary.

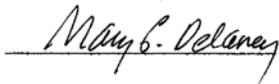
**CONNECTION TO BROOKTRAILS SECOND ACCESS**

73-8 It is a foolhardy omission by Caltrans to not include in the EIS/EIR, an alternative that anticipates a convenient connection to Brooktrails traffic. A Brooktrails second access must be addressed to determine how the bypass will connect to one or more of the alternatives. This discussion must include the cumulative impacts of this newly created traffic circulation pattern.

**INTERCHANGE DEVELOPMENT**

73-9 Throughout the years, there has been much discussion among the citizens of Willits about prohibiting development around the interchanges to protect businesses in town. The EIS/EIR must include mitigation measures for Caltrans to purchase the development rights on all properties adjacent to the interchanges in order to protect the Willits business district from commercial sprawl outside the City of Willits.

Sincerely,



73-10 To mitigate visual impacts of overpass and raised roadway is to make the concrete work into art and interesting forms. Make the freeway interesting to look at, i.e., different forms and color. Come up with new forms and shapes.

73-11 Purpose of (EIS/EIR) is too narrow. The town of Willits will grow in the future. The town does need a bypass but also needs help with commercial and Brooktrails traffic in and out of town in connection to the new road. A Commercial Street exit from new road is needed.

73-12 The cultural value of the valley (rural life, ranch life, beauty of the valley) needs to be listed as an Unavoidable Significant Impact from a long term cultural value. The new road needs to stay out of the valley. This new project should raise the quality of life for humans of the Willits Valley.

**Brian Ferri-Taylor**

73-13 The purpose of the project addresses interregional traffic, but side benefits of the project will be improvements to local traffic circulation. See General Response 1.10 for a discussion of why a two-lane bypass is not being considered for construction; General Response 1.8 regarding traffic operations at Quail

Meadows Interchange; General Response 1.3 for a discussion of why Modified Alternative JIT has been identified as the LEDPA/Preferred Alternative; and General Response 1.4 regarding Willits Creek restoration.

73-13

I am a physical therapist who has lived in Willits (Brooktrails) for 21 years. I travel about 2,000 miles per month in Lake and Mendocino counties. I attended the nicely done Caltrans presentation on 7/24.

My overall impression of the Caltrans proposal for a bypass is flawed in it's purpose of upgrading north/south traffic flow on highway 101 to LOS C status while disregarding local traffic and environmental needs. I do not experience significant traffic delays either north or south of Willits on those two lane sections of Highway 101.

I would like to see a two lane bypass built at existing road levels to allow full access to those roads. I would like to see a Truck Scales interchange rather than one at Quail Meadows. A Quail Meadows interchange is too close to the high school and Sherwood Road and would cause increased traffic problems in those area. Brooktrails needs a second access road with easy access to Highway 101. Stream restoration to the Truck Scales is large. For these reasons I support and would like you to consider the ELSIE/Wild Oat Canyon and Willits Creek Restoration as proposed by Hal Wagenet. I don't think the EIS/EIR adequately addressed those options.

**Marta Trevey**

73-14 An interchange to the middle of town would not provide access to the portion of U.S. 101 south of S.R. 20, where many visitor-serving businesses are concentrated. See General Response 1.9.

73-14 . Family owns business in town. Four-lane bypass has no exits into middle of town, nor much incentive to enter Willits. Bypass does not address Hwy 20 interchange. This is an issue, it brings much of the congestion. Brooktrails traffic is also a problem

73-15 An inversion layer and fog are two different meteorological conditions. An inversion layer is created when the air temperature increases with height, thereby trapping the air or smog. The air is unable to mix due to the differences in air density. Any of the alternatives would improve air quality over the existing condition, by reducing idling and stop and go traffic on existing U.S. 101. See Section 5.12 (DEIS/EIR), and Section 3.12 (FEIS/EIR).

73-15 The environment. This valley tends to have a fog layer which will trap the smog in. Smog and poor air quality tends to follow bypasses and fast moving vehicles.

**Tom and Sandy Strong**

73-16 Section 5.6 (DEIS/EIR) describes how the project will be designed to avoid floodplain impacts.

73-16 We are also concerned about flooding around our home when you change the valley floor with all that dirt... This needs to be addressed.

**Vicki Caraway**

73-17 See General Response 1.9.

73-17 Doesn't it make far more sense to take local research into account instead of throwing darts randomly at a map, not considering local concerns? Please work with our community in deciding interchange locations!

**Christopher Martin**

73-18 Caltrans traffic studies concluded that a two-lane bypass does not meet the purpose and need for the project. See responses to Comments 34-15 (Willits Citizens for Good Planning) and 36-6 (Willits Environmental Center). See also General Response 1.10.

73-19 A two-lane facility would provide LOS "D" at peak hour upon construction (2008), and remain at LOS "D" through year 2028. Thus, a new two-lane highway would be functionally obsolete within the 20-year design period because it does not meet the purpose and need for the project. Chapter 2 (DEIS/EIR) provides detailed discussion of the purpose and need for the project as well as level of service criteria. General Response 1.10 elaborates on the DEIS/EIR discussion of why a two-lane facility does not meet the purpose and need for the project.

73-20 Alternative L/C does not meet Section 404(b)(1) Clean Water Act criteria for its overall environmental harm. See General Response 1.3.

73-21 Either of the proposed northern interchanges meets the purpose and need of the project and would accommodate a second Brooktrails access.

**73-18**

**#1- LOS calculations**

I have some questions regarding section 3.6.2 which deals with the two lane alternative. In this analysis it gives the LOS calculations for a 2 lane facility as being LOS D in 2008 and diminishing to LOS E in 2028.

I note that when Caltrans performed exactly the same calculation, ie. LOS for a 2 lane facility, in the Value Analysis Report, Alternative #1.6, in 1998, it came up with "approximate level of service C for design life of project (2025)". Furthermore, SHN Consulting Engineers, in their report on two lane bypass alternative dated October 1999, also calculated LOS C for such a

**73-19**

facility, which conclusion we have confirmed by our own calculations using the traffic data supplied by Caltrans from the 1998 traffic studies. I further note that this conclusion was not disputed by Caltrans in its rebuttal of this study, signed by Andrew Brandt and dated Dec. 15, 1999.

Therefore my question is: given that the base data from the traffic studies has remained unchanged, what changes in assumptions have been made that have resulted in such a radically different outcome? For example, the data shown in Figures 12,14 & 15 show traffic volumes using the bypass that are nearly double what can be accounted for by the projected regional north/south thru traffic. Where does this extra volume come from? If it is being assumed that a large number of local in-town trips would be diverted onto the bypass, then please could you specify just which such trips would be so diverted, ie. who, going from which point to which other point in town, would choose to use the bypass in preference to Main Street, and could you also please specify the source of these assumptions, ie. the studies or other basis which might support such assumptions?

**2 - LOS C**

Given that the requirement that the Willits Bypass operate at LOS C has never been subject to CEQA review, could you please explain the legal basis upon which it is now being used to eliminate an alternative, ie. a 2 lane facility, that is otherwise clearly both technically and economically feasible and that is also apparently capable of greatly reducing the environmental impacts of this project?

**3 - "Functionally obsolete"**

In section 3.6.2 , final paragraph, it states "As such, to develop a two-lane highway would result in a facility that would be functionally obsolete within the design period.". Would you please define "functionally obsolete", ie. what criteria do you use in order to classify a highway as functionally obsolete? Is there any criterion other than "fails to meet LOS C"?

**73-20**

**4 - The L/C alignment**

Since the L/C alignment would appear to result in the greatest environmental impacts of all the alternatives, it should not be chosen.

**73-21**

**5 - The Quail Meadows Interchange**

The claim that the Quail Meadows Interchange is unacceptable, on grounds of traffic safety and in relation to access to Brooktrails, is entirely unsupported.

**74 Thomas DeMarchi**

74-1 Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included among the range of feasible alternatives in the DEIS/EIR. See General Response 1.10. See also responses to Comment 22-4 (Mendocino County Farm Bureau) and Comment 33-1 (Sierra Club, Mendo-Lake Group) regarding range of feasible alternatives.

74-2 Significant unavoidable impacts are identified in Section 6.4 (DEIS/EIR). Caltrans is confident in the adequacy of the impact conclusions presented in the technical studies and DEIS/EIR prepared for this project. See General Response 1.11.

Tom DeMarchi  
1851 Crawford  
Willits, CA 95490

August 3, 2002

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

Maiser Khaled, Chief  
District Operations – North  
Federal Highway Administration  
980 – 9<sup>th</sup> Street, Suite 400  
Sacramento, CA 95814

Re: Highway 101 Willits Bypass EIS/EIR

Dear Ms. Daniels and Mr. Khaled:

As a resident of the Willits area (Brooktrails) for the past 20 years, I am disturbed by severe deficiencies in the Draft EIS/EIR on the proposed 101 Bypass.

74-1

The most serious problem is the document's failure to analyze a two-lane alternative. The evidence I've seen indicates that a lane-separated, limited-access two-lane bypass (on any of the potential alignments) would:

- be more than adequate to handle the projected traffic volume through and beyond the planning period;
- minimize the many significant adverse impacts of the proposed by-pass (see below);
- greatly reduce the over-budget price tag, as well as construction time; and
- offer more flexibility in the alignment and probably allow for adding an interchange to connect with downtown Willits and Highway 20.

By law, the EIS/EIR is required to analyze all feasible alternatives. There is no justifiable reason for eliminating consideration of a two-lane option. Caltrans has already decided that traffic north of the proposed by-pass can be adequately handled on the existing two-lane highway. A look at the projected volumes shows that this is also true of all the through-traffic. All that is required to meet the objectives of traffic flow and safety is to by-pass the Willits bottle-neck. There is no need to do so with a high-speed four-lane freeway.

74-2

In reviewing the Draft EIS/EIR for the Willits Bypass, I have found it fails to identify numerous significant impacts of a 4-lane freeway. These include:

- Noise. The threshold of a 12 decibel increase in noise is too high (and even that high threshold may be exceeded). The valley is currently a quiet oasis,

74-3 See response to Comments 74-1 and 74-2.

Additionally, see General Response 1.9, which discusses why a center valley interchange is not being considered for this project. See General Response 1.4 regarding Willits Creek restoration. See General Response 1.3, which discusses why Alternative L/C is not the preferred alternative for construction.

See General Response 1.6 regarding Brooktrails Township second access road.

74-2, cont.

which is a major attraction of this community to its residents. A freeway with high-speed traffic will be heard throughout the entire valley. This noise level is certainly an unavoidable significant impact which cannot be adequately mitigated.

- Loss of farmland. The EIS/EIR mentions this impact but then suggests a vague future proposal for mitigation. Even if this uncertain "mitigation" proved useful, there would still be unavoidable loss of farmlands under the swath of the freeway itself. Again, this impact must be listed in Chapter 6.
- Loss of oak woodlands (Alternative LT) and loss of wetlands (Alternative LT and J1T). As with farmlands, no mitigation can adequately compensate for such losses.
- Visual impacts. The EIS/EIR proposes mitigation measures, which are laudable. However, no mitigation can hide a huge 4-lane freeway rising 10 to 40 feet above the valley floor for six miles. The valley will be permanently and drastically altered from its current rural, natural character. This must be listed as a major unavoidable impact of any of the proposed alternatives.

74-3

It is essential that the EIS/EIR adequately identify these major unavoidable impacts and evaluate feasible alternatives, notably a two-lane bypass. In addition, it should consider:

- the need for tie-ins to Highway 20 and a second access road to Brooktrails;
- purchase of conservation easements at interchanges to prevent commercial sprawl and protect Willits businesses; and
- restoration of Mill Creek (possibly in conjunction with the "Elsie" L/C route proposed by Hal Wagonet).

I request that these points be addressed in the final EIS/EIR and that Caltrans seriously consider the two-lane bypass alternative. This rural community, set in its beautiful, peaceful valley, is itself a "rare habitat" worthy of protection.

Sincerely,



Thomas M. DeMarchi

**75 Marisela de Santa Anna**

75-1 Significant unavoidable impacts are identified in Section 6.4 (DEIS/EIR). Caltrans is confident in the adequacy of the impact conclusions presented in the technical studies and DEIS/EIR prepared for this project. See General Response 1.11.

75-2 NEPA and CEQA both have language allowing the lead agencies (either the federal agency in the case of NEPA or the state agency in the case of CEQA) to determine level of significance. Caltrans Traffic Noise Analysis Protocol lists the criteria that were used to determine level of noise impact as a result of the various build alternatives for the proposed bypass project. See response to Comment 75-1.

75-3 Modified Alternative J1T (the Preferred Alternative) has been developed to minimize impacts to resources including the oak riparian woodland referred to in the comment. See response to Comment 26-1 (California Oak Foundation).

75-4 Modified Alternative J1T, the Preferred Alternative, would result in 10 residential relocations (see Section 3.3.2 FEIS/EIR). Sections 5.2.5.2 and 5.2.5.3 (DEIS/EIR) dealt specifically with the issues of residential relocation and the potential impacts of relocation on minority and low-income populations. Table 5-3 provided estimates of the number of relocations affecting low-income and minority residents.



**Marisela de Santa Anna**

August 3, 2002

Mrs. Marisela de Santa Anna  
1800 Muir Mill Rd.  
Willits CA 95490

Dear Ms. Daniels,  
I have reviewed the Draft Environmental Impact Statement/Environmental Impact Report for the Willits Bypass and I have the following comments:

**Cher Daniels, Chief  
Caltrans Office of  
Environmental Management 5-1  
2389 Gateway Oaks Dr.  
Sacramento, CA 95833  
Attn: Nancy Mackenzie,  
Environmental Coordinator**

After spending 4 to 5 hours reading through this document I feel that it fails to identify numerous significant impacts that any 4 lane route will have on our little valley and the surrounding communities. 75-1

Noise is an impact of significance that is not really addressed. Every one of the proposed 4 lane routes will have significant noise impact on the whole of the Willits valley. This will substantially degrade the character of the area and our quality of life. This valley is just too small to absorb the kind of noise levels that will be caused by a 4 lane freeway going through any part of it. 75-2

The second significant impact that I feel is not addressed is the impact to the Oak woodlands that are located within the valley floor. We have very little left of our Valley oak woodland habitat and I feel that all the remaining stands should be protected. 75-3

The third and very important impact that I feel is very significant and again was not addressed as such was the loss, to many of our low income families of their homes (if E is the route chosen) and properties. These families are not able to respond to this proposal because many are not able to read English but I have spoken to some and they were heartbroken to hear they could lose their hard earned homes and felt there would not be places affordable elsewhere in Willits for them. These families are what I see as the backbone of many of our small businesses and would have a substantial impact if they were to leave the area. 75-4

Section 5.2.5.3 (DEIS/EIR) discusses the probable use of last resort housing benefits for low-income residents of this area. These benefits ensure that low-income residents are provided with decent, safe, and sanitary housing.

The shortage of vacant housing units in this area has been noted. In the event of a shortage of housing locally, Caltrans would provide reimbursement for moving expenses within a 50-mile radius. However, Alternative E3 is no longer under consideration since it does not meet Clean Water Act criteria for its overall environmental harm.

75-5 See General Response 1.10 for a discussion of a two-lane bypass and why it does not meet the purpose and need for the project, and therefore, was not included for consideration in the DEIS/EIR. Reducing the four-lane bypass to two lanes would not reduce the footprint substantially because of necessary design components such as shoulders, side slopes, and drainage facilities.

75-6 See General Response 1.12 regarding "growth at interchanges."

pg. 2

There are 2 more important considerations I would like state:

75-5

I want to know why the 2 lane alternative was not given more consideration. I feel that it does meet the goals and objectives of this bypass and would not only cost much less, it would have many less impacts on our little and beautiful valley.

75-6

I also would like Caltrans to look at the purchase of Conservation Easements at the interchanges as a mitigation which would help the area maintain its' natural beauty and keep the chain food restaurants in our town rather than build new ones on all the edges of the freeway. We already have 5 or 6 along a stretch of 101 not even a mile long! Please give my (and many of the residents of this pristine area) review serious consideration in the final document.

Thank you for your time,

Sincerely,

*Marisela de Santa Anna*

**76 Larry Desmond**

76-1 Caltrans studies do not support a two-lane facility for the proposed project. Caltrans' analysis of a two-lane bypass concluded that it would not meet the purpose and need of the project, and therefore, it was not included as an alternative in the DEIS/EIR. See General Response 1.10.

76-2 Sections 5.11, 5.10, 5.2 (DEIS/EIR) explain the impacts associated with noise, visual, and business, respectively.

76-3 Regarding farmland mitigation measures, see responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning).

Regarding oak woodlands, surveys will be conducted for Modified Alternative JIT, the Preferred Alternative, which minimizes the riparian oak woodland referred to in the comment, to identify and measure individual trees that cannot be avoided by the proposed project. See response to comment 26-1 (California Oak Foundation). Again, a two-lane facility does not meet the purpose and need of the project and, therefore, was not considered in the DEIS/EIR. Reducing the four-lane bypass to two lanes would not reduce the footprint substantially because of necessary design components such as shoulders, side slopes, and drainage features. Curves are limited by the design speed of a roadway and have no relationship to the number of lanes.

8/2/02

Cher Danials, Chief  
Caltrans Office of envir. Manage. S-1  
2389 Gateway oaks Dr.  
Sac. ca 95833  
Attn: Nancy Mackenzie

Maiser Khaled, Chief  
District Operations - North  
FHWA  
980 9th St., Suite 400  
Sac. ca 95814

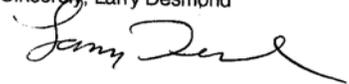
Dear Nancy Mackenzie,

My name is Larry Desmond and I have been a resident of the Willits valley for over 20 years, and this letter is in response to the E.I.R. in regards to the Willits By-pass. I want to acknowledge that yes, the current and foreseeable traffic needs to be addressed, however by Caltrans own studies a Two Lane by-pass is adequate, well into the future. This alternative needs to be fully addressed and evaluated. Caltrans own findings Do Not Support a Four lane freeway. On the topic of Significant Impact this study does not list NOISE----- VISUAL----- BUSINESS-----, having any significant impact, Please explain this finding and on what basis. My disire and I hope that of Caltrans, is to improve transportation throughout this valley without destroying, this valley in the process.

In regards to the valley environment both farming and remaining oak woodland Both FRM-1 and FRM-3 are not feaseable, and can not be a midigation. On the topic of oaks, why are you considering running a freeway over the largest remaining intact oak woodland in the valley??? Old growth ( hard or soft wood ) has they ever been really replaced? Go around. This concept is more feaseable if it is a two lane, it is actually possible to curve the road! For that matter a Two Lane would also address the IMPACTS of noise, visual and businesses in this community.

Response is requested,  
Larry Desmond  
1800 Muir Mill Road  
Willits ca 95490

Sincerely, Larry Desmond



76-1

76-2

76-3

**77 Dorotheya Dorman**

77-1 Due to the long queues that came about as a result of traffic turning left to SR 20 from Main Street, a dedicated left- turn lane had to be developed. Caltrans created the continuous turn lane to solve the problem of motorists needing a safe place to make the left turn. It is a standard configuration that is used statewide and is approved by federal agencies. Driveways are located so that there should not be a conflict for vehicles that want to turn from the same exact location. The traffic eventually has to narrow down to one lane each way at the railroad tracks.

Throughout the entire segment of U.S. 101/Main Street there are multiple businesses on each side of the road. Developing controlled access and egress points for both the businesses and traffic would not be feasible. As a result, two-way left-hand turn lanes were the most practical in terms of traffic flow, access and cost.

COMMENT ON WILLITS BYPASS DEIR?EIS  
August 15, 02

Dear Ms. Cher Daniels

77-1 Countywide, the Willits traffic jam is well known, so well known that savvy drivers avoid late afternoon enroute requiring the south to north traverse. Fewer people are aware that Caltrans caused the traffic jam by confiscating the western northbound lane for a turn only lane. Locally, David Drnell of the Willits Environmental Center told me, the turn only lane is called the suicide lane because it permits turns to the left across the double solid lines then across again two lanes of southbound traffic to the now defunct Lura Market. Conversely, this turn lane permits left hand turns from the southbound lanes across the double solid lines into the turn only lane so a driver can cut in front of the north bound traffic to duck into the Safeway parking lot. A simple diagram clarifies this explanation:

The turn only lane creates the possibility of two drivers, one coming from the north and one from the south meeting head on in the turn only lane. San Francisco eliminated the last of these opposing turn lanes some ten or fifteen years ago, designating instead permitted U turn intersections, perhaps a half mile down the road. This reform eliminated the traffic jam caused by the turn only lanes.

Why did Cal Trans steal the second northbound traffic lane to create the turn only lane? Was there a perverse plan to cause a traffic jam so that aggravated local residents would support a Willits bypass alternative? Or was it bureaucratic stupidity? Answers to this question will be appreciated.

Sincerely,  
Dorotheya M. Dorman  
2801 Radical Ridge  
P.O. Box 95470  
P. 01

**78 Bob Doty**

78-1 General Response 1.3 explains why the hybrid Alternative L/C is not the preferred alternative. See response to Comment 34-87 (Willits Citizens for Good Planning) regarding using the hillside in the Sherwood Road area for borrow material.

78-2 See General Response 1.6 regarding Brooktrails Township second access road.

Although all of the proposed build alternatives include a connection with S.R. 20, the comment probably refers to an extension of S.R. 20 from the current in-town intersection to a center valley interchange. See General Response 1.9 for a discussion of a center valley interchange, which is beyond the scope of the proposed project.

78-3 Comment noted. Caltrans traffic studies of existing conditions are the basis for the purpose and need for a proposed four-lane bypass. See General Response 1.10 regarding a two-lane bypass.

Caltrans  
Department of transportation:  
RE: Willits Bypass

78-1 IN your consideration for a bypass please take a look at the EISie alternative. What options are best and would have the least impact on willits are those which utilize the hillside in the Sherwood road area. A second access road in to brooktrails is a must as well as a Hwy 20 exit.

78-2

78-3 Please do not even consider the 2 lane roundabouts presented by the willits environmental center as this would be insufficient. A Four lane bypass is the only answer, if not four more.

Thank you  
Bob Doty  
Sherwood Road Resident.

**79 Robert and Carol Doty**

79-1 Any of the bypass alternatives will reduce traffic on Main Street in Willits. The reduction in traffic resulting from the bypass would substantially improve traffic conditions that would reduce conflicts between vehicles and pedestrians and bicyclists. See General Response 1.8 regarding traffic operations at Quail Meadows Interchange. To further address local traffic, 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.

General Response 1.3 explains why Alternative L/C is not the preferred alternative for construction.

To whom it may concern  
att: Chew Daniels, Chief, 07/24/2002

79-1 We have lived in Willits for 35 years. We are very supportive of the Elsie/Wildcat Canyon Plan. This would be a permanent decision that will release us of the horrendous traffic in our town. I am a High School teacher at Willits High School, and we've had many accidents because the traffic is so dangerous, and the trucks are so loud and dangerous for students who ride their bicycles and walk.

Robert Doty  
5480 Canyon Rd  
Willits Ca 95490

Carol Ann Doty  
5480 Canyon Rd  
Willits, Calif 95490

mailing address is  
P.O. Box 1346  
Willits, Calif  
95490

**80 Ellen Drell**

80-1 The DEIS/EIR addresses economic impacts (Section 5.2), farmlands (Section 5.4), visual and noise impacts (Sections 5.10 and 5.11), and future growth (Section 6.1). The character of Willits was addressed under Section 5.4 in the discussion of the project's consistency with local and regional plans and policies. Reinvigorating the railroad beyond the scope of this project and, therefore, is not discussed in the DEIS/EIR. See response to Comment 80-4 for more discussion.

80-2 Caltrans traffic studies of existing and future conditions are the basis for the purpose and need for a proposed four-lane bypass. See General Response 1.10 regarding a two-lane bypass.

80-3 The NEPA/404 resource agencies made fully informed decisions when they concurred with the purpose and need, modal choice, and range of alternatives studied in the DEIS/EIR. The DEIS/EIR includes a reasonable range of alternatives that meet the purpose and need of the project.

Monday, Aug. 26th, 2002

429

From:  
Ellen Drell  
6150 Hearst Rd.  
Willits, Ca. 95490

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

Re: Willits Bypass

Dear Chief Daniels;

I have reviewed the DEIR/DEIS for the Willits Bypass and would like to submit the following comments and questions. I am also including by reference the comments of Richard Estabrook for Willits Citizens for Good Planning and the comments submitted by David Drell for the Willits Environmental Center.

Scoping

80-1

The DEIR/EIS fails to list the issues and concerns that emerged as a result of the scoping process including the December 5th, 1989 Scoping Meeting. Neither the text on pages 3-27 through 29 nor Map 29 in the atlas reveal the issues and concerns expressed by the public that led to the various alternative design ideas or locations, other than impacts to wetlands, housing or costs.

80-2

There is no discussion of concerns about economic impacts to Willits, farmlands avoidance, maintaining rural character, avoiding noise and visual impacts, desire to reinvigorate the railroad, future growth impacts, or other issues of concern to area residents. The DEIR/EIS reveals that for thirteen years Caltrans has succeeded in ignoring these other issues, steadfastly clinging to a 30-year old vision of a 4-lane freeway through Little Lake Valley. The only deviation from the original route seen in the current alternatives are variations and truncations in the wettest of the wetlands in the northern portion of the Valley. I object to Caltrans' cloaking its decisions as to what alternatives are dropped and which remain in the approval of the PDT (mostly Caltrans staff and resource agency representatives dependent on Caltrans staff for details of the project) and the much

80-3

80-4 The North Coast Railroad Authority (NCRA) is a "local" agency created by the legislature in 1989 to preserve rail services in northwestern California. To achieve this directive, the NCRA purchased the rail line from Healdsburg in Sonoma County north to Eureka in Humboldt County and provided rail services to the North Coast until 1998 when El Nino storm damage, funding shortfalls, and safety issues forced the closure of the rail line. Since this time, the NCRA received funds and/or funding commitments from several state and federal agencies to work toward restoration of rail services. The NCRA recently completed its capital and environmental assessments and is working with various state and federal agencies to ensure environmental compliance for its railroad reopening project. The project description is "to reopen, restore and upgrade the Northwestern Pacific Railroad between Lombard (Postmile 1 in Napa County) to Samoa (Postmile 301 in Humboldt County) to enable the resumption of commercial freight and excursion passenger service." The NCRA has publicly reaffirmed its need to retain all current right-of-way to ensure completion of the proposed project

and restore rail services to the North Coast. The suggestion that Caltrans use right-of-way currently owned by the NCRA as an alternative for the Willits Bypass is not a feasible option.

80-5 Section 3.6 and Chapter 10 (DEIS/EIR) summarize Caltrans' public outreach effort throughout project development, including the TAG and PDT meetings that were held to evaluate the range of alternatives and the criteria used to rank and evaluate alternatives.

80-6 Modified Alternative J1T (the Preferred Alternative) minimizes impacts to and avoids realignment of creeks that are salmonid habitat. Also, this alternative was developed specifically to minimize impacts to the large oak woodland referred to in the comment, among its other impact avoidance features. The comments regarding LOS is a reference to a two-lane versus four-lane facility; General Response 1.10 discusses why a two-lane bypass does not meet the purposes and need for the project. Further, reducing the four-lane bypass to two lanes would not substantially reduce the project footprint because of necessary design components such as shoulders, side slopes, and drainage facilities.

comments of E. Drell, page 2.

80-3  
cont.

heralded NEPA 404 MOU. Is it not true that several resource agency representatives would not have agreed to Caltrans' insistence that the Purpose and Need for the project include LOS C if the agency representatives had understood that the LOS C criteria would eliminate all alternatives but a 4-lane freeway? Is it not true also that Caltrans did not receive in writing agreement from the EPA to drop the TSM Alternative, the only wetland avoidance alternative? Is it not true that the EPA asked Caltrans to retain the TSM through the DEIR/EIS stage of this project?

80-4

The public has shown strong interest in a non-freeway, lesser impact alternative since the beginning of this process, as indicated by among others, alternatives F, N, and O shown on Table 3-5. Caltrans inappropriately dismisses all three by either failing to study them or mischaracterizing them. Alternative F, use of the railroad corridor and relocating the existing tracks, was never studied, despite reference to a study, and was tossed because it was "similar to O". N, which also used the railroad corridor, and had a 2-lane segment, was tossed because of its "similarity to O". O, a 4-lane alternative along the railroad tracks was tossed because of its impacts on homes. Caltrans has very neatly eliminated alternatives that incorporated an existing transportation corridor and might have had fewer overall impacts. (With this rationale, J1T and LT should have been tossed because of their similarity to J which had unacceptable growth inducing impacts.)

80-5

Table 3-5 reveals that the DEIR/EIS had 1) eliminated alternatives based on a very narrow range of issues of concern to the public; 2) the public, via the "TAG" teams or any other means was never directly consulted on which of the alternative ideas would be pursued and what alternatives would remain, except for discussions regarding alternative K, the clearly destructive eastern route; and 3) the arguments for dumping all but freeway routes are circular, fraudulent and inaccurate.

80-6

Since 1988, salmonids in Outlet Creek, Baechtel Creek, Broadus Creek and Willits Creek, all impacted by any freeway alternative, have been listed as threatened under the Endangered Species Act. Also, in the last decade, wetlands and valley oak woodlands have been increasingly

80-7 See General Response 1.10, which discusses Caltrans analysis of a two-lane bypass and its conclusion that it would not meet the purpose and need of the project. Supporting data can be found in the Willits Bypass Traffic Study, which is available at locations identified in the DEIS/EIR (page 1-8). The NEPA/404 resource agencies made fully informed decisions when they concurred with the purpose and need, modal choice, and range of alternatives studied in the DEIS/EIR. The DEIS/EIR includes a reasonable range of alternatives that meet the purpose and need of the project and no change to the DEIS/EIR is required.

comments of E. Drell, page 3.

recognized as rare habitats in California and in need of special protection. This adds additional significance to the public's desire, and the resource agencies' needs to first AVOID, and then reduce impacts to these species and habitats. Such considerations should have ✓ caused Caltrans to put previous criteria in perspective. For example, Caltrans desire to achieve LOS C on a 4-lane freeway must be newly weighed against the possibility of causing the extinction of coho salmon in the watershed of Little Lake Valley. Similarly, the desire of Caltrans to design for 70mph speed capability must be weighed ✓ against the destruction of Little Lake Valley's last valley oak wood- ✓ land of sufficient size to actually create oak woodland habitat. ✓ Given all of the above, why hasn't Caltrans called for a re-scoping of this project?

80-7

Range of Alternatives

The DEIR/EIS fails to present a full range of feasible alternatives that would meet the purpose and need of the project, to move regional traffic safely and efficiently around Willits. LOS C as a "bottom line" criteria for this project is not justified either legally or in practical terms.

A 2-lane, grade-separated and possibly lane separated bypass alternative along one of the valley routes, or combination of valley route segments, was presented to Caltrans in 1999, well within a time frame sufficient to include this alternative in the DEIR/EIS. Was it not the case that I, and others, met with Caltrans representatives regarding this alternative in late 1999 and we were told that an analysis would take perhaps three months? Is it not true that at this time Caltrans was still in the process of completing certain studies that would be included in the DEIR/EIS including interchange design design and location, traffic projections and others? Is it not true that representatives from one or more of the resource agencies indicated interest in a 2-lane alternative if Caltrans would consider studying it? Is it not true that a reputable traffic engineering firm confirmed that a 2-lane, grade-separated bypass had the capacity to handle the traffic use projected for the Willits bypass and that it was indeed a feasible alternative?

80-8 The DEIS/EIR (Section 5.4.6) distinguishes among “farmland uses”, “prime soils,” and “Williamson Act Contract lands”. Table 5-7 summarizes farmland conversion, Table 5-8 addresses prime farmland soils, and Table 5-9 summarizes Williamson Act Contract lands; the text explains these distinctions. Alternative E3 impacts prime soils, as shown on Table 5-8, to a lesser extent than the other build alternatives, however, it would have a higher impact rating due to the high number of acres that Alternative E3 would impact.

Caltrans has worked with landowners to minimize disruption to agricultural operations, such as providing access roads and replacing impacted livestock ponds.

Section 3.4 (FEIS/EIR) summarizes farmland impacts that would result from Modified Alternative J1T.

comments of E. Drell, page 4.

Why did the DEIR/EIS misstate that the Willits Environmental Center asked Caltrans to study the 2-lane alternative in 2000, after all the technical studies had been completed? Why does the DEIR/EIS state that the level of service of a 2-lane bypass would be LOS E within twenty years? Our calculations, using Caltrans' same data and methods indicate that a 2-lane facility would provide LOS D well beyond the planning horizon for this project. Why has Caltrans not been able to justify its LOS E predictions with supporting data?

I believe that Caltrans must issue a supplemental DEIR/EIS that fully analyses the 2-lane alternative if the document is to meet the requirements of NEPA and CEQA.

80-8

Farmland Impacts

Why does the DEIR/EIS atlas misrepresent farmland impacts by showing only those properties which are currently in the Williamson Act (Map 13)? Why is there no map showing the impacts of the alternatives to agricultural soils directly, and a map showing the indirect impacts of a freeway to farms and ranches and their agricultural lands disrupted by the intrusion of a highway?

The DEIR/EIS text and tables (pages 5-30 and 31) are useless (and absurd on their face) for evaluating impacts to farmland, and to farm and <sup>ranch</sup> culture in Little Lake Valley. Table 5-7 claims that Alt. E3, the only alternative not on the valley floor, is the only alternative to exceed the farmland conversion threshold! Page 5-31 states that E3 has no soils classified as prime agricultural or unique farmland soil. Yet Table 5-7 shows that the impacts of building E3 will result in the conversion of 713 acres of farmland to other uses...three times more farmland than will be converted along any of the valley routes! Table 5-8 shows E3 will have the greatest impact on farmland (despite the fact that there are no prime or unique agricultural soils on E3), and E3's impacts to prime farmland will be double the impacts of J1T or LT, two routes which actually destroy working farms!

Is Caltrans deliberately mixing Williamson Act acres and prime farmland acres in an attempt to make the farmland impacts of J1T and LT

80-9 See responses to Comment 26-1 (California Oak Foundation) and Comment 27-1 (California Native Plant Society).

80-10 See response to Comment 26-1 (California Oak Foundation).

80-11 For the Quail Meadows Interchange, Caltrans estimated the elevation of the railroad at the crossing of Alternatives J1T and LT at 410.5 m (1347 ft) by interpolating elevations on the railroad tracks north and south of the crossing. Spot elevations on the valley floor near the interchange are about 407 m (1335 ft), so the railroad is approximately 3.5 m (12 ft) above the valley floor. Vertical clearance at the railroad must be a minimum of 7.1 m (23.3 ft); therefore, the bottom (soffit) of the bridge must be at least 10.6 m (34.8 ft) above the valley. The structure depth is approximately 2 m (approximately 7 ft), yielding a profile that is at least 12.6 m (41 ft) above the valley floor.

In addition, the existing highway will be connected as the local connector road at the interchange. The existing highway at the point where it will be modified to form the local road is at roughly elevation 416 m (1365 ft). Caltrans used a very slight down grade moving toward the interchange, and the elevation of the local road in the area of the interchange is approximately 413 m (1355 ft). With proper clearance for the local road and allowing for structure depth, the profile over the local road is about 420.5 m (1380 ft), or about 15.5 m (51 ft) above the 405 m (1329 ft) elevation terrain existing at the interchange.

Regarding extending Alternative J1T and LT beyond Quail Meadows interchange at some future time, the profiles and alignments of the alternatives would have to be revised. The elevations may or may not be conducive to future extensions. Caltrans made no effort to design for such extensions.

Caltrans can only generally respond to the second paragraph of this comment. Alternatives C1T and L/C are generally 3 m (approximately 10 ft) to 5 m (approximately 16 ft) above the valley floor. The grade lines of these alternatives are set at least 1 m above what Caltrans believes is the 100-year flood elevation. The grade lines are also designed to be a minimum of 0.3 percent, meaning they must climb gradually away from the lowest point. At the viaduct, of course, the soffit of the structure must clear the 100-year flood elevation, and standard practice is to provide extra clearance (freeboard) for wave action, debris passage, and so forth. The design freeboard is 1 m (3.3 feet).

The controlling factors in establishing the profiles at the north ends of Alternatives J1T and LT are the viaduct elevation and the local road crossing.

comments of E. Drell, page 5.

appear minimal or at least less serious? This section of the DEIR/EIS must be re-issued and expanded to fully disclose the impacts of the various alternatives on farmlands.

#### Biological Impacts in General

80-9

In all of its biological studies and results, impacts and mitigations, the DEIR/EIS must make a distinction between various habitat quality. It is not meaningful and therefore <sup>not</sup> sufficient to simply measure impacts in gross numbers of acres. Those impacts must be measured against the quality of the habitat to be altered or destroyed. High quality habitat, for example, the oak woodlands on the Colli ranch, must carry greater significance than degraded or fragmented habitat when comparing the relative impacts of the alternatives.

#### Oak Woodland Impacts

80-10

This document is grossly deficient in its failure to disclose impacts to oak woodlands. A full inventory must be undertaken, and the results mapped and presented to the public at the draft EIR/S stage, of the locations, types and quality of oak woodland habitat impacted by this project. Did Caltrans conduct an on-the-ground biological inventory of the approximately 30 acres of valley oak woodland on the Colli ranch? Was Caltrans aware that this is the only valley oak woodland actually providing oak woodland habitat due to its size left in Little Lake Valley? Alternative LT would cut a 150-ft. swath of freeway through the heart of this habitat. The DEIR/EIS makes NO obvious reference to this unavoidable and highly significant impact! In fact, the DEIR/EIS concludes that LT has no impacts that cannot be reduced to insignificance. Caltrans has simply "disappeared" this valuable resource, a resource comparable in its uniqueness to wetlands. Has Caltrans failed to address this impact in order to lessen the negative impacts of the LT alternative relative to J1T?

Caltrans must redress this omission. The impacts of LT on valley oak woodlands seriously undermines the feasibility of southern LT as presently configured.

80-11

#### Fill and Overpass Heights

For any alternative, during final design, Caltrans is committed to refining the profiles in an effort to reduce impacts. The designs will still need to meet design standards.

80-12 Our responses to the above comments do not provide substantial new information that would require recirculation of the DEIS/EIR or circulation of a supplemental document. See General Response 1.11.

comments of E. Drell, page 6.

Why is the Quail Meadows interchange height 49 ft. above the ground surface if the maximum elevation required to bridge the railroad is in the neighborhood of 25 to 30 ft.? Is this height required if J1T or LT were to be extended beyond Quail Meadows at some later date?

Why are the freeway fill prisms, where they cross wetlands in the northern portions of the valley alternatives, 18' to 30' above the valley floor? The DEIR for the proposed Willits sewer plant calls for berms around the effluent ponds to be only 3' to 5' to avoid flooding. Wouldn't the height required to avoid flooding be the same for both projects?

80-12 Based on my above concerns and questions and those raised in the referenced comments of Willits Citizens for Good Planning and the Willits Environmental Center, I request that Caltrans issue a supplemental DEIR/EIS, with opportunity for full public and agency comment. Thank you for your attention to these issues.

Sincerely,

  
Ellen Drell

## 81 Steve and Lana Eberhard

81-1 The Modified Alternative J1T has been identified as the Preferred Alternative for construction because it meets the purpose and need for the project and has the least overall environmental harm of the other alternatives that were considered in the DEIS/EIR. See General Response 1.3.

81-2 The Truck Scales interchange is the northerly interchange on both Alternatives C1T and the hybrid Alternative L/C. These alternatives are not considered feasible for construction because they do not meet Clean Water Act Section 404(b)(1) criteria. See General Response 1.3. Caltrans will make every effort to minimize the height of the facility.

The criteria of designing the roadway surface 1 m (3.3 feet) above the 100-year floodplain was established to ensure that the highway would be kept open during severe flooding and to keep the structural section (the pavement and gravels below the pavement that support traffic loads) dry. At other locations, the profile will rise to provide clearance for a local road passing below the mainline; for example, the freeway mainline rises and an undercrossing (a structure carrying freeway traffic over a local road) provides for grade separation (for example, at Center Valley Road on Alternative C1T). Caltrans is conducting detailed studies to determine the elevation of the 100-year flood. Design intends to establish the final profile on Modified Alternative J1T (the Preferred Alternative) as low as possible while meeting the design criteria.

Crossings at local roads, the wastewater treatment plant, and railroad will be the controlling factors in establishing fill heights for the bypass.

81-3 See General Response 1.10 regarding Brooktrails Township second access road. Use of soil from construction of a Brooktrails Township second access road, for the bypass, would be possible only if related environmental reviews and permits were completed on that project.

81-4 See General Response 1.4 regarding a Willits Creek restoration.

81-5 See General Response 1.9 which discusses why additional interchanges on the valley alternatives are not being considered for this project.

81-6 Noise abatement was considered in areas where traffic noise impacts were predicted. Noise abatement is being considered in areas where it is *feasible and reasonable*. See also response to Comment 276-1 (Bill and Lynda Southwick).

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

To: Cher Daniels, Chief  
Caltrans Office of Environment Management S-I  
Attn: Nancy MacKenzie, Environmental Coordinator  
2389 Gateway Oaks Drive  
Sacramento, CA 95833

From: Steve & Lana Eberhard  
4340 Blue Lake Terrace  
Willits, CA 95490  
707-456-9018

8-7-2002

Dear Mr. Khaled and Ms. Daniels,

We are writing this letter out of concern for our little community, Willits. We all realize that progress must even come to Willits and we personally look forward to having this "bypass" built so it will relieve some of the congestion going through town. What most of us want is to minimize the problems associated with a "freeway" coming through our valley. Perhaps if you lived in the area you would want the same.

81-1 We (my wife and I) hope and expect to have Alternative C1T plus

81-2 1.) Keep a low profile. Don't go over the rail tracks. Avoid the higher/loader profile by having the North interchange near the "Truck Scales".

81-3 2.) Cut a second access to Brooktrails for the residents of Brooktrails and use the cut earth as "fill" for the bypass.

81-4 3.) Restor Willits Creek.

81-5 4.) Construct two interchanges (off/on ramps) in town in addition to the North and South interchanges. A must would be at Highway 20 and the second at Commercial Street.

81-6 5.) Construct sound walls in appropriate areas. The town of Cloverdale, not far South of us on Highway 101 got sound walls, why don't we deserve the same?

After studying the situation, we feel that the above suggestions would help mitigate the impact on our great community.

Thank you for your consideration,



C: Hal Wagenet PO Box 422 Willits, CA 95490

**82 Arthur Eck**

82-1 See General Response 1.6 regarding Brooktrails Township second access road.

82-2 Any of the bypass alternatives will reduce traffic on Main Street in Willits. To further address local traffic, 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. See General Response 1.8 regarding traffic operations with the Quail Meadows Interchange.

82-3 See General Response 1.4 regarding a Willits Creek restoration.

82-4 The Modified Alternative J1T has been identified as the Preferred Alternative for construction because it meets the purpose and need for the project and has the least overall environmental harm of the other alternatives that were considered in the DEIS/EIR. General Response 1.3 explains why Alternative L/C is not the preferred alternative for construction.

13 July 2002

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

Dear Ms Daniels and Ms MacKenzie

82-1 The population of Brooktrails, a Mendocino County Townwhip, is now about 3800 and INCREASING MONTHLY with new homes being built constantly. Before very long, the population of Brooktrails will exceed that of Willits. Our only road to Hiway 101 is Sherwood Road and it is now overstressed and dangerous. The County is being forced to build a second access soon. The Brooktrails Property Owners Association, Brooktrails Board of Directors and Mendocino County Supervisors have endorsed this second access to reach Hiway 101 via Wild Oat Canyon at the intersection known as the "Truck Scales".

82-2 Except for retired people like me, a very large percentage of Brooktrails residents commute to Ukiah and beyond since there is insufficient businesses in Willits to employ them. Also, a second access is absolutely necessary for safety and evacuation in case of a wild fire in the westerly forest. There have been years of investigation, nine to my knowledge, and public discourse, all resulting in the Wild Oat Canyon and Truck Scales intersection as being the very best alternative for Brooktrails. IN ADDITION, THE TRUCK SCALES INTERSECTION KEEPS DANGEROUS TRAFFIC AWAY FROM WILLITS HIGH SCHOOL, MAKING IT SAFER FOR OUR YOUNG STUDENTS; WHO, AS YOU WELL KNOW, NEVER CONCENTRATE ENOUGH ON TRAFFIC HAZARDS! Yet, you, Caltrans, appear to have placed insufficient weight on the SAFETY OF HIGH SCHOOL STUDENTS and the needs of Brooktrails by insisting on the "Quail Meadows Interchange" WHICH IS THE MORE HAZARDOUS TO WILLITS HIGH SCHOOL!

82-3 One of the reasons for your choice of the Quail Meadows Interchange refers to environmental aspects---BUT---you, Caltrans, appear to have not sufficiently considered the "WILLITS CREEK RESTORATION" proposal which reconnects Willits Creek with Outlet Creek thereby restoring the waterways to what nature made it before the railroad was built. This gives the fish their original natural bypass free of runoff from the freeway and free of sedimentation from construction and a cool, shaded habitat PLUS enhances the new Willits wastewater treatment plant which will expell only pure clean water using today's technology. Any wetlands impact and endangered plants problems can be solved with a mitigation bank.

82-4 Since the fish, wetlands and endangered plants environmental problems can be easily solved, IT IS MORE IMPORTANT TO NOT CREATE A PERMANENT HAZARD FOR WILLITS HIGH SCHOOL STUDENTS BY BUILDING THE QUAIL MEADOWS INTERCHANGE WHEN YOU CAN AVOID ALL THAT TROUBLE BY CREATING THE BYPASS USING ALTERNATIVE L UNTIL IT INTERSECTS ALTERNATIVE C, THEN ALTERNATIVE C TO THE TRUCK SCALES INTERCHANGE--WHICH HAS COME TO BE KNOWN AS "ELSIE".

"ELSIE" and the Truck Scales Interchange has been, FOR OVER THREE YEARS now, been the choice of the Brooktrails Property Owners Association, the Brooktrails Board of Directors, the Willits City Council AND the Mendocino County Supervisors---AND you, Caltrans have received mountains of letters to that effect; just ask your office in Eureka!

82-5 Comment noted. See responses to Comments 82-2 and 82-4. Caltrans and FHWA appreciate the public's comments on the DEIS/EIR and the proposed project. To keep the public informed about the project, newsletters are mailed periodically. Also, check the District 1 Willits Bypass website for project updates  
<http://www.dot.ca.gov/dist1/d1projects/willits/index.htm>. To be added to the project mailing list, contact John Bulinski, Project Manager at (707) 441-5729.

82-5

LETS KEEP IT SAFER FOR THE KIDS AT WILLITS HIGH WHILE AT THE SAME TIME MEETING THE NEEDS OF YOUR LOCAL CUSTOMERS BY BUILDING "ELSIE" AND THE TRUCK SCALES INTERCHANGE! (Please keep me informed of your actions.)

MOST EMPHATICALLY YOURS

*Arthur Eck*

Arthur Eck\*  
1623 Padula Drive  
Willits, CA 95490

Phone and FAX: 1-707-459-3911

\* Combat Veteran and Ex-Prisoner of War, World War II

Paid for life membership in:

American Ex-Prisoners of War  
Disabled American Veterans (rated 100% Service Connected Disabled)  
Veterans of Foreign Wars (elected Chaplain for 6 years)  
American Legion, Willits Post 174 (elected Chaplain for 4 years and elected Commander on 11 June 2002)

Block Captain, Neighborhood Watch

Adopt a Road (pick up trash about every 2 to 3 months over about 2.5 miles of neighborhood streets in Brooktrails)

Past Instructor for 6 years for AARP's 55ALIVE MATURE DRIVERS COURSE

Retired Aeronautical and Quality Control Engineer (BSAE and BSQC), retired from Lockheed Missiles and Space Company, now Lockheed Martin

P.S. IF YOU REALLY WANT TO "DO IT UP BROWN" YOU SHOULD EXTEND HIWAY 20 EAST THROUGH WILLITS TO THE BYPASS AND HAVE AN INTERCHANGE THERE; WHICH IS NO MORE THAN THE THREE INTERCHANGES YOU PROPERLY PROVIDED FOR CLOVERDALE (WILLITS IS AS LARGE AS OR LARGER THAN CLOVERDALE; MUCH LARGER WHEN YOU INCLUDE BROOKTRAILS AND PINE MOUNTAIN!).

cc: Maiser Khaled, Chief, District Operations

North Federal Highway Administrations

980 Ninth Street, Suite 400

Sacramento, CA 95814

**83 Amy and Neil Elliott**

83-1 See General Response 1.6 regarding Brooktrails Township second access road.

8-5-02

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

ATTN: Nancy Mackenzie, Environmental Coordinator  
916-274-5809

RE: **FIRE!**

We realize that you and your staff have a difficult job. At the public meeting (SRO) here, it became clear that--given the sheer volume of technical reports and public input involved--whatever you decide, you will be criticized. And you will probably weather most of the criticism. Except...

While we were meeting and while you have been deliberating, California was, and is, burning. Brooktrails, a community of over 6,000, has no escape route. The one narrow, curving, tree-and-brush-lined narrow road is frequently closed by landslides, sometimes blocked off by fallen utility poles. It absolutely cannot handle emergency vehicles and evacuation of residents.

Fortunately, there is a solution:

83-1

Instead of rejoining Hwy 101 north of Willits at the Quail Meadows interchange, build it at the Truck Scales, across Wild Oak Canyon, and build the needed emergency road already proposed from that point on 101 to Sherwood Road in Brooktrails

Sincerely,



Amy and Neil Elliott  
27981 Fox Road, Brooktrails  
Willits, CA 95490  
(707) 456-0601

copy to Maiser Khaled, Chief, District Operations,  
North Federal Highway Administration  
980 9th Street, Suite 400  
Sacramento, CA 95814 (916) 498-5020

## 84 Richard Estabrook

84-1 The letter refers to Mr. Estabrook's letter dated August 26, 2002, which he submitted as Willits Citizens for Good Planning. The letter is included under Agencies and Organizations, Letter #34. In response to Mr. Estabrook's Public Records Act request, Caltrans provided traffic volumes on the valley alternatives, an electronic copy of traffic volume calculations, and calculations supporting Caltrans' determination that a two-lane facility will not provide an acceptable level of service that meets the purpose and need for the project.

84-2 The Traffic Report does contain references to the process of forecasting the future traffic volumes for the Willits Bypass Alternatives. The distribution of future traffic to local streets and the bypass are extrapolated from data such as existing traffic counts, an origin and destination study, growth factors, linear regression, and modeling. This data is used to forecast future traffic volumes under "no-build" (e.g., no bypass) conditions and redistributed under "build" (e.g., with bypass) conditions. Stick diagrams of the traffic (roadway) network are created of the project area. The forecaster uses the stick diagrams to make sure that traffic flows balance between entry and exits points of the network, turn movements are reasonable in relation to traffic flows between origins and destinations, and local trips versus regional trips are accounted for in the process. Professional judgment is important part of the iterative process used to distribute traffic.

Draft traffic stick diagrams are then used as the basis for building micro-simulation traffic models (CORSIM) of each alternative. The models replicate vehicle behavior, traffic conditions, and traffic flows. Once again the forecaster/modeler iteratively checks the models and the simulation animation to validate the results. Adjustments are made to the draft stick diagrams where the model reveals issues of capacity or delay, which prevent vehicles from progressing efficiently in the network. The primary rule in distributing traffic in a network is that traffic will normally follow a path of least resistance and cost. Higher resistance equates to lower speeds and congestion. Higher cost means more time spent traveling in congested conditions. There are exceptions to the rule, but generally traffic will flow where speeds are higher and travel time less. In some cases, drivers will opt to take a longer route, even if it requires more travel time, if they can travel at higher speed under uncongested conditions. The volumes are adjusted in the models and simulations re-run and the results analyzed for reasonableness based on the inputs.

Richard Estabrook  
2026 Primrose Dr.  
Willits, CA 95490

September 3, 2002

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

Dear Ms. Daniels:

84-1

Although I am submitting this addendum to my comments on the Willits Bypass DEIS/DEIR after the August 26, 2002, deadline, I am asking that you still consider these comments. On June 30, 2002, I sent a letter to Caltrans that included a Public Records Act request and a request for a written explanation of how traffic volumes were calculated. While I received a partial response to my Public Records Act request on August 2, 2002, I did not receive the explanation of traffic volume calculations until August 29, 2002. The letter was dated August 27, 2002, one day after the close of the comment period. This letter contains new information that affects some of the comments I made previously, therefore, I am asking that you consider these comments. Specifically, I would ask that you replace my discussion regarding Page 3-24, Table 3-4, with the following discussion:

### Page 3-24, Table 3-4, "Traffic Volumes on U.S. 101"

Discussion: The Peak Hour traffic volumes shown in this table are not supported by the technical study called "Willits Bypass Traffic Study Report, November, 2000 (Traffic Report)". Nor are they supported by Excel spreadsheet I received as part of a Public Records Act request or a follow up letter from Caltrans, dated August 27, 2002. This discussion will only deal with alternatives CIT, LT, and JIT, as these are the only feasible alternatives. Also, this discussion will focus on the follow-up letter from Caltrans.

84-2

My first question is: Why didn't the Traffic Report contain a detailed discussion of how traffic volumes were obtained? Why did I have to go these lengths to obtain basic information which allows me, the public, to understand how you arrived at the numbers you did? A technical/engineering report is supposed to completely document the calculation procedures so that any person with a basic understanding of the subject matter, could reproduce the traffic volumes that you obtained. That way the public can critique and comment on the methodology used.

84-3

The August 27 letter does give some insight as to where some of the traffic volumes came from. It also raises some additional questions. It appears that the criteria used by Caltrans as to the amount of local traffic that would opt for the bypass instead of old U.S. 101, is time savings. In

The above discussion only cursorily addresses some of the steps used in creating traffic forecasts and modeling traffic networks. Forecasting is an analytical process rather than a purely quantitative process. It is not a process that can be easily replicated without the prerequisite knowledge and understanding of traffic flow theory, macro-and micro modeling logic, capacity analysis, land-use planning, driver behavior, and a multitude of other factors that can affect trip generation, trip distribution, and trip assignment.

84-3 In-town traffic was adjusted in the models based on the change in volumes for each alternative. Volumes on existing U.S. 101 do decline by about 100 vehicles per hour in each direction in 2028 Alternative C1T; however, cross traffic volumes and S.R. 20 volumes remain relatively constant. Average vehicle speed values are affected by factors other than traffic volumes such as traffic signal timing to accommodate cross traffic. Average speeds for each of the alternatives were derived from multiple CORSIM model runs. Each model run was based on a different random seed number that alters vehicle entry headways and progression into the traffic network. After multiple model runs there was no appreciable difference in average speeds on existing U.S. 101 between Baechtel and Sherwood for the C1T, J1T, and LT Alternatives in 2028, thus the travel times on Old U.S. 101 for all these alternatives in 2028 are reported as the same.

84-4 Traffic will follow a path of least resistance. The 48 vehicles will save time and avoid congestion in Downtown Willits. It is important to remember that this forecast is for the Year 2028. New development will occur in undeveloped portions of Willits south of S.R. 20.

84-3  
cont.

other words, if a driver in south Willits could get to a destination in north Willits more quickly by using the bypass, than by going down Main St., then that driver would opt for the quickest route, regardless of the extra distance involved. The same would apply to regional Sherwood Road traffic. They would opt for the bypass, even though they would have to "double back" to get to Sherwood Road, as long as it would offer some time savings. Apparently, Caltrans used their traffic simulation program, "CORSIM", to calculate time savings of the various route options.

My next question is: Was the in-town traffic adjusted in the CORSIM modeling, as a result of more traffic (or less) using the bypass instead of old 101? It does not appear that was case based on Attachment 1 of the August 27, letter. For example, in giving time comparisons between old 101, Alternative C1T, and Alternatives J1T/LT, Attachment 1 uses the same travel time for old 101 in both cases. If the different in-town traffic volumes were taken into consideration in the CORSIM modeling, there should be different in-town travel times depending on whether alternative C1T was being modeled, or J1T/LT were being modeled. Because alternative J1T/LT theoretically attracts more local traffic, then there is a corresponding drop in traffic going through town, allowing less intersection delay. In fact, the Traffic Report indicates that there is 200 vph drop in traffic at the Hwy 20 intersection for alternatives J1T/LT as compared to alternative C1T. It does not appear that this was taken into account.

For example, in Attachment 1, the same "Old US 101" travel time between Upper Haehl Creek Interchange and Sherwood Road (8.61 minutes) is used for all bypass time savings calculations. In reality, the time it takes to go from the Upper Haehl Creek interchange to Sherwood Road, via Old US 101, should be longer for alternative C1T, because alternative C1T does not attract as much local traffic, thereby keeping more local traffic in-town and causing additional intersection delays.

#### Northbound Traffic - C1T

84-4

Now, referring to Figures 1 and 2 of the August 27, letter (enclosed), it appears that the northbound bypass traffic consists of 546 vph that is generated from traffic approaching Willits from the south, and 104 vph from local traffic "doubling back" to the Haehl Creek interchange to go north. The table on the right side of Figure 2 quantifies the origins and destinations of the drivers. According to this table, 33.0% (383 vph) of the northbound traffic approaching Willits is destined for points north of Willits. This figure is supported by the Origin/Destination study done in 1998, and I accept this conclusion.

The next row states that 6.5% (48 vph) of the traffic is local traffic "doubling back" to the Haehl Creek interchange from somewhere in Willits, with destinations north of Willits. What data is this based on? According to Attachment 1 in the August 27 letter, there is only a 1.09 - 1.36 minute time savings using the bypass, between Baechtel Road (south) and the northern interchange. Unfortunately, other points within Willits were not quantified, however, it is obvious that anyone originating from north of Highway 20, would not realize any time savings using the bypass in this manner, and would still opt for Main St. Please explain how you arrived at 48 vph using the bypass under this scenario.

84-5 See General Response 1.8 regarding traffic operations with Quail Meadows Interchange.

84-6 Under existing conditions the assertion may have some validity; however, based on the available vacant land and Willits General Plan designations, in the future (2028) additional development will occur at and south of Baechtel Road. Trips generated at this location would save time by using the bypass.

84-7 In the future (2028), based on the available vacant land and Willits General Plan designations, additional development will occur in north Willits that will attract/generate vehicle trips that will use the bypass.

84-8 Caltrans' experience has shown that a small percentage of trips will use a bypass, even if it is longer and takes more time, just to avoid congestion and slow moving traffic on local streets.

84-5

The next row indicates that 7.5% (87 vph) of the northbound traffic has a destination of Sherwood Road. Attachment 1 of the August 27 letter, makes the case that the CORSIM modeling shows that traffic destined for Sherwood road would have a 1.4 minute savings with the Truck Scales interchange, and a 3.9 to 4.1 minute savings with the Quail Meadows interchange. However, does the CORSIM modeling calculate the time it takes to get to Sherwood Road, or does it calculate the time it takes to get on Sherwood Road? There is a big difference. When turning left onto Sherwood Road from Main St., the geometry of the intersection is relatively standard, and an ideal saturation flowrate ( $s_i$ ) of 1900 pcp/hpl (passenger cars per hour of green time per lane) times the standard Left Turn Factor ( $F_{LT}$ ) of 0.95 can be approached, for a total volume of 1805 vehicles per hour per effective green time (vphg). I have actually confirmed a slightly lower number, around 1500 pcp/hpl, from personal observations of traffic flow at this intersection. However, turning right onto Sherwood Road is another matter. The geometry of this turning movement requires a very sharp, near-180° climbing turn. Vehicles must slow to a near-stop to make this turn, and even then most larger vehicles end up in the opposing traffic lane. Most vehicles also block the entire south-bound lane by trying to "swing wide" to make the turn. Since there is no right-turn lane, the saturation flow rate in the south bound direction may be as low as 400-500 pcp/hpl. Since there are so few vehicles making this turn at the present time, I was not able to make any meaningful observations. The Sherwood Road/Hwy 101 intersection will fall to Level of Service E or F quickly as more and more cars try to access Sherwood Road from the bypass. As a result, any time savings realized by using the bypass will quickly disappear as more and more vehicles opt for the bypass. Was this considered in your analysis?

84-6

The next row indicates that 3.6% (27 vph) of the northbound traffic is comprised of drivers in Willits, doubling back to the Haehl Creek interchange to access Sherwood Road. However, Attachment 1 shows that there is no time savings to be gained for anyone originating north of Baechtel Road with a destination of Sherwood Road. Since there are essentially no businesses south of Baechtel Road, this volume should be 0 vph for all bypass alternatives.

84-7

The next row indicates that 6.5% (75 vph) of the northbound traffic is local residents that have destinations presumably towards the north end of Willits, but not Sherwood Road. Interestingly, this is almost as many cars that are predicted to access Sherwood Road using the bypass. However, any time savings realized by drivers accessing Sherwood Road will be quickly lost as you move to destinations south of Sherwood Road. It is doubtful that drivers with destinations south of Commercial would use the northern interchange to go, or come from, the south. Sherwood Road serves a population of roughly 4000 residents, and the Willits population that access their residences via commercial street is less than 1000 people. Therefore, I would expect that this category of bypass users would be less than 1/4 that of people using the bypass to access Sherwood Road. For alternative C1T, this number should be 25% of 87, or 22 vph. For bypass alternatives JIT and LT, the percentage could approach 33% of the Sherwood Road traffic, since the time savings may extend slightly further south than for alternative C1T.

84-8

The final row indicates that 4.1% (30 vph) of the northbound bypass traffic is local traffic that originates north of Baechtel (presumably) and has destination south of Sherwood Road. Once again, Attachment 1 shows that no time savings would be realized by drivers doing this, so there should be 0 vph shown in this cell.

84-9 Regarding southbound distribution of traffic for Alternative C1T in 2028, timesaving is the primary factor used in the distribution, but it is not the only factor. Driver preference and comfort must also be considered. There is only one case cited where drivers will not save time by using the bypass. In that one case, experience has shown that a small percentage of drivers will opt to use a bypass even if it take longer and is further if they can avoid congestion.

84-9

In conclusion, the amount of northbound bypass traffic for alternative C1T, that can be technically defended is, at most, 540 vph, not 650 vph.

#### Southbound Traffic - C1T

Southbound traffic is a little more difficult to quantify because the August 27 letter did not go into any detail with the southbound traffic. I will try to reconstruct the thought process using the "time savings" logic that Caltrans used.

First, the Origin Destination study identified that 59% of the southbound traffic approaching Willits has destinations to the south of Willits, so we can conservatively assume that all of this traffic will opt for the bypass upon reaching the Truck Scales Interchange. Since the total southbound traffic is 570 vph, this puts 336 vph on the bypass.

There could also be some southbound traffic that has destinations in south Willits and will opt to use the bypass instead of going through town. As stated above, the time savings gained by doing this is only 1.09 - 1.36 minutes according to the northbound figures. The biggest delay for northbound traffic is the Hwy 20 intersection, which is not a big delay for the southbound traffic because 1) there is less south bound traffic at the pm peak hour, and 2) there are 2 southbound lanes going through the traffic light. However, even assuming that the percentage is the same as the northbound traffic (6.5%) this adds an additional 31 vph to the southbound bypass.

The next category would be cars turning left from Sherwood Road to access the bypass to get to points south of Willits. According to the Willits Traffic Report, 28% of the southbound Sherwood Road traffic has destinations south of Willits. In the year 2028, this amounts to 82 vph. However, for the northbound traffic using the bypass to access Sherwood Road, it was assumed that only 7.5% (out of a total of 18%) of the traffic would opt for the bypass. Using the same ratio would put an additional 34 vph on the bypass from Sherwood Road.

The next category are vehicles originating from the Sherwood Road and using the bypass to get to points in south Willits. Since Attachment 1 shows no time savings to be realized by doing this, the volume would be zero.

The next category are vehicles in north Willits using the bypass to go to destinations south of Willits. Again, this could be estimated as a percentage of Sherwood Road traffic doing the same thing. For alternative C1T, this would be 25% of 34 vph, or 9 vph.

The final category are vehicles originating in north Willits, using the bypass to get to destinations in south Willits. Since Attachment 1 shows no time savings to be achieved by doing this, the volume should be zero.

In conclusion, the total southbound bypass traffic should be 410 vph, for a total volume on alternative C1T of no more than 950 vph.

#### Alternatives J1T and L1T

84-10 The comment proposes an alternative calculation of both northbound and southbound peak hour traffic volumes for Alternatives C1T, J1T and LT. However, the traffic volumes contained in the Willits Traffic Study and DEIS/EIR are supported by the time savings data and the method described in this report and no changes are proposed.

84-11 The comment proposes a change in the traffic volumes listed in Table 3-4 of the DEIS/EIR. The data contained in the Willits Traffic Study and the data previously provided to the author of this letter (Figure 84-1, letter sent by District 1 Director, Rick Knapp to R. Estabrook dated August 26, 2002) supports the traffic volumes used in the DEIS/EIR traffic analysis. Additional data included in Figure 84-2 also supports the traffic volumes presented in the DEIS/EIR.

84-10

Although I don't have a detailed breakdown of traffic volumes for these alternatives, I can use the same "time savings" logic as Caltrans did to estimate peak hour bypass volumes for these alternatives. I will make the following assumptions:

- All Sherwood Road traffic with destinations/origins south of Willits will use the bypass
- The amount of "north end" Willits traffic with destinations/origins south of Willits who will use the bypass, will be 33% of the Sherwood Road traffic doing the same.
- Regional traffic per the Origin/Destination study
- The amount of south Willits traffic back tracking to the Haehl Creek interchange with destinations north of Willits, will be 6.5% (48 vph) of total traffic going south on old 101 south of town.

84-11

Using these assumptions give a maximum northbound bypass traffic (peak hour) of 710 vph, and a maximum southbound volume of 480 vph, for a total volume of 1190 vph. The defensible traffic volumes for Table 3-4 are as follows:

Alternative	Traffic Volumes					
	Peak Hour (vph)			Annual Average Daily Traffic (vpd)		
	1998	2008	2028	1998	2008	2028
C1T		760	950		10,130	12,690
J1T		950	1,190		12,690	15,870
LT		950	1,190		12,690	15,870

As a result of the new information provided me in the August 27 letter, I am also revising several of my Level of Service figures I originally submitted as "Appendix 9". Using the data from the above Table, all three alternatives will operate at LOS "D" in the year 2028, not LOS "E", and certainly not "functionally obsolete" as stated in the EIS/EIR.



Figure 84-1

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 1, P.O. BOX 3700  
EUREKA, CA 95502-3700  
TTY Phone (707) 445-6463  
Phone: (707) 445-6445  
Fax: (707) 445-6314



August 26, 2002

Mr. Richard Estabrook  
2026 Primrose Drive  
Willits, CA 95490

Re: Public Records Act Request Follow-up

Dear Mr. Estabrook:

In our letter dated August 1, 2002, our office stated we would prepare a response to your questions regarding traffic volumes on the Willits Bypass. This response letter addresses your questions and explains the methodology used to forecast the 2028 bypass traffic volumes for alternatives C1T, LT, and JT. This letter also gives several examples to further clarify the results of the study.

Your letter asks for clarification of the traffic volumes on Alternative C1T (Willits Bypass, Draft EIR/EIS, Figure 12, Alt. C1T, 2028) and asks why the volumes do not appear to conform with the results of the Origin and Destination (O/D) Study (Willits Traffic Study, Table 5). Your letter stated that, in your opinion, the Alternative C1T northbound bypass volumes should be 383 vph, yet Figure 12 shows 650 vph. You asked us to account for the extra 267 vph. You also questioned the southbound bypass volumes and the bypass volumes for alternatives JT and LT. You expressed that the "extra" traffic on the bypass alternatives appears to be inconsistent with the growth factors that were used to forecast the traffic volumes.

Methodology

Origin and Destination Studies and Growth Factors are valid tools to estimate future origin (entry) and destination (exit) volumes, but they cannot generally be used to estimate individual link (roadway) volumes. The C1T Alternative route provides a new and different path between origins and destinations. In the 1998 O/D Study there is only one path (existing US 101) between South Willits and North Willits. Consequently, in developing traffic forecasts for these two paths, a growth factor was applied to the entry volumes and then the traffic was distributed to the different paths a vehicle can take using trip time estimates and professional judgement.

In the case of the 2028 C1T Alternative, a 1.59 growth factor was applied to the base year northbound entry volume of 730, which equated to a volume of 1160 vehicles. Those 1160 vph were then distributed to the different paths to reach their destination(s). Our traffic study projected that 650 vph will use the Alternative

Estabrook  
 August 26, 2002  
 Page 2

C1T bypass in the year 2028. The example in the next paragraphs shows how this estimate was derived.

The following figures graphically represent Alternative C1T in 2028 and the northbound bypass traffic distribution. The diagram in Figure 1 illustrates the overall traffic flow on C1T and old US 101. Figure 2 is a flow chart detailing the traffic distribution on C1T.

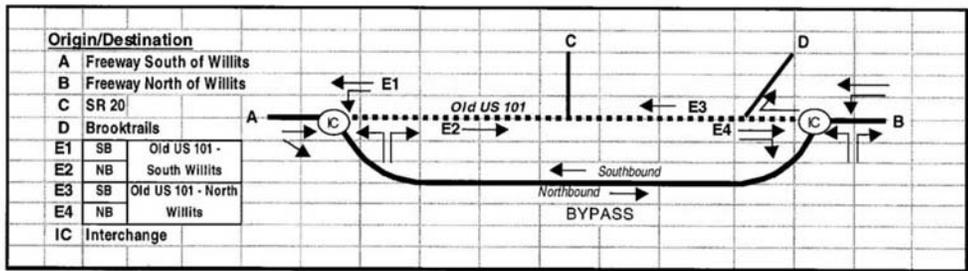


Figure 1. Diagram representing 2028 traffic flow on C1T Northbound bypass.

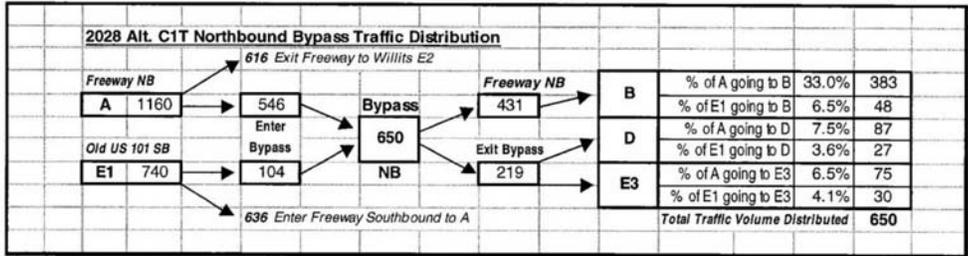


Figure 2. Flow chart of traffic distribution on C1T Northbound bypass in 2028.

Follow the arrows on Figure 2 to trace how we account for the 267 trips. Start with the origin box labeled "A," with 1160 vph traveling north on the US 101 freeway entering the Little Lake Valley. 616 vehicles exit the freeway at the Upper Haehl Interchange to northbound old US 101 and 546 continue on north along bypass Alternative C1T. Find the origin box labeled "E1," southbound old US 101 and note that 740 vehicles enter the freeway at the Upper Haehl Interchange from old US 101 southbound with 636 traveling south and 104 traveling north along the bypass. Add the initial 546 vehicles traveling north on the bypass with the 104 vehicles that entered the freeway northbound. The sum total of vehicles on the bypass equals 650.

Those 650 vehicles travel north on the bypass to the Truck Scales Interchange. At the Interchange, 219 vehicles exit and 431 vehicles continue north on US 101. The

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O/D Study indicates that 33% of the vehicles entering from the south are through trips. Thirty-three percent of the initial 1160 equals 383 vph, yet there are 431 vehicles, or 48 more vehicles traveling through northbound at the Truck Scales Interchange.

Those 48 vehicles originated at "E1" in South Willits with a destination north of the exit point labeled "B" on Figure 1. The vehicles that originated at "E1," travel southbound on old US 101, get on the freeway bypass northbound at the Upper Haehl Interchange, and travel on the bypass to destination "B," because this driving choice is faster than traveling north through Willits on old US 101 to "B." At the Truck Scales Interchange, 219 northbound vehicles exit and travel southbound on old US 101 to destinations "E3" (North Willits) and "D" (Brooktrails). Those 219 vehicles originated south of Willits at "A" and in South Willits at "E1." By adding the additional 48 through trips described above to the 219 exiting trips, we achieve a result of 267 vph.

Based on this methodology, the answer to your questions is that local trips will use bypass Alternative C1T because it will be quicker and less congested than using old US 101. The example, as shown in Figure 2, holds true for Alternative JT and LT as well. The number of local trips on those bypass alternatives will be greater because the timesavings will be greater when the northern interchange is located at Quail Meadows rather than at the Truck Scales.

#### Time Savings Examples

There will be considerable timesavings and speed improvements for vehicles using the Bypass. The following examples are taken from data generated by the CORSIM Model for traffic in 2028 (see Attachment 1). A northbound driver exiting the new US 101 at the Upper Haehl Creek Interchange and traveling north on old US 101 with a destination of Sherwood Road will travel at an average speed of 23 mph reaching their destination in 8.61 minutes. That same driver, utilizing bypass Alternative C1T, exiting at the Truck Scales Interchange and doubling back on old US 101, will reach Sherwood Road in 7.21 minutes while traveling at an average speed of 58 mph. Utilizing bypass Alternative C1T will save the driver 1.4 minutes.

The same will be true for bypass Alternatives JT and LT, except that the timesavings will be even more dramatic. Traveling from the Upper Haehl Creek Interchange and doubling back on old US 101 to Sherwood Road on bypass Alternative JT will save 4.1 minutes. Taking this same route on bypass Alternative LT will save 3.91 minutes. A substantial portion of the traffic with destinations in Willits, regardless of where they originate, will choose the uncongested path that is quicker--even if it requires traveling farther. This is consistent with conclusions from travel demand models.

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The same rationale will hold true for trips traveling in the southbound direction. Trips originating north of Willits, with destinations in southern Willits, will save time by traveling south on the bypass to the Upper Haehl Interchange and doubling back on old US 101. While these trips will be longer in distance traveled, they will avoid congested local streets and will be faster, thus saving time.

Only one example on Attachment 1 shows a lack of timesavings. The example is a direct trip on old US 101 between Baechtel Road and Sherwood Road. That trip will be quicker to use old US 101 rather than the bypass. Accordingly, most local traffic north of Baechtel Road and south of Sherwood Road will not utilize the bypass alternatives. However, some trips with origins and destinations in close proximity to Baechtel and Sherwood may choose to utilize the bypass because of the free flowing travel conditions it will provide.

Thank you for your interest in the projected Willits Bypass traffic volumes. In addition to improving safety, one goal of creating an alternate bypass route around a community is to improve the speed and efficiency of inter-regional traffic. Improved speed and travel times are an important criteria for creating any bypass. In this instance, an added benefit will be created for local traffic, which will utilize the bypass to avoid congestion in the community. The benefits for both local and interregional traffic will combine to reduce air pollution, decrease costs, and save time.

I believe this response completes your request.

Sincerely,

RICK KNAPP  
District Director

Enclosure: Attachment 1

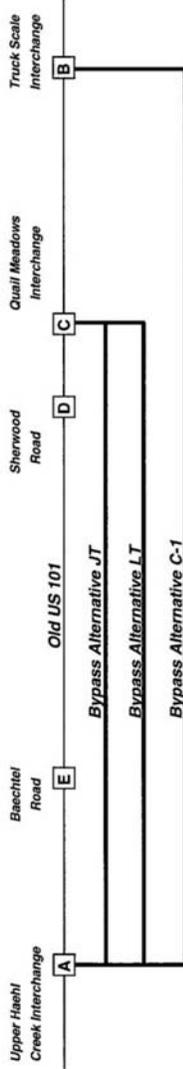
c: Lena Ashley, Project Manager  
Cher Daniels, Environmental  
Andrew Streng, District 3 Claims  
Tim Fisher, Administration  
Bill Davis/Dennis Azevedo, Office of Travel Forecasting and Traffic Modeling

Figure 84-1, continued

WILLITS BYPASS

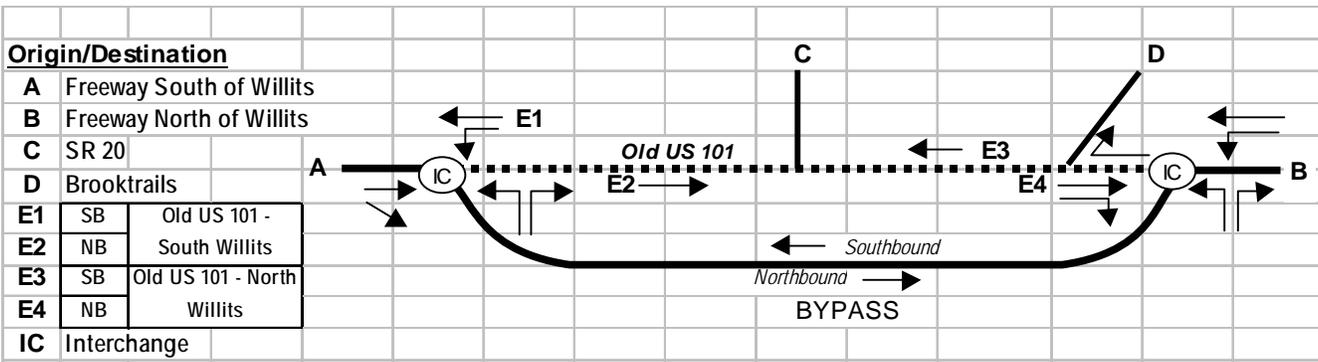
Bypass Alternatives C1T, JT, and LT  
Time Savings Comparison - Year 2028

ATTACHMENT 1



Origin	Node to Node	Destination	Trip Route	Direction	Total		Avg. Speed	Travel Time	
					Miles	MPH		Seconds	Minutes
Upper Haehl Interchange	A B	Truck Scale Interchange	Via Old US 101	NB	5.01	28	681	10:85	
			Via Bypass Alternative C-1	NB	5.30	64	298	4:97	
Time Saved Using Bypass Alt. CT									
Upper Haehl Interchange	A C	Quail Meadows Interchange	Via Old US 101	NB	3.90	25	568	9:47	
			Via Bypass Alternative JT	NB	3.90	64	219	3:66	
			Via Bypass Alternative LT	NB	4.10	64	231	3:84	
			Time Saved Using Bypass Alt. JT			349	5:81		
Time Saved Using Bypass Alt. LT									
Upper Haehl Interchange	A D	Sherwood	Via Old US 101	NB	3.33	23	517	8:61	
			Via Bypass Alternative C-1	NB/SB	6.98	58	433	7:21	
			Via Bypass Alternative JT	NB/SB	4.47	59	271	4:51	
			Via Bypass Alternative LT	NB/SB	4.67	60	282	4:70	
Time Saved Using Bypass Alt. CT									
Truck Scale Interchange	B E	Baechtel	Via Old US 101	SB	3.69	26	515	8:59	
			Via Bypass Alternative C-1	SB/NB	6.62	55	434	7:23	
Time Saved Using Bypass Alt. JT									
Quail Meadows Interchange	C E	Baechtel	Via Old US 101	SB	2.58	22	432	7:20	
			Via Bypass Alternative JT	SB/NB	5.22	53	355	5:92	
			Via Bypass Alternative LT	SB/NB	5.42	53	366	6:11	
			Time Saved Using Bypass Alt. JT			77	1:28		
Time Saved Using Bypass Alt. LT									
Baechtel	E D	Sherwood	Via Old US 101	NB/SB	2.01	19	391	6:35	
			Via Bypass Alternative C-1	NB/SB	6.30	54	568	9:47	
			Via Bypass Alternative JT	NB/SB	5.79	53	406	6:77	
			Via Bypass Alternative LT	NB/SB	5.99	53	418	6:96	
Time Lost Using Bypass Alt. CT									
Time Lost Using Bypass Alt. JT									
Time Lost Using Bypass Alt. LT									
								37	0:61

Figure 84-2



**2028 Alt. C1T Northbound Bypass Traffic Distribution**

		616 Exit Freeway to Willits E2								
Freeway NB	A	1160	546	Bypass	650	Freeway NB	B	% of A going to B	33.0%	383
						431		D	% of E1 going to B	6.5%
Old US 101 SB	E1	740	104	NB	219	Exit Bypass	E3	% of A going to D	7.5%	87
								% of E1 going to D	3.6%	27
								% of A going to E3	6.5%	75
								% of E1 going to E3	4.1%	30
								<b>Total Traffic Volume Distributed</b>		<b>650</b>
								636 Enter Freeway Southbound to A		

**2028 Alt. JT & LT Northbound Bypass Traffic Distribution**

		523 Exit Freeway to Willits E2								
Freeway NB	A	1160	640	Bypass	750	Freeway NB	B	% of A going to B	33.0%	383
						406		D	% of E1 going to B	3.4%
Old US 101 SB	E1	685	110	NB	344	Exit Bypass	E3	% of A going to D	12.1%	140
								% of E1 going to D	11.1%	76
								% of A going to E3	7.8%	90
								% of E1 going to E3	5.5%	38
								<b>Total Traffic Volume Distributed</b>		<b>750</b>
								575 Enter Freeway Southbound to A		

**2028 Alt. C1T Southbound Bypass Traffic Distribution**

		185 Exit Freeway to Willits E3								
Freeway SB	B	574	389	Bypass	500	Freeway SB	A	% of B going to A	59.9%	344
						394		D	Southbound US 101 traffic will not use Bypass to get to destination "D"	-
Old US 101 NB	*E4	518	111	SB	106	Exit Bypass	E2	% of B going to E2	17.4%	100
								% of E4 going to E2	1.2%	6
								<b>Total Traffic Volume Distributed</b>		<b>500</b>
								406 Enter Freeway Northbound to B		

**2028 Alt. JT & LT Southbound Bypass Traffic Distribution**

		195 Exit Freeway to Willits E3								
Freeway SB	B	570	389	Bypass	600	Freeway SB	A	% of B going to A	60.0%	342
						475		D	Southbound US 101 traffic will not use Bypass to get to destination "D"	-
Old US 101 NB	*E4	652	228	SB	125	Exit Bypass	E2	% of B going to E2	14.9%	85
								% of E4 going to E2	6.1%	40
								<b>Total Traffic Volume Distributed</b>		<b>600</b>
								434 Enter Freeway Northbound to B		

\* E4 - Traffic includes trips originating at D

