

135 Linda MacDonald

135-1

Bullet #1: Any of the bypass alternatives would remove traffic from Main Street and reduce congestion in Willits. Without the bypass, bi-directional traffic volumes on Main Street would increase to 2,474 vehicles per hour in the peak hour. With a bypass, traffic is reduced on Main Street by 772 vehicles per hour. This reduction substantially improves traffic conditions on Main Street.

Bullet #2: Caltrans will investigate the use of quiet-pavement technologies, such as open-graded asphalt.

Bullet #3: General Response 1.9 discusses why a center valley interchange is beyond the scope of this project. None of the valley alternatives would prohibit construction of a future center valley interchange.

Bullet #4: Modified Alternative J1T is identified as the Least Environmentally Damaging Practicable Alternative (Chapter 2, FEIS/EIR). This alternative minimizes wetland impacts while avoiding the large oak riparian forest, the business park, and the park recreation complex. Appendix A (FEIS/EIR) includes mitigation measures proposed for Modified Alternative J1T. The USFWS and NOAA Fisheries Biological Opinions (Appendix D, FEIS/EIR) include minimization measures in their terms and conditions. The Conceptual Mitigation Plan (Appendix L, FEIS/EIR) presents a conceptual plan of how the project will mitigate for impacts to the valley.

Bullet #5: Caltrans traffic analyses have concluded that a two-lane alternative would not meet the purpose and need for the project (see General Response 1.10).

Bullet #6: Modified Alternative J1T has been identified as the Preferred Alternative (see Chapter 2 of FEIS/EIR, and General Response 1.3). Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria and, therefore, will not be considered for construction. Alternative L/C would result in severe overall environmental harm. Along with Alternative C1T, this alternative has the greatest direct impact to jurisdictional wetlands and other waters of the U.S., and the extensive creek realignment required for this alternative would result in adverse impacts to habitat of three federally listed fish species, including critical and essential habitat of federally listed fish species.

Bullet #7: See General Response 1.4 regarding Willits Creek restoration.



Linda MacDonald
191 Wood St., Willits, CA 95490
(707) 459-4563
linda@lindamacdonald.com
www.lindamacdonald.com

August 6, 2002

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

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

Dear Ms. Daniels and Mr. Khaled:

My family and I are long-time residents of Willits and Mendocino County (31 years) and reside just two blocks from Main St./Hwy 101 in downtown Willits. I am a retired teacher from the Willits Unified School District and my husband is currently a full-time Mendocino College teacher. Our children have grown up in this community and we are here for the long haul. We have gone to meetings about the highway bypass, read articles in The Willits News, and gone to Caltrans meetings. We want a quiet town, a town that is not a tourist destination, and we want a livable and walkable small community.

135-1

We have reviewed the Draft EIS/EIR for the Willits Bypass and this is what is important to us and what we hope you will consider when making decisions:

- To lessen as much traffic on Main St. as possible.
- To lessen as much noise from the new highway as possible.
- To create a through turnoff to Highway 20 from East Hill Rd. (I realize that the more direct route of Blossom St. to Hwy. 20 is not possible due to the height needed to cross a creek and the railroad.) We are against a turnoff onto Commercial St. as detrimental to the old part of town.
- To disturb the valley as little as possible and use the least amount of acreage.
- To consider a 2-lane bypass.
- We support L and C, named Elsie.
- We support the Willits Creek restoration.

Thank you for your attention and interest.

Sincerely,

136 Andy Mackey

136-1 Under the No Build condition, congested traffic conditions on Main Street/U.S. 101 would continue to worsen. General Response 1.10 explains why a two-lane bypass does not meet the purpose and need for the project.

136-2 Modified Alternative J1T was identified as the LEDPA because it would minimize impacts to wetlands while avoiding the large oak riparian woodland, the business park, and the park/museum complex. Regarding work in streams, see response to Comment 8-5 (RWQCB).

136-3 Comment noted.

8/22/02 436
CHER DANIELS, Chief
Caltrans
Sacramento
Attn: Nancy MacKenzie, Enviro Coordinator

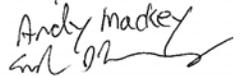
Dear Ms. Daniels,

136-1 Please give serious consideration to a much smaller Willits By-pass or no by-pass at all. It seems from Caltrans' own studies that the majority of Willits' traffic is local. Once I get north of the high school, there is never any traffic. A two lane By-pass would be more than enough if you have to build something. But please don't cut or impact the oak woodlands or rechannel any streams. This isn't what we want or need in Willits.

136-2 I believe that California is about to move away from Freeways and into more efficient and clean forms of public transportation. Please don't sacrifice this beautiful northern Valley to a soon to be obsolete dinosaur technology.

42265 Little Lake
Mendocino, CA 95460

Thank you for considering
the public you serve,

Andy Mackey


137 Lynne and Keith Matheny

137-1 Any of the proposed bypass alternatives would reduce traffic congestion on Main Street because interregional traffic will be removed from local city streets creating less overall demand of the local infrastructure. Also, some local traffic will opt to take the bypass even if it requires slightly more travel time, to travel at a higher speed under uncongested conditions.

Regarding traffic noise, while noise is an unavoidable occurrence with the construction of any of the alternatives, it is not considered significant under either CEQA or NEPA guidelines.

Regarding the appearance 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 same or 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.

Regarding the project's impact on local businesses, see response to Comment 34-48 (Willits Citizens for Good Planning).

Any of the proposed alternatives would accommodate a Brooktrails second access road (General Response 1.6).

137-2 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. See responses to Comments 73-5 (Mary Delaney) and 22-3 (Mendocino County Farm Bureau). 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.

137-3 Modified Alternative J1T has been identified as the Preferred Alternative. Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species (General Response 1.3). The Brooktrails Township CSD has stated that Modified Alternative J1T would accommodate a connection for the community's second access road (General Response 1.6).

August 22, 2002

Dear Caltrans:

As a Willits resident, I have been following the bypass saga for many years. When I moved here 30 years ago, it was being talked about. Now, apparently, it's really going to be built. My husband and I wonder if our input will do any good, but here it is.

137-1 We would like to see the traffic congestion in town alleviated. The backup between the light at Main and Commercial as far south as Taco Bell is atrocious at many times of the day. Like others, we are concerned about traffic noise that a large bypass would bring and the appearance of such a structure on our rural landscape, not to mention the detriment to our town businesses, which have enough trouble making a go of it as it is. We are also concerned about our neighbors in Brooktrails who have only one exit from that area, Sherwood Road.

137-2 Therefore, we strongly urge you to consider a two-lane bypass, which would be safer, quieter and cheaper (\$70 million less, I've read), and would serve our needs for the next 100 years, according to one of your own studies made in 1999, while allowing for a Highway 20 interchange. Being a smaller "production," it would make a lesser impact on the visual beauty of the area and take up less farmland.

137-3 We are impressed by the ELSIE route and are only sorry it hadn't been thought of earlier. As a public agency, it would seem that you would feel obligated to serve the public in every way possible, and the combination L and C routes for the bypass would also serve the citizens of Brooktrails and perhaps one day save many lives.

137-4 We would also like to see you incorporate a way for travelers to exit into our town when they want to use our motels and restaurants and shop here, without making it necessary for them to travel all the way into town via an exit to the south or north and down Main Street. It is our understanding that your latest choice of routes will not mitigate the traffic problems in the Highway 20 and Safeway areas at all. If not, why build it at all?

137-5 Please try to put yourselves in our places. We live here because we want to be in a quiet rural area without traffic noise and congestion like you have in Sacramento. We want a way to alleviate traffic congestion with a minimum of noise and damage to our rural beauty. Please consider the L and C routes combination and the two-lane bypass option and a Highway 20 interchange.

Lynne & Keith Matheny
221 E. Valley St.
Willits CA 95490



137-4 General Response 1.9 explains why center valley interchange is beyond the scope of the proposed project. See response to Comment 137-1 regarding traffic congestion.

137-5 The proposed project will reduce traffic noise and congestion on Main Street in Willits. Please see responses to Comments 137-1 through 137-4.

138 Boyd Mathias

138-1 The comment is correct that stop-and-go-traffic degrades air quality. See response to Comment 139-3 (Karina McAbee

138-2 Modified Alternative J1T has been identified as the Preferred Alternative. Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species (General Response 1.3). See Section 1.2 (FEIS/EIR) for the current project schedule.

08/23/2002

Please get the by-pass.

138-1 Please get the bypass. Some of the environmentalists ignore the air quality degradation of trucks and autos in their stop-and-go through Willits.

138-2 I vote for the LC combination, soon. It has been too long already.

Boyd Mathias

139 Karina McAbee

139-1 Item 1: The noise levels will increase throughout the valley as a result of the bypass. Noise abatement was considered at all locations and is under consideration where it is feasible and reasonable. Page 5-140 (DEIS/EIR) discusses the long-term noise impacts associated with each alternative.

139-2 Item 2: The DEIS/EIR does not say that visual impacts are insignificant. Section 5.10 (DEIS/EIR) discusses whether the visual quality of any particular viewshed will remain low, medium, or high with construction of each alternative. Table 5-31 (DEIS/EIR) states the CEQA level of impact for visual resources as less than significant *after* implementing the mitigation measures. With the exception of Alternative E3, which requires the most earthwork of all the build 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 same or similar visual impacts. Additionally, the visual impacts of the current congested highway along with more future congestion were weighed against the visual impacts of the proposed project.

139-3 Item 3: Car engines run more efficiently at higher speeds, and a car traveling at a higher speed emits less pollution than a car traveling at a lower speed. This is evident in the results of running the Air Resources Board Emission Factor (EMFAC7F1.1) Program. A car traveling at 55 miles per hour (mph) emits 2.91 grams of Carbon Monoxide (CO) per mile as opposed to a car traveling at 45 mph which emits 3.30 grams of CO per mile (Condition: 45 degrees Fahrenheit). The Willits bypass would reduce the amount of stop-and-go traffic through town and allow the traffic to flow unimpeded and at a higher rate of speed. See also, FEIS/EIR Section 3.12.

139-4 Item 4: Regarding feasibility of mitigation measures FRM-1 and FRM-3, please see responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning).

139-5 Item 5: Modified Alternative J1T was developed, in part, to minimize impacts to the riparian oak woodland referenced in the comment. Caltrans will avoid oaks to the extent possible. Caltrans will consult with resources agencies to develop a mitigation plan that will maximize the potential for successful re-establishment of impacted oak trees. See responses to Comments 26-3 (California Oak Foundation) and 27-3 (California Native Plant Society). See also, Conceptual Mitigation Plan (FEIS/EIR, Appendix L).

139-6 Item 6: Subsequent to public circulation of the DEIS/EIR, USFWS determined that Oil Well Hill is foraging habitat only, not nesting habitat, for Northern spotted owl. The reader will note that Oil Well Hill is not old growth forest and was not identified as such in the DEIS/EIR. The area consists primarily of young to mature pine and madrone trees with some mature Douglas fir. Caltrans will comply with the terms and conditions of the USFWS Biological Opinion regarding Northern spotted owl (FEIS/EIR, Appendix D).

01 11

July 24, 2002
To: Cal Trans
Re: Bypass EIR

I have lived in Willits since 1983, attracted, in part, by the peaceful, quiet beauty of the valley and mountains around us. The building of a freeway will have a great impact on us all.

If the purpose of the Bypass EIR is to identify the significant environmental impacts, then this EIR has failed to do so. Some of the significant impacts not listed in the EIR include:

139-1 1. Noise - automobiles driving 70 mph through the middle of the valley will increase noise pollution over 400% throughout the valley floor and the surrounding mountains. Yet without any mitigation, noise is not included in the list of impacts.

139-2 2. Visual impact - Planting trees will help some - but not enough to reduce the visual impact to insignificance.

139-3 3. Pollution - Higher speeds will also increase the amount of air pollution, which will aggravate the effects of the inversion layer on ~~the~~ sensitive individuals, and also pollute the farmlands throughout the valley.

139-4 4. Loss of Farmlands was glossed over with an impossible "mitigation."

139-5 5. Loss of trees - Cal Trans will plant acorns for every tree removed? This is not an acceptable mitigation.

139-6 6. Oil Well Hill - This "borrow site" will then be turned into an old growth forest for spotted owls - 150 years from now?

139-7 Aside from the environmental impacts, all the valley routes fail to address the traffic flow on Highway 20. All Hwy 20 traffic will still have to drive through town to get to and from the freeway.

139-8 There is also no consideration given to the possibility of connecting with a 2nd Brooktrails access road. This 2nd access is absolutely essential for the safety of thousands of residents, and connecting it to the bypass should be part of the overall plan.

139-9 I am greatly offended by your complete disregard for the 2 lane alternative. It should have been included in this study. A 1998 feasibility study concluded that traffic projections estimate it will take 130 years before we outgrow a 2 lane road. In 100 years we will not be driving cars as we know them - so why do you want to build a freeway we don't need? A 2 lane road will solve our traffic problems, at much less cost, and with much less environmental impact and damage. It should at least be considered a serious alternative.

139-10 I would like to know 1) who got paid how much to write this report? and 2) who within Cal Trans is responsible for accepting this report and passing it on to us? And how much in tax money has been spent on this project over the decades? And after all that time and money, this is what you come up with? And then you tell us this is our last chance to comment?

139-11 As a citizen and community member, I am appalled at this Bypass EIR. These non-mitigations are evidence of either your contempt for our community or your own incompetence. It certainly doesn't instill confidence in your ability to make the best decisions. On the contrary, this document makes a mockery of the entire process of intelligent decision making.

Sincerely, and with indignation,

Karina McAbee
Willits, California

139-7 S.R. 20 traffic will still have to travel through a portion of Willits (the south segment of Main Street) to access U.S. 101; however, without the bypass, traffic on Main Street would increase by 34% in 2028. With the bypass in 2028, traffic volumes will be similar to what they are today (Willits Traffic Study, Figures 4 through 15). 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.

139-8 Any of the valley alternatives considered in the DEIS/EIR would accommodate a connection to a Brooktrails second access road (General Response 1.6).

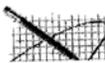
139-9 We are not sure what 1998 feasibility study the comment is referring to. If it is a traffic study prepared by SHN, Caltrans reviewed the study and concluded that it did not justify a two-lane facility (see also, response to 35-18). See General Response 1.10 for a detailed discussion of why a two-lane alternative does not meet the purpose and need for the project and was, therefore, not included for consideration in the DEIS/EIR.

139-10 The question does not pertain to the substance of the DEIS/EIR and, therefore, does not require a response. Caltrans has provided reasonable opportunities for public involvement during the planning and development of the project (see Chapter 10 DEIS/EIR). See also, General Response 1.11.

139-11 Typically, it is only when a preferred alternative is identified that mitigation measures can then be developed in greater detail (General Response 1.14). The DEIS/EIR is a *summary* of detailed studies that are available to the public for review (page 1-8, DEIS/EIR). The DEIS/EIR contains sufficient information for decision makers to approve or disapprove the project. Caltrans and FHWA are confident in the adequacy of the Draft and Final EIS/EIR. Caltrans has provided reasonable opportunities for public involvement during the planning and development of the project (see Chapter 10 DEIS/EIR).

140 Roni McFadden

140-1 General Response 1.10 explains why a two-lane bypass does not meet the purpose and need for the project. Modified Alternative J1T has been identified as the Preferred Alternative. Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species (General Response 1.3).



() To: nancy_mackenzie@dot.ca.gov
08/06/02 03:36 PM cc:
Subject: Willits Bypass

Below is the result of your feedback form. It was submitted by
() on Tuesday, August 6, 2002 at 15:36:43

140-1 S1: I urge you to consider the alternative of the two lane bypass, the ELSIE version bypass and include this proposal in the final EIS/EIR
Thank You

T6: Roni McFadden
T2: bluejayln@pacific.net
T4: 16250 Blue Jay Ln, Willits, CA 95490
T42: 707-459-0741
B1: Submit

141 This number left blank intentionally

142 Patricia McKillican

142-1 The bypass will remove traffic from, and therefore reduce traffic on Main Street in front of the high school and at the Sherwood Road intersection (General Response 1.8).

Modified Alternative JIT has been identified as the Preferred Alternative. See General Response 1.3, which discusses why the hybrid Alternative L/C does not meet the criteria for LEDPA because of its overall environmental harm, including significant adverse impacts to wetlands and its potentially significant adverse impact to local hydrology and to federally listed fish species.

Wed. July 31, 2002
16815 Pebble Ct.
Lacuna Lake, Ca 95457

Clu: Daniels
CalTrans Office of
Environmental Management 5-1
2389 Gateway Oaks Dr.
Sacramento, Ca 95833
Attn: Nancy McKenzie
environmental coordinator Re: Willits Bypass

(23)

142-1 Dear Mrs. McKenzie -
I lived on Sherwood Road for over 30 years - The Quail Meadows interchange is probably the most outrageous proposal I have ever heard of - I can only believe that CalTrans has never really examined this area - I came to Willits in 1952. Thinking we could soon have a By-Pass. The bottom of Sherwood Road causes serious problems with traffic - especially at school dismissal time - Please use your influence to promote the "Elsie" plan - Wild Oat Canyon road will serve a lot of inter regional



traffic and would show that CalTrans has at long last discovered common sense.

Sincerely,
Patricia McKillican

143 Arnie Mello

Caltrans received approximately 150 of this form letter. 116 of the authors are listed below, the remaining signatures were illegible.

- Adams, Buffalo
- Anderson, Bonnie
- Angius, John
- Avilla, Betty
- Avilla, Joe
- Axell, Deborah
- Bailey, Margo
- Baker, Nikki
- Bays, Bettye
- Beck, Martha
- Beers, Marilyn
- Bell, Louise
- Bouley, Brian
- Buckley, Janice
- Cail, Dean
- Cannon, Jacqueline
- Case, Mark
- Chattler, Cathy
- Coller, R. D.
- Collins, Tom
- Collins, Janet
- Count, Patricia
- Crespo, Olga
- Cunningham, Carolyn
- David, John
- Davis, Marcia
- Davis, Robert
- Davison, Charles
- Decker, Anita
- Dill, Carmen
- Don, Monica
- Downing, Edgar
- Duste, Leon
- Edwards, Tammy
- Faulkner, Margaret
- Ferrante, Kristen
- Glanders, Carrie
- Goldner, George
- Golightly, Nancy
- Graham, Karen
- Grimm, Margaret
- Hands, Sue
- Hansen, Tina
- Hart, Callista
- Harter, Pearl
- Hill, Richard and Claudia

August 15, 2002

Cher Daniels, Chief
Cal Trans Office of Environmental Management S-1
2389 Gateway Oaks Drive
Sacramento, Ca. 95833

Attn: Nancy MacKenzie, Environmental Coordinator

- 143-1 I support the ELSIE/Wild Oat Canyon proposal. It offers the best service for travelers, commuters, and residents of Willits and Brooktrails. Fire and other safety officials agree and have endorsed this plan.
- 143-2 The Willits Creek restoration is the best mitigation plan for the north end of the freeway. It will give the fish a bypass around our road and work well with the City of Willits' new wastewater treatment plant.
- 143-3 Please build the ELSIE hybrid alternative and study the Willits Creek restoration.

Sincerely,



Arnie Mello
1780 Hawk Place
Willits, Ca. 95490
707-459-0883

- Huffman, Ray
- Hunter, Sylvia
- Jackson, Jeanne
- Jayne, Carol
- Johnson, Rudy
- Kelleher, Elena
- Kelly, Linda
- Knight, John
- Kroner, Rosina
- Kuns, R. A.
- Lacy, Jeff
- Lacy, Connie
- Lapote, Sandra
- Lawrence, Al
- Lourde, Thoman
- Lyon, Lorain
- Mack, Barbara
- Martin, Dave
- Mastrian, Karen
- McAfee, Vicki
- Mello, Arnie
- Mitchell, Barbara
- Moore, Nadine
- Myer, Jerry
- O'Neill, Margaret
- Orenstein, Ron
- Palmgren-Steele, Edette
- Perez, Angel
- Peterson, Danny
- Pool, Richard
- Potter, Eugene
- Potter, Celeste
- Ragsdale, Lynette
- Reaney, Dave
- Renicle, Jamie
- Rex, Barbara
- Schenk, Timothy
- Schenk, Lisa
- Schunan, Edwin
- Schwartzmeyer, John
- Shannan, Kelley
- Shellenberger, Edward
- Silva, Jacqueline
- Simms, Kert
- Skinner, Hayden
- Smith, Mike and Brenda
- Smoak, Alfred and Joyce
- Spady, Donn
- Spatzer, Eleanor
- Stayer, Doris
- Steele, Frederick
- Stewart, Michael
- Stuart, Mary
- Swanson, Charles

Thomas, Katherine
Thurman, Andrea
Uppinghouse, Kathleen
Uppinghouse, Ronald
Van Meter, Dennis
Vaughn, Mary

Waddell, Elder
Waddell, Justin
Walker, Ardis
Wallace, Gordon
Waters, Joyce
Watkins, Al

Webb, Della
Webb, Jim
Weller, Cindy
Williams, Janet
Wilson, John and Beverly
Young, S.

143-1 Modified Alternative J1T has been identified as the Preferred Alternative. See General Response 1.3, which discusses why the hybrid Alternative L/C does not meet the criteria for LEDPA because of its overall environmental harm, including significant adverse impacts to wetlands and its potentially significant adverse impact to local hydrology and to federally listed fish species. Also, see General Response 1.8 regarding traffic operations with Quail Meadows Interchange.

143-2 See General Response 1.4 regarding a Willits Creek restoration.

143-3 See responses to Comments 143-1 and 143-2.

John and Beverly Wilson added the comment, at right, to their letter.

143-4 The wishes of the local community had to be weighed with the overall purpose and need for the project to improve traffic conditions for interregional traffic and with laws and regulations protecting state and national natural resources (for example, the Clean Water Act Section 404(b)(1)). In response to comments received from the public circulation of the DEIS/EIR, Alternative J1T was modified to avoid the business park, the park-recreation complex, and the large oak riparian woodland (Modified Alternative J1T, the Preferred Alternative). For a description of the public involvement opportunities and alternatives review process that have occurred over the past several years, see Chapter 5 (FEIS/EIR), Section 3.6 (DEIS/EIR) and Chapter 10 (DEIS/EIR).

Nikki Baker added the comment, at right, to her letter.

143-5 General Response 1.9 discusses why a center valley interchange is beyond the scope of this project. See response to Comment 114-4 (Roland Hulstein). Note also that the absence of a middle interchange will benefit businesses between south Main Street and the existing S.R. 20 intersection. A new interchange would likely have a negative impact on these businesses.

Barbara Mitchell added the comment, at right, to her letter.

143-6 See responses to Comments 143-4 and 143-5.

Edette Palmgren-Steele added the comment, at right, to her letter.

143-7 See response to Comment 143-5.

143-4 We feel you have not given enough consideration to the wishes of the community, after all we're the ones that have to live with it!!

143-5 Conditional upon adding an interchange connecting the bypass to highway 20. This is a major highway with a lot of traffic both commercial and touristy. Willits is crowded from these types of traffic coming from and going to the coast. Please do add this interchange, otherwise major problems will remain.

143-6 Most of the road block turns L at 20. I can't believe CalTrans is being so uncooperative in allowing Willits citizens a real input and

143-7 The proposal is ok as stands, however another exit at Hiway 20 would be very beneficial.

144 Jason Minton

144-1 See General Response 1.14 regarding project mitigation.

The impact conclusions for biological resources were the result of technical studies and professional judgment. NEPA/404 agencies (U.S. EPA, ACOE, USFWS, NOAA Fisheries, USFWS) as well as CDFG agreed with the impact conclusions presented in the DEIS/EIR. See General Response 1.11.

144-2 A full range of reasonable and feasible alternatives on a *four-lane facility* were evaluated. 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. Note also that since project planning began in 1962, approximately 30 alternatives have been considered as a result of public and governmental agency input and independent investigation by Caltrans staff (Section 3.6, DEIS/EIR).

August 10, 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,

Let me briefly introduce my qualifications, and then I will describe my comments on the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/DEIR) for the Willits/Highway 101 Bypass. I hold a Master of Science degree in biology from the University of North Carolina at Wilmington, and a Bachelor's degree in Environmental Studies from the University of California at Santa Cruz. Further, I was employed for seven years at the Wild Bird Society of Japan (WBSJ), that nation's largest non-profit organization for nature conservation. While at the WBSJ, I gained practical experience in research and the effective implementation of measures to protect biodiversity. I was coordinator for several projects, including the mitigation of wetland impacts from agricultural development and dam construction projects in China. I am also experienced in wildlife analysis utilizing geographic information systems (GIS) and statistical procedures. I was raised in Willits, and have returned here in order to raise my family because it is a lovely place to live.

I have reviewed Section 5.7 Biological Resources of the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/DEIR) for the Willits/Highway 101 Bypass. I was very disappointed to find that section inadequate and largely incapable of supporting evaluation.

My comments fall into four categories:

- 144-1 1) Mitigation measures for biological impacts (Section 5.7.4.1) were not presented in a state that precluded the public from making any real evaluation of the effectiveness of those measures.
- 144-2 2) A two-lane bypass alternative was not included, and therefore all practical options for construction were not treated to environmental evaluation.

144-3 See Comment 144-21, below, for detailed comment and response.

144-4 See General Response 1.4 regarding a Willits Creek restoration.

144-5 See response to Comment 144-1. Naming specific success criteria at the DEIS/EIR stage was not possible without identification of a preferred alternative. A final mitigation plan for Modified Alternative JIT will include specific success criteria.

144-6 See responses to Comment 144-1.

144-7 See response to Comment 144-1.

144-3 3) The area estimated for each habitat type may not be correct, because it appears that estimates were made from aerial photography that was not rectified for scale.

144-4 4) Willits/Mill Creek restoration is warranted to be evaluated by the DEIS/DEIR.

In the following pages I will present my critique in detail.

1) Inadequacy of mitigation measures

144-5 The majority of mitigation measures for biological impacts (Section 5.7.4.1) did not illustrate the intended mitigation measure to an extent that a knowledgeable reader could determine the effectiveness of the intended activity. Most measures appeared to be at an early stage of conceptual development that did not provide the details necessary to gauge their effectiveness. The most important item that was almost universally lacking were criteria by which success or failure would be judged for each specific mitigation measure. Due to the preliminary nature of the mitigation measures in Section 5.7.4.1, they could not demonstrate the reduction of impacts below threshold levels, and thus the absence of most biological impacts from Section 6 Unavoidable Significant Impacts is not warranted. I will illustrate my conclusion by addressing specific instances from the DEIS/DEIR, and recommend that an amended draft be available for public comment prior to finalization of the EIS/EIR.

144-6 Comments on specific mitigation measures for biological impacts follow:

BIO-1 and BIO-2: The listed measures are not in fact mitigation measures, but rather they are only proposals to develop measures that address the stated topics. To illustrate my point, "Caltrans/FHWA are considering and conceptually evaluating these sites and will explore them more fully once the final mitigation requirements have been determined." (p. 5-67). The effectiveness of an action that is at a considering/conceptual stage is indeterminate, and the relevant biological impact should be listed in Chapter 6 until such time as the mitigation measures can be evaluated and determined to reduce the impact below threshold levels.

144-7 The text of BIO-2 continues, "A final mitigation plan will be adopted before the Final EIS/EIR is distributed." (p 5-67). This is not sufficient to allow public comment on a crucial issue of the EIS/EIR, namely biological mitigation measures. In essence, I wasted my time to review a document that was not at a stage for release as a draft for public comment. These (and others as described in the following) mitigation measures must be developed and presented in an amended DEIS/DEIR and distributed for public comment.

144-8 See response to Comment 144-1.

144-9 See response to Comment Letter 26 (California Oak Foundation) and responses to Comments 27-1 and 27-3 (California Native Plant Society).

144-10 See response to Comment Letter 26 (California Oak Foundation) and responses to Comments 27-1 and 27-3 (California Native Plant Society).

144-11 A two-lane alternative was not considered in the DEIS/EIR because it does not meet the purpose and need of the project (General Response 1.10).

144-8 BIO-3 sustains similar comments as above.

144-9 BIO-8 for oak woodland mitigation does not represent the best scientific knowledge on the subject, nor does it stand up to basic common sense. The measure cites planting ratios to replace oaks impacted by the construction, but those ratios appear to have been pulled out of a hat, or at best, out of context. They are sourced (not “cited” as would have been appropriate) as coming from the California Department of Fish and Games’ Oak Protection Guidelines, but I can not find any formal document by that title in the literature publicly available. Further, there are no statements about factors by which to measure success of the mitigation, and this is necessary given the high mortality that can occur in replanting efforts.

144-10 Another criticism of this measure is that the term “oak woodlands” refers to a general vegetation community-type, and it should be noted that the DEIS/DEIR does not present a breakdown by area for the different species of oaks that will be impacted. This is very important because certain species, namely the valley oak *Quercus lobata*, are considered to be under greater threat than other species. I would recommend that an amended mitigation measure include that the preferred roadway route completely avoid any occurrences of multiple valley oaks at a single location.

This may seem extreme, and one might point out the fact that the acreage of oak woodlands predicted to be impacted by any of the valley alternative routes is relatively small. However, if we look at the construction route as a transect survey representing the vegetation of the Little Lake Valley, then we must interpret the small area for oak woodlands as suggesting that this community type is a remnant of a much larger population that at one time certainly existed in the area. My interpretation is that agricultural development of the valley has reduced the area of oak woodlands that once occurred, and therefore the remaining patches of that habitat require a high-degree of protection because they are the last occurrences of an under-represented community type in the area. This would require that the conservation of oak woodlands be maximized under any alternative.

144-11 An alternative, not analyzed in the DEIS/DEIR, that could be designed to reduce the impact on oak woodlands is a two-lane bypass. The lower travel speeds of a two-lane road should allow more opportunity for engineers to avoid sensitive sites, and the footprint of the roadway would theoretically be reduced when compared to the four-lane

144-12 See response to Comment 144-1.

144-13 See response to Comment 144-1.

144-14 See response to Comments 144-1 and responses to Comments 27-6 and 27-7 (California Native Plant Society).

144-15 See response to Comment 144-1.

144-16 There are no provisions in the federal Migratory Bird Treaty Act (MBTA) that require protection of the habitat after the young birds have fledged and are independent of the nest. After the nesting season, the nest trees and surrounding habitat can legally be removed.

alternatives. Lack of a two-lane alternative is particularly missed when addressing the potential impacts of construction for oak woodlands. An amended DEIS/DEIR should include analysis of a two-lane bypass.

144-12 BIO-9 Once again, the text contains a will-look-into statement rather than an actual mitigation measure. The text presents the acronyms of various state agencies in order to suggest compliance with regulations of those agencies, but without clear statements of methodology and criteria-for-success, there is no way to evaluate this mitigation for impact to riparian forests. Please amend this measure and redistribute for public comment.

144-13 BIO-10 purports to be the mitigation measure for native bunchgrass, but simply informs the reader that the measures set forth in the Mitigation and Monitoring Plan will be followed. That document does not appear to be available for public evaluation, at least not at the Willits Public Library where I accessed the DEIS/DEIR. The mitigation measures must be made public for evaluation or, I believe, the legal requirements for disclosing the DEIS/DEIR have not been satisfied.

144-14 BIO-11 and BIO-12, the mitigation measures for the rare plant species Baker's meadowfoam, and glandular western flax receive the same comments as given for BIO-10 above, and the same request for public disclosure of an amended DEIS/DEIR.

144-15 BIO-13 states that the mitigation measures in the Mitigation and Monitoring Plan will be applied to wetland impacts. Once again, this document was not available for public review and comment, and an amended DEIS/DEIR is warranted.

144-16 BIO-14, 19 and 20 are regarding California Yellow Warbler, Yellow-breasted Chat and raptors. The measures state that nesting sites of those species will be identified and monitored, with buffer zones provided for some species, and no-construction zones during the active nesting period for others. I would recommend that the treatment of those nesting habitats during the post-nesting period be identified. We should be able to predict the eventual fate of those nesting sites from construction impacts. Only then can we determine if the impacts from construction have been reduced below the stated thresholds for significant unavoidable impact.

BIO-23 is more specific than the other general mitigation measures, and is acceptable.

144-17 See response to Comment 144-1.

144-18 The only valley alternative that would impact a valley oak woodland is Alternative LT. Modified Alternative J1T was developed to minimize impacts to the valley oak woodland. See response to Comment 26-1 (California Oak Foundation).

144-19 See response to Comment 144-1.

144-17

Figs 5-1 and 5-2 represent the level of impact that is predicted for pre- and post-mitigation, respectively. There are few mitigation measures that can actually be evaluated to determine effectiveness, so the reduction in impact shown in Fig 5-2 is unsupported.

144-18

Mitigation measures BIO-1 through 6, 8, 9, and 13 are again addressed on page 5-77 with text stating that, in comparison to the wildlife value of riparian and oak woodlands impacted during construction “it may take decades for the trees (planted as mitigation - JM) to mature and regain former wildlife habitat values.” This is correct, in my opinion, and must be stated within the text of each relevant mitigation measure. Further, since “decades” places full habitat value being regained at a point in time beyond the planning life of the bypass, these mitigation measures may not be considered as reducing relevant biological impacts below threshold values. These are included as significant unavoidable impacts for alternative E3, but not for the remainder of the alternatives. Extremely mature and valuable oak woodlands will potentially be impacted by valley routes, and although the acreage is less than with alternative E3 they are critical habitats even at small acreage due to the limited area of remaining occurrences (as described for BIO-8). Several state statutes and regulations are relevant to oak woodlands and the threshold for unavoidable significant impact has likely been passed for all valley routes except perhaps J1T. Especially if one considers the length of time that it would take to create comparable woodlands, which is beyond the planning life of the project, thresholds have been exceeded.

144-19

Essentially, my point is that the majority of mitigation measures for biological impacts do not provide a depth necessary to allow meaningful review by the public. Therefore the document does not fulfill its legal requirements and should be amended and redistributed for public comment prior to finalization. There is some reference to a Mitigation and Monitoring Plan that could potentially provide the details necessary, but that document is not available for public evaluation, fatally undermining the DEIS/DEIR.

In brief, I consider that the inadequacy of Section 5.7 disallows real evaluation by the public, and therefore the DEIS/DEIR does not satisfy the requirements of the California Environmental Quality Act (CEQA) or National Environmental Policy Act (NEPA) regarding good faith disclosure.

144-20 A two-lane alternative was not considered in the DEIS/EIR because it does not meet the purpose and need of the project (General Response 1.10). Caltrans traffic studies substantiate the need for a four-lane bypass. If the comment is referring to the 1999 Value Analysis, see response to Comment 34-15 (Willits Citizens for Good Planning).

A S.R. 20 interchange could be constructed on any of the four-lane valley alternatives as a separate future project. The reader should note that two-lane highways do not typically have interchanges. Further, the claim that a two-lane highway could avoid impacting resources is based on reduced design speed and correspondingly reduced radius horizontal curves. A reduced free-flow operating speed solely because a facility is two-lane is a faulty assumption.

The Modified Alternative JIT (the Preferred Alternative) avoids the one large oak riparian woodland referred to in the comment.

144-21 The early mapping of wetlands and Baker's meadowfoam was done on aerial photographs that were not scale-rectified. The assessment of impacts to meadowfoam plants was made by

conducting on-the-ground surveys and counting individual plants in the field – not from mapping, so impacts to Baker's meadowfoam discussed in the text is accurate. The mapping of other resources within the project corridor was done on rectified-scale engineer's maps. Because of the lapse of time since the last surveys, additional surveys will be conducted prior to construction to assess the current status of Baker's meadowfoam. Caltrans will coordinate with CDFG on the appropriate ratio to mitigate for this species as a result of impacts by Modified Alternative JIT, the preferred alternative. See Section 3.7.2.1 of the FEIR/EIS for additional discussion of Baker's Meadowfoam.

144-20

2) Two-lane alternative

The four alternative routes presented in the DEIS/DEIR each include the construction of four-lanes. Clearly a divided two-lane bypass should be considered because it satisfies all stated goals for the Willits/Highway 101 Bypass. Please note that the stated goal of providing level-of-service (LOS) 3 would at first appear unattainable by a two-lane bypass, but the evaluation scales for two-lane and four-lane roadways are not equal, therefore the LOS should be re-evaluated for a two-lane alternative. According to Caltrans' data, traffic volumes do not warrant a four-lane bypass, and the safety of such a bypass is suspect since the travel speeds would be much higher than on a two-lane roadway. The two-lane bypass also allows other design features, including an interchange with Highway 20, and a construction route that could avoid impacting some biological resources like oak woodlands.

A two-lane bypass is clearly a viable option that would provide a level of environmental impact varying from that of the four-lane bypasses presented in the DEIS/DEIR. The two-lane bypass must therefore be included in an amended DEIS/DEIR before the purpose of the document can be fulfilled.

144-21

3) Area measurements

It is unclear to me from my reading of the DEIS/DEIR how the area size of each vegetative community-type was calculated. If they are based on the Jones and Stokes Associates survey of 1997 then it should be noted that all estimates are likely to contain error of indeterminate scale, as stated on page 3-11 Mapping Accuracy of that report. The reason is that the sensitive communities were delineated using aerial photographs that were not rectified to allow consistent scale across the image. As a general rule, the area represented by a map-unit increases toward the edges of an aerial photo because of the angle at which the light must travel into the aperture from various locations. Thus, a map unit at the edge of the image will represent a greater area on the ground than a map unit.

If the area values used in the DEIS/DEIR are in fact based on the earlier report, then please consider the error that this may introduce to the comparisons. The Jones and Stokes report did not estimate a magnitude for the error, but it is possible to calculate at least a range of expected errors. The error will vary depending on the scale of the image and the location of its azimuth. Please confirm if this is a source of error in the DEIS/DEIR and if that is the case, take steps to correct it.

144-22 See response to Comment 144-4.

144-23 Under the “rule of reason,” the EIS and EIR must set forth sufficient information for the public to make an informed evaluation and for the decision-maker to fully consider the environmental factors involved and make a reasonable decision. The rule of reason requires only that the document show that the project proponent has made an objective, good-faith attempt at full disclosure. Exhaustive treatment of issues is not required.

The comment does not provide specific information on the DEIS/EIR’s “inaccuracy,” so no response to that issue is possible.

No change to the DEIS/EIR, in response to comments 144-1 through 144-23, is necessary.

4) Willits/Mill Creek restoration

144-22 The restoration of a flow that will potentially benefit anadromous fish and water quality in Willits/Mill Creek has been proposed by members of the Willits community and apparently affirmed by the California Department of Fish and Game. This effort could be studied and implemented as part of the Willits/Highway 101 Bypass.

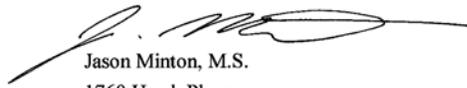
Conclusion

144-23 The Willits/Highway 101 Bypass is certainly an idea whose time has arrived, and I thank you very much for implementing its study. Please do not construe my comments to suggest that I am “against” the bypass, because I will readily confirm that it is necessary for both Willits and Highway 101. I do, however, criticize the DEIS/DEIR because it does not provide a realistic evaluation of the situation for biological resources, and does not make a full disclosure that can be evaluated by the public. In fact, some of the comments of the Willits/Highway 101 Bypass DEIS/DEIR rival for inaccuracy those that I criticized while reviewing Chinese EIRs for agricultural intensification and dam construction. I commend you for not suggesting, as an EIR in China did, that the construction can increase the biodiversity of nature reserves by forcing fauna out of the construction zone and onto the reserves.

After my years overseas I am convinced that the legal framework for environmental conservation in the United States is the best in the world, and the transparency of government is rivaled by no others. The present DEIS/DEIR, however, does not live up to that standard, and I am disappointed at the level of work presented for public review.

I look forward to your reply, and thank you very much for your time and consideration of the issues I have raised in this letter of comment.

Sincerely,



Jason Minton, M.S.
1760 Hawk Place
Willits, CA 95490

145 Glen Minyard

The following individuals submitted the same form letter:

Minyard, Glen
Minyard, Susan

145-1 General Response 1.3 discusses why Alternative L/C (the "ELSIE" proposal) does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species. Because Alternative L/C does not meet Section 404(b)(1) Clean Water Act criteria, the ACOE would not be able to issue a permit to construct this alternative.

See General Response 1.4 regarding a Willits Creek restoration.

145-2 Any of the proposed bypass alternatives would reduce traffic congestion on Main Street because interregional traffic will be rerouted/removed from local city streets creating less overall demand of the local infrastructure. See General Response 1.8 regarding traffic operations with Quail Meadows Interchange.

145-3 See response to Comment 120-1 (Bernard Kamoroff) regarding the extensive public involvement in the development of the bypass project, which was critical in developing the alternatives that were considered in the DEIS/EIR. See also Chapter 5 (FEIS/EIR) concerning public involvement since circulation of the DEIS/EIR, which was crucial in modifying Alternative JIT to respond to local concerns. Caltrans and FHWA will continue coordinating with City of Willits and Mendocino County throughout final design and construction of the project.

Dear Sir or Madam,

We are writing this letter concerning the Willits bypass. We have lived here for many years & agree that the bypass is needed now. Caltrans has a special opportunity to do this project in a way that will benefit the 101 corridor and all of the traffic it effects regionally.

145-1 We support the ELSIE/Wild Oat Canyon & Willits Creek Restoration proposal. So does every governing body in Mendocino County.

We ask that you please get this project right after studying it for over 40 years now. This recommend plan (ELSE/Wild Oat Canyon) will help everyone involved, (even the fish)! This plan has the best overall chance for success.

145-2 The proposed plan to have an interchange next to the High School would increase traffic, the danger to people, & create more accidents.

145-3 It would be so great to see that Caltrans can be flexible & logical to address our regional concerns. This would be great boost to all involved & good PR too.

Please, let's get it right!

Sincerely,



146 Michael and Ina Miyahira

146-1 General Response 1.3 discusses why Alternative L/C (the "ELSIE" proposal) does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species. Because Alternative L/C does not meet Section 404(b)(1) Clean Water Act criteria, the ACOE would not be able to issue a permit to construct this alternative.

See General Response 1.6 regarding a Brooktrails second access road.



July 8, 2002

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

Attention: Nancy MacKenzie, Environmental Coordinator
RE: Willits Bypass EIR

Greetings,

146-1

We are owners of property in Brooktrails and are writing to let you know that we support the **Elsie/Wild Oat Canyon** proposal. This proposal offers the best service to the Brooktrail community.

Your careful attention to our support of the Elsie/Wild Oat Canyon proposal would be greatly appreciated.

Yours Truly

Michael Miyahira
Michael Miyahira

Ina Miyahira
Ina Miyahira

cc:

Maiser Khaled, Chief, District Operations - Federal Highway Administration
Hal Wagenet, Willits, CA 95490

147 Patricia Moeller

147-1 General Response 1.3 discusses why Alternative L/C (the "ELSIE" proposal) does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species. Because Alternative L/C does not meet Section 404(b)(1) Clean Water Act criteria, the ACOE would not be able to issue a permit to construct this alternative.

Any of the proposed bypass alternatives would reduce traffic congestion on Main Street because interregional traffic will be removed from local city streets creating less overall demand of the local infrastructure. See General Response 1.8 regarding traffic operations at the high school and at the U.S. 101/Main Street intersection.

See General Response 1.6 regarding a Brooktrails second access road.

July 13, 2002
1121 Perch Lane
Willits, California 95490

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

Dear Ms. Daniels and Ms. MacKenzie,

I am a resident of Willits, California and live in the subdivision of Brooktrails.

I am very much in favor of a Willits Bypass built as speedily as possible. Highway 101 is too important to be slowed going through our town, and the traffic with its accompanying complications are not good for the town of Willits.

147-1 I SUPPORT THE ELSIE/WILD OAT CANYON PROPOSAL. As you know, this combines the L1 in the south and the C1T in the north, now known as Elsie.

Sherwood Road, a two lane road, is my only way into Willits. The intersection of 101 and Sherwood Road is dangerous already, right next to the High School. Congestion is backed up with parents taking children to school and with the workers from Brooktrails going and coming from work.

The Elsie proposal will give us another access road needed for traffic flow and for emergency services. We live in a forest area.

Please, please, listen to the residents of Brooktrails and Willits, please plan with us, please do the job right. People's safety depends upon a good decision here that will have so many advantages.

Thank you for building us a by-pass, thank you for considering my very serious concern

Yours truly,



Patricia E. Moeller

Patricia E. Moeller

148 Joanne Moore

148-1 Regarding adequacy of the impact analyses in the DEIS/EIR, see response to Comment 30-1 (Mendocino Forest Watch).

148-2 A two-lane alternative was not considered in the DEIS/EIR because it does not meet the purpose and need of the project (General Response 1.10). 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. Also, see response to Comment 34-15 (Willits Citizens for Good Planning), which addresses the 1998 Value Analysis Report referred to in the comment.

General Response 1.3 discusses why Alternative L/C (the "ELSIE" proposal) does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species. Because Alternative L/C does not meet Section 404(b)(1) Clean Water Act criteria, the ACOE would not be able to issue a permit to construct this alternative. (A four-lane Alternative L/C was studied in the DEIS/EIR under a nodal analysis; Section 1.5, DEIS/EIR.)

148-3 The creek restoration project and a Brooktrails second access are not interdependent. Any of the valley alternatives, including Modified Alternative JIT (the Preferred Alternative) would accommodate a connection to a Brooktrails second access road (General Response 1.6). See General Response 1.4 regarding creek restoration.

Under the Clean Water Act, avoidance of impacts to aquatic resources and to federally listed species and their habitat must be considered before compensatory mitigation. Reasonable and feasible alternatives to Alternative L/C are available that minimize impacts to these biological resources (General Response 1.3). Further, because of the magnitude of impacts that would result from construction of Alternative L/C, the extent of wetland creation and creek restoration and enhancement would escalate rather than reduce the cost of this alternative. As noted above, ACOE will not consider issuing a construction permit for this alternative since it does not meet Clean Water Act criteria.

Joanne Moore, J.D.
26010 String Creek Road
Willits, CA 95490

August 10, 2002

Cher Daniels, Chief
Caltrans Office of Environmental Management 5-1
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 am a resident of the Willits area who moved here from the Bay Area almost 14 years ago. I moved here for the clean air, clean water, open spaces, quiet, peace, nature, etc. etc. etc.

I have reviewed the EIR/EIS for the proposed Willits bypass and have the following comments to make:

148-1

There are a number of significant unavoidable impacts for which there are no adequate mitigations proposed ... noise, visual impacts, loss of oak woodlands, economic impact due to loss of tourism, and loss of agricultural land to name a few.

148-2

I am strongly in favor of a two-lane alternative which would have a much smaller impact on the valley and economy and could be constructed, according to a Caltrans' report, at a significantly lower cost than any of the 4-lane alternatives. The 2-lane bypass option, including an analysis of the combination of Caltrans' L and E routes locally known as ELSIE¹ should have been included in the EIR/EIS. It would be safer, would not have as great an economic, visual, or environmental impact, and would take care of the traffic congestion now experienced in Willits.

Sincerely,



Joanne Moore

148-3

¹The ELSIE alternative would significantly mitigate wetlands impact, probably saving millions of dollars, by changing Outlet Creek back to its original 1900 streambed. This would allow the Wild Oats Canyon access road from Brooktrails to be constructed, resulting in a much-needed emergency exit and easier access to the bypass for Brooktrails' residents ... thus significantly reducing traffic in town.

149 Marilyn Mooshie

149-1 General Response 1.3 discusses why Alternative L/C (the "ELSIE" proposal) does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species. Because Alternative L/C does not meet Section 404(b)(1) Clean Water Act criteria, the ACOE would not be able to issue a permit to construct this alternative.

Any of the proposed bypass alternatives would reduce traffic congestion on Main Street because interregional traffic will be removed from local city streets creating less overall demand of the local infrastructure. See General Response 1.8 regarding traffic operations with Quail Meadows Interchange.

See General Response 1.6 regarding a Brooktrails second access road.

See General Response 1.4 regarding creek restoration.

Boonville, CA 95415
July 11, 2002

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

Dear Ms. Daniels:

I am writing in support of Hal Wagonet's proposal for the Willits Bypass. We, the residents of Mendocino County, have long been involved in the Bypass issue, for it is WE who will be impacted by it. There is no doubt that a Bypass is needed: it took me 45 MINUTES to get through Willits last Sunday, in bumper to bumper traffic that began well north of the city limits!

149-1

But Caltrans seems to be oblivious of the overall environmental impact of their glib suggestions and plans. There are fragile wetlands involved, and high-impact traffic grids to be concerned with. The Quail Meadows Interchange will NOT work, as it will create more congestion than it will solve. By addressing the fish and wetlands problems, alongside the traffic issues, the whole picture is taken into consideration, rather than the short-sighted myopic view that Caltrans usually takes. Wagonet's Willits Creek Restoration proposal uses the holistic view, unlike Caltrans' proposals. It was man's hand that destroyed the original Willits Creek in its natural flow, and we now have an opportunity to restore that watercourse and build a meaningful Bypass that shows concern for the local environmental health of the area. It may not mean much to bureaucrats in Sacramento, but Mendocino County residents have a deeply-connected interest in the plans.

I urge you to move in favor of the mitigation measure known as the Willits Creek Restoration, using the preferred route of Alternative L in the south, CIT in the north, and the Truck Scales Interchange. Weighing the ELSIE/Wild Oat Canyon option against the problems that would be generated by the Quail Meadows Interchange, even the most entrenched bureaucrat would have to admit to the many advantages of the former.

Respectfully,



Marilyn Mooshie

150 Jacqueline Morninglight

150-1 The need for the proposed bypass is explained in Chapter 2 (DEIS/EIR).

150-2 While both CEQA and NEPA require a public circulation period for draft environmental documents, good planning practice dictates early public involvement. Caltrans and FHWA involved the local community early in the bypass planning process and our coordination efforts with our local partners will continue throughout and after project construction.

150-3 Again, the need for the proposed bypass (to reduce interregional delays, improve safety, and achieve LOS C for interregional traffic on U.S. 101) is explained in Chapter 2 (DEIS/EIR). The benefits to the Willits community of removing U.S. 101 off of Main Street are discussed on page 2-9 (DEIS/EIR).

150-4 If nothing is done, the Level of Service (LOS) on Main Street will deteriorate to an LOS "F" by 2028, which by any standard is unacceptable (Willits Bypass Traffic Report, Table 14, page 34; Caltrans 2000i). Without the bypass, bi-directional traffic volumes on Main Street would increase to 2,474 vehicles per hour in the Peak Hour. With a bypass, traffic is reduced on Main Street by 772 vehicles per hour. This reduction substantially improves traffic conditions on Main Street.

150-5 The purpose of the proposed bypass is to reduce delays, improve safety, and achieve a level of service of at least "C" for interregional traffic on U.S. 101. However, additional benefits of a bypass will be to reduce traffic congestion on local streets in Willits, improving conditions for pedestrians and bicyclists, as well. Also, 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.

Office of Environmental Management
Caltrans District 3

1180 East Hill Road
Willits, CA 95490 439
August 26, 2002

Hello,

I am a resident of Willits and a citizen of California and, in some form, your employer.

150-1 I have opinions (strong feelings + thoughts) about the proposed Caltrans activities in our community. There is NO NEED here for a super highway. NO NEED → SUPER HIGHWAY!

150-2 I realize that Caltrans and the Federal Highway Administration are in the business of building highways. I know this community input process is just a task for you to complete so you can get on with this foregone plan of yours. I, also, realize that your plan is totally off-base, out of context and completely inappropriate for this community.

150-3 Willits is a lovely, rural, small town, community with charm and vigor and character. It is not an urban sprawl with multiple commuters travellers and free ways. We are not a population of oblivious folks who don't notice or care about the quality of their lives and

environment and who take whatever you do to them without speaking up or fighting back.

150-4 you seem to have picked up on our "traffic problem" on Main Street as an excuse for the super highway option. Our traffic is extremely mild. Look at San Rafael or Santa Rosa (on the freeway!) ours is nothing by comparison. How about a Highway 20 interchange by-pass?

150-5 Any alternate, north/south, through the whole area, two-lane road, (perhaps two. One to the east and west of Main Street) would completely relieve the traffic (giving locals an alternative) and (this is most important) maintain the integrity and character of our community.

I moved here 30 years ago (from LA) to raise my children in a lovely, small town - not next to the freeway!

150-6 The bypass project proposes to remove U.S. 101 from Main Street, so that the freeway will not be running *through* Willits, but rather, around it. Removing the freeway off of Main Street will improve residents' and visitors' experiences of Willits. The reasoning and justification for constructing a bypass is supported by the purpose and need statement for the project (DEIS/EIR, Chapter 2).

150-7 Caltrans, FHWA, and many other stakeholders in the bypass project have strived to minimize impacts of the bypass to the environment. Modified Alternative J1T was identified as the least damaging to the overall environment, pursuant to Clean Water Act Section 404(b)(1) (General Response 1.3). Additional efforts will be made during final design to reduce impacts further.

General Response 1.10 explains why a two-lane bypass does not meet the purpose and need for the project. Note that since project planning began in 1962, approximately 30 alternatives have been considered as a result of public and governmental agency input and independent investigation by Caltrans staff (Section 3.6, DEIS/EIR).

150-6

3.
There is no logical, supportable argument to excuse the choice to build the kind of roads it seems you have already decided to put through Willits. As a California traveller I love to drive through small communities with character and charm. I abhor freeways that go on and on with no style, charm, life or purpose (with the exception of providing JOBS for all of you - perhaps?)

150-7

I am also concerned about the well being of our environment — the valley Little Lake, Oak trees, wild life, watershed etc. — that your plan seems willing to sacrifice (needlessly — because your BIG superhighway is NOT the only or the best solution) We need only a simple two-lane alternative thru-road.

150-8 One of the reasons Alternative E3 (the western alignment) has been eliminated from consideration, since public circulation of the DEIS/EIR, is the highly erosive, unstable soils that would require ongoing maintenance.

150-9 See response to Comment 120-1 (Bernard Kamoroff) regarding the extensive public involvement in the development of the bypass project, which was critical in developing the alternatives that were considered in the DEIS/EIR. See also Chapter 5 (FEIS/EIR) concerning public involvement since circulation of the DEIS/EIR, which was crucial in modifying Alternative J1T to respond to local concerns. Caltrans and FHWA will continue coordinating with City of Willits and Mendocino County throughout the final design and construction of the project.

150-10 The no-build alternative does not meet the purpose and need for the project. See also response to Comment 150-7.

150-11 Caltrans and FHWA appreciate your comments and will continue to seek public input throughout the project.

150-8 And just a last note/query. Why do you think you can or should fool with a Big project through our lovely valley when you haven't figured out how to keep the road from sliding off the mountainside every year between Ukiah and Willits? Something here dislikes these big, invasive overdone highways.

The land and the people dislike these plans. I think you should listen and adapt. Adjust your plan so that you are actually doing your job! — of providing appropriate roadways for California (all of it)

150-9 You must look at the area, the community, the terrain. You must listen to the people and respond to the true needs of the area. Until you can REALLY do that you should do nothing.

150-10 That is my suggestion — NOTHING or minimal; alternative thru roadways.

150-11 Please respond. Thank you for taking the time to listen to my concerns.

Bless you in your work for us.

Thank you



Jacqueline B. Morninglight

Jacqueline B. Morninglight
1180 East Hill Rd
Willits CA 95490

151 Don Morosi

151-1 Comment noted. Caltrans and FHWA appreciate your comments on the proposed bypass project.

Alternatives C1T, J1T, and LT, were originally known as C1, J1, and L. They bypassed Willits beginning at the Upper Haehl Creek Interchange and ending on Oil Well Hill. In the Fall of 2000, they were truncated due to budget constraints. Alternatives C1T, J1T, and LT (and Modified Alternative J1T) now end near the existing railroad crossing on existing U.S. 101 north of Willits. (There was no practical way to truncate Alternative E3; thus it remains as Alternative E3 and terminates on Oil Well Hill.)

August 20, 02

Cher Daniels
Caltrans Off. Environ. Mgt. S-1
2389 Gateway Oaks Drive
Sacramento, CA 95833

Ref: N. MacKenzie-Willits Bypass

Dear Ms. Daniels:

151-1

As a 49 year resident of Longvale, 15 miles north of Willits on the 101 highway, I wish to wholeheartedly support the long over due four lane Willits bypass.

I travel back and forth a number of times per month from Longvale to the Bay Area. We have been promised a bypass for over four decades. You already know about the congestion that occurs in town, so I wish to mention another aspect. The shortage of people thinking fifty years or more ahead.

Every time I travel the four lane road to our turn off, I am appreciative of what was done so many years ago. The protesters in Willits who want either of two lane bypass or none at all are very short sided.

I am immanently aware of the shortsightedness of failure enlarge portions of the 101 highway in Marin County. The failure to increase the number of lanes did not prevent growth from occurring either in Marin or points to the north. Rather it created choke points, traffic delays and now dreadfully increased building costs.

Some of the people in Willits need to get their heads out of the sand. Good planning with a farsighted vision is needed to build the best possible four lane bypass. The 101 is a major California highway. May I suggest that the road should extend to the Reynolds Highway at the bottom of Oil Well Hill. Occasionally during winter floods the old highway has been flooded and forced to close.

Sincerely,



Don Morosi
P.O. Box 401
Laytonville, CA 95454

152 David Morrow

152-1 Caltrans Traffic staff reviewed the SHN report (10/28/99) and concluded that the report did not justify a two-lane facility.

152-2 Chapter 2 (DEIS/EIR) provides a detailed explanation of the purpose of the project to reduce delays, improve safety, and achieve a Level of Service of at least "C" for interregional traffic on U.S. 101 within the vicinity of Willits. A two-lane alternative would not accomplish the purpose of the project. General Response 1.10 explains why a two-lane bypass does not meet the purpose and need for the project.

152-3 See response to Comment 80-4 (Ellen Drell).

David D. Morrow AICP
555 Cypress Avenue
Ukiah, CA 95482

August 23, 2002

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

SUBJECT: Willits Bypass EIR

Dear Ms. Daniels;

152-1 I have reviewed the Willits Bypass project at many stages. This included preparing an independent analysis of road capacity needed for this project (the SHN report Willits Environmental Center, 2000). Your agency was provided with a copy of this report, along with aerial photos and a complete discussion of the current and future traffic capacity for the two lane alternative. The SHN report showed that Level of Service and safety considerations could all be met by a two lane bypass alternative. I have reviewed with great interest the project's Draft EIR/EIS and have the following comments:

- 152-2
1. The Draft EIR/EIS document only considers four lane alternatives. This is a surprising deficiency. The Final document should provide a complete environmental impact analysis for a two lane route through the Little Lake Valley. As shown in the SHN report, the two lane bypass would clearly handle all traffic expected over the next 25 years. A two lane road would be less costly, would impact wetlands and sensitive habitats less, produce less run-off, require less maintenance (paved area would be much smaller), and have support from all parts of the community. There is no *technical reason* why a two lane bypass would not provide all the mobility necessary into the foreseeable future. It appears that considering only the four lane option in the Draft report is a *political decision, and not a technical one*. To meet the law, the Final EIR/EIS should provide a thorough and complete analysis of the two lane option, providing an honest appraisal using sound engineering principals.
 - 152-3 2. The Final document should consider the beneficial effects of restoring freight service north of Willits on the Northwest Pacific Railroad. Much of the past, current, and future truck traffic going through Willits moves resource materials (i.e., wood chips, lumber) If, as District 1 Director Rick Knapp asserted in a

152-4 See response to Comment 34-11 (Willits Citizens for Good Planning). While technically feasible, a two-lane alternative is not a reasonable alternative because it does not meet the purpose and need of the project. A four-lane bypass is formally supported by the Willits City Council, Mendocino County Board of Supervisors, Mendocino Council of Governments, North Coastal Counties Supervisors Association, and the California Transportation Commission (see Section 2.6, DEIS/EIR).

152-5 Caltrans and FHWA appreciate your comments on the DEIS/EIR and the proposed bypass project.

recent San Francisco Chronicle article, that 2,000 trucks per day are going through Willits, then the railroad could certainly alleviate much of this traffic through town. Wood chips and lumber are perfect bulk commodities that rail excels at transporting. A functioning railroad would certainly argue for the two lane bypass. Restoring the rail line through the Eel River canyon could be accomplished with the money saved by building a two instead of four lane bypass.

152-4

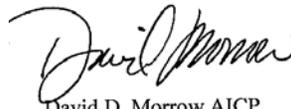
Both the California Environmental Quality Act and the National Environmental Policy Act require documents to use sound technical analysis. They also both require analysis of reasonable alternatives. In this case, *reasonable* would be an alternative supported by a sound technical analysis using the Highway Capacity Manual (HCM) and other accepted road planning tools. As previously noted, the two lane bypass option is technically feasible when analyzed using the HCM and standard methods. Exclusion of reasonable, technically feasible alternatives (e.g. two lane bypass), especially ones that are requested by citizen groups and that have community support, weakens the Final Document and makes it open to litigation, which most certainly would result in project delay and increased costs.

Delay and increased costs do not serve the public trust. To meet the requirements of the law, expedite the planning process, and save public money, it would be much more logical to provide a thorough review of the two key issues cited above *now*, rather than several years from now after litigation and subsequent delay.

152-5

Thank you for the opportunity to offer these comments. I am a practicing preparer of environmental reports and have over 25 years experience with CEQA and NEPA. If I can provide assistance or answer any questions please contact me at the address above or by telephone at 707/463-8639.

Yours very truly,



David D. Morrow AICP

July 30, 2002

Rep Mike Thompson
640 Main St. Suite 101
Napa, Ca. 94559

Dear Mr. Thompson:

I write in response to your commentary in our local Willits News (enclosed) re the Willits Bypass written by Gordon Wagener. It was so persuasive and well written I called him with thanks for a cogent and clear explanation. He strongly recommended I write you.

We have lived in and around Willits for 25 years and watched an increasing snarl of traffic on Main St. Hwy 101. At present our home is 5 miles north of Willits and our lives will be greatly influenced by the bypass location. The frustration and decision of endless studies and circular debates makes us feel hopeless. It begins to astound us to untangle the mess.

The truck scale site for the freeway interchange

153-1 Modified Alternative J1T has been identified as the Preferred Alternative for construction. See General Response 1.3, which discusses the reasons that Alternatives C1T and L/C (with Truck Scales Interchange) do not meet Clean Water Act Section 404(b)(1) criteria and therefore are not considered a viable alternatives. Any of the bypass alternatives will reduce traffic in Willits, including at the high school (General Response 1.8).

See General Response 1.6 regarding Brooktrails second access road.

153-1

proposed by Wagnon would accommodate:
1. the considerable Brooktrails traffic,
2. the southbound Hwy 101 traffic from the no.
3. and avoid the congestion at Willits High Sch.

The Luvail Meadow site, proposed in other plans, is right beside the high school on the north. Currently Sherwood Rd. channels all Brooktrails traffic into the high school local on its south side. In repeat, placing the interchange north at the truck scales solves traffic flow from the west (Brooktrails) and from the north coming into Willits and avoids the existing school population. This solution has won the approval of numerous responsible community groups in Brooktrails and Willits.

Please help us "move from debate to decision in selecting this safe and sensible site location -"

Thank you,

Barbara Muller
38701 Ryan Creek Rd.
Willits CA 95490.

Troubling questions about the Willits Bypass

Does Caltrans lack necessary vision?

Troubling questions arise concerning the Willits Bypass. Why is Caltrans so intent on moving 3.1 million yards of earth in order to have the Quail Meadow interchange, rather than moving 2.4 million yards for the truck scales interchange?

Why would they choose to bridge the railroad three times at a cost of approximately \$3 million for the Quail Meadow interchange rather than to avoid crossing it at all at the truck scales interchange?

Guest Commentary

With Gordon Wagenet

Why do they avoid viaduct construction like the plague, always citing "enormous cost," when it is the obvious solution for minimizing impacts on flora, fauna and wetlands of the Little Lake Valley?

Is cost the be-all and end-all? Is it better to build a less than satisfactory bypass than to fight for the best possible one by cutting costs somewhere else? The savings realized by not crossing the railroad three times and hauling an extra 700,000 yards of earth would go a long way toward offsetting those "enormous costs."

Why does the bypass have to be so wide? Many urban freeways are just the minimum width to accommodate the twelve-foot lanes, and they carry a lot more traffic than this one ever will. Common sense dictates an absolute minimum here to avoid unnecessary disturbance to the environment and the confiscation of valuable valley land.

Why do they avoid viaduct construction like the plague, always citing "enormous cost," when it is the obvious solution for minimizing impacts on flora, fauna and wetlands of the Little Lake Valley?

Why must we adhere to the rulebook that says all four-lane freeways must have at least a 44-foot median? The concrete barrier down the Ridgewood grade seems quite effective. Build a minimum width freeway with concrete divider: another obvious way to save money.

We are really talking here about common sense. A good author on the subject is William K. Howard. In his book *The Death of Common Sense*, he says on page 60: "How things are done has become far more important than what is done." On page 172 he says, "Whenever the rules are eased, our energy and good sense pour in like sunlight through opened blinds. After the 1994 earthquake in Los Angeles toppled freeways, California Gov. Pete Wilson suspended the thick book of procedural guidelines... Instead of a four-year trudge through government process, the Santa Monica freeway was rebuilt in 66 days, to a higher standard than the old one... When the rulebook got tossed, all that was left was responsibility."

Willits has endured a 40-year trudge. Thousands of hours and millions of dollars have been wasted on studies assessing the environmental impacts and disturbance of archeological artifacts on freeway routes that were never viable possibilities, such as Alternate E that carved its way through the heart of Brooktrails at an estimated cost of over twice the amount budgeted. All this was done to conform to the rulebook. Common sense was not a factor.

Caltrans is avoiding its responsibility to our area, hiding behind their mission to improve inter-regional traffic. They are not concerned with local problems such as: how do Brooktrails residents get out of there? Their own survey shows that 60 percent of Brooktrails traffic is going beyond Willits, to Ukiah, Santa Rosa, Fort Bragg and elsewhere. Now that is inter-regional traffic! It is their responsibility! Just because the Wild Oat canyon access to Highway 101 has not yet been built is no excuse for Caltrans to ignore Brooktrails.

Common sense shows the Quail Meadow

See WAGENET, page 9

154 Nick and Linda Nichols

154-1 Alternatives JIT, Modified JIT, and LT would have one at-grade crossing of the Northwestern Pacific Railroad tracks. See General Response 1.3, which discusses the reasons that Alternative L/C (with Truck Scales Interchange at Wild Oat Canyon) does not meet Clean Water Act Section 404(b)(1) criteria and therefore is not considered a viable alternative. See General Response 1.4 regarding a Willits Creek restoration.

154-2 See General Response 1.6 regarding Brooktrails second access road.



"NIKNAK"
<niknak@pacific.net>
08/07/02 11:09 AM

To: "Nancy MacKenzie" <nancy_mackenzie@dot.ca.gov>
cc:
Subject: Willits Bypass

154-1 I am almost a lifelong resident of Willits and have been waiting most of my lifetime for THE WILLITS BYPASS!!! I live in Brooktrails and have several doctors in Ukiah. Getting through Willits is the largest obstacle to a calm and productive trip.

154-2 My husband and I see no reason to cross the railroad several times with one of your alternatives, when the Elsie and Oat Canyon routes avoid that. The Willits Creek Restoration Project corrects the realignment of long ago and works into our favored plan.

154-2 Please consider getting the show on the road with the L C combination and Wild Oat Canyon Brooktrails' badly needed second access-egress. Very sincerely, Nick and Linda Nichols, 25058 Brooktrails Drive, Willits, CA 95490

155 Linda Nichols

155-1 Any of the bypass alternatives will reduce traffic on Main Street, including at the high school (General Response 1.8).

155-2 See General Response 1.4 regarding Willits Creek restoration.

155-3 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.

08/20/2002

Dear Ms MacKenzie, In 1964 California Division of Highways (as it was then called--my father worked for the division for 43 years, ending as foreman of the maintenance shop in Willits) bought some property in the near-east valley from Charles Swift, who took the money and ran to Oregon, where he has long since passed away, never having seen his property converted to a Willits bypass.

I cannot estimate how many thousands of dollars have been spent on studies and acquisitions for the bypass, but if it had been built back in 1964, I am sure we could all be rich if we had that money.

155-1 The Quail Meadows interchange is going to exacerbate our current problems at the bottom of Sherwood Road and will do nothing to alleviate the current traffic jam all along Sherwood Road (since it is the only way in and out of Brooktrails. Not your concern, but certainly OURS). The Willits Creek Restoration Project will cure all your

155-2 problems with the Truck Scales Interchange and satisfy the EIR, I'm sure.

155-3 Please listen to an old timer who's been around the United States several times and NEVER ran into a traffic jam ANYWHERE but Charleston, South Carolina, at evening rush hour!!! Willits is an abomination for all through traffic and especially for local commuters. A north-south alternate route from Baechtel Road to Commercial Street will help local traffic after the bypass takes the big load off.

156 Tom Norman

156-1 See Section 1.2 (FEIS/EIR) for estimated project schedule. There are many steps from funding to construction, which make the entire process quite lengthy, especially for such a large and complicated project as a bypass.

8-17-02

Please O.K. The Route
101 Willits Bypass Draft.

We need The Freeway
around Willits - I have lived
here for 40 yrs.

156-1 Build it as soon as
you can

Thank you
Tom Norman
Oregon

23951 Sherwood Rd
Willits, CA

**157 Cathy O’Roke and
Tim Howe**

See General Response 1.3,
which discusses why
Alternative L/C does not
meet the criteria for
LEDPA.

Any of the valley
alternatives considered in
the DEIS/EIR would
accommodate a
connection to a
Brooktrails second access
road (General Response
1.6).

157-1



"Cathy O'Roke"
<ohowke@earthlink.ne

To: <nancy_mackenzie@dot.ca.gov>

cc:

t> Subject: Willits Bypass

07/21/02 01:05 PM

Please respond to
ohowke

Dear Ms. Mackenzie,

My husband and I own a home on Schow Road northwest of Willits. We strongly prefer the "Elsie" option for the Willits bypass. This is the locate name for a combination of the L option south of town switching to option C north of town. We feel this option is the only one that works for Willits and takes into account the need for a second access road for Brooktrails.

Sincerely,

Cathy O'Roke
Tim Howe
27150 Schow Road
PO Box 596
Willits, CA 95490

158 Janet and Tony Orth

158-1 See response to Comment 33-4 (Sierra Club, Mendo-Lake Group).

158-2 Comment noted. The proposed project is a four-lane bypass.

158-3 See General Response 1.4 regarding Willits Creek restoration.

158-4 The viaduct is incorporated into the project to avoid impacts to the floodway. According to FHWA policy, it would not be a prudent use of public funds to add viaduct to avoid wetlands when another feasible alternative exists that minimizes wetland impacts. See response to Comment 34-63 (Willits Citizens for Good Planning).

Janet & Tony Orth
P.O. Box 1331
Willits, CA 95490

August 25, 2002

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

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

Re: Comments on Willits Bypass Draft EIS/EIR

Dear Cher Daniels and Maiser Khaled:

We welcome this opportunity to provide our personal comments on the Draft U.S. 101 Willits Bypass Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We have enjoyed meeting with various Caltrans Project Development Team members in our official roles as public agency staff and elected representatives.* Together we have actively participated in many public meetings and studied volumes of material in preparation for making informed comments on this crucial project affecting our home, the Brooktrails/Willits community.

158-1

The bypass alternative that we favor is a four-lane "L-C" Hybrid Alternative with a Truck Scales interchange coordinated with a future Brooktrails "gateway" Second Access road and Willits Creek restoration. In supporting this design we join the Brooktrails Township Community Services District, City of Willits, Mendocino Council of Governments, Third District County Supervisor candidate Hal Wagenet, and many other individuals who are asking Caltrans to further study this concept.

158-2

As Brooktrails residents of 22 years, we are daily commuters, one of us south to Ukiah and the other countywide. Highway safety is a primary concern, including 1) minimizing of accidents, 2) needs of emergency response teams, and 3) evacuation of the local population in the event of a disaster. We believe a four-lane bypass would best address safety needs.

In addition, we propose or support the following project enhancements, potentially with Transportation Enhancement Activities (TEA) or other funding sources:

158-3

- Realign Willits Creek to its historic creek bed, to improve local fish habitat values and mitigate wetlands impacts

158-4

- Construct additional viaduct roadway, to the optimum needed to achieve hydrological enhancement of the northern segment, so as to qualify as the preferred alternative

158-5 The Quail Meadows interchange (Alternative JIT, Modified JIT, and LT) accommodates a connection to a Brooktrails second access road (General Response 1.6). A Truck Scales Interchange (Alternatives C1T and L/C) will not be part of the project (General Response 1.3).

158-6 The DEIS/EIR identified Oil Well Hill area as the designated borrow site. The project contractor may choose to use its own selected site, but only as long as it has obtained necessary permits prior to construction.

158-7 See General Response 1.12 regarding “growth at interchanges.”

158-8 Comment noted. The suggestion to plant redwoods is in conformance with the recommendations for plant material in the mitigation measures to reduce impacts to visual resources (DEIS/EIR Section 5.10). The attached sketch appears to be a type of leach/line grey water system, which might be adequate for small residential or single-home development but not for transportation-type projects because, among other issues, storm water flows that would be generated would be large volume flows. The lower cutoff for consideration of treatment BMPs as feasible is 123 cubic meters in a 24-hour time frame (or 4,344 cubic feet or 32,490 gallons).

For treating water runoff, the project will use the Caltrans Storm Water Management Plan approved list of BMPs (Mitigation Measure WQ-1, Appendix A, FEIS/EIR). These BMPs have been proven to be technically feasible for the treatment of highway run-off.

157-9 See response to Comment 33-4 (Sierra Club, Mendo-Lake Group).

- 158-5 • Coordinate project design features at the Truck Scales interchange, to provide a “seamless gateway interchange” for a Sherwood Road connection route
- 158-6 • Coordinate the construction of the northern segment with the planned Brooktrails Second Access road, for project savings when mining for borrow soils
- 158-7 • Purchase conservation easements along the project route, to mitigate environmental impacts, including the western hills for already existing, high resource value spotted owl habitat.

158-8 As public policy advocates, we have been involved in plans and visions for the future that we believe will improve conditions and environmental impacts of a four-lane bypass:

- New technology developments such as cleaner and quieter vehicles that run on alternative fuels, and less polluting diesel engines
- Willits inventor Ed Burton’s proposal for redwood tree plantings over buried redwood bark filters for absorbing untreated water runoff, in a constructed-wetland forest design that could also create visual and noise barriers to some of the proposed highway segments (*see concept paper attached*).

158-9 **In summary, we recommend that Caltrans study and prepare an amended Draft EIS/EIR that describes a four-lane L-C Hybrid “Preferred Alternative,” alongside the other study alternatives.** In this document, the decision making process should be made clear. If not another Draft EIS/EIR, an equivalent approach that allows full public review and comment prior to final adoption and certification of the project EIS/EIR should be followed. The document should also include a full description of an associated environmental mitigation plan and implementation program.

Please refer to the Brooktrails Township comments, which we principally authored, for supporting testimony to our personal comments. Please place this DEIS/DEIR comment letter on the public record, for consideration in choosing the best design for this important transportation project affecting our community.

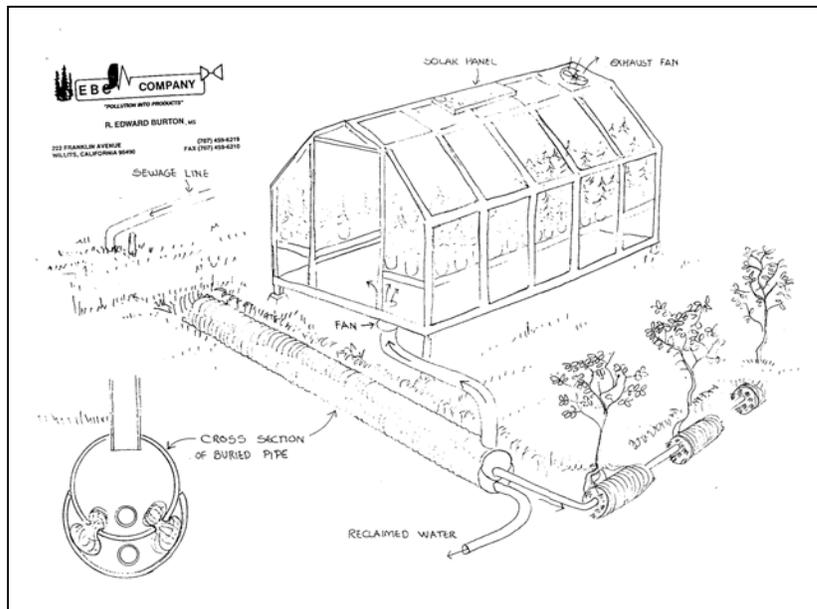
Sincerely,



Janet and Tony Orth

Enc: EBC Company’s wastewater concept

* Staff to MCOG
Elected to LAFCO, Brooktrails Township CSD,
Mendocino County Democratic Central Committee,
California Democratic Party Central Committee



159 Gary Owen

159-1 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.

The 1998 study the comment refers to is probably the 1999 Value Analysis that is discussed in response to Comment 34-15 (Willits Citizens for Good Planning).

Reducing a four-lane bypass to a two-lane bypass does not reduce impacts by 50 percent because of necessary design components, such as shoulders, side slopes, and drainage facilities. See also response to Comment 73-5 (Mary Delaney).

July 17, 2002

Cher Daniels, Chief
CalTrans Office of Environmental Management S-1
2389 Gateway Oaks Dr., Suite 100
Sacramento, CA 95833
Attn: Nancy Mackenzie, Environmental Coordinator

Dear Ms. Daniels,

I have the following comments to submit concerning the Draft EIR/EIS Document for the Willits ByPass Project:

159-1

1) A significant portion of the Willits area community has demonstrated support for construction of a Two Lane ByPass for several years. Yet, the Document refuses to include this viable alternative by the use of a circular, self-fulfilling illogic that it would not meet CalTrans' own objectives. However, a Two Lane Alternative actually would meet the stated "purposes and needs" of the project, as defined in the EIR/EIS, better than the hugely expensive Four Lane alternatives offered. Those purposes and needs are, essentially, to facilitate the movement of inter-regional traffic and to increase safety.

A Caltrans 1998 study found that the Two Lane would be more than adequate to handle that traffic flow which has no destination, origin, or stop-over in Willits for at least the design lifetime of the project. Even by the year 2028, conditions on a Two-Lane By-Pass would be similar to the current existing Two-Lane segments of Highway 101 in the Little Lake Valley north of Willits. Because of the huge cost of the Four Lane Alternatives, however, there could be no money left over to improve the other, more dangerous segments of existing highway in the Willits area, such as the blind passing zones in residential areas in the Ryan Creek area. A safe, smooth Two Lane By-Pass could be constructed all the way from the south project boundary to the largely-empty four lane highway north of Ryan Creek and still be within the \$116 million project budget.

Moreover, a Two Lane By-Pass has the following advantages over the Four Lane Alternatives offered in the Document:

- much lowered impacts to all the aspects of the natural environment,
 - much less consumption of acreage,
 - less consumption of fill material from borrow pits,
 - by designing to a lower traffic speed (50-55 mph),
- studies prove that traffic deaths could be much lowered (My memory tells me that the most all of the vehicular accident traffic fatalities in recent years have occurred either in the Ryan Creek area, or in the Four Lane section of highway atop and on the south side of Ridgewood Grade!),
- by the same token, noise levels are much reduced,
 - visual impacts are lessened

159-2 General Response 1.3 explains the reasons Alternative E3 is no longer under consideration. Alternative E3 could not be reasonably truncated due to issues involving the topography and resulting steep grade from the Upp Creek Interchange to existing U.S. 101 north of the old truck scales.

159-3 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 for a discussion of a center valley interchange, which is beyond the scope of this project on any of the valley alternatives.

Any of the bypass alternatives will reduce traffic in Willits, including at the Sherwood Road/Main Street intersection (General Response 1.8).

-a Two Lane would be built much more quickly, reducing social and economic disruption (not to mention noise!) to the Willits community,
-a Two Lane would facilitate travellers' desire to utilize the existing businesses of Willits more readily, thus lessening the economic loss over the long run,
-both during the construction, and with the naturally slower speeds, there would be significantly reduced consumption of fossil fuel by a Two Lane Alternative,
-it costs so much less! (If the decision to truncate the offered alternatives was made, according to the Document, in order "by the need to design a project within the existing budget constraints", then CalTrans is obligated to examine an alternative which achieves exactly that, plus reduces all environmental damages, and facilitates the movement of inter-regional traffic adequately.

It is foolhardy to over-design a project and to waste so much more money than is needed in these days of State fiscal crisis, when a smaller project is much more appropriate and less damaging.

159-2

2) It is obvious that Caltrans has artificially stacked the deck against the E3 Alternative. As the only route which does not pass through the sensitive Valley lands subject to other regulatory agency permitting, E3 was assigned a cost of over twice as much, essentially eliminating it from practical consideration. But this \$301 million cost derives from the facts that E3 is up to five miles longer than the other routes, is the only one which continues all the way to Oil Well Hill, and is the only one to have three interchanges, including being the only one to actually connect with the "other" State highway, Highway 20! To fairly present a non-Valley route to the ultimate decision-makers (both in cost and in environmental impacts), the other three routes must be measured by the same yardstick: extend them all the way to Oil Well Hill, and add interchanges with Hwy 20; then refigure their costs.

If, as the Document states, Routes C, L, and J were "truncated" in order to lower costs, there is no reason not to truncate E at the same northerly point, except to inflate its apparent cost so highly above the Valley routes.

159-3

3) It is indicative of the inadequacy of the Caltrans proposals that they would propose to spend up to \$151 million dollars of State money (Alt C, J, and L) to build a Four Lane Freeway for Hwy 101 and yet not connect it to Hwy 20, nor to facilitate the large traffic flows in and out of the Brooktrails community.

The proposal to continue to route all Hwy20-bound traffic (from north and south) to the south Haehl Creek interchange and then right back up through the center of town (exactly where today's traffic back-ups occur) for the next 35 years will ensure that trucks continue to lumber down Main St., that traffic jams will continue to occur, and

159-4 Comment noted. The DEIS/EIR (page 1-8) provides the location where interested parties can review copies of the technical studies that are summarized in the DEIS/EIR. See also, Appendix A (FEIS/EIR) for avoidance, minimization, and mitigation measures proposed for the project.

159-5 See General Response 1.14 regarding project mitigation.

159-4

pedestrian safety will continue to be jeopardized by out-of-towners trying to "get the hell out of Dodge."

Any Project Alternative that neither facilitates smooth and easy traffic flow from Hwy 101 to Hwy 20 does not meet the stated needs and purposes of the project in Chapter 2. And, any project that does not acknowledge and provide for the fact that much of the existing congestion on the current 101 alignment is the many vehicles attempting to access the Brooktrails community likewise does not meet the stated needs and purposes. If there's no traffic congestion north of Sherwood Rd., does it not show that the "thru" traffic is not the primary problem?

Why spend that much money for that little solution?

4) It is simply absurd that the Document concludes that there would be only three "unavoidable and significant impacts" from the three Alternatives other than E (Section 6.4). I, and many other Willits citizens, consider the greatly increased noise levels to be significant, the loss of wetland to be significant, the loss of business to be significant, the loss of old growth Oak Woodland to be significant, the placement of a ten mile long, 150' to 250' wide concrete monster in the middle of our Valley to be a significant visual degradation of our environment, the inevitable growth inducement of cheap highway commercial development around the interchanges to be significant (see item 7 below), and the damage to wildlife habitat to be significant.

The Document tries to wave an imaginary and future wand to make these impacts disappear with wishful thinking in Chapter 6, but we who will have to live with these immense changes to our environment and community will never be able to escape their impact so easily. To pretend otherwise is to present a false and inherently flawed Document to the decision-making authorities.

159-5

5) The Document promises that many of the mitigations "will be prepared" in the future, or that Caltrans will cooperate with other Agencies in the future to develop measures to lessen various environmental damages. This is blatantly inadequate under federal and state law in that the decision-making authorities, and the public, cannot make an adequately informed before all the mitigating measures and the impacts of the choices are known. How can the effectiveness of a mitigation be evaluated until it is described, defined, and made part of the legal document?

Moreover, this tactic is a classic way to get out of taking mitigating measures at all. Who is to enforce the follow-through? These vague promises most always are forgotten by governmental agencies once the choice is made and the permits issued. If the Document can only promise to design a mitigation sometime "in the future," then the public and the decision-making authorities must assume that no mitigation will ever be performed.

159-6 The location of the proposed access road shown in the DEIS/EIR was approximate and because of the large scale of the map, the access road appeared to encompass the entire length of the unnamed ephemeral stream, which it did not. The impacts to resources related to the creek were analyzed and summarized in the DEIS/EIR. Modified Alternative J1T may require the realignment of approximately 2,800 feet of this ephemeral creek channel. However, Caltrans will have to reconstruct this channel adjacent to the alignment. The reconstructed channel will include normal water flows and riparian vegetation. See response to Comment 180-1 (Ed and Erlyne Schmidbauer).

159-7 See General Response 1.12 regarding "growth at interchanges." The first paragraph on page 4-20 of the DEIS/EIR is a discussion of a visual survey of the businesses along U.S. 101. At the time of this survey, there were 188 businesses in Willits along U.S. 101. The analysis divides these businesses into three categories: primarily serving residents of the area, primarily serving tourist/through traffic, and serving both. The comment suggests that the "both" category be combined with the "primarily serving tourists" category. However, impacts to businesses in this category are difficult to pinpoint. Impacts to businesses that primarily serve tourists are also difficult to pinpoint. For instance, U.S. 101 bypasses the City of Ukiah, and Ukiah does not have a well-known tourist attraction, but Ukiah had almost as many hotel/motel rooms per capita as Willits in 2001 (0.04 in Ukiah and 0.05 in Willits, according to an informal survey in August 2002). The data suggest that a location along U.S. 101 provides an advantage to tourist-serving businesses whether or not the city in which they are located is bypassed.

Whatever the impacts of the loss of through traffic, businesses that serve both residents of and visitors to this area are less likely to feel the effects of a bypass than businesses that primarily serve visitors. For this reason, the analysis treats this 21 percent of the businesses along U.S. 101 separately.

159-6

6) Routes C, J, and L all include in the Environmental Atlas (Vol. 2) a nearly-mile long access road to the Schmidbauer Ranch from East Hill Rd. that would be adjacent and in addition to the specified right-of-way for the freeway itself. This would necessitate additional "taking" of private property from one landowner in order to provide access to private property for another landowner. This is despite the fact that the Haehl Creek interchange is only a few hundred feet away from the Schmidbauer residences and that their current access is from the same general area. Moreover, the decades-old agreement between the State and the Schmidbauer family promised access to their property from existing 101, or the new interchange, and not from distant East Hill Rd.

Most incredibly of all, this proposed mile-long access is drawn on the map directly on top of a seasonal creek with riparian habitat the entire length of the access. From personal knowledge, this creek channel is up to 15 feet deep and 40 feet wide, provides important wildlife habitat (nursery, persistent waterholes, cool summer shelter, dense vegetative cover, snag trees, etc.), contains riparian vegetation, and drains a fairly large expanse of hilly terrain. I personally have seen bear, mountain lion, fox, bobcat, yellow-breasted chat, white-tailed kite, and golden eagles (the latter three are "species of concern") in this creek area, not to mention deer, frogs, turtles, etc.

To bulldoze it in and pave it over for no apparent reason, and to fail to account for this loss of environmental quality and the loss of plant and wildlife habitat in the body of the Document is a frightening indication the willingness of Caltrans' engineers to do willy-nilly damage to the Willits area environment. Without aggressive mitigation, this access road destruction alone qualifies as a "significant and unavoidable impact." Do they ever get out and walk the ground before they draw roads on maps? Where's all the water gonna flow once you build a road on top of a creek?

159-7

7) The Document fails to adequately consider the growth-inducing impacts of the new highway interchanges. It vaguely discounts the possibility in a single sentence, without justification, and does not propose a single mitigation.

It is inevitable that pressure for conversion of adjacent properties to the interchanges will result in a sprawl of motels, gas stations, fast food joints, etc. at one or both of the Willits access points. This has happened virtually everywhere when a by-pass is built. These new business tend to be corporate-built and -owned and do little to enhance the local economy. Moreover, they inevitably take business away from the existing, long-established, and largely locally-owned businesses within the currently developed foot-print of town. This usually results in a

The comment regarding the multiplier effect of lost revenue is noted. The loss of some portion of the tourist dollar currently spent in Willits would have multiplier effects within the community. On the other hand, the removal of undesirable traffic, especially large trucks through the downtown area, holds the potential for attracting new businesses and shoppers to the downtown area. And, in the short term, construction expenditures will also have multiplier effects on the local and regional economy.

The second paragraph on page 4-20 is based on the number of *retail* stores and retail permits in Willits in 1998 – data that comes from the California State Board of Equalization. The State Board of Equalization has developed a definition of what constitutes a “retail store.” Included in this definition are: apparel stores, general merchandise stores, food stores, eating and drinking establishments, home furnishing and appliances, building materials and farm equipment, auto dealers and auto supplies, and service stations. The second paragraph on page 4-20 combines the Board of Equalization’s data on retail stores with the count of businesses along U.S. 101 to determine that there are 118 retail stores on U.S. 101.

The Economic Impact Report prepared for this project determined that the local economy would see greater long-term growth with a bypass than under current conditions.

degradation of the economic viability of the historic downtown section. Adding insult to injury, any new highway interchange commercial business would, in Willits' case, be outside the City limits and thus would not contribute tax revenue to the City.

To adequately protect against this unsightly highway commercial sprawl (read: Visual Impact), the Final EIR/EIS should include a mitigation directing that the State purchase the development rights on all properties adjacent to the proposed interchanges, and hold that easement forever against development. Not to do so would be to slowly multiply all of the other environmental effects of the By-Pass itself.

Furthermore, a mitigation should be included to provide economic assistance for the conversion of the numerous Willits tourist-based businesses that will suffer loss of traffic to other community-enhancing uses. The Document on page 4-20 claims that some 17% of Willits businesses "appear to cater primarily to tourists or both tourists and area residents." The impact of the loss of 101 traffic past their doors of these businesses is obviously a significant impact to the local economy. Yet, no mitigation is proposed. Therefore this loss of business must, by law, be listed as a "significant and unavoidable impact" in Chapter 6.4.

Moreover, Table 4-10 lists 188 Willits area business along U.S. 101: of these, 25 are Restaurants, 6 are Fast Food, 8 are Gasoline, 1 is a Convenience store, 11 are Hotel/Motels, 15 are Gift/Variety shops, and 2 are "Other Tourist Services." That adds up to 68 business that, by their very nature, serve travellers. That is 36% of total Willits business that are travel-oriented, not the 17% that the text on the same page claims. The Document does not even take into account the fact that the loss of revenue to 68 directly-affected businesses (and consequently to the City tax return also) then ripples throughout the whole Willits economy and affects even more businesses.

(Even more troubling, while the table lists 188 businesses along U.S. 101 within the City limits, the text claims that there are only 118 retail stores along 101 in the entire City of Willits. By eliminating the hotels/motels, gasoline stations, and restaurants from the calculations, the Document then arrives at the false 17% figure. Perhaps this sudden disappearance of 70 Willits businesses is predictive of what will happen to the local economy after the ByPass.)

This not only makes the damage to the Willits economy more that twice as significant as the Document claims, it bodes poorly for the accuracy of the other tables, statistics, and conclusions throughout the Document.

The Final EIR/EIS should include as a mitigation the provision of significant enhancement funds to aid local businesses and employees adversely affected by loss of

159-8 The oak riparian forest referred to in the letter would be avoided by the construction of Modified Alternative J1T, which was designed to avoid impacts to a number of resources including the oak riparian forest. See response to Comment 26-1 (California Oak Foundation).

159-9 Caltrans/FHWA are confident in the adequacy of the DEIS/EIR as a document of disclosure and for providing the necessary information to make a decision on the project. Also, see response to Comment 144-23 (Jason Minton).

business, and to reconstruct Main St. ("Business 101") into something attractive, as was done in Cloverdale.

159-8

8) The Document fails to adequately mitigate the loss of old-growth Oak Woodland habitat, particularly as it relates to Route L, which destroys the Colli Woodlands. The proposed mitigation (to plant five acorns for each tree bull-dozed) is less than that practised by the average wood-pecker each hour of a fall day. Old growth woodland, even under the most optimistic of scenarios, could not be re-created by one hundred landscapers working full-time for two hundred years. When the design life of the freeway is only a few short decades, and the proposed mitigation would take centuries, the Document fails to protect this significant aspect of our lovely Willits area environment.

159-9

In conclusion, I am concerned that the persons and agencies which will make the ultimate decision concerning the Willits Bypass cannot be inadequately informed, as required by law, because of the deficiencies inherent in the Draft document. I am requesting that these issues be honestly and fully evaluated, and that the true "significant unavoidable damages" be acknowledged in the Final EIR/EIS.

Sincerely,


Gary W. Owen
881 East Hill Rd.
Willits, CA, 95490

160 Robert Parker

160-1 Caltrans appreciates your comments. Determination of the preferred alternative has been a lengthy process. General Response 1.3 explains selection of Modified Alternative J1T as the LEDPA/Preferred Alternative.

Reasons for not including a center valley interchange are discussed in General Response 1.9.

The Quail Meadows Interchange on the preferred alternative (Modified Alternative J1T) will accommodate a connection to a Brooktrails second access road (General Response 1.6).

See General Response 1.4 regarding a Willits Creek restoration.

2241 Rancheria Road
Redwood Valley, CA 95470
22 August 2002

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

SUBJECT: COMMENTS ON THE ROUTE 101 WILLITS BYPASS DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)/ENVIRONMENTAL IMPACT REPORT (EIR)

Dear Ms. MacKenzie:

Thank you for the opportunity to comment on the Draft EIS/EIR for the proposed Willits Bypass for Route 101.

160-1

My perception is that Caltrans has done a very thorough job in depicting the potential environmental impacts associated with the route alternatives for the proposed bypass. It's obvious that your agency has gone far beyond the minimum requirements in gathering comments, attitudes, recommendations and "gripes" from area residents and the many public entities and regulatory agencies that are stakeholders in the project. I strongly feel that it is now time to make a decision on the preferred route. From the latest information I've heard, Caltrans will select the preferred alternative for the Willits Bypass by January 2003 and *could* select the preferred alternative by the end of this calendar year. At this point, I see no reason whatsoever for postponing the decision beyond January 2003.

It's true that different segments of our local region have somewhat varying positions on discrete features of the Willits Bypass project. For instance, the City of Willits still wants an interchange for State Route 20 to be seriously considered—even if providing such interchange would mean deleting the one at Haehl Creek. The Brooktrails Township Community Services District wants the bypass to accommodate direct connection with a (future) Brooktrails Second Access. This would be supported by an interchange at the Truck Scales site. Regardless of the various emphasis points, the overwhelming majority of local area residents strongly support a four-lane bypass and want it to be constructed as soon as is practicable. Also, there seems to be *universal* support for performing a focused restoration of Willits Creek (basically, re-establishing a 575-foot reach at/near the historic alignment of the creek) as part of the overall project.

Although an interchange for Route 20 will most likely be needed sometime in the future, the bypass project is viable as it's now configured, with an interchange south of Willits and another to the north. I'm confident that with all the lengthy deliberations on the bypass—especially by the Project Development Team, representing a wide range of stakeholder interests and concerns—there are sound reasons for not including a Route 20 interchange in the current project.

160-2 The hybrid Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria and therefore, will no longer be considered for construction. See response to Comment 160-1 regarding Alternative L/C and other issues noted here.

Regarding the Haehl Creek Interchange, see response to Comment 20-4 (Mendocino County Board of Supervisors).

160-2

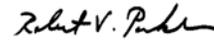
Caltrans District 3 (cont.)
Page 2

With the preceding background, my recommendations for the Willits Bypass are as follows:

- Bypass should be a *four-lane* highway
- A hybrid alignment is preferred—consisting of the “LT” alignment south of the applicable nodal point and the “C1T” alignment north of the nodal point
- Restoration of Willits Creek should be included as an integral part of the project, as a major environmental mitigation measure
- Northern interchange should be the Truck Scales Interchange
- The Haehl Creek Interchange should be designed so as to efficiently convey traffic onto and off the Willits Bypass

Should there be any questions on the forgoing comments, please contact me at 707-485-7867.

Very truly yours,



Robert V. Parker, P.E.

cc: Assemblywoman Virginia Strom-Martin
Senator Wesley Chesbro
Rick Knapp, Director, Caltrans District 1
Lena Ashley, Project Manager, Caltrans District 1

161 Evelyn Parks and Jo Ann Flynn

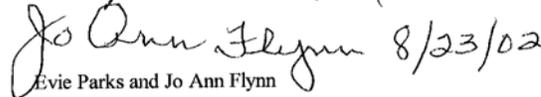
161-1 Comment noted. See General Response 1.10 regarding a two-lane facility.

161-1

Caltrans,

I have been a Willits resident since 1967 and the traffic is getting worse every year. I am for the Willits Hwy. 101 bypass. A two lane undivided highway is the most dangerous in the country. I have seen reports and the statistics on deaths on two lane highways and it has been staggering. If a bypass is going to be built at all, we need a four lane highway. The noise is not going to be any different, two lane or four lane. It is NOT going to "encourage" more traffic, that doesn't even make sence, as some protesting a four-lane bypass have suggested. (Evidently, they haven't had any friends hit and killed by cars on Main Street, as we have.) A two-lane highway is just another road waiting to kill. It has even been said in a recent news report, "if you really want to kill someone, put'um on a rural, two-lane highway." As seen on a research and report shown on MSNBC on August 11, (Dateline, Weekend", by Stone Phillips), they have been researching the two-lane highways across the country and found them to be the most dangerous in the country. There is no room for correction or error on the highways that go around curves or into the mountain areas. Not counting straight two-lanes where there is no where to go when a drunk driver or sleepy driver may be heading your way. Head-on collisions are a big problem. All these problems should difinately be considered. If the money is going to be spent on the bypass and it's available, the bypass should be built right the first time, not to have to go back and find more funding to fix a BAD mistake!

Sincerely,



Evie Parks and Jo Ann Flynn

162 Jill Peacock

162-1 See response to Comment 73-5 (Mary Delaney) and General Response 1.10.

162-2 Modified Alternative J1T was identified as the LEDPA because it would result in the least overall environmental harm of the other build alternatives, including impacts to wetlands and other environmental and community resources.

Implementation of a mitigation and monitoring plan will further minimize and compensate for impacts resulting from the project (Appendix A, FEIS/EIR). Regarding local traffic, see response to Comment 32-1 (Save All the Valley Eternally).

162-3 Caltrans analysis of a two-lane alternative concluded that it does not meet the purpose and need of the project. See General Response 1.10 for further explanation.



Jill M. Peacock
21575 Locust Street
Willits, CA 95490
Home Phone 707 459 2151
Email jpeacock@mcn.org

August 08, 2002

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

162-1 Dear Ms. Daniels,
I have been a resident of Willits for about ten years and am extremely concerned about the plan to build a four-lane freeway through our beautiful valley. I know that on a few holiday weekends in the year there is a back-up of traffic through our town, and that large trucks use our only main street, but these problems could be helped by a much less damaging two-lane bypass that would cost much less, help with the 40% of traffic that is local, and be a minor environmental and visual disruption.

162-2 Willits Valley is unique in its flora and fauna and in its sheer pastoral beauty, a rare and lovely place with stunning view in all directions, and is home to many plants and birds. I have seen the destruction that huge freeways do to the places they are routed through, and hope that Willits can be one place where short-sighted planners choose a gentle way round the traffic problems. With the CA budget in its shaky position it seems wrong to embark on such a huge waste of our tax money on a project that will destroy an area for once and for all, and still not solve the problems of local traffic or a Brooktrails township access. Willits has been cut up by a railway, and the presence of 5 or 6 rivers, and local traffic flows could be helped by some simpler planning solutions.

162-3 We need to take this plan back to the beginning, and in the light of traffic studies look at a two-lane bypass alternative that will save money, be much more people friendly, and not change the character of the area in irreversible ways. A freeway is forever, not in Willits,
Thank you,
Yours sincerely,

Jill Peacock

163 Carol Perez

163-1 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.

All of the build alternatives considered in the DEIS/EIR are true bypasses.

See General Response 1.6 regarding Brooktrails second access road. See General Response 1.8 regarding traffic operations at Quail Meadows Interchange. See General Response 1.12 regarding "growth at interchanges." See General Response 1.4 regarding Willits Creek restoration.

Carol A. Perez
27310 Oriole Dr.
Willits, CA 95490
ac2perez@msn.com

July 31, 2002

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

To Whom It May Concern:

163-1 My husband and I have been residents of Brooktrails and Willits, CA for over 20 years. We have been hearing about a freeway bypass of Willits for as long as we have lived here. We are very pleased that it is finally about to happen in reality. My work requires me to commute to Ukiah 3 to 4 days a week. Having a freeway bypass would be very much appreciated. However, it has come to our attention that the proposed northern interchange at Quail Meadows would actually lengthen my commute to Ukiah. Therefore, I am writing this letter to encourage CalTrans to build the ELSIE hybrid alternative that would offer Brooktrails a shorter route of access to the freeway at the northern end of Willits and decrease the congestion that is currently a problem with traffic coming off of Sherwood Rd into town. The advantages to using the truck scales interchange would be:

- Natural connection to Brooktrails
- Easy commuter route; a true bypass
- Reduces congestion at Sherwood Rd at US 101
- Improves safety at Willits High School
- No commercial development at the interchange
- Better emergency vehicle access to Brooktrails
- Good disaster evacuation route for Brooktrails

This interchange is supported by:

- Brooktrails
- City of Willits
- Willits Board of Supervisors
- Willits Police Department
- Mendocino Emergency Service Authority
- Emergency Medical Services

- California Department of Forestry
- Little Lake Fire Department
- Brooktrails Fire Department
- Willits Unified School District

I would also ask that you study the Willits Creek Restoration that has been proposed. The Willits Creek Restoration gives endangered fish a bypass of their own by returning the creek to its original configuration. It is only 8% as long as the CalTrans proposed stream realignment and would enhance the new Willits Sewer Plant by increasing channel flows.

Respectfully yours,

Carol A. Perez

164 Rick and Kris Pierce

164-1 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 included for consideration in the DEIS/EIR. See General Response 1.9 regarding center valley interchange.

164-2 Modified Alternative J1T has been identified as the Preferred Alternative. Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria for its overall environmental harm, including significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species (General Response 1.3). See General Response 1.6 regarding a Brooktrails second access road.

August 21, 2002

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

Dear Nancy,

As twenty-five year residents of beautiful Willits, California, we would like to express our views regarding the proposed Willits bypass project. We have lived and worked in Willits since 1976 and raised our family here. It is our home and we want to maintain the beauty and small-town character of our little city.

164-1

We would like to go on record in support of a two-lane, rather than a four-lane, bypass with an interchange for Highway 20. A two lane bypass will negatively impact the beauty of Little Lake Valley less and will adequately serve traffic projections for the next 100 years. It will cost much less and be quieter than the four lane option.

164-2

Furthermore, we feel the best route for the highway is the ELSIE route (a combination of routes L and C). This route with it's interchange north of town at the truck scales will allow for traffic from Brooktrails to head south to Ukiah without having to congest the north end of town near the high school. It will also provide an urgently needed second access road for residents of Brooktrails.

We respectfully request Caltrans to include these proposals in the final Environmental Impact Statement/Report. In talking to many, many of our fellow residents we feel this is the feeling of the great majority of the inhabitants of Willits. The bypass has the potential to create many improvements in our little city but only if Caltrans listens to the will of the people and follows these common sense suggestions. Thank you for your consideration.

Sincerely,

Rick Pierce
Kris Pierce

165 Jennifer Poole

165-1 See response to Comment 9-3 (City of Willits Mayor's Office).

165-2 Caltrans and FHWA are coordinating the development of final mitigation measures with agencies having jurisdiction over affected resources, including resource agencies, and local and county government. See also response to Comment 9-3 (City of Willits Mayor's Office).

165-3 See Section 1.2 (FEIS/EIR) regarding project funding.

165-4 See responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning), respectively, regarding feasibility of mitigation measures and discussion of viaduct.

165-5 There were several other reasons that Alternative E3 does not meet criteria for LEDPA. See General Response 1.3. See also response to Comment 34-63 (Willits Citizens for Good Planning).

8-26-02

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

Attn: Nancy MacKenzie,
Environmental Coordinator
Re: Willits Bypass Draft EIS/EIR

cc: various

Dear Ms. MacKenzie:

I have listed below some comments on the **Willits Bypass Draft EIS/EIR**.

On issues raised by the City of Willits

- 165-1 * I strongly agree with the City of Willits about "the need to insure that any adverse project impacts to the City are mitigated."
- 165-2 * I strongly agree with the City's concern that development of mitigations will occur outside of any public process, without any input from city officials or citizens.
- 165-3 * I strongly agree with the City's concern about funding for mitigations. Capital costs alone for every alternative exceed the current project budget. The DEIR says: "Additional state and regional funds will be the source of the balance of funds needed to construct the project." Is that a guarantee?
- 165-4 According to the DEIR, just one farmland mitigation that would have to be incorporated into any of the valley alternatives would TRIPLE the cost of the project: "If a valley alternative is chosen as the preferred alternative, the design will be modified to place the alignment on a continuous viaduct. A continuous viaduct would impact the least amount of farmland; however, it would more than triple the current estimated cost of each alternative."
- As the City asks: "Is this measure intended to mean that, in order to adequately mitigate agricultural impacts, each of the valley alternatives must incorporate a continuous viaduct? Would the cost of such a viaduct make ALL [emphasis mine] the alternatives prohibitively expensive to build, thereby ruling out ALL [emphasis mine] of the alternatives?"
- If it IS the conclusion of the planners who created this environmental document that all of the alternatives would cost far more than is currently budgeted for the Willits bypass, why is this conclusion hidden in the fine print? Why are the capital costs shown in Table 2-3, Estimated Project Cost, for valley routes J1T and LT not adjusted to include the construction cost of a continuous viaduct, if building one is required or even planned?
- 165-5 The DEIR says that Alternative E3, with an estimated capital cost of \$301 million, does not meet the federal criteria for Least Environmentally Damaging Practicable Alternative due to "excessive construction costs." If the valley routes' capital costs were adjusted to include the cost of a continuous viaduct, they'd cost \$453 million (J1T) and \$390 million (LT).

165-6 Caltrans will make every effort to minimize the annoyance and inconvenience of project construction. See Section 2.4 and Section 3.18 (FEIS/EIR) regarding construction process, impacts, and mitigation measures.

Regarding impacts to local businesses and City revenues, see responses to Comments 34-43 through 34-49 (Willits Citizens for Good Planning). See General Response 1.12 regarding “growth at interchanges.”

165-7 See response to Comment 9-2 (City of Willits Mayor’s Office). Mitigation measures are proposed to reduce projects impacts. Caltrans will continue to work with the City of Willits throughout project design and construction to minimize impacts.

165-8 Comment noted. See General Response 1.3 regarding development of Modified Alternative J1T.

165-9 See response to Comment 9-83 (City of Willits Mayor’s Office).

165-6	<p>What about funding for mitigations to compensate Willits for the “pain and suffering” experienced during the construction process, and the short- and long-term impacts of a Willits bypass on local businesses and City revenues? What about compensation for the growth-inducing impact of a southern interchange lying outside the City’s boundaries? Not only will the City of Willits have no jurisdictional authority over the pace and standard of development there, all sales tax revenues garnered at the interchange will accrue to the County of Mendocino, not the City of Willits. Conservation easements could help here; who will fund them?</p>
165-7	<p>Without a Highway 20 interchange to get tourist, truck and everyday traffic from the Coast off Main Street, with the noise and visual impact of a 68 mph freeway very close to town, and with the awkward connection of Brooktrails traffic to the planned Quail Meadows interchange, Willits will be giving more than it gets out of this project – as it is described in the DEIR. Substantial compensatory mitigations are surely in order.</p> <p>* I emphasize my concern for the lack of a Highway 20 interchange.</p>
165-8	<p>* I share the City of Willits’ lack of support for alternative J1T.</p>
165-9	<p>* I agree with the City of Willits’ comments that it is “regrettable that such a large credibility problem exists with the public’s perception of the document and the process.”</p>
<p>On issues raised by Willits Citizens for Good Planning</p>	
165-10	<p>* I strongly share the concerns about the impacts of a substantial increase of Noise on the Willits valley. The DEIR says only noise increases in excess of 12 dBA will be considered “substantial.” If Willits Citizens for Good Planning are correct in identifying a 12 dBA increase as equivalent to a four-fold increase in current noise levels, to suggest that such an increase would not be a significant impact on our rural valley is absurd.</p> <p>Even so, the DEIR states that noise increases will range from 1 dBA to 19 dBA. Mitigating these noise increases with sound walls would be unfeasible or unreasonable due to cost, the DEIR states. So, evidently, they’ll remain unmitigated. Why then, in Table 5-31, CEQA Summary of Environmental Impacts and Mitigation Measures, are Noise impacts listed as “Less than Significant”?</p> <p>I tried to read the Noise sections several times to understand why a noise increase of 19 dBA was NOT considered a significant impact at the end of the day, but I could not figure it out.</p>
165-11	<p>* I, too, believe the visual impact of a four-lane freeway through this beautiful valley is a substantial impact that must be considered an unavoidable significant impact even after considering the suggested mitigations.</p>
165-12	<p>* I find the arguments for the two-lane bypass put forward by Willits Citizens for Good Planning to be persuasive. I don’t believe Caltrans’ arguments that a two-lane bypass will not meet the “Purpose and Need” of the bypass. A first-stage two-lane project was approved by the California Transportation Commission back in 1992, “due to limited funding available for new projects.” Has the level of service on Highway 101 changed that much in 10 years? I can find no arguments that it has. (In fact, there’s probably fewer lumber trucks today.) If a two-lane project was good enough to start with for the CTC in 1992, why isn’t it good enough today?</p>

165-10 There would be no increase in noise above 12 dBA for the Modified Alternative J1T. See the Noise analyses (Caltrans 2000f, 2001b, 2002, 2005c; Appendix M) and Section 3.11, FEIS/EIR, for additional discussion on noise.

Sound walls are not proposed for most areas primarily because a 5 dBA reduction in noise levels was not attainable, making the sound wall infeasible. For a sound wall to be feasible it must be able to reduce the noise level by at least 5 dBA (Traffic Noise Analysis Protocol, 1998).

If the predicted traffic noise levels, after project construction, are expected to result in a substantial noise increase over the existing noise levels there would be a potential for the proposed project to cause a significant adverse environmental effect due to noise. To determine if the substantial noise increase is a significant adverse environmental effect, consideration must be given to the context and intensity of the substantial noise increase. Context refers to the project setting and uniqueness, or sensitive nature of the noise receiver(s). Intensity refers

to the project induced substantial noise increase, i.e. the increase over the “no-build” condition; it also refers to the number of residential units affected and to the absolute noise levels.

When looking at the context of a project impact, Caltrans analyzes the impacts to a person or receptor in relationship to the whole project. Caltrans analyzed 107 locations, which covered all receptors within the noise modeling capabilities. Of these locations analyzed, one receptor on Alternative E3 (no longer being considered for construction) had a 19 dBA increase. One location in a seven-mile project corridor with numerous receptors did not trigger a significant adverse impact overall; that is not to say that the individual would not experience a noise impact.

Caltrans will, during the design phase of this project, continue to investigate the use of quiet-pavement technologies, including open graded asphalt.

165-11 See response to Comment 34-78 (Willits Citizen for Good Planning).

165-12 General Response 1.10 provides additional discussion, to that included in the DEIS/EIR (Section 3.6.2), as to why a two-lane bypass does not meet the purpose and need for the project. See also response to Comment 34-30 (Willits Citizen for Good Planning).

165-13 We believe the comment refers to Caltrans Route Concept Report for U.S. 101. Route Concept Reports (RCR) are concepts for construction of highway improvements for the 20-year planning horizon, and beyond. In the U.S. 101 RCR, two segments of existing two-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 four lanes. Finally, in the foreseeable future, we do not expect these segments to require four lanes due to increased traffic volumes. However, if conditions change, the RCR could change to address future needs.

165-14 The comment does not state what part of the DEIS/EIR is being referenced. Table 4-7 (DEIS/EIR) lists property values based on 1996 data, rather than 1990-2000 data as stated in the comment.

165-15 Comment noted.

165-16 See Section 1.2 (FEIS/EIR) for a discussion of estimated project funding and schedule.

Additional comments

- 165-13 * I'd like to note Caltrans' recent decision to formally acknowledge that there will be exceptions to their four-lane-all-the-way-to-the-border policy for Highway 101, including the Richardson Grove area. If this policy had been in place when work began on the environmental review for the Willits bypass, would a two-lane alternative have been taken more seriously?
- 165-14 * I am wary of the DEIR's treatment of property values in the Willits valley. Data used is from 1990 - 2000, so it misses the substantial increase in property values seen around Willits since 2000. Some realtors say property values have gone up 100 percent in the last year and half or so; and properties listed for sale or for rent in the Willits News certainly are more expensive than they were in 2000.
- 165-15 * I'd also like to put on the record my strong objection to the statement attributed to Caltrans' Rick Knapp in the Aug. 15 SF Chronicle story on the Willits bypass that "it can take two hours to travel the 2 miles through town." Two hours? I haven't heard about any two-hour traffic jams in the nine years I've lived here.... I mean, how many hours does it take to get across the Golden Gate Bridge if there's been a big accident? Does that mean Caltrans is planning to replace the Golden Gate with a 16-lane hunk of concrete? Maybe we need to add some compensatory mitigation to the deal for the loss of tourism revenues that such ongoing exaggeration of the traffic problems in Willits has caused....
- 165-16 * Despite the above comment, I do agree that Willits deserves a break from the Highway 101 traffic, and that 101 drivers in a hurry deserve a break from the backup in Willits. If a four-lane bypass - including proper mitigations and genuine compensation for the serious impacts on the people and environment of the Willits valley -- is not buildable at this time due to costs, Caltrans should get real and start studying some workable, buildable solutions to the problem of Highway 101 congestion in Willits.

Thank you.



Jennifer Poole
P.O. Box 1698
Willits, CA 95490
707-459-2633
jtpoole@saber.net

NOTE: These comments were mailed to the above address on August 26, 2002, as well as submitted electronically through the Comment submission form on the Caltrans website at:
<http://www.dot.ca.gov/dist3/departments/environmental/willits/comments.html>

166 Marcia Pratt

166-1 See General Response 1.10. Caltrans traffic analysis of a two-lane bypass concluded that a two-lane bypass does not meet the purpose and need of the project and therefore, it was not considered in the DEIS/EIR.

166-2 Alternatives C1T and L/C, which include the Truck Scales Interchange (Wild Oat Canyon), do not meet Clean Water Act Section 404(b)(1) criteria and therefore, cannot be considered for construction. See General Response 1.3.

166-3 See General Response 1.12 regarding "growth at interchanges."

79 W Valley St. (331)
Wildcat CA 95170
August 17, 2002

Dear People of Caltrans

166-1 I have so many concerns about the bypass. I know we need a bypass, but I'd like to ask you to do a report on a two-lane bypass.

That would save enough money to take care of some of my other concerns:

166-2 I'd like the bypass to end at Wildcat Canyon - as in the L/C alternative.

166-3 I'd like you to purchase easement at the interchange to prevent commercial sprawl which would interfere with existing businesses

Sincerely,
Marcia W. Pratt
Down Town Home Owner -
Truckee, North, Truckee

167 William Ray

167-1 See response to Comment 33-5 (Sierra Club, Mendo-Lake Group).

167-2 Oil Well Hill is not composed of old-growth forest. The DEIS/EIR does not claim to create an "old-growth redwood forest" on Oil Well Hill in the short-term. Because suitable foraging habitat for northern spotted owl would not be replaceable during the assumed life span of the proposed action, Caltrans and FHWA propose revegetation and minimization measures to reduce impacts at the Oil Well Hill borrow site (Appendix A, FEIS/EIR).

167-3 See responses to Comments 26-1 through 26-4 (California Oak Foundation). Regarding unique oaks in Little Lake Valley: the *Inventory of Rare and Endangered Plants of California* (sixth edition, published by the California Native Plant Society [CNPS], 2001); and the *Oak Woodlands of Mendocino County: An Assessment of Their Distribution, Ownership Patterns and Policies Affecting their Conservation* (Giusti, 2000) do not document the occurrence of any unique oaks in the Willits area.

Baker's meadowfoam is not unique to Little Lake Valley. Populations of Baker's meadowfoam are known to occur near Laytonville and Ukiah, as well as Little Lake Valley, near Willits (Source: *The Status of Rare, Threatened, and Endangered Animals and Plants of California: Annual Report for 2000*, published by the California Department of Fish and Game, 2001).

167-4 The viaduct was not proposed as wetlands mitigation but to avoid floodway impacts. See also responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning), respectively, regarding feasibility of mitigation measures and discussion of viaduct. Caltrans and FHWA have demonstrated, pursuant to Clean Water Act Section 404, that the proposed discharge (Modified Alternative J1T) is unavoidable and that Modified Alternative J1T is the *least environmentally-damaging practicable alternative*. The alternative includes appropriate and practicable steps to minimize adverse impacts on the aquatic ecosystem (40 CFR 230.10(d)) and then provides mitigation for remaining impacts. See Appendix G, Final Alternatives Analysis, FEIS/EIR and Appendix A (FEIS/EIR) for mitigation measures. Appendix D contains the USFWS and NOAA Fisheries Biological Opinions with terms and conditions for the project.

<p>Cher Daniels, Chief Caltrans Office of Enr.Mgt., S-1 2389 Gateway Oaks Dr. Sacramento Ca. 95833 Attn: Nancy MacKenzie</p>	<p>August 5, 2002</p> <p>Maiser Khaled, Chief District Operations-North FHWA 980 9th St., Suite 400 Sacramento Ca. 95811</p>
<p>Regarding the Draft EIR for the Willits Bypass:</p>	
<p>I wish to ask you several questions that must be answered before this can constitute a valid document. My impression is that it is hopelessly skewed and deceptive, and if I am correct, the entire project must be re-studied and an amended EIR presented for public comment.</p>	
167-1	<p>1. How did your Traffic Volumes and Levels of Service (Map 9) claim to rely on your 1998 study but increase the north-of-Willits traffic by 3,500 cars more than that study stated? Map 9 claims 12,800 total. Its source, the 1998 study, stated 9,300 total vehicles per day. Is this not proof of fraud, invalidating the entire Draft EIR and all its freeway-directed conclusions?</p>
167-2	<p>2. By what logic can you claim to convert Oilwell Hill into an "old-growth redwood forest", when that type of forest cannot be duplicated in less than 10,000 years? Is this not open mockery of the citizen and the public comment process? Does not this claim invalidate your entire study, necessitating an amended EIR?</p>
167-3	<p>3. Although, on p. 5.74, you state that there will be major impact on the oak woodlands, 56 acres of them, virtually all that are left, including the rarest in the world, a subspecies unique to this alluvial valley, you claim to "restore oak woodlands locally by planting oaks" (5.7.4.2) in <u>acorn form</u>--how is this restoration when the project life is 20 years and the life of the destroyed oaks was 300 years? Is this not a violation of Senate Concurrent Resolution 17, protecting "black, Englemann, valley and coastal live oaks" from destruction? Are not species of oaks unique to this alluvial valley equivalent in value to Baker's meadow foam, also a species unique to the Willits valley? Since there is no such consideration, does this lack invalidate the study and indicate the need for an amended EIR?</p>
167-4	<p>4. Since the viaduct construction you have proposed as wetlands mitigation (5450' near Willits and 2690' over Outlet and Mill Creek) costs three times the budget for fill-construction, are you not falsely offering mitigation? Is such an unlikely plan, a fraud on the concept of mitigation, indicative that the freeway design cannot be built because so grossly expensive? Would not an amended EIR suggest the honest assessment that freeway construction through the Willits valley wetland cannot be built in compliance with wetlands protections?</p>

167-5 See response to Comment 32-2 (Save All the Valley Eternally).

167-6 The Sound32 model used in the analysis of noise impacts, discussed in the DEIS/EIR, for this project takes into account the elevation of the roadway compared to the surrounding terrain. The year 2028 peak hour volume for the bypass ranges from 1,150 to 1,590 vehicles per hour.

When defining highway traffic noise impacts, the Leq (h) noise descriptor is used, not the individual vehicle peak noise level. For a definition of Leq(h) see Appendix A (DEIS/EIR).

167-7 See response to Comment 167-6.

167-8 Inversion layers in valleys such as Willits usually occur during the winter, when a stable (stagnant) cold air layer at ground level is formed by radiational cooling at night, trapping emissions into it. That type of layer is the reason why CO is mostly a problem in the winter - emissions are trapped in a relatively thin layer and accumulate. The layer gradually thickens during the night, then dissipates after sunrise as solar heating causes the air to mix. CO concentrations tend to be worse in the early-mid evening hours and morning commute periods because traffic is active during those times but daytime heating is not available to mix out the inversion layer. Evening concentrations are particularly troublesome due to the very thin (perhaps less than a hundred feet) layer initially formed. Other indications of an inversion layer are "valley fog" and high concentrations of wood smoke at low altitudes - smoke from fireplaces may rise less than a hundred feet in the early evening before getting trapped at the interface between cold surface air and warmer air at altitude, causing health issues and PM2.5/PM10 exceedances. Summertime inversions are an issue primarily where a regular, large influx of marine air into a warm valley occurs, as in the Bay Area and Los Angeles Basin. Those conditions do not exist very often in Willits. Summer inversions of the marine type are an issue mainly for ozone formation, not CO or PM.

The DEIS/EIR did not neglect to look at the effects of an inversion layer. The air quality modeling performed to estimate the carbon monoxide (CO) levels is done under worst-case conditions (i.e. an inversion layer). In order to estimate the CO levels in the air quality modeling, receptors are chosen along the proposed routes. Protection of public health is the ultimate objective of receptor selection when conducting project-level dispersion modeling impact analysis on air quality. If the location of a sensitive receptor, such as a school or elderly care home, is along the proposed route, they are used in the analysis.

167-9 Caltrans is not aware of any legislation that "mandates a rapid reduction in traffic" or would severely limit increases in Vehicle Miles Traveled (VMT). Growth in VMT does not necessarily worsen air quality. In fact,

167-5	5. Is it not an unavoidable environmental impact to allow 10,000 vehicles a day to scream past the Little Lake Cemetery, a protected environment according to p. 5-138? Does not your Appendix A, 23 CFR, Chapter 1, part 772 invalidate this part of Route L and J due to violation of Caltrans Highway noise levels (dBA) of 75-90, over fifty times above existing conditions? And does not the gross neglect necessitate an amended EIR? <i>of the Little Lake Cemetery</i>
167-6	6. Why is there no mention whatsoever in the Draft EIR of the insupportable amplification of already illegal noise levels, when you add the effects of a viaduct construction for over a mile and a half, 24-49' above the valley? Can 75-90 dBA 10,000 times a day on a heightened platform in an amphitheater-shaped valley result in no more than 67 dBA? Is this not a fraud upon the Draft EIR process, requiring an amended EIR?
167-7	7. Will not Caltrans be subject to criminal liability under these circumstances for health damages to the children of the Seventh Day Adventist School, -90 dBA for heavy trucks, 85 dBA for medium trucks, 75 dBA for cars, 100 dBA for construction noise for five years? And <u>every day</u> traffic is on the facility?
167-8	8. Why has the Draft EIR completely neglected the inversion layer phenomenon in the Willits Valley when concluding that there would be no impacts (5.12.5.1) to the region, long term, regarding air quality pollution? The inversion layer takes pollution in the atmosphere and RETURNS it to the breathable air near the ground. Such an effect would act most directly on the children attending the SDA School and upon the numerous elderly families along the proposed route, in particular the Redwood Meadows apartments.
167-9	9. Does not this freeway proposal, which would never be utilized beyond 25% of its capacity (Caltrans Highway Safety Improvement Project, Dec. 1998, Table 2; Highway Capacity Manual, Updated 1997) contribute to Vehicles Miles Travelled as prohibited by The Sher Act and the Cortese Bill, which mandates a rapid reduction in traffic?
167-10	10. Given that 70% of traffic on the present Highway 101 is local, how can Caltrans justify the enormous expense of a full-sized freeway, to funnel off 30% of 13,000 cars a day? Is Caltrans not generating further pollution, development, and accidents (Caltrans Highway Safety Improvement Project, Dec. 1998, Table 2) by placing a freeway where it does little good and produces extensive harm?
	Yours truly, William Ray <i>William Ray</i>

even if a project does not decrease VMT, but it contributes to reduction in traffic congestion, it would actually have a beneficial effect on air quality.

167-10 The goal of the project is not to reduce traffic on Main Street, but to improve conditions for interregional traffic on U.S. 101. A benefit of the project, however, will be to remove interregional truck traffic from U.S. 101.

No change in the DEIS/EIR, in response to comments 167-1 through 167-10, are necessary.

168 David Reaney

168-1 The hybrid Alternative L/C, which was included in the DEIS/EIR, does not meet Clean Water Act Section 404(b)(1) criteria because of its overall environmental harm, including significant adverse impacts to wetlands and to federally listed species and therefore, it cannot be considered for construction. (General Response 1.3) Any of the alternatives considered in the DEIS/EIR and the preferred alternative, Modified J1T, improve safety and driving conditions on U.S. 101, and by removing traffic from Main Street, improve local traffic conditions.

169 This number intentionally left blank

168-1

David W. Reaney
25958 Hawk Terrace
Willits, CA 95490

08/06/02

Mr. Cher Daniels, Chief
Caltrans Office of Environmental Management S-1
2389 Gateway Oaks Dr.
Sacramento, CA 95833
Attn: Ms. Nancy MacKenzie, Environmental Coordinator Tel: 916-274-5809

And
Mr. Maiser Khaled, Chief, District Operations Tel: 916-498-5020
North Federal Highway Administration
980 9th Street, Suit 400
Sacramento, CA 95814

Re: Willits, CA Bypass

Dear Ms. MacKenzie and Mr. Khaled:

I have studied the alternate routings of the Willits Bypass including the plan that Caltrans is proposing and the alternate "Elsie/Wild Oat Canyon-Willits Creek Restoration" plan. In my view and that of most of the neighbors here in Brook Trails where I reside, the later plan is by far and away a much better solution from the standpoint of ecology, safety and a better alternative for the local and the long-distance traveler on State Rt. 101.

Kindly take this as my vote for this preferable alternative. Also it is imperative that whichever plan is finally decided upon, work on this bypass should begin immediately. There are major safety issues as well as the endless traffic problem that await anyone that tries to travel through Willits in either direction.

Sincerely,

David W. Reaney

Cc: Mr. Hal Wagenet
PO Box 422
Willits, CA 95490

Tel. 707-459-9084
Fax 707-459-4798

Email: dwreaney@pacific.net

170 Kenneth Rich

170-1 Alternative E3 will not be considered for construction because it does not meet Clean Water Act Section 404 criteria for its overall environmental harm (FEIS/EIR). Not only would Alternative E3 result in a number of adverse environmental impacts, it is not a practicable alternative because it cannot be accomplished within the financial resources that could reasonably be made available. See Chapter 2 FEIR/EIS for discussion on the development of the Modified Alternative J1T.

Either contact address referenced in the comment is viable.

Kenneth Rich
P.O. Box 162
Willits CA 95490
(707)459-0903
July 20, 2002

Cher Daniels, Chief

Caltrans Office of Environmental Management S-1
2800 Gateway Oaks Drive, Suite 100
Sacramento CA 95833

Att: Nancy MacKenzie, Environmental Coordinator

Re: Willits Bypass KP R69.4/KP 84.2 (PM R43.1/52.3) [EA26200]
Environmental Impact Statement / Report

Thank you for the opportunity to comment on this EIR/S.

¶#1 Almost all the folks I've spoken with who live on or near E3 and who would most strongly object to this alignment, including folks who attended our Muir Mill Road Association meeting on July 10, have told me that E3 is a "dead deal" and that writing letters simply isn't needed. Based upon my discussions with them and other community members, this perception exists because of four factors: (1) The EIR/S itself (S.5) cites the Section 404 analysis which describes E3 as not meeting the requirements of LEDPA. Table S-1 alone would seem to eliminate E3 from consideration, as it rates more significant remaining impacts even with mitigation than any other alignment; (2) The Willits News reported the failure of E3 and CIT to meet the requirements of LEDPA in a page one story on June 26, 2002; (3) General community consensus is that E3 is neither practicable, affordable, nor a serious option (expressed at the community July 16 meeting and otherwise); and (4) Strong community and local government support for one of several alignments which combine several "nodes" of various valley alternatives. In spite of these reasonable perceptions that E3 is dead, I am writing a letter to point out what I consider to be problems with the EIR/S itself, and to highlight arguments against the choosing of E3 in particular. Others are doing a great job pointing out problems with the process which impacts the valley alternatives. For ease of reference and response, I shall number each paragraph (¶). By the way, The Willits News showed the contact address for Cher Daniels as 2389 Gateway Oaks Dr., while the EIR/S shows 2800 Gateway Oaks Drive as the address. I sure hope you'll get

170-1

170-2 The comparison of the number of collisions for each alternative is objective and fair. As stated in the DEIS/EIR (Section 3.5.1), Alternative E3 would yield fewer accidents because it proposed a continuous freeway segment.

The collision charts developed for the project are based on statewide averages for roadways of similar character throughout the project limits. Caltrans conducted the studies over the full project limits in order to be able to compare the alternatives. The comment correctly points out that Alternative E3 appears to provide the safest operations, at least in part because of the relative length of freeway segment. If the valley alternatives were constructed as freeways to the original project limits, the collision numbers for those alternatives may be reduced somewhat. However, the safety performance of the valley alternatives would be speculative partly because of the relative operations. For example, Alternative E3 would put more traffic on the freeway sections than the valley alternatives. On the other hand, Alternative E3 has steeper grades and is likely to have some snow and ice issues in winter.

If the valley alternatives were extended as freeways to the project limits, their costs would increase considerably. Note also that the greater length of freeway constructed for Alternative E3 in comparison to the valley alternatives is reflected in its higher capital cost. While the extension of the valley alternatives would be supported by the Transportation Corridor Report for U.S. 101, a continuation of a valley alternative further to the north is not foreseeable nor would it be a priority project for Caltrans, Willits, or Mendocino County.

The comment states that the truncated alternatives would eventually be widened to four lanes. The reader should note that all of the build alternatives are proposed for construction as four-lane alternatives.

170-3 The Willits Traffic Study, which was summarized in the DEIS/EIR, contains detailed diagrams, discussion, and explanation for the forecasted traffic volumes. See page 1-8 (DEIS/EIR) for availability and location of all technical studies summarized in the DEIS/EIR.

Figure 3-6, P.3-25 of the Draft EIR/EIS – The vertical axis of this chart is mislabeled. The vertical axis labeled “Speed” should read “Hours”. The correction has been made to the figure (Volume 3, FEIS/EIR).

The Highway Capacity Manual (HCM) provides the method, standards, and criteria for determining Level of Service (LOS) for various roadway types. The LOS standards for two-lane highway are different than the standards for a freeway, which are in turn different than the standards for an urban arterial. The unique standards reflect the different operating characteristics and driver perceptions for the various facility types. A four-lane

feedback sent to either address. To be sure, I’m sending to both.

170-2

¶#2 As the other three alignments still under consideration are shortened, or “truncated” routes, they do not offer the extent or level of service that E3 would. This factor and consideration shows up not only in the numbers of cars which would completely bypass Willits, but in the number of accidents and deaths (Table 3-2) attributed to each potential alternative. A direct comparison therefore makes E3 appear the safest. But this is an “apples and oranges” comparison, as the other alignments are all shortened routes. For a more direct and fair comparison, all routes would have to run the length of the valley, and the accident rates then compared. Lacking this, some sort of pro-rated comparison seems in order. The probability is that any of the truncated valley alternatives would eventually be widened to four lanes if traffic increases warranted such, and money were available at some future time. Witness the widening of 101 between Cloverdale and Hopland, and the Ridgewood Grade’s recent widening efforts. When and if this widening happens, E3 would likely show no significantly safer accident numbers. As the chart stands now, the comparisons are unfair.

170-3

¶#3 I can find nothing in the EIR/S which shows how the traffic numbers, taken from a survey in 1998, have grown to the number to justify a four-lane bypass. Where is this information? (And note that Chart 3-6 shows speed on the vertical axis where it should show hours.) It seems to be that the Level of Service (LOS) rating system is designed to favor four lane highways. Where is some consideration of a two-lane with periodic passing lanes? Why is this not considered an option? It certainly seems to work fine on Hwy 20 between Willits and Fort Bragg, and on 101 between Hopland and Ukiah. While you state that in 1992 “there was no local support or regional support for a two-lane expressway” (3.6.2), I wonder if that would still be the case 10 years later, and after community review of this EIR/S. It might be a good time to reinvestigate this option. Passing lanes should bump that rating up into the acceptable LOS range; and a reinvestigation of how your projected traffic demands might grow could impact this decision as well. A scenic two-lane bypass which curves around existing “trouble spots” in the valley would certainly meet budget requirements while reducing all impacts and providing adequate LOS for bypassing traffic.

170-4

¶#4 While you discuss funding (2.5, 3.6.2, and elsewhere), the figures used confuse the reader. It seems that some mitigation costs are included in the “capital costs” of the alternatives as they are already built into the design, while others, some of which would

freeway will always produce a better LOS than a two-lane highway with same traffic volume because an additional lane increases capacity.

See General Response 1.10 for further discussion.

170-4 Capital costs include some, but not all, cost of mitigation. The alternative with the fewest or least environmental impacts (biological resources, residential and business relocations, hazardous remediation, etc.) will generally incur lower costs for mitigation. See responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning), respectively, regarding feasibility of mitigation measures and discussion of viaduct.

170-5 It is not possible to quantify the costs of ongoing maintenance on Alternative E3, but a very rough estimate of additional annual maintenance costs for Alternative E3 would be in the range of \$100,000. The estimated cost includes allowances for minor slides and slip-outs, snow and ice removal, water quality cleanup, and a host of lesser issues. The slides and slip-outs would not include catastrophic events because it would be impossible to predict such events. The additional maintenance cost was not included in the DEIS/EIR because it was too small relative to the round-off of capital costs and would not significantly affect the decision on a preferred alternative.

The highly erosive soils located along Alternative E3 have a high potential to result in unpredictable slides. Even with specialized foundation treatments, specialized cut slope and fill slope design, mechanically reinforced embankments, stabilization trenches, catchment areas, and specialized subsurface drainage techniques, the potential for landslides remains high for Alternative E3. See also response to Comment 170-1.

run into multiples of millions of dollars (FRM-3 into the hundreds of millions of dollars), are not. Since cost is certainly key to the completion of this project, how are citizens to make reasonable comparisons when there is nothing to address cost ranges which would include likely mitigation costs for each of the alternatives?

170-5

¶#5 It seems to me that part of the costs of a project are the ongoing costs. Part of that figure will be the loss of taxable sales which each alternative would result in. As you state, E3's loss is more than twice that of any other alternative (Table 5-5). Likewise the impacts to revenue flows into local governments and schools would be most dramatically reduced with E3 (Table 5-6). Why is there no discussion about the estimated costs to maintain each of the alternatives? Certainly E3, with its inevitable creeping and waving and erosion, with or without earthquakes, would require substantially more in the way of upkeep. Note again the many millions of dollars spent to date on Ridgewood Grade stabilization efforts, with no end in sight. Estimated costs of upkeep, including predictable repaving, should be a part of the EIR/S so that we can consider those numbers as we respond.

170-6

¶#6 S.7.1 and 5.1.4.2 correctly state that the potential for landslides would remain high with E3 even with special design mitigations. This would seem a good place to state that a total of eight accurately located faults exist in the project area. Of these eight, three do not cross any alignment under consideration. Five do, and *all five* of these cross E3. (See Volume 2, Map 10) Likewise the situation with Zone Boundaries. If we (or Caltrans) has learned anything from the continuing problems with 101 at the Ridgewood Grade, it is that the hills around here aren't suited for two- or four-lane highways. Cut slopes of 1:1 or 1:2 (3:3) are too steep, are they not, for this type of ground? How are these ratios chosen? What would happen to the cost of E3 were these ratios to be reasonably flatter? You state in 5.1.4.2 that "the stability of the embankments through this area is questionable." No it isn't. The stability is terrible, slides not infrequent, and erosion is a problem even *without* a highway carved through the hills. As with the Ridgewood Grade, build a four-lane through the western hills, and wind up with a two-lane bypass and ongoing reconstruction efforts and costs. Were a significant earthquake to occur, the E3 bypass would be no more, and we in the area could rest assured that getting it back online would not be priority #1 with highways elsewhere, in more populated areas, also likely impacted.

170-7

¶#7 The experience at the Forsythe Creek crossing at 101 in Redwood Valley is a

170-6 Alternative E3 was designed based on Caltrans Office of Geotechnical Design recommendations which were based on review of geologic literature and field observations. No investigative field borings were taken at the early project development stage. The cut slopes for most of Alternative E3 would generally be 1:2 and from about Baechtel Creek to the Sherwood Road area, cut slopes would include periodic benches. In the northern segment, because the hills are more stable, slopes would be 1:1 for cuts up to 30 m high, 1.5:1 for cuts more than 30 m high. Any flattening of cut slopes would increase project costs. Caltrans shares the concerns regarding the stability of Alternative E3 and it is one of the factors considered during the selection of the preferred alternative. See also responses to Comments 170-1 and 170-5.

170-7 The comment is correct that Alternative E3 would have potential adverse impacts to fish species. The Draft 404(b)(1) Alternatives Analysis (DEIS/EIR) stated that Alternative E3 would have the greatest potential indirect impact to jurisdictional aquatic resources that are habitat to federally listed species, due to the potential for large amounts of erosion-related sediments to enter the major salmonid streams. This is the primary reason that the alternative does not meet Clean Water Act Section 404 criteria, and therefore, is not eligible for construction. See also response to Comment 8-5 (California Regional Water Quality Control Board).

170-8 The law in this case is Title VI of the Civil Rights Act of 1964. Section 4.5.1 (DEIS/EIR) describes this law as well as Executive Order 12898 (Environmental Justice).

In most cases, the goal of evaluating a project using environmental justice criteria is to determine whether or not the project's impacts would be predominantly borne by low-income and minority residents, or if these impacts would be more severe or greater in magnitude than impacts to the general population. The statistical approach in Section 5.2.5.3 (DES/EIR) is meant to provide a comparison of the relocation impacts *within* each alternative alignment. The raw numbers of low-income and minority relocations along each alternative (i.e., 77 on Alternative E3, one on Alternative C1T, four on Alternative J1T, and two on Alternative LT), would not provide information on the *proportion* of the impact on low-income and minority residents along each alternative. For instance, only three relocations are required by Alternative C1T, but one of them has been designated as a "low-income/minority" residence. So a third of the relocation impact on this alternative is on low-income or minority residents.

170-9 The comment is noted. Relocation impact costs are included in the cost of constructing Alternative E3. Because of Alternative E3's overall environmental harm, including relocation impacts, this alternative will not be constructed. The Modified Alternative J1T has been identified as the least overall environmentally damaging alternative.

reminder 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 & Game verified a viable population of coho salmon spawning in Baechtel Creek this season. What would happen to this population if E3 is chosen, with its "long culverts" and resultant silting and flow increases (p. 5-88)? We cannot afford to lose more of this population. It is not acceptable (5.8.2) to wait until you choose an alternative to propose specific mitigations for endangered species.

170-8

¶#8 As you state (5.2.1), existing law prohibits disproportionately high adverse impacts to minority or low income populations. E3 is off the scale here, with a total of 114 households (298 persons) relocated, with a high proportion of these being of the sensitive nature. (Draft Relocation Impact Report Dec. 16, 1999) Your Table 5-3 summarizes the impacts to low-income and minority housing unit (which of course means people). While you correctly state that with E3 "the impact of relocation would fall disproportionately on low-income and minority residents" (5.2.5.3) your way of determining proportions seems to paint the picture better than it is. The raw number of displaced targeted households with E3 is 77 of the 114 total. Yes, that is rounded off to 68%. And this is certainly disproportionately impactful to the targeted populations. But just using the percentages of impacted residences as a guide does not tell the whole story. Just using percentages of relocations as the measuring stick, E3 is 2.3 times as impactful as LT (68% versus 29%). But look at the raw numbers: E3's 77 is 38.5 times greater than LT's total of 2 displaced sensitive households. This is certainly even more disproportionately impactful of the protected populations, and this reality should be part of your analysis. Your analysis in Table 5-4, which shows displaced affordable houses as a percentage of total affordable houses in the area comes closer to the real impacts, with E3's 9.8% at 32.7 times LT's 0.5%. There's the disproportionality. Does the law specify how "disproportionately" is to be determined? Let's use some common sense here. The raw numbers tell how devastating E3 would be to low-income and minority communities more than do the percentages as you've used them.

170-9

¶#9 While I'm on this subject, I do not agree that "E3 would not substantially alter residents' ability to access community facilities." (5.2.5.3) Whether or not the interchange is at-grade, there is a psychological as well as physical separation which happens when one is on "the wrong side of the tracks" (or highway). I would anticipate that you get very few letters or comments from individuals who are protected by these laws, as they tend not to know they have a voice; they are invisible and often feel

170-10 The comment correctly identifies limitations inherent in attempting to relocate the residents of 114 housing units displaced by Alternative E3 in the Willits community. In the event that replacement homes could not be constructed in Willits because of a lack of appropriately zoned vacant land, residents displaced by this alternative would be likely to seek residences in nearby communities, such as Brooktrails and Ukiah. Capital costs shown in the DEIS/EIR include right of way and relocation costs.

However, the reader should note that because of its overall adverse environmental impacts, Alternative E3 does not meet Clean Water Act Section 404 criteria and therefore, is not eligible for construction.

170-11 Regarding feasibility of mitigation measures FRM-1 and FRM-3, please see responses to Comments 34-60 and 34-63 (Willits Citizens for Good Planning). Appendix A (FEIS/EIR) proposes measures to offset the loss of farmland.

powerless against the powers that be. Thus, we have these laws to protect them whether or not they speak up. Were E3 to be chosen, I surely hope an organization effort would be made to give them a voice. I would certainly personally assist with such an effort. As E3 would displace all the residents of a mobile home park, that low-income community, and the comfort and security it affords its residents, would be obliterated. "Last resort payments" would be needed to "buy off" this problem. Since this is not a mitigation but a legal right, are costs for this included in E3's advertised price tag?

170-10

¶#10 "While there is not sufficient existing housing...for the large number of residences (114) that would be displaced...relocation could be accomplished by rezoning and developing vacant lots within the City of Willits." (p. 5-11) This makes the assumption that the City of Willits would rezone for an alignment it has shown no interest in, that the properties would remain affordable when owners could then anticipate huge returns on their now more valuable lots, and that people would not fight against such relocation and rezoning. Gobbling up these hypothetically rezoned properties would dramatically reduce the availability of future affordable housing in the Willits area.

170-11

¶#11 Pursuant to the 1984 Farmland Protection and Policy Act, scores above the 160-point threshold...will result in a negative impact. As you state, E3 is the only alternative, with a score of 188.0, which passes this threshold for impacts to "Prime and Unique" farmlands. (5.4.4) Mitigation Measure FRM-3 states, "If a valley alternative is chosen as the preferred alternative, the design will be modified to place the alignment on a continuous viaduct. A continuous viaduct would impact the least amount of farmland, however, it would more than triple the current estimated cost of each alternative." In other words, if this mitigation measure is implemented, E3 becomes the least expensive alternative by over \$150 million. This simple paragraph, if implemented, turns the complete feedback part of the Draft EIR/S on its head. It makes a farce of the rest of the considerations and issues we've all been looking at, by making all three of the valley alternatives too expensive. Going back to costs, it seems that a mitigation for floodplain impact, FP-1, includes bridging (by viaduct) the entire floodplain (as opposed to valley). These costs seem to be included in alignment cost estimates, as these viaducts are shown on the maps. Again, some mitigations seem to be included in costs, others not. And why is it that this is the only mitigation measure proposed in the EIR/S which mentions cost? While it is my understanding that mitigation for loss of farmland is not a legal requirement, some mitigation short of putting the whole highway on viaduct may be reasonable and practicable.

170-12 Early establishment of a new stream realignment (on Alternatives CIT and L/C) was discussed during project development. CDFG, NOAA Fisheries, ACOE, and RWQCB have stated that the construction of any new stream sections, if required, will have to occur prior to construction and be fully functional. Regarding work in stream channels, see response to Comment 8-5 (RWQCB).

170-13 The direct impact of construction activities would be to the creeks with the indirect impact of blocking fish passage. The indirect effect is not less critical than the direct effect. Because of the high potential for indirect impacts to salmonids due to siltation and other impacts, Caltrans through consultation with the resources agencies has concluded that Alternative E3 does not meet Clean Water Act Section 404(b)(1) criteria and therefore, is not eligible for construction. See the NOAA NMFS Biological Opinion in Appendix D of the FEIR/EIS.

170-14 Planting redwood trees as a screen between Alternative J1T and the ball fields was proposed after consultation with the City. Redwood trees are compatible with the local theme of 'Gateway to the Redwoods.'

See Section 5.10 (DEIS/EIR) for mitigation measures to lessen visual impacts. However, because of concerns about Alternative J1T's impacts to the recreation/museum complex (including the ball fields), the alternative was moved to the east behind an existing stand of dense tall riparian vegetation. See Chapter 2 (FEIS/EIR) for a description of Modified Alternative J1T, the preferred alternative for this project.

170-15 23 CFR 772 constitutes the FHWA noise standard. This standard is therefore used as the basis for identifying traffic noise impacts under NEPA. The significance of the noise impacts is based on the context and intensity of the noise impact. Alternative E3 does not meet Clean Water Act Section 404(b)(1) criteria and will no longer be considered for construction.

170-12	¶#12 Regarding the necessity of protecting riparian cover for stream temperature control (5.5.6.3), why not prepare the new stream realignment during the initial stages of construction, perhaps even years before the entire construction process is underway and all right-of-way is purchased? 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 well before actual stream realignment is undertaken. It would require getting some water to those plants, and some monitoring. My guess is that local organizations could be encouraged to participate in this process in order to make things as trauma-free as possible.
170-13	¶#13 Why is it written that the salmonid populations could be "indirectly affected as a result of construction activities that could temporarily block the passage of migrating fish" (p. 5-98)? It seems like a direct impact to me. And remember, if the migration of fish is blocked, an entire run and generation of fish could be eliminated when either mature fish cannot return to their birth places to spawn, or newly hatched fish cannot get downstream to the river and ultimately the ocean. You kill enough of a returning population, and you eliminate all their potential progeny.
170-14	¶#14 About visual impacts. All of the alternatives negatively impact the way our community will look. Would a long row of redwood trees grow in the valley, let alone block the view of the viaduct from the ball field? I sure don't see many redwoods out in the valley now. The bottom line is that there really is no way to hide a project of this size from view. And in my opinion, the impact of any of the alternatives is significant to the quality of life we have here. In that sense, less is more.
170-15	¶#15 About noise. First, from where do the thresholds in terms of decibels of "significant" noise increases come? Secondly, and on a personal note, I have a copy of a letter in my files addressed to Caltrans and dated March 7, 1991 in which I requested that a noise monitoring device be placed on my property, as E3 would pass less than half a mile from my home. As my home sits on a ridge up the canyon from the proposed Baechtel Creek bridge, this was and is of no small concern to me. Noise travels up, down, and across that canyon easily, and I want my home considered. I have more than several neighbors with similar concerns. This is of particular concern, as "E3 would include truck climbing lanes on a large, steep hill between Baechtel Creek and the proposed S.R.20/U.S. 101 Interchange" (3.4.2). Have the obvious dramatic increases in noise levels of large trucks engine breaking and using their jack brakes when going

170-16 The Section 404(b)(1) Alternatives Analysis conclusions are in agreement with the comment. While Alternative E3 has the least direct impacts to wetlands, it would have the greatest potential indirect impact to jurisdictional aquatic resources that are habitat to federally listed species, due to the potential for large amounts of erosion-related sediments to enter the major salmonid streams (General Response 1.3).

170-17 The Modified Alternative J1T has been identified as the Preferred Alternative. See response to Comment 120-1 (Bernard Kamoroff) regarding the extensive public involvement in the development of the bypass project, which was critical in developing the alternatives that were considered in the DEIS/EIR. See also Chapter 5 (FEIS/EIR) concerning public involvement since circulation of the DEIS/EIR, which was crucial in modifying Alternative J1T to respond to local concerns. Caltrans and FHWA will continue coordinating with City of Willits and Mendocino County throughout final design and construction of the project.

down, and downshifting and revving up when going up these grades been taken into account? Why have not the homes in my area been considered, especially when an early letter brought this concern to your attention? (My home was built in 1976.) Most of the homes which would be impacted by E3 in the area around Muir Mill Road do not even show up on your maps. The impact would certainly be significant to those of us who live here; and no other route alignment seems to include such a dramatic incline with its resultant noise problems. No consideration of "reasonable and feasible" (5.11.4.2) noise abatement options has been made for the homes in this area, and I consider that completely unacceptable, and challengeable.

170-16 ¶#16 A word on Table S-1 and sections 6.4 on environmental impacts that cannot be avoided and 6.1.3 which summarizes why E3 would not meet the LEDPA: If nothing else, this chart and these summaries show that Caltrans has successfully and fully explored a wetlands avoidance alignment, and that it is simply not acceptable, as it most dramatically negatively and significantly impacts so many areas of concern, no matter the mitigations considered and implemented.

170-17 ¶#17 "Construction of Alternative E3 would require a considerable degree of public involvement....This Plan—to be successful—would need to be based on public input." (p. 5-15). As I mentioned in my first paragraph, public input specifically against the choosing of E3 will be small, since so many don't consider it a viable alternative. This should not be interpreted by Caltrans to indicate universal public support for this alignment. Should E3 be chosen as the preferred alternative, there will be substantial community involvement; but I suspect it will be *against* the implementation of that alternative, and any step that would be required to further it toward completion. There would be justifiable anger and suspicion that the Draft EIR/S was a total sham. If FRM-3 is required as a mitigation making E3 potentially the least expensive (although mitigation costs there are not yet completely included in that price tag), there will be justifiable outrage.

I look forward to your responses to my concerns.

Sincerely,



Ken Rich

171 Aeryn Richmond

The following individuals submitted the same form letter:

Edwards, Isidora
Jacob, Jake
Jones, Jim and Lela
Leslie, Jay
Nissir, Sandra
Nissir, Stanley
Richmonde, Aeryn
Unsworth, Robert

171-1 Modified Alternative JIT has been identified as the Preferred Alternative. Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species (General Response 1.3).

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

171-2 See responses to Comments 115-1 (Bill Jack). See General Response 1.8 regarding traffic operations with Quail Meadows Interchange.

171-3 See General Response 1.9 regarding a center valley interchange.

171-4 While all the alternatives considered in the DEIS/EIR meet the project purpose, only the Modified Alternative JIT meets Section 404 Clean Water Act criteria as the alternative with the least overall environmental harm.

July 27,2002

Ms. Cher Daniels
Cal Trans Office of Environmental Management S-1
2389 Gateway Oaks Drive
Sacramento, CA. 95833

Attention: Nancy MacKenzie, Environmental Coordinator

Re: Willits By-Pass

171-1

I have reviewed the Willits by pass proposal and have come to the conclusion that the only logical solution that meets the needs of the general public is the truck scales interchange to the North combined with the proposed Elsie Wild Oat Canyon Rd. plan.

171-2

At this time the residents that are living in the Brooktrails subdivision, 60% head south for work and large-ticket item shopping.

Brooktrails is headed for expansion and will most likely double in size in the next ten years. I dont see how the residents will be able to use the existing or Quail meadows plan effectively.

171-3

As for accessing the Coast on Hwy 20, I see the need for an entrance and exit as close to Hwy. 20 as possible.

171-4

Please re-consider. This is an inter-regional problem.

Sincerely yours,



172 Beverly Risch

172-1 The Modified Alternative J1T has been identified as the Preferred Alternative. Because of its overall adverse environmental impacts, Alternative E3 does not meet Clean Water Act Section 404 criteria and therefore, is not eligible for construction.

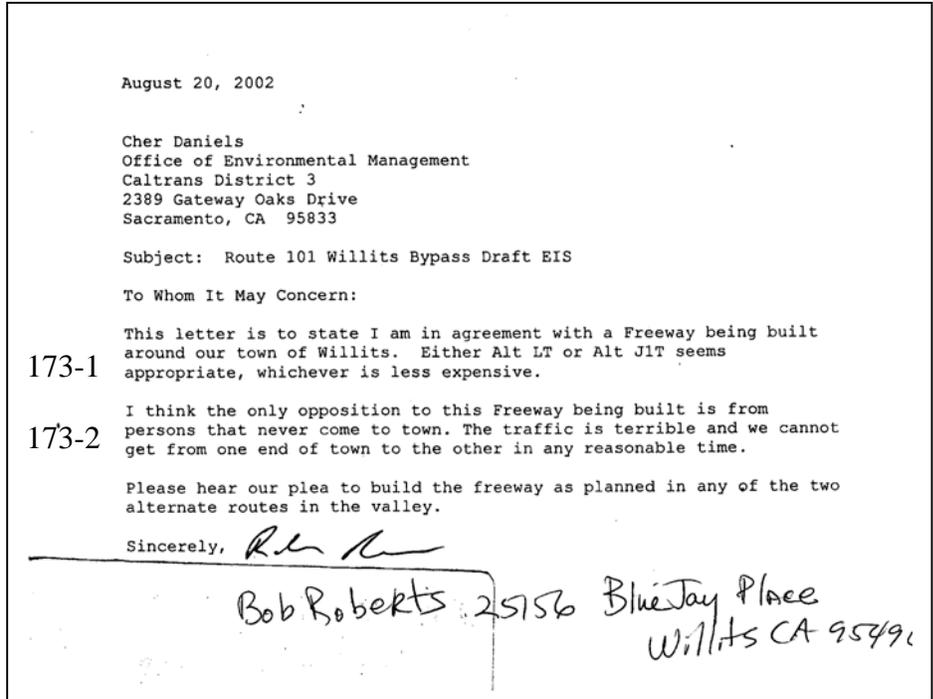
We are all against
E3! We all moved
out here for peace
and quiet; not a dam
freeway over our heads.
Thank you
Beverly Risch

172-1

173 Bob Roberts

Thirty-five duplicates of this form letter signed by 46 individuals were submitted in one package to Caltrans. The following is a partial list of individuals who signed copies of the letter, the list is not complete because many signatures were not legible.

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



173-1 The Modified Alternative J1T has been identified as the Preferred Alternative (General Response 1.3). Section 1.2 (FEIS/EIR) addresses estimated cost of the project.

173-2 Construction of the bypass will reduce traffic on local streets in Willits resulting in improved travel times for local traffic.

174 Wolfgang Ronnefeldt

174-1 See responses to Comments 30-1 (Mendocino Forest Watch), 139-11 (Karina McAbee), 144-23 (Jason Minton).

174-2 The project (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. See Chapter 2 FEIR/EIS regarding development of the Modified Alternative JIT. See General Response 1.6 regarding Brooktrails second access road.

174-3 General Response 1.10 explains why a two-lane bypass does not meet the purpose and need for the project.

Wolfgang Ronnefeldt, M.A.

Telephone (707) 459-2101

900-B Exley Lane
Willits, CA 95490

August 25, 2002

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

Dear Ms. Daniels:

174-1 Although I haven't had the time to examine the EIR as I would have liked, I am concerned that so many thoughtful Willits citizens are concerned about it's lack of thoroughness in looking at the consequences of the various routes, and the questions raised about unsatisfactory mitigations.

174-2 I feel that it is critical that all of these many factors be taken quite seriously. Remember that whatever action taken by Caltrans at this time will affect generations of people in this valley for decades to come. No decision should be taken lightly. I am concerned that none of our governing bodies are satisfied with the various options proposed by Caltrans to date. That includes the City of Willits, the Brooktrails township, the County of Mendocino and MCOG. That definitely makes me feel that Caltrans needs to address their concerns before moving ahead.

174-3 It also seems to me that it might be appropriate to examine a two-lane bypass. I recently came to Willits on Highway 101 from Bandon, Oregon. The highway alternates back and forth between a two-lane and a four-lane. It didn't seem to present that big a problem. Why can't 101 continue to maintain this "holiday" aspect?

Sincerely,



Wolfgang Ronnefeldt, M.A.

175 Gary Roussan

175-1 Modified Alternative J1T has been identified as the Preferred Alternative for construction. See General Response 1.3, which discusses the reasons that Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria and therefore is not eligible for construction. See General Response 1.4 regarding a Willits Creek restoration and General Response 1.5 (FEIS/EIR) regarding the City wastewater treatment plant.

175-2 See General Response 1.6 regarding Brooktrails second access road.

175-3 Any of the proposed bypass alternatives would reduce traffic congestion on Main Street because interregional traffic will be removed from local city streets creating less overall demand of the local infrastructure. Also, some local traffic will opt to take the bypass even if it requires slightly more travel time, to travel at a higher speed under uncongested conditions.

175-4 The proposed bypass will reduce congestion on U.S. 101 and will also result in reduced congestion on local streets in Willits, improving access to businesses and services. See responses to Comments 34-43, 34-45 through 34-48 (Willits Citizens for Good Planning) and 130-2 (Monty Levenson).



GARY L. ROUSSAN
200 BONNIE LANE - WILLITS, CA 95490
Phone (707) 459-6433 - Fax (707) 459-1684

8-8-02

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

Attention: Nancy MacKenzie, Environmental Coordinator

Dear Nancy:

I am completely in favor of a four lane bypass to be constructed in the Willits area and I realize there are three proposals that are being considered.

175-1 I am in favor of the ELSIE/Wild Oat Canyon proposal, along with the concept of digging a new channel between Willits Creek and Outlet Creek, as this makes good sense as it would improve fish habitat, eliminate environmental impact caused by the other proposals and in turn, help the City of Willits meet required dilution standard for effluent released from the wastewater treatment plant.

175-2 Furthermore, Brooktrails residents must have a second access to escape an emergency situation such as a major fire in the area. (This will happen sooner than later). The congestion now experienced by those using the existing access is get to work in the morning is ridiculous and undoubtedly creates a "road rage" mentality for those commuting out of the area.

175-3 The congestion in downtown Willits, every afternoon, for several hours, is a disgrace to those of us who live here. This congestion also hampers the movement of emergency vehicles that need to have fast access to fires or traffic accidents.

175-4 Businesses in the downtown area that fear loss of business, should consider the thought of most travelers going through Willits, whose only mission is to get through it as fast as possible...rarely considering stopping for anything. With a bypass, those travelers, who need food or service, will have much less problem leaving the freeway to access their needs.

Sincerely yours,

Gary L. Roussan, a Willits Resident

176 Hyman Rudoff

The following individual submitted the same or similar letter:

Campbell, Josephine

176-1 Chapter 2 (DEIS/EIR) explains the purpose and need for the project to reduce congestion, improve safety, and achieve at least LOS "C" on U.S. 101 in the project area for interregional traffic. Removing traffic from local streets will reduce congestion and improve safety for local citizens.

176-2 Any of the alternatives considered in the DEIS/EIR would accommodate a connection for a Brooktrails second access road (General Response 1.6). See General Response 1.8 regarding traffic operations with Quail Meadows Interchange.

176-3 See General Response 1.4 regarding a Willits Creek restoration.

176-4 Earthwork requirements for Alternative L/C are estimated at 2.1 cu m/ 2.7 cu yd (in millions), which is greater than for Alternative C1T (1.8 cu m/ 2.4 cu yd in millions) and for Alternatives J1T and Modified J1T (both estimated at 1.9 cu m/ 2.5 cu yd in millions).

Modified Alternative J1T has been identified as the Preferred Alternative. Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria for its overall environmental harm, including significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species (General Response 1.3).

Willits CA 95490
1 August, 2002

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

Gentlemen:

176-1 I should like to register my opposition to the Caltrans plan for the Willits Bypass and its proposed accompanying changes.

First and foremost, it appears to me that the plan is essentially limited to an accommodation for the passage of trucks and other traffic through the area, with little regard to the safety of the local citizens and the well-being of the wild life.

176-2 At present, and in the plan, the 4000 (approx.) residents of Brooktrails are at grave risk from wildfires. The area is well wooded; many of the trees are of the very flammable fir family, and there is virtually no reasonable evacuation route for the residents.

Sherwood Road is the sole practical exit route. It is steep, winding, narrow, and in large part surrounded by trees. A fire in this part of Brooktrails would be a catastrophe.

Sherwood Road joins Route 101 at a very acute angle. Large equipment, even a 21-foot RV, has difficulty negotiating this intersection. This means that the ingress of emergency vehicles would be subject to at least as much difficulty as even a small RV. One hardly needs to emphasize the problem that would arise at the intersection in case of a fire in the upper levels of Brooktrails.

The provision of a second access near the truck scales area would constitute a substantial amelioration of the situation

176-3 The location proposed for the creek is unfortunate when compared with the advantages to the passage of fish under the "Elsie" plan. It is scarcely credible that an environmental impact study would not reflect this observation.

176-4 Finally, the figures reveal that it would be much less expensive to follow this plan than to move the greater volume of earth involved in the Caltrans plans as they have been presented.

Therefore I repeat my opposition to the existing Caltrans plan.

I urge you to consider seriously, and preferably to adopt, the "Elsie" plan.

Sincerely yours,



Hyman Rudoff, Ph.D.

cc. Hal Wagenet

177 Keith Rutledge

The following individuals submitted duplicates of this letter:

Rutledge, Keith
Simpson, Nancy

177-1 See General Response 1.8 regarding traffic operations with Quail Meadows Interchange).

177-2 General Response 1.10 explains why a two-lane bypass does not meet the purpose and need for the project.

177-3 Modified Alternative J1T has been identified as the Preferred Alternative. Alternative L/C does not meet Clean Water Act Section 404(b)(1) criteria for its significant adverse impacts to wetlands and its potentially significant adverse impacts to federally listed fish species (General Response 1.3).

See General Response 1.6 regarding Brooktrails second access road.

August 5, 2002

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

Attn: Nancy MacKenzie, Environmental Coordinator
Re: Willits Bypass.

As a resident of Mendocino County, I would like to respond to the proposed Caltrans bypass options for the Willits Valley.

177-1 **NO on the Quail Meadows interchange.** This option will create huge traffic jams at the junction of Sherwood Road and Hiway 101.

177-2 **NO on Four Lanes.** Two lanes will adequately serve our needs for a long time into the future. Four lanes would create irreparable destruction to the lovely valley and is totally unnecessary.

177-3 **YES on LC,** the option proposed by Hal Wagenet. LC will solve many problems for the residents of Brooktrails and the surrounding area who commute to Ukiah and points south to work. We need another access route into and out of Brooktrails.

I urge you to use the utmost intelligence and discretion in choosing the final solution. Please work toward the LC plan. Thank you for your attention to this matter.

Yours truly,

