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April 17, 2015

To: Mr. Gabriel Corley, CTP Project Manager

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**Comments to Caltrans regarding the 2015 Draft of the *California Transportation Plan 2040***

I am submitting these comments on behalf of the Bay Area Coalition for Headwaters, a California non-profit whose work focuses on supporting a healthy and diverse natural environment on California's north coast. Within the context of the goals and strategies laid out in *Caltrans 2040 Plan*, we would like to address gaps in stated goals evident in these Caltrans projects:

**1. The project to widen and realign 197/199 in Del Norte County**

## 2. The Richardson Grove project on Highway 101 in Humboldt County

## 3. The Willits Bypass project on Highway 101 in Mendocino County

The above mentioned projects, which would bring more of the oversized (STAA) trucks onto California's coastal Highway 101 and Routes 197/199. I-5, as a multi-lane interstate that was built to handle shipping trucks can and should be the primary route for STAA trucks. Moreover, the Highway 299 project (Buckhorn Summit), due to be completed within two years, provides a trucking route from I-5 to Arcata, making both the 197/199 and Richardson Grove projects unnecessary.

With two of those projects yet to break ground and one unfinished, there exists an opportunity to listen to the public and bring those projects into compliance with Caltrans' stated goals. In our view, that would mean shelving the Richardson Grove and 197/199 projects and down-sizing the northern exchange in the Willits Bypass to fit the actual number of lanes of the Bypass (i.e., an exchange for two lanes, rather than for four lanes, since the Bypass is in fact two lanes joining two lanes.)

A working knowledge of the ecology of the areas the coastal highways travel through, replete with rare, threatened and endangered species (e.g., salmon runs, denizens of the redwood forest like tree voles, salamanders and marbled murrelets, the myriad species that depend on natural wetlands on the Pacific Flyway, etc.) and severely reduced, degraded—or disappearing—ecosystems like ancient redwood forests, wetlands, and undammed rivers, as well as unstable geology, are not appropriate environs to increase highway capacity to handle larger vehicles. Neither are these projects in line with either the goals of *Caltrans 2040 Plan*, nor with the implementation strategies Caltrans claims to be established in conjunction with that plan.

In our comments here, we want to reference in particular the Goals to improve **Public Safety and Security** (G-4), the goal to **establish livable and healthy community** (G-5) and the Goal to **practice environmental stewardship** (G-6).

We support development of integrated transit systems geared to include pedestrian and bicycle by-ways, as stated in the goals for the *2040 Plan* for California's urban areas. But for areas rich in native habitats, threatened or rare species and rural communities, the expansion to larger highways and larger trucks is counter to Caltrans' own stated goals, not in compliance with environmental law cited in Caltrans plans, and not in the interests of those rural communities or preservation of precious and at-risk natural resources in California, including threatened salmon species and their spawning grounds and a State Park protected for nearly a century for its showcase grove of ancient redwoods.

The people of California have assumed those ancient redwoods were safe from the invasion of jackhammer shovels into their feeder root zone by virtue of the State Park designation. What gives Caltrans the right to override the protections inherent in this designation? The "need" for more oversized trucks (Some STAA trucks already travel Highway 101 via exemptions granted) and "realigned" roadways through the redwoods is not foundation enough to base the violation of public trust resources, State Park designation and one of California's most precious natural resources upon. This is particularly true when a project already underway (Hwy. 299) will render that "need" moot in the near future.

Overview of contradictions we see between the *CT 2040* goals and strategies, and the **three north coast Caltrans projects**:

### **Willits Bypass**

There is significant loss of scores of acres of wetlands, when we have guidelines that mandate "no net loss of wetlands" (mandate of the Army Corps of Engineers who permitted the Caltrans project in the Mendocino wetlands.) The Army Corps is at fault as well, with regards to the wetlands loss, as it is their mandate, but it is Caltrans carrying out said destruction via the draining and fill of wetlands. Mitigation intended to "replace that loss does not fully return that loss, and moreover, that mitigation in this circumstance is unproven, not fully funded nor staffed, and is not in place while draining and fill of the wetlands continues. Further, those in charge of this same project have been appallingly disrespectful and non-responsive to involvement and input from local Tribal groups (i.e., the Coyote Valley Band of Pomo Indians and the Sherwood Valley Band of Pomo Indians) in Caltrans destruction of native archaeological sites.

### **Richardson Grove**

While Caltrans claims "no negative impact" will come from their highway project through Richardson Grove State Park, the agency did not even hire a scientist to assess the impact. Their consultant was an arborist, a trades person. It is rather like hiring a weather reporter to assess global warming rather than a climate scientist. The actual expert forest ecologist hired by plaintiffs who brought a legal challenge to Caltrans Richardson Grove

project, did determine a significant risk to the old growth redwoods based on the science of forestry, and also found that Caltrans had not even counted the redwoods accurately. Caltrans' sloppy planning and assessment can hardly be called "stewardship."

In fact, none of the above points to on-going efforts to illustrate environmental stewardship on the part of Caltrans, while it is stated as one of the agency's goals in the 2040 document.

Regarding G4 to **Improve Public Safety and Security**:

The Caltrans Strategic Highway Plan (SHSP), a "data-driven effort to reduce fatalities and serious injuries on all public roads in California", in part defines the goal. Yet it has been shown that larger (STAA) trucks cause more accidents resulting in injury and death. This will certainly be true on winding, tight curves of Highway 101 and highways 197/199, with inherent visibility restrictions.

The G4 section mentions bicycle and pedestrian travel ways in its discussion of multimodal transportation opportunities, and we fully support that strategy. However, while there already exist safety concerns around traffic and bicycle interface in areas like Richardson Grove, more and larger trucks will only exacerbate that safety issue, which does not exist on I-5, the most appropriate throughway for STAA trucks is I-5, since bicycles and pedestrians are not allowed on I-5.

According to the Advocates for Highway and Auto Safety, increases in truck size (as with bringing more STAA trucks to northern California's coast highways) have never resulted in fewer trucks on the road despite greater load capacity. Some of the problems caused by more of the larger trucks on the road are as follows:

- More accidents occur: the bigger/heavier trucks contribute to the current increase of deadly truck accidents (counter to CT 2040 Safety Goals and Strategies)
- Oversized trucks cause major damage to local road infrastructure (counter to Goal 5)
- Bigger trucks use more fuel (counter to Goals and Strategies relating to greenhouse gas emissions and climate change.)

Regarding G5 to **Foster Livable and Healthy Communities and Promote Social Equity:**

The Draft Plan states that “Solutions must support “community aesthetics, the natural and built environment, and sustainable living” and further “balance cultural and historic values when addressing...impacts.” While rural character, agricultural lands and the protection of natural habitats are mentioned specifically, these values are decidedly not given priority in the 197/199 Del Norte, Richardson Grove or Willits Bypass projects.

Caltrans Willits Bypass:

Several hundred acres of agricultural lands are lost to that use in this highway construction, with an additional acreage taken out of agricultural use for “mitigation” for loss of wetlands acres. Small family farmers work most of the farmland in this valley and are an essential part of the local economy.

It is difficult to see a priority given preservation of “culturally sensitive Native American...resources” when many of the hundreds of archaeological sites and artifacts have come to light via “discovery by bulldozer,” and subsequently local Tribal groups have been stone-walled in many attempts to have consultations with Caltrans. These consultations are, in fact, required by law.

The Draft states that the “CTP 2040 strategies ensure consideration for natural and historic resources...including Native American and other cultural resources.” As stated earlier, the bulldozing of what has now been deemed “an archeological district” by the California Office of Historic Preservation, without adequate consultation with the affected Tribes; without temporary work stoppages, as required by Advisory Council on Historic Preservation to allow for rescue and documentation of artifacts and sites by affected Tribes. The Caltrans Willits Bypass Project therefore stands counter to stated goals.

Richardson Grove and Del Norte as tourism destinations are an integral part of the local economy. Negative impacts on the environment would affect their value as major contributors to the north coast tourism industry, and therefore to the local economies.

Willits' local economy stands to be devastated by diversion of northern California-bound tourists and recreationists from local businesses because of the Bypass.

The rural character of each of these project areas is particularly striking, and would not be protected, as stated as a goal of Caltrans' strategy, but rather negatively impacted.

### **Regarding G6: Practice Environmental Stewardship**

#### Richardson Grove Project:

There are few natural habitats in northern California that residents and tourists from around the world alike value and hold primary for protection as the ancient redwoods. The courts found that Caltrans did not make true and solid arguments on which to base its claims of "no negative impact" from planned excavation around the roots of these giants. Redwood trees are particularly vulnerable because of their lack of a taproot. As well, this Caltrans project encroaches on Richardson Grove State Park, one of the most popular redwood state parks on the 101 corridor, and as such is an important source of tourism for the county.

#### Caltrans Willits Bypass Project:

There have been many Water Quality violations seriously impacting the natural aquatic and riparian habitats, including Haehl Creek, supporting native salmon runs. One of the incidents seriously jeopardizing salmon habitat occurred when a large section of infrastructure of the Willits Bypass collapsed on January 22, 2015, resulting in wet concrete spilling into the creek, the alkaline nature of that substance potentially seriously injurious to Haehl Creek's health and habitat values.

There have been many other permit violations, including lack of required mitigation plans, even bringing the Army Corps of Engineers to suspend Caltrans operations.

## 197/199 Highway Expansions in Del Norte County:

There are many likely impacts from this Caltrans Plan that run directly counter to the stated goals in the *2040 Plan*. The unspoiled, wild and scenic Smith River would be negatively impacted, along with its denizen salmon species and old growth redwoods lining the canyons. Again, the negative impact on one of our California wild river jewels is not fulfilling a need when an alternative (the 299 project) is nearing completion. How forward-thinking is it to continue with this project and Richardson Grove, both unnecessary, when the residents oppose them and the environment would suffer?

Regarding the recognition of the importance of addressing climate change and greenhouse gas emissions, and the establishment of transportation use as the largest source of CO<sub>2</sub>, accounting for almost 40% of GHG emissions in California (from the CT 2040 Draft Plan) addressing climate change is vital. While we laud the discussion of zero-emission vehicles, and the focus on transportation modes such as rail; the northern California Caltrans projects we address in our comments are sorely lacking in keeping with the positive goals, and are in fact counter to them, being more in line with outdated ways of transportation planning.

Moreover, AB32 require that the 2020 total greenhouse gas (GHG) meet the emissions level of 1990, and by 2050 be 80% below the 1990 level. While Caltrans admittedly has some seemingly sound proposals for emission reductions for urban areas, the direction of these three north coast projects run counter to the stated goals.

With all these aforementioned projects, large numbers of Californians (who are stakeholders), find that natural resources, important habitat, cultural resources and environmental stewardship values are absolutely not given priority. Instead, what is given priority is STAA trucks and the trucking industry. Prioritizing the trucking industry over the environment is not a goal for the people of California, and should not be a goal for Caltrans.

The recent State Smart Transportation Initiative (SSTI) documented a culture in Caltrans that was “stuck in the past” in terms of the agency’s planning and priorities, and recommended a focus on maintaining existing infrastructure, moving away from the era of prioritizing the building of new roads and Highways. While the north coast projects we reference specifically are not new roads per se, they nonetheless exist as part of the “bigger, wider, faster roads” priority we see in Caltrans. With these projects lies a tremendous opportunity to meet SSTI’s recommendations and practice environmental stewardship

Given the finite nature of budget dollars, it serves the people of California to layer a clear priority ranking for projects in the state. With regard to coastal Northern California, there are solely needed repair projects that stand waiting to be budgeted—such as the Last Chance Grade in Del Norte County, while hundreds of millions of dollars are invested in particularly egregious and unpopular projects.

It also serves the public trust, economies of rural Northern California and the invaluable natural environment to halt and discontinue these projects that are based on out-moded models, values and culture of transportation planning, and prioritize forward-moving projects that keep systems working without devastating costs to the ecology.

While we realize that the *CT 2040* put forth goals that are for future planning and our comments focus of current projects, of those three projects, two have not yet broken ground and the third has design flaws in the project segment not yet completed. (That problem is the northern exchange for the Willits Bypass, built for four lanes, when the Bypass and the highway it rejoins are both two lane roads. Downsizing this exchange would greatly reduce environmental impact and answer public opposition to that part of the project.)

But how can Caltrans state commitment to goals and strategies that not being applied to current project design? This question looms larger when lobbying by the public has been significant to rethink or better design these projects. A forward-looking approach requires flexibility and creative design. That is needed with regards to these north coast projects. Apply that thinking to current projects, and the *2040 Plan* will gain a more credible footing.

Sincerely,

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