

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

November 5, 2012

Comments to Caltrans Recirculated DEIR/EA for STAA truck access on Hwy 199/197, due Nov. 5, 2012

ATT: Jason Meyer, California Department of Transportation,
North Region Environmental, Unit E1, P.O. Box 3700, Eureka, Ca. 95502-3700
jason_meyer@dot.ca.gov

Summary

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

Because this new information substantially affects the evaluation of so many aspects of the DEIR/EA, and because these concerns are so far reaching and extend the scope of the project to such a great extent, we believe a fully recirculated DEIR/EIS is necessary for adequate reevaluation. We also believe that a new and accurate assessment will show that this is an ill-conceived project that will endanger the public welfare, and that the only rational decision would be abandonment of the project, in order to protect the public welfare.

New information has now lead us to believe that an immediate and significant increase of STAA truck traffic is likely to result as a cumulative impact of creating an STAA bypass through Hwy 199/197 and Hwy 101 (Richardson Grove STAA project) that diverts, or significantly induces I-5 truck traffic around Siskiyou Summit in winter. Siskiyou Summit is known to be the most dangerous pass along I-5, with a steep grade (~6%), only two lanes in each direction, and frequent accidents, closures due to high elevation winter snow storms, and frequent truck chaining requirements.

Creating a relatively frost free alternate STAA coastal bypass around Siskiyou Summit changes the dimensions of the Hwy 199/197 project, involving substantial increased traffic and safety hazards, as well as fragmentation of communities all along Hwy 199, including communities in Oregon. The DEIR/EA has failed to engage these communities, and a project with such a broadly increased Interstate scope should be elevated to an EIS. The DEIR/EA has completely failed to identify and inform the public about such a traffic diversion.

The DEIR/EA and RDEIR have failed to evaluate the cumulative impacts that result from the combined projects that constitute an I-5 bypass around Siskiyou Summit. The DEIR/EA has failed to accurately assess induced traffic, both immediate and long term. This omission significantly changes most aspects of analysis, such as significant increased motorist and pedestrian safety risks, water quality risks and endangerment of public drinking water from increased truck spills, as well as biological risks, vegetation impacts due to accelerated road failures and maintenance, endangered species impacts, Wild and Scenic River impacts, National Park and National Recreation Area impacts, community fragmentation, and severe economic maintenance burdens. Such a broad stroke of change in the region should necessitate a full EIS evaluation.

Furthermore, because the public has thus far been so misled as to think that there will be an insignificant increase in traffic, a full reassessment of the goals and policy decisions is in order.

New Relevant, Significant Evidence has emerged.

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

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

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

FODN and James Barrett then carefully measured the difference in distance between the I-5 route and the Coastal route from Grants Pass, Oregon and San Francisco. The new STAA coastal bypass would be 44 miles longer than taking I-5 from Grants Pass to San Francisco.

New evidence, Attachment _____, Caltrans published pamphlet “Operation Snowflake” is a winter driving guide that directs traffic around Tejon Pass on I-5 in Southern California, another problematic pass on I-5. The various STAA bypasses shown around Tejon Pass are much longer than route I-5. The shortest difference is bypass route 41/ Hwy 101 to Los Angeles, about 91 miles longer than Hwy I-5. The Hwy 166 bypass is about 188 miles longer than route I-5. Caltrans advertises and encourages the use of these longer I-5 coastal bypasses.

There is absolutely no factual basis within the DEIR/EA for assuming that STAA trucks would not make good use of a bypass around Siskiyou Summit that is only 44 miles longer.

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

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

FODN was suspicious about the magic multiplier of 3.9, as there had been no appropriate survey of current long haul users, but only a limited survey of current local users. The Friends of Del Norte engaged expert Mara Feeney to shed light on our concerns.

FODN also contacted Robert Cervero.

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

Dr. Robert Cervero states:

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

James Barrett then writes a follow-up letter to Caltrans.

New evidence, Attachment _____, letter dated **April 17, 2012** from James Barrett, which in part states:

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

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

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

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

Attachment _____, DEIR 199/197, Fehr & Peer Traffic Analysis, Figure 9. This figure does provide useful information within the DEIR/EA 199/197, providing heavy truck traffic volumes of regional Hwys 199/197, Hwy101, as well as I-5 heavy truck traffic. As shown:

If only 10% of Hwy I-5 heavy truck traffic is induced when Siskiyou Summit closes or requires chains, this would likely result in an immediate increase of about 270% of the daily number of large trucks currently on Hwy 197 during the winter, or an addition of about triple the current number of large trucks; Hwy 199 would likely see an immediate increase of about 150%; and Hwy 101 south of Crescent City would see an immediate increase of about 130%. If the percentage of diversion in winter is greater than 10%, which is highly likely, the induced heavy truck traffic will be astronomical. We should not be guessing at this. A real assessment with interviews of through route truckers during winter, when Siskiyou Summit requires chains or is closed (which is very frequent) is needed to evaluate this situation. A real assessment of the following impacts is needed.

New Evidence- Attachment _____, expert Planning Consultant Mara Feeney, letter dated Sept 26, 2012. Within this letter Mara Feeney reviews and critiques the DEIR/EA and the proposed STAA Hwy project for Hwys 199/197.

New Evidence- Attachment _____, ODOT traffic records for Siskiyou Summit closures/chainings
New Evidence- Attachment _____, ODOT planning information about Siskiyou Summit

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

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

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

Hwy 101 south of Crescent City already has Fatality-plus-injury and Total Collision rates at 8 and 11 times the statewide average for a similar facility (New Evidence- Attachment _____, Caltrans documents)

Hwy 197 is currently a back country rural residential road with 72 driveways directly entering onto the road. **(Two different citizens counted them.)** There will be a significant increased safety hazard to the residents along this road due to increased wintertime truck traffic.

Safety is inadequately addressed on Hwy199, as there are no improvements planned between Hiouchi and Gasquet, which has the highest accident rate. (CHP records, comments submitted by Dori and David Bruce to the DEIR/EA 199/197 STAA access). There would also be fragmentation of communities along the entire Hwy from Grants Pass to California. Caltrans has failed to engage Oregon in the conversation, although large truck diversions would greatly affect such communities.

Such increases would result in a significant increase in risk of truck spills along Hwy 199/197, threatening the water quality of the Wild and Scenic Smith River, a refugia for California's last salmon, and only drinking water source for Crescent City. The City has very limited reserve water capacity.
(Ted Souza comment to the DEIR/EA, tracking the history of spills on Hwy 199/197, resubmitted.)

There would be a significant impairment of providing safe and enjoyable travel through a National Recreation Area, as well as Redwood National Park, and endangerment of tourists who travel to the Smith River during the winter for our fishing season.

There would be a significant and impractical economic burden, and endangerment of the public welfare in trying to maintain Hwy 199 and the geologically unstable Hwy 101 under such increased winter traffic.
(New evidence- Caltrans documents about landslides and Last Chance Grade)

The Currently adopted California Transportation Policy Priority is to better maintain the current infrastructure, as there is limited financial capacity, and an overload of maintenance projects.