

September 26, 2012

To Whom It May Concern:

The Friends of Del Norte (FODN) contacted me earlier this year and asked me to provide an objective review of the environmental impact analysis that Caltrans District 1 prepared for the proposed 197/199 Safe STAA Access Project (June 2010), as well as the comments that FODN has submitted on this project to date, and to offer my professional opinion on both.

I am a planning consultant with approximately 35 years of experience in community involvement and environmental review for complex and often controversial projects throughout the United States and Canada. My experience includes participating in multidisciplinary environmental analyses for numerous infrastructure development and improvement projects in California, including work for Caltrans on proposed roadway improvement projects throughout the State, including District 1 (see resume attached).

Although a Final EIR/EA for the 197/199 Safe STAA Access Project was scheduled to be released this summer, instead the Draft EIR/EA is now being re-circulated for public review and comment, with additional information provided on potential impacts to trees. For a project as important as this one, in a setting with such extraordinary environmental resources, Caltrans should have used the opportunity of re-circulating the draft document to provide additional information and address other key issues that have been raised by FODN--including the faulty assumptions underpinning the truck traffic analysis, the weakness of the economic impact analysis, and the lack of a cumulative traffic impact analysis.

Estimates of short-term increased truck traffic on US199 in the Draft EIR/EA are based on a very limited survey of local businesses (based on a small number of brief survey questions), in which 80 percent of the respondents stated they did not need and would not use STAA trucks on US199 if the project were implemented. Only three local businesses stated that they would use STAA trucks on US199 to lower shipping costs, but one of these has subsequently closed and another ships products only two months each year. Based on these local business surveys, the analysts concluded that Crescent City would enjoy substantial economic benefits from the project yet there would be a negligible short-term increase in truck traffic on US199 associated with local business demand.

The traffic analysis also uses data from a study done by a reputable transportation analyst at UC Berkeley, Dr. Robert Cervero, whose research indicated that long term induced effects of creating new access generally occur at a rate of 3.9 times the short term induced growth rate. However, in direct correspondence with FODN, Dr. Cervero indicated that the referenced research had been done "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."<sup>1</sup>

Furthermore, the analysis does not include any consideration of additional through truck traffic that might be encouraged by the creation of a new STAA truck traffic loop connecting I-5 via SR 197/US 199 to US 101 south through Richardson Grove. Caltrans evaluated proposed changes to US101 at Richardson Grove, a state park with significant old growth redwood resources south of

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<sup>1</sup> E-mail message from Robert Cervero, University of California Transportation Center, to Eileen Cooper, FODN. April 9, 2012.

Eureka, in a separate environmental document.<sup>2</sup> These two proposed projects combined, however, would make it possible for STAA trucks to travel from I-5 at Grants Pass to San Francisco using a scenic coastal route—and, more importantly, one that would allow them to avoid chaining requirements in the Siskiyou range during winter storms. The Draft EIR/EA prepared for the 197/199 Safe STAA Access Project, based on limited survey information and a questionable multiplier, concludes that there would be no significant increase in heavy truck traffic and therefore no significant increase in associated safety risks to local residents, visitors, or the environment.

The project purports to improve safety—but the STAA truck off tracking modeling appears to have assumed unrealistic speeds. In addition, the project proposes no roadway improvements at all for those segments of US199 that now has the highest accident rates.

STAA access on SR 197/US 199 is also purported to be good for the local economy, but the Draft EIR/EA identifies no fiscal benefit to local government entities, nor does it document that the project in any way would result in lower consumer costs for products sold in Del Norte County. Clearly, the lack of STAA network status on SR 199 has not deterred businesses from locating to Crescent City to date. Despite its relatively small population size and remote location, Crescent City has succeeded in attracting such big box retailers as Home Depot and WalMart, as well as a major state prison with continuous resupply needs.

A handful of surveyed business owners in Del Norte County speculated that as many as 30 new local jobs *might* be created if the proposed roadway improvements are made. At a project cost of \$22-34 million (depending on which alternative is selected), this would be an expenditure of on the order of \$1 million per new job in a few businesses, but the economic analysis does not consider potential jobs that would be lost due to switching from local trucking firms that own predominately CA legal trucks to outside firms offering STAA trucks for deliveries, nor does it calculate potential job losses in the tourism sector (which employs more people than any other private sector in the County) resulting from the deterioration of prime scenic and recreational values and perceptions of increased safety and environmental risks.

Caltrans is proposing a large investment of public funds for little clear economic benefit, and for a project that would have substantial impacts on quality of life by: taking private property; decreasing existing buffers between highway right-of-ways and adjacent homes and businesses; increasing the risk of fatal traffic accidents<sup>3</sup> due to increased heavy truck traffic; increasing the risk of toxic spills into the Smith River corridor (threatening community water supply sources, world class sport fishing, and critical habitat for several endangered species), and degrading scenic values<sup>4</sup>. The project would increase heavy truck traffic on a road that local residents and businesses depend upon for daily access, but that is also on a significant scenic byway that attracts many visitors annually for bird watching, sightseeing, camping, river rafting, boating and sport fishing—activities that would be disrupted by additional heavy truck traffic. These visitors are the backbone of the tourism industry that employs more people in Del Norte County than any other private sector of the economy, as noted in the Draft EIR/EA.

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<sup>2</sup> In response to lawsuits filed by local environmental organizations, a federal judge ordered Caltrans to redo the environmental analysis for this project on April 4, 2012.

<sup>3</sup> According to DOT statistics, while large trucks represent only 3 percent of all registered vehicles, they are responsible for 12-13% of all crash fatalities.

<sup>4</sup> According to the draft EIR, “A vast area of cut slope with a rock fall mitigation system would greatly degrade the existing visual quality of the roadway corridor” (DEIR p. 2.1-86).

The land use analysis fails to identify project conflicts with adopted plans and policies pertaining to the protection of scenic, recreational and biological resources in the Smith River corridor, such as the Smith River National Recreation Area Management Plan, which states that “the management emphasis for the middle Fork-Hwy199 management area shall be on maintaining wildlife values and providing for a full range of recreation uses, with particular emphasis on the scenic and recreation values associated with the Smith River, old growth redwoods, and CA state highway 199.” Designation of US 199 as part of the STAA truck network would not be consistent with this management priority.

Caltrans’ own Route Concept Report, prepared in 1989 (well after the passing of the Surface Transportation Act of 1982, allowing 53’ truck trailers), acknowledges “the geophysical constraints of the relatively narrow, steep and rocky Smith River Canyon” and concludes that environmental concerns and ecological sensitivities make SR 199 “a poor candidate for extensive upgrading.” That report recommended leaving SR 199 “basically a 2-lane, conventional highway, with passing lanes.” The report recommended developing additional passing lanes as necessary only to maintain acceptable Level of Service, and concluded that: “This Route Concept should serve as a guide for long range planning of improvements to Route 199. It will protect the State’s investment in the Route, while recognizing environmental and financial constraints which will not allow the programming of extensive improvements for this highway.”

It seems that local lobbying and calls for better STAA truck access to Crescent City have caused Caltrans to abandon this previous (and apparently rational) position. The proposed project will result in an increase in heavy truck use on a roadway whose main value is in providing access to environmental and recreation resources along the scenic Smith River Canyon, as well as access to the redwood forests that comprise one of California’s two UNESCO World Heritage sites (the other being Yosemite). Enjoyment of these scenic drives and the natural resources that surround them would be marred by driver concerns about long, heavy trucks careening around curves in areas that would still have considerable variability in lane widths, shoulder widths, and sight distances. There is already a documented history of truck accidents on US199, including fatalities and diesel spills threatening the Smith River. The existing roadway is so narrow and twisting that the improvements Caltrans has proposed at seven locations along the roadway to allow STAA truck access cannot all meet Caltrans engineering design guidelines and will require mandatory design exceptions.

US199 is a vanishingly rare resource: a winding country road that meanders through an area with extraordinary recreational and scenic values. This road—one of only ten routes included in the Forest Service Scenic Byway Network--traverses rolling terrain in the most heavily visited part of the Smith River National Recreation Area, which lies within a National Forest. For much of its length, US 199 follows the course of the Smith River, the only major river system in California that remains undammed, with the longest stretch (over 300 miles) of designated as Wild and Scenic River of any river in the United States. Together with several other roadways, Route 199 is part of the “Mystic Corridor” connecting Crater Lake National Park in Oregon to the redwoods and the California coast near Crescent City.

In my view (both personal and professional), there is still a place for winding country roads along scenic rivers with exceptional scenic, recreational, and ecological values. We should be trying to preserve them, rather than “improving” them to become part of the STAA truck network. Such resources will become more highly valued and sought after over time, as they become more scarce. The irony is that the creation of a STAA truck route (with uncertain truck traffic and safety impacts) may kill the very goose that remains capable of laying golden eggs in Del Norte

County in the future—namely, tourism in this area that is known for its pristine river, extraordinary parks, and scenic resources.

Furthermore, the proposed improvements, which *at great cost* would provide the bare minimum of changes needed to meet current STAA route qualification requirements are not likely to be a sensible long term investment. In the 1960s, the industry standard in trucking was a 40' trailer; in the 1970s it was 48', in the late 1980s, 53' trailers were authorized. The American Trucking Association recently has been seeking Congressional approval for even longer, heavier trucks, despite evidence that heavy trucks are the major source of highway and bridge damage, and that heavy trucks do not pay their fair share of the cost of roadway deterioration and bridge replacement. The continuation of these trends into the future is reasonably foreseeable.

I have no stake whatsoever in this project. Nonetheless, on behalf of FODN, I urge local elected officials and the State of California to reconsider prioritizing funding for this project, which has been declared to be good for public safety and the Del Norte County economy based on wishful thinking and inadequate information pertaining to environmental impacts.

Sincerely,

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