Richardson Grove Operational Improvement Project

HUMBOLDT COUNTY, CALIFORNIA
DISTRICT 1 – HUM – 101, PM 1.1/2.2
464800

Final Environmental Impact Report/ Environmental Assessment and Programmatic Section 4 (f) Evaluation

Volume 2
Responses to Comments

Prepared by the
State of California Department of Transportation

The environmental review, consultation, and any other action required in accordance with applicable Federal laws for this project is being, or has been, carried out by Caltrans under its assumption of responsibility pursuant to 23 U.S.C. 327.

May 2010

Responses to Comments

The December 2008 Draft Environmental Impact Report/Environmental Assessment (DEIR/EA) was circulated to the public from December 5, 2008 to March 12, 2009. Caltrans received nearly 800 comment letters and emails from the general public. Many of these comments were email communications. At the public hearing held December 15, 2008, members of the public had the opportunity to dictate their comments to a court recorder. The large number of comments received from the general public during the public comment period attests to the awareness of the local community about this project and the community's interest in having its concerns heard and addressed.

How to Use the Responses to Comments Volume

The comments received to the DEIR/EA within the comment period have been organized into as follows: State Agencies, organizations, and individuals. Numerous copies of a form letter were received. An example of the form letter and a list of people who submitted the form letter is provided rather than including each form letter. An index of comment letters is provided at the beginning of each section for use in locating a particular comment letter. Responses to comments can be found immediately following each letter or email.

Many of letters from the general public were form letters and many additional comments from the general public focused on a select number of issues and topics. To facilitate the review of the Responses to Comments volume and to provide a comprehensive response to the common issues raised, General Responses have been prepared to address the most frequently expressed concerns. Recurring comments and responses are as follows:

<u>Comment</u>
Question necessity of the project and cannot find information within the document that explains how this project allows the restrictions for the longer trucks to be lifted by Caltrans.

<u>General Response 1</u>
The need for the project is stated in the 2006 and 2008 Regional Transportation Plan (RTP) for Humboldt County. The primary mode for goods movement in the County occurs by trucking. Moreover, the RTP recognizes that truck transportation is a major component of many industries doing business in Humboldt County and the north coast. The RTP notes that the STAA restriction at Richardson Grove increases shipping costs for both imported and exported goods. The RTP further states that truck length restrictions and backhaul opportunities in Humboldt County are preventing businesses from being profitable and competitive with other similar business along the west coast. In addition, due to the absence of rail service in the County, plans for developing the port in Humboldt Bay is directly linked to efficient movement of goods via trucking.

The Federal government began regulating the maximum size of commercial motor vehicle on the Interstate highway system in 1956. The standards have continued to evolve with the passage of subsequent laws. In 1982, the Federal government passed the Surface Transportation Assistance Act (STAA). This Act increased the allowable size of commercial trucks on the Interstate highway system. In addition, this Act authorized the establishment of a National Network for trucks where federal width and length limits would apply. In California, the STAA network consists of the National Network and Terminal Access Routes. The National Network includes the Interstate system and Defense Highways such as I-5 and I-80. Terminal Access Routes are portions of State routes or other roads that can accommodate STAA trucks. Terminal Access Routes allow STAA trucks to a) travel between National Network Routes, b) reach a truck's operating facility, or c) reach a facility where freight originates, terminates, or is handled in the transportation process. US Route 101 in Humboldt County is designated as a Terminal Access Route with the exception of the section through Richardson Grove.

Congress established minimum length standards for most commercial truck tractor semi-trailers and for twin trailers pulled behind a truck tractor. The federal length limits are the minimums that States must allow for certain vehicles on the National Network and reasonable access routes. Congressional involvement in vehicle length reflected the desire to standardize the enforcement of length along the National Network and to thereby eliminate any administrative and operating confusion caused by varying State provisions governing commercial vehicle length along that element of U.S. highways.

STAA defines a truck standard but it does not define prescriptive highway improvement standards. Standard design practice is to check the proposed roadway design and, where necessary, use truck-turning templates specific to the type of truck needing accommodation. For this project, due to the number of curves, a software package that models a truck's turning sweep was employed to identify where the deficiencies were that would cause off-tracking over the center line into the opposing lane as well as to ensure that the proposed geometric modifications would be sufficient to allow STAA trucks to traverse the curves without off-tracking.

The proposed project would make small adjustments to the roadway geometrics sufficient such that STAA vehicles can negotiate the curves without off-tracking. Adjustments made at the curves would include such things as modifying the curve radius (the sharpness of the curve), adding to the shoulder width, lengthening the curve, modifying the superelevation rates, and changing the orientation of the curve in relationship to the fixed objects (the trees). These small shifts in alignment (averaging 2-6 feet) would provide the appropriate geometrics to the roadway design that would control or minimize the amount and location of off-tracking near the trees and eliminate conflict points between opposing traffic which would allow the STAA restriction to be lifted.

<u>Comment</u>

Construction of the project would cause harm to the atmosphere and health of the redwood grove, which is a gateway to the north coast and defines the character of the

region. Removing even a few redwood trees would greatly diminish the gateway experience.

General Response 2

No old growth trees would be removed as part of this project. Fifty-four trees would be removed in total, 30 from within the park. The only two redwoods to be removed in the park are less than eight inches in diameter. The majority of the thirty trees to be removed in the park are four to twelve inches in diameter and fourteen of the 30 trees are tan oaks. The largest tree proposed to be removed from the park is a 24-inch in diameter tan oak. The majority of the tree removal would occur at two locations. Ten of the trees would be removed at the northern park boundary on the slope below the staff residential units. This location is shown in Figure 7B of the final document. The second location is at PM 1.36 which was a previous cut slope and is shown in Figure 6B in the final document. Fourteen trees would be removed from this second location, the majority of which includes tan oaks and Douglas firs. Simulations of the before and after visual characteristics of the cut area at PM 1.36 are also found in Figures 1 and 2 in Appendix K of the final environmental document.

The current ambiance of the park for the motorist and visitor would not be altered substantially as a result of this project. The roadway would remain a curvilinear two lane highway with minimal to no shoulders. As no old growth trees would be removed, the canopy over the highway with the redwoods abutting the edges of the roadway creating the "gateway effect" would remain unchanged. The greatest alignment shift would occur around PM 1.40. Simulations of the before and after visual characteristics at PM 1.40 can be found in Figures 3 and 4 in Appendix K of the final environmental document.

A number of measures have been incorporated into the project design and construction strategy that would minimize both short-term and long-term impacts to the park resources. Caltrans arborist and Dennis Yniguez, an independent arborist contracted by Save The Redwoods League to evaluate the project, have determined that the project as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of the old growth redwoods adjacent to the highway construction. Appendix B in the final environmental document identifies these measures incorporated into the project to protect park resources.

Comment

Cutting the roots of redwood trees would result in adversely affecting or killing the redwoods.

General Response 3

The most sensitive area for the trees can be found in what is called the structural root zone which consists of a circular area with a radius three times the diameter of the trunk of the tree. The roots found within this area are important for absorbing and delivering nutrients and water to the tree. The structural root zones for all redwood trees adjacent to the roadway thirty inches in diameter and larger in the park have been mapped. In the park, all excavation below the finish grade within the structural root zone area except for

the culvert work would be done with pneumatic excavators (such as an air spade), shovels, pick axes, or other non-mechanized methods to minimize disturbance or damage to the roots from large equipment.

Pneumatic excavators use compressed air to "excavate" the soil leaving the roots intact. Since most of the proposed excavation would occur in the vicinity of the edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather, excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill from the structural section placed over the roots. To minimize severing roots beneath existing grades, the current design increases the road height.

A special structural section is being used, Cement Treated Permeable Base (CTPB). This base material is less thick than the normal base material decreasing the depth of excavation that is required in the vicinity of the trees. In addition, CTPB requires less compaction to be performed which also reduces the impacts to the tree roots.

Irrigation will be provided to minimize stress on the redwoods in the park during construction where excavation below the finish grade will occur with the exception of the cut slope at PM 1.36. Within 24 hours of the excavation and once a week thereafter between the dates of June 1 through September 30 water equivalent to ½ inch in depth would be applied in the area from the edge of pavement to 25 feet beyond the pavement.

The specifications for the project also will mandate that a certified arborist be present in the park to monitor construction activities and ensure that the minimization measures are being complied with.

A certified arborist, Darin Sullivan, was part of the team developing the project design and proposing measures to minimize impacts to the old growth redwoods. After evaluating the project he concludes that with the minimization measures incorporated into the project, "it is my professional opinion that this project can be performed with minimum impact to the root vitality of these wonderful trees." Dennis Yniguez, a registered consulting arborist contracted by Save the Redwoods League to evaluate the project notes that, "this project appears to have been designed with the protection of adjacent old-growth redwoods as a fundamental consideration." He further states, "the existing root systems of old growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." Mr. Yniguez concludes, "My professional opinion is that the highway alterations, as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of old growth redwoods adjacent to the highway construction."

Comment
Construction impacts would result in noise, air pollution, soil compaction and other effects that would disrupt the serene environment, drive away wildlife, and discourage the public's use of the State park.

General Response 4
Construction will result in temporary noise, nuisance odors, traffic delays, and other impacts and that these impacts could negatively affect the visitor experience at the park as well as affect wildlife. However, construction within the park would be, for the most part, in discreet areas at any given time and no pile driving or blasting is proposed for this project. It should be noted that in one third of the project limits the only construction activity would be some drainage improvements and repaving.

The existing park visitor experience is already affected with the traffic noise from US Route 101 which bisects the park. The improvements being proposed for the highway would occur on essentially the existing alignment; the average alignment shift from the existing centerline is two to six feet. The project is not expected to result in increased truck traffic. A maximum of two foot shoulders will be added in the park which would not result in appreciable widening of US Route 101 in the park.

The wildlife has adapted to the activities of the park including evening campfire programs, generators from the RVs in the campground, general maintenance activities conducted by the park staff to upkeep the park facilities and roads as well as traffic and maintenance activities associated with US Route 101.

A number of measures have been incorporated into the project to minimize impacts. Appendix B in the environmental document identifies these measures incorporated into the project to protect park resources.

Comment
This stretch of Route 101 provides inadequate access for bicyclists and the project does seem to comply with Caltrans policy stating that Caltrans must consider bicycle access whenever a highway improvement project is planned.

General Response 5
The Caltrans policy requires that providing for non-motorized travelers (including pedestrians, bicyclists, and persons with disabilities) be fully considered when planning and constructing a project. It also states that providing such access should be in balance with community goals, plans, and values. These values are considered to include economic, social, and environmental effects such as the elimination or minimization of adverse effects on the environment, public services, aesthetic features, and the community at large. With the proposed project, providing for non-motorized access is problematic through the park since the shoulders of US Route 101 cannot be widened sufficiently without the removal of several old growth redwoods. Outside the park boundaries the project does propose widening the roadway to provide four foot shoulders

for both the northbound and southbound lanes to better accommodate pedestrians and bicyclists.

To construct a bike/pedestrian path separate from the existing highway in the park would have to be done on land under the jurisdiction of State Parks, or would involve a longer and very steep detour of Route 101, which would likely make its construction not feasible. State Parks, as the agency controlling the management and approval of the type and location of any new facility within its jurisdiction, is the most appropriate lead agency for planning such a facility.

Comment
Concern that a few businesses will benefit from the publicly funded project while businesses in close proximity to the project dependent upon tourism may suffer.

General Response 6
Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and the one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.

It is not anticipated that businesses located along State Route 254 would be substantially affected by the work proposed at Richardson Grove. While businesses on US Route 101 in the project area would be affected by traffic delays and queues that could form in front of their businesses, it would not result in substantial adverse impacts. The estimated traffic delay times would typically average five to ten minutes under normal circumstances and these are standard delays for work on a two lane State or US highway. Access to the businesses and the park will be marked with cones to discourage queues from blocking the access. Flaggers will be utilized at the park entrance when construction occurs in the vicinity of this access. Flaggers may be deployed south of the park if problems with blocking business access occur.

A meeting with business owners prior to construction will occur to discuss anticipated construction impacts and staging of the project. In addition, a communication plan will be developed to continuously update local businesses as to construction activities so that businesses can have relevant information to base operational decisions on. Part of the communication plan will be to provide business owners with a Caltrans contact person to report problems to so that issues can be resolved in a timely manner.

It should be noted that there have been previous construction projects on US Route 101 in and near the grove in the past few years. Traffic delays similar to what is expected for the current project would have been experienced for those projects as well.

Comment
Local businesses directly impacted by the project, especially during construction, not adequately acknowledged.

General Response 7
It is acknowledged in the document that during construction adjacent businesses would be affected by traffic delays resulting from the one way traffic signal and traffic staging. Delay times would typically average five to ten minutes up to a maximum of fifteen minutes under normal circumstances. This is fairly standard for work on a two lane State facility. Since I-5 is the nearest alternative to using this section of US Route 101 and would constitute a minimum of a 300 mile detour, and the anticipated traffic delays are similar to delays experienced elsewhere along State highways due to construction, it is not expected that motorists with destinations in northwest California would modify their travel routes to avoid the construction at Richardson Grove. Caltrans will be working with the local businesses located in close proximity to the project area to minimize the impacts of construction. For example, a communication plan will be developed to continuously update local businesses and the public as to construction activities. Thus, it is not anticipated that businesses dependent upon tourism would be substantially affected by the construction of this project.

Comment
Support an alternative to lower the speed to 25 mph through Richardson Grove to provide STAA access.

General Response 8
Reducing the speed limit would not correct the existing deficiencies in the roadway geometrics resulting in the STAA restriction. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off-tracking. The posted speed limit in this area was reduced from 40 mph to 35 mph in fall 2008 after conducting an Engineering and Traffic Survey.

In addition, the California Vehicle Code requires that speed zones be set based on prevailing speeds, collision history, and highway, traffic and roadside conditions not readily apparent to drivers. Average 85th percentile speeds were measured on US Route 101 through the project limits and ranged from 41 mph to 49 mph for all vehicles and 39 mph to 44 mph for commercial trucks. Setting the speed limit far below the 85th percentile speed would make a large number of reasonable drivers “violators” and set up an unenforceable “speed trap” which is not allowed by the vehicle code. The reduction of the previous speed limit from 40 mph to 35 mph was justified based on several factors including the roadside conditions. The close proximity of trees, while not hidden, may present an unusual or at least an unaccustomed driving experience to some highway users and many drivers seem to have difficulty judging the clearance to trees along the highway. Also on bright sunny days, there is an abrupt change in lighting conditions when the drivers enter and exit the grove. In addition, although Caltrans maintains a

friction-course overlay through the park (a type of pavement that provides for more friction for tires), the year-round constant shade may contribute to a road surface condition that is inconspicuous. Because of these factors, Caltrans believes that the existing speed limit of 35 mph is both realistic and enforceable.

Comment
Support an alternative to bypass the State Park.

General Response 9
In the late 1950's several alternatives for US Route 101 were studied. In 1968, a new alignment for US Route 101 east of the Eel River but still within the boundaries of Richardson Grove State Park was adopted (Alternative A). But funding was dropped before the project could be constructed. Later in 2001 a Feasibility Study evaluating the alternatives dropped previously was conducted. The alternatives included widening the existing roadway to four lanes through Richardson Grove State Park and three alternatives with new alignments for Route 101—Alternative A as discussed above, Alternative B which include a tunnel at the edge of the park, and Alternative C which bypassed the park to the east. The Feasibility Study concluded that each of the alternatives would have severe environmental impacts. Widening on the existing alignment had substantial adverse impacts on the old growth redwoods as well as park facilities like the campgrounds, visitor center, and trails, while the alternatives on new alignments would require large amounts of excavation and disposal due to either steep terrain or constructing a tunnel. The new alignments would require a large amount of vegetation removal and new bridges over the South Fork of the Eel River. There would be impacts to federally and state listed wildlife. The cost for the alternatives on new alignments were estimated to range from approximately $100 to $600 million as compared to the $5.5 million of the proposed project. Due to the substantial environmental impacts and high costs a bypass alternative was not considered feasible.

Comment
Support a signalization alternative to implement one way traffic control.

General Response 10
Just installing a signal to reduce speed would not correct the existing deficiencies in the roadway geometrics resulting in the STAA restriction. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. Thus, to effectively reduce off-tracking, a signalization alternative must implement some system of one way traffic control for STAA vehicles.

Several variations of signalization alternatives were considered in the DEIR/EA. Each of these alternatives assumes signals would restrict the current two-way traffic configuration to one way, one lane traffic for all day or portions of the day. Without making the modifications to the alignment, the issue of off-tracking of the STAA vehicles would not be solved for two way traffic. Having the traffic stop at a signal before proceeding, even at a reduced speed, would not resolve the issue of STAA vehicles off-tracking and

encroaching into opposing lane of traffic when there is little to no shoulders available to use.

The signalization alternatives considered included: 1) Operate a signal system for one or two cycles per hour allowing STAA vehicles only while restricting two way traffic. The rest of the time two way traffic is allowed and STAA vehicles would be restricted. 2) Operate a signal system during the night hours only and allow STAA access only when signal is in operation and one way traffic in effect. 3) Operate a signal 24 hours a day allowing alternating one way traffic. 4) Operate a signal stopping traffic in the non-peak direction, leaving the peak direction open to through travel. This is similar to #3, except the delay times in the non peak direction would be substantially longer.

One of the biggest issues with installing a permanent signal is the expected traffic queuing. There is the potential for the traffic queue to reach one to two miles in length or more during times of high traffic volumes such as the weekends during the summer months. These queues would back up into the four lane freeway sections of US Route 101. The substantial queuing would be less likely if the signals were only in operation during the evening hours as the traffic volumes are less at night. These queues and the associated traffic delays resulting from the queues would also affect emergency vehicle response times. (The difference between the proposed project's temporary signal and a permanent signal is the proposed project envisions utilizing a signal system during the off peak season to construct the retaining wall and thus the longer queues and associated traffic delays are not expected to result. In addition, the area under traffic control by the signal during construction is very short to cover the area in the vicinity of the retaining wall whereas a permanent signal would control approximately a mile segment of the roadway.)

Another concern with permanent signalization is delay times for the motorist. Based purely on the time it takes for vehicles to travel through the limits of one way traffic operation, the cycle length during minimal traffic flows would be 9-10 minutes. However, during the daily peak hour flows the theoretical cycle length would be 34 minutes (based upon a peak hour flow of 900 vehicles). This would equate to an average delay of 17 minutes per vehicle. This estimate is based on an optimal situation using actuated operation. With fixed time operation, the delay times could go up substantially. At Richardson Grove an actuated system is not feasible because the stopping locations would be located approximately one mile apart due to the limited availability of locations providing minimum stopping sight distance. Due to the distance between the stopping locations for northbound and southbound traffic, the signals would have to be operated with separate controllers which means that the signals could not utilize traffic actuation.

Alternatives 1 and 2 also have the issue of providing space for the STAA vehicles to wait until the one way traffic is enacted and the STAA vehicles are allowed to enter the traffic queues to traverse the grove. In the project area there is very limited area that could be utilized for this purpose with the steep slopes west of the highway and the river to the east and few pullouts, providing storage space to accommodate STAA vehicles waiting to

traverse the grove would likely have to be developed at some distance from the project for both northbound and southbound vehicles.

The issue with compliance increases as delay times rise. The longer the delay time, the more potential for motorists to either ignore the signal system or conclude that the system is inoperative. In addition, the problem with how to deal with the uncontrolled traffic entering the highway from the park entrance as well as other ingress/egress points within the park when the rest of the Route 101 traffic is under one way traffic control would have to be resolved.

See Section 1.4.2 of the environmental document for more information on the signal alternatives considered.

Comment
Concern that the local trucking companies would be adversely affected by providing STAA access allowing larger trucks from outside the area.

General Response 11
The issue is that the size of vehicle in use commonly throughout the nation, including California, has changed to the STAA. What has been reported is that while California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with the industry standard-sized vehicles (STAA trucks). Thus, the non-STAA vehicles tend to be older vehicles as the newer vehicles are the industry standard-sized trucks. Smaller businesses, which depend upon trucking companies for importing and exporting their products are finding it difficult to reliably access these non standard-sized vehicles.

Local trucking firms are not prohibited from including STAA vehicles in their fleet regardless if the STAA restriction at Richardson Grove is lifted or not.

Comment
Concern that the project would result in inducing large scale commercial growth and big box stores. County should be supporting family businesses.

General Response 12
Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction at Richardson Grove has adversely impacted their business. The STAA restriction affects a cross section of businesses including such diverse interests as local manufacturing firms, cheese producer, recycling center, seafood exporter, local brewery, construction industry representatives, agricultural product representatives, lumber product representatives, dairy owners, clothing manufacturer, ranching business, creamery, performing arts representatives who rely on the STAA vehicles to transport the sets for local performances, and racing recreationists who use the STAA vehicles to transport their cars. In addition, Caltrans has heard from many other business owners who support those businesses who are affected by the STAA restriction and so, they themselves are also affected.

Since the industry standard is the STAA vehicle, big box stores would likely realize some economic benefit from lifting the restriction just as small, local, independent businesses are expected to. The lack of STAA access did not prohibit the establishment of big box stores in Eureka and elsewhere. Information from an internet survey conducted by the County indicated that the big box stores tend to have CA Legal trucks included in their fleet, while the small, independent businesses which do not have their own fleet are more affected by not being able to utilize industry standard sized vehicles for their shipping needs. The survey provided quantitative estimates of the dollar impact of trucking constraints on a high percentage of local businesses in several export dependent industry sectors. The information generated even from the limited number of industry sectors considered was sufficient to enable Caltrans to determine that the benefits derived from the project would be worth the expenditure of public funds.

A qualitative rather than quantitative analysis for growth was performed for this project. The economic costs of not constructing the proposed project would fall on businesses currently located in Humboldt County including small, local businesses. Providing access for STAA trucks is not expected to result in substantial incentive for big box development because it does not substantially change the factors that most influence growth in Humboldt County. A study prepared by the Humboldt County Association of Governments (Cambridge Systematics, Inc., 1989) identified distance from major population centers, lack of direct access to the Interstate road system, lack of a completed four lane north-south or east-west highway, limited air service, unreliable and inadequate rail service, lack of industrial land zoned in Eureka, shortage of labor in some occupations, lack of diversity of tourist attractions and visitor activities, and perception of the area by outsiders as remote, as being the major constraints to economic activity and subsequent growth in Humboldt County (see Section 2.1.2 in the environmental document). Thus, providing STAA access is not expected to be a primary factor influencing growth in Humboldt County, including “big box” development. It should also be noted that the lack of STAA access has not prohibited the development of big box stores in Eureka.

<u>Comment</u>
Concern that the project would widen and straighten the roadway resulting in speeding vehicles.

<u>General Response 13</u>
The proposed project does not straighten the roadway, but actually introduces more curves into the alignment. The proposed realignment changes the curves such that the curves are initiated earlier so that vehicles have initiated going into the curves prior to reaching the trees causing the geometric deficiency. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain 4-foot shoulders to better provide for bicyclists and pedestrians. The widening that is proposed in the park is at spot locations to gain up to 2-foot shoulders where currently there are no or less than 2-foot shoulders and where there are no trees immediately abutting the roadway that would preclude widening. Thus, it is not an anticipated that the project

would result in vehicles traveling this section of US Route 101 faster. The numerous curves as well as the roadway characteristics of minimal to no shoulders with large trees adjacent to the edge of pavement would not be changed by the project and would continue to discourage speeding. In addition, the posted speed limit through Richardson Grove was reduced from 40 mph to 35 mph in fall 2008.

Comment
Concern that the project would result in increased truck traffic.

General Response 14
It is not anticipated that truck traffic would increase on Route 101 as a result of the proposed project. The project will not be increasing the capacity of the highway as no additional travel lanes will be constructed. The potential for increased truck traffic would be due to diverted truck traffic that currently uses other north/south routes such as I-5 and Route 99. Diversions from these other routes would depend upon it being economically feasible for the trucking companies to change their existing routes based upon fuel consumption and travel times. Since all the major coastal cities from southern California to northern Washington have readily available access to the I-5 and Route 99 corridors which have straighter alignments and faster travel times, the opening of STAA access to Route 101 through Richardson Grove is not expected to generate a substantial amount of diverted truck traffic. If the project is constructed, some of the truck traffic that currently use Route 101 through Richardson Grove would likely switch from non-STAA trucks to STAA trucks which has the potential to reduce the number of truck trips.

A traffic study performed for the projects to lift STAA restrictions on Routes 197 and 199 in Del Norte County[1] also found that there was very little latent demand expected with the lifting of STAA restrictions on these two routes. Latent demand is traffic that would use a route but cannot or does not for some reason. This would include STAA trucks that would shift onto the route because the STAA restriction was lifted as well as includes those trips that would switch from CA legal trucks to STAA trucks. For the study on Routes 197 and 199, it was determined that "only a small increase of about 8.25 new daily truck round trips are projected…" It is anticipated that the conditions on Route 101 in the southern portion of Humboldt County would be similar.

Comment
Removing invasive plants is not sufficient mitigation for the adverse impacts to the redwood trees.

General Response 15
A number of measures have been incorporated into the project design and construction strategy that would minimize both short term and long term impacts to the park resources. The Caltrans arborist and Dennis Yniguez, an independent arborist contracted by Save The Redwoods League to evaluate the project, have determined that the project as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of the old growth redwoods adjacent to the highway

[1] Fehr & Peers May 2009. "197/199 Safe STAA Access Project Draft Traffic Analysis Report." Page ES 2.

construction. The additional measure to remove non-native vegetation is an attempt to further enhance the environs of the redwoods.

Comment

Installing corvid- proof trash cans is not sufficient mitigation for adverse impacts to marbled murrelets and northern spotted owls.

General Response 16

The US Fish and Wildlife Service determined that the proposed project would not result in any marbled murrelet or northern spotted owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of marbled murrelets or northern spotted owls, particularly to young or the loss of eggs is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated critical habitat of the marbled murrelet based on the following factors: 1) The removal of as many as 31 second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available to nesting marbled murrelets within half mile of proposed vegetation-removal activities and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) The trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current marbled murrelet nesting habitat; and 3) the project includes measures to avoid and minimize impacts to old growth redwood tree roots during construction.

While there is no known cases of marbled murrelets nesting in Richardson Grove State Park, it is estimated that at least one nesting pair are present within the 250 acres of suitable nesting habitat which may be subjected to noise disturbance during the breeding season. The US Fish and Wildlife Service concurs that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the marbled murrelets or northern spotted owls in and near the project area.

Providing the corvid-proof trash receptacles is a conservation measure recommended by the US Fish and Wildlife Service during the consultation efforts for this project and Caltrans incorporated this measure into the project. Conservation measures in the context of the federal Endangered Species Act represent actions that are intended to further the recovery of and/or minimize or compensate for the project effects on the listed species. The revegetation of disturbed areas and the restoration of the half acre that would be relinquished back to State Park are also conservation measures. The restoration of the half acre would enhance foraging habitat for northern spotted owls.

Surveying potential breeding habitat to identify potential nesting areas is identified as a recovery action in the marbled murrelet Recovery Plan (US FWS, 1997). The two year survey for marbled murrelets that Caltrans has proposed to do at Richardson Grove State Park would aid in the recovery of the species by providing information to the US Fish and Wildlife Service about the population in inland nesting areas.

Index to Letters from State Agencies

The following letters from State Agencies are alphabetized by agency name:

Department of Forestry and Fire Protection
Department of Parks and Recreation
Native American Heritage Commission

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

Humboldt – Del Norte Unit
118 Fortuna Blvd.
Fortuna, CA 95540
Website: www.fire.ca.gov
(707) 726-1272

Ref: 7100 Planning
Date: February 11, 2009

Deborah Harmon, Senior Environmental Planner
CA Dept. of Transportation
1656 Union Street
Eureka, CA 95501

Project:
Richardson Grove Operational Improvement Project CalTrans

Ms. Harmon,

The California Department of Forestry and Fire Protection (CALFIRE) provides these standard project review comments on the above noted project.

FIRE SAFE

General
CALFIRE has responsibility for enforcement of Fire Safe Standards as required by Public Resources Code (PRC) 4290 and 4291. However CALFIRE is not the lead agency in planning development and project permitting. CALFIRE provides input as a contributing agency, generally limited to plan review, and is not the approving agency for these projects.

Local Responsibility Areas
Should this project include Local Responsibility Area (LRA) lands, CALFIRE has no direct fire safe input on those parcels. However, in those areas with LRA parcels adjacent to State Responsibility Area (SRA) land, CALFIRE recommends that local standards be applied that are consistent with those CALFIRE makes for SRA lands.

State Responsibility Areas
Should this project include State Responsibility Area (SRA) lands, the following are CALFIRE's Fire Safe minimum input and recommendation for any and all development.

1. In Humboldt County, developments must meet minimum fire safe standards by constructing the project in conformance with County Fire Safe Ordinance 1952, which the California Board of Forestry and Fire Protection has accepted as functionally equivalent to PRC 4290. The County Fire Safe Ordinance provides specific standards for roads providing ingress and egress, signing of streets and buildings, minimum water supply requirements, and setback distances for maintaining defensible space.

2. New buildings located in any Fire Hazard Severity Zone within State Responsibility Areas shall comply with the 2007 California Building Code (CBC) Section 701A.3.2. This requires roofing assemblies, attic and eve ventilation, exterior siding, decking and deck enclosure, windows and exterior doors, and exposed under floor areas that are approved "ignition resistive" in design. 1

3. All development, especially commercial or industrial development, should be designed to comply with the most current versions of the following standards:
   a) California Fire Code (CFC) — for overall design standards
   b) Public Utilities Commission (PUC) General Order 103 — for design of water systems

c) National Fire Protection Association Standards (NFPA) for fire flow minimums and other design questions not specifically covered by CFC and PUC
d) Housing and Community Development Codes and Standards —for mobile home parks and recreational camps

4. For Department of Real Estate reporting purposes, fire protection coverage in SRA is generally described as follows:
   During the declared fire season (usually June through October) CALFIRE responds to all types of fires and emergencies in SRA.
   During the remainder of the year (winter period), CALFIRE responds to emergency requests with the closest available fire engine, if a response can reasonably be expected to arrive in time to be effective. A fire engine is usually available somewhere in the Unit, but may have an extended response time.
   There are many hazards confronting fire protection agencies in most subdivisions on SRA lands. Steep terrain and heavy wildland fuels contribute to fire intensity and spread. The distances from fire stations and road grades encountered usually create an excessive response time for effective structure fire suppression purposes.
   Subdivisions increase fire risks from additional people and increase probable dollar losses in the event of fire due to added structures and improvements.

5. If the project expects to produce densities consistent with a major subdivision, the impacts on all infrastructures should be mitigated. Local government more appropriately provides the responsibility for high-density area protection and services. Annexation or inclusion into Local Responsibility Area should be studied as well.

6. CALFIRE does not support development in areas where there is no local agency fire service for structure fires and emergency medical response. Fire services should be extended into service gap areas as a condition of development. New development can adversely impact existing fire services. Careful consideration must be given where development may overload the local fire service's ability to respond.

RESOURCE MANAGEMENT

CALFIRE has enforcement responsibility for requirements of the Z'berg—Nejedly Forest Practice Act of 1973. CALFIRE is also the lead agency for those parts of projects involving the scope of the Forest Practice Act. The following basic input will cover the majority of projects. Each project will be reviewed with additional input sent at a later date, if needed.

The following comments reflect the basic Resource Management policies of the Board of Forestry and Fire Protection and CALFIRE on CEQA review requests. These policies apply to both Local and State Responsibility Areas.

1. If this project reduces the amount of timberland, by policy, the Board of Forestry and CALFIRE cannot support any project that will reduce the timberland base of California. "Timberland" means land which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees regardless of current zoning (PRC 4526). However, if the zoning and intended use are consistent with the county's general plan; and if no land other than timberland can be identified to site the project; then CALFIRE may choose not to oppose the project.

2. If **any** commercial timber operations are involved with a project, the timber operations cannot be conducted without a CAL FIRE permit. Commercial timber operations include the cutting or removal of trees offered for sale, barter, exchange, or trade or the conversion of timberlands to land uses other than the growing of timber (PRC 4527). Contact your nearest CAL FIRE Resource Management office for guidance on obtaining the necessary permits.

3. If **any** timberlands are being converted to a non-timber growing use by this project, the conversion operations cannot be conducted without a CAL FIRE permit (PRC 4621). Conversion of timberland takes place when trees are removed and the land use changes, even without the sale, barter, exchange, or trade of the trees. Contact your nearest CAL FIRE Resource Management office for guidance on obtaining the necessary permits.

4. If timberland is in the viewshed of a project, the current and future owners should be overtly notified that changes will occur to their views due to timber management activities. Further, no project should be allowed to negatively affect access to timberland for timber management purposes; neither on the project parcel(s) nor any other timberland parcels.

5. If timber harvesting has occurred and post-harvest restocking and prescribed erosion control maintenance obligations have not been met on a parcel, future owners should be overtly notified (14 CCR 1042). The current owner of a parcel is responsible for restocking requirements and maintenance of roads whether or not they were involved in the actual harvest plan.

6. If the project involves the development of parcels zoned as Timber Production Zone (TPZ), CALFIRE cannot support the project. Dividing TPZ land into parcels of less than 160 acres requires a Joint Timber Management plan prepared by a Registered Professional Forester (RPF), recorded as a deed restriction for a minimum of 10-years on all affected parcels, and approved by a four – fifths vote of the full board (Govt. Code 51119.5). TPZ may be rezoned using a "Ten Year Phase Out," which precludes the need for a Timberland Conversion Permit. CALFIRE opposes immediate rezoning of TPZ land.

If CALFIRE staff develops additional comment on this project, it will be forwarded in an additional response letter.

By
Planning Battalion
CALFIRE Humboldt – Del Norte Unit

For Ralph Minnich, Unit Chief

1. The roadway improvements on Route 101 would not include construction of any new buildings.
2. The roadway improvements would not include any impacts to commercial timberlands nor to any parcels zoned timber production zones.

State of California • The Resources Agency
Arnold Schwarzenegger, *Governor*
DEPARTMENT OF PARKS AND RECREATION • North Coast Redwoods District
Ruth Coleman, *Director*
P.O. Box 2006, Eureka, CA 95502-2006 • 707-445-6547

March 10, 2009

Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501

California State Clearinghouse,
by fax to: 916-323-3018

Re: Richardson Grove Operational Improvement Project DEIR SCH # 2009012070

Dear Ms. Harmon:

Thank you for the opportunity to review and comment on the Richardson Grove Operational Improvement Project DEIR (SCH # 2009012070). California State Park's North Coast Redwoods District (NCRD) consists of twenty-four park units totaling approximately 134,000 acres and is responsible for the management of the largest stands of extant old-growth redwoods that exist. Richardson Grove is a "heritage park" with worldwide significance. These forests are enjoyed by millions of people extending from those in the region to more distant statewide visitors; people come from the furthest reaches of our nation and all corners of the planet to experience the Redwoods and most pass through Richardson Grove to do so.

Many of these visitors have strong legacy ties to Richardson Grove State Park, and a family connection that spans generations. Any project that affects the historic patina and the natural fabric of Richardson Grove State Park can have far reaching impact to millions of people as they enter the Redwood Region.

As CalTrans developed this project your office has been open to our involvement and has included NCRD staff at many levels. We met on several occasions to discuss the project's progress, including two in-depth discussions about the DEIR. We appreciate your openness and desire to consider our suggestions. We also know that you are working hard to protect the significant natural, cultural and recreational values within the park. Your design acknowledges the significance of the site as you work to satisfy the call for efficient transportation. Our comments are relative to the specifics of the DEIR, we hope they are useful and we continue to be available for discussion as you make progress with this project.

When reviewing projects that may affect state park resources we base our review on the Department's Mission Statement which states:

"The mission of the California Department of Parks and Recreation is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting it's most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation."

After careful review, the North Coast Redwoods District has identified several inconsistencies in the DEIR and there is a general lack of data or information that is necessary for our staff to make qualified determinations as to the impact to the State Park resources, and the viability of the mitigation measures that are presented. There are inconsistencies between the CEQA checklist and the Environmental Consequences sections of the DEIR. Several sections of the DEIR are not consistent with CEQA for which we believe additional analysis or mitigation measures need to be developed. The document also contains numerous mitigation measures that are not enforceable and are therefore not compliant with CEQA.

Because of the apparent inconsistencies, lack of clear mitigation methods and a lack of sufficient data to evaluate the proposed project, we are not able to make a determination on some critical aspects of the project's impact to the State Park. We are concerned that the document does not meet its requirement to be an enforceable environmental tool.

We offer the following constructive analysis of the DEIR:

1) Section 1.1. The DEIR states that the speed limit is 40 mph through the project area. This needs to be updated to state that the speed limit through the Park is 35 mph.

2) Section 1.2. The DEIR acknowledges that the project area is part of the Pacific Coast Bike Route yet does not provide any measures to increase safety for bicyclists. While there may be an opportunity to provide a bicycle/pedestrian route through Richardson Grove State Park (RGSP), which may be planned by the District, in the advent that this route is not approved, and in the advent that hiker/bikers do not avail themselves of the route, California State Parks (DPR) believes that alternative measures should be evaluated such as active signage which may increase bicyclist safety.

3) Section 1.2, Collision Data. What percentage of the collisions in the project area were associated with STAA (both legal and illegal) vehicles.

4) Section 1.2, Collision Data. The DEIR states that "These factors, non-standard alignment, fixed objects on or near the shoulders, and scenic value of the setting cannot be improved within the scope of the project." Given this, that the most frequent type of collision was "hit object", and that vehicle speeds in the project area are often in excess of the posted limit (85%), what is the potential that the proposed action may actually increase the number of vehicle accidents and subsequently result in greater impacts to old-growth redwoods? If vehicle

strikes to old-growth redwoods increase after the implementation of this project what will be done to reduce this impact and to provide mitigation?

5) Section 1.2, Collision Data. The document states that lowering the speed limit within the project area "should help improve safety and operations ... for both motorists as well as providing some improvement for bicyclists". Given, that the DEIR, acknowledges that 85% of the traffic in the project area was exceeding the then posted speed limit of 40 mph and that the proposed action will actually facilitate greater speeds through the Park by softening the turns provide justification that the proposed action will not result in increased hazards to motorists, cyclists, and to old-growth redwoods.

6) Section 1.3.1. Discuss the relationship between the proposed disposal site located at PM 106.50 and any adjacent watercourses.

7) Section 1.3.1. The DEIR references the need to transfer State Park lands to Caltrans and visa versa to accommodate new easements. DPR has not been provided maps of the proposed easement/property transfer and has not agreed to any transfers. Furthermore, the transfer of lands would require environmental review and as it is part of the proposed action such easement/land transfers should be clearly identified and evaluated in the DEIR.

8) Section 2.1.1.4. Parks & Recreational Facilities, Affected Environment. The DEIR references "large redwood forest". Please define this term, or use the more recognized term of old-growth forest.

9) Section 2.1.1.4. Parks & Recreational Facilities, Environmental Consequences. The DEIR states that in some cases, the roadbed would be moved closer to the trees and in other instances the roadbed would be realigned farther away from the trees. The hardened surface associated with the roadbed and shoulder is a significant adverse effect on the health of any mature tree, including old-growth redwood, where it encroaches into that tree's critical root zone (within 3 x the diameter at breast height (dbh) of the tree). However, the DEIR does not document whether or not the proposed action will increase the cumulative amount of hardened surface on the critical root zone or decrease it. Unless such a detail analysis is conducted, the significance of the proposed action on old-growth redwoods cannot be evaluated. Once this information is provided, it can be evaluated for the significance of the impact to the trees. If that information is not provided, there is not enough substantial evidence to make a finding of significant or less than significant. It is also impossible to develop mitigation measures or evaluate alternatives without this information.

10) Section 2.1.1.4. Parks & Recreational Facilities, Environmental Consequences. The DEIR is unclear as to the amount of habitat within RGSP that will be impacted from the proposed action versus the amount of habitat that will be restored. DPR has concerns that the amount of mitigation will be less than a 1:1 ratio that will not provide mitigation for the direct habitat loss. Additional impacts will occur from the loss of an established vegetation community

consisting of mature vegetation to one of seedlings and transplants that will take years to obtain a similar structure and complexity of the areas impacted. This would warrant a mitigation ratio of 3:1 or greater for habitat loss. The DEIR needs to be amended to provide adequate mitigation at a ration of at least 3:1 for habitat loss within the Park.

11) Section 2.1.1.4. Parks & Recreational Facilities, Environmental Consequences. The DEIR states that "some construction activities will occur at night". This is a vague statement and needs clarification. The DEIR should state exactly what construction activities will occur at night and if any of these activities will be restricted to certain areas or times of night or season. Until this information is provided DPR cannot evaluate potentially significant adverse effects to park operations, visitors, or natural resources.

12) Section 2.1.1.4. Parks & Recreational Facilities, Environmental Consequences, Avoidance, Minimization, and /or Mitigations. The DEIR states that "numerous special conditions have been incorporated to minimize impacting the resources of the park". These special conditions need to be clearly defined and enforceable. If the special conditions are mitigation measures then they must be identified as such in the DEIR.

13) Section 2.1.2. Growth. Environmental Consequences. The DEIR states that "the inaccessibility of these areas [Humboldt County] to longer trucks is not the most important constraint on business development in northern California" and that one of the most important constraints is "the lack of a completed four-lane north-south or east-west highway". This and the other major constraints to business development listed in the DEIR support the argument that this project is not going to meet the ultimate transportation goals and is only an interim treatment that will eventually result in a proposal for a four-lane highway through or around RGSP. DPR is concerned that the Proposed Build Alternative is only a temporary fix to an issue that will either continue to erode the natural, cultural, and recreational values of RGSP or require a complete bypass of the Park as originally envisioned in CalTran's previous planning efforts. Will the need for a 4-lane highway from the Bay Area through Humboldt and Del Norte counties be determined to be necessary? If so, the proposed alternative will degrade the values of RGSP and if, the final solution is a bypass, then these impacts will have been unnecessary.

14) Section 2.1.3. Community Impacts. Environmental Consequences. The DEIR states that "access to the park will be delineated with cones in an attempt to ensure that vehicles in queues do not block access during construction". This assumes that the motorists in the queues understand the purpose of the cones and oblige. If access to RGSP was blocked, it could result in impacts to visitors and park operations, both of which could result in loss of revenue. DPR requests that the DEIR be amended to require the placement of flag persons at these locations to assure that access is not blocked. This would also facilitate the movement of emergency services into or through RGSP.

15) Section 2.1.3. Community Impacts. Environmental Consequences. The DEIR states that both "campground visitors and park residences would be affected by noise from night construction" yet provides no mitigation for these significant adverse affects (as documented in Noise Section). All measures provided later in the document are non-enforceable and at the discretion of the contractor. The DEIR needs to be revised to provide measures to mitigate impacts associated with nighttime construction to park visitors and residences to a level of less than significant. These measures, as required by CEQA must be enforceable and not at the discretion of the contractor.

16) Section 2.1.4. Utilities/Emergency Services. Environmental Consequences. The DEIR states that emergency service providers will potentially be delayed through the project area and that they will be given priority; however, the DEIR does not assess the amount of time that emergency services will be delayed and if that delay would be considered significant. The DEIR needs to be amended to provide such an evaluation and if appropriate mitigation.

17) Section 2.1.4. Utilities/Emergency Services. Avoidance, Minimization, and/or Mitigation Measures. The discussion in the DEIR indicates that the proposed action could result in significant delays to emergency service providers yet provides no enforceable mitigation measures. Rather, the DEIR defers the development of mitigation measures to a later date and makes it the responsibility of a future contractor. This is a violation of CEQA in that mitigation measures need to be disclosed in the environmental document and that they be enforceable. Furthermore, it does not allow the public or affected emergency service providers an opportunity to evaluate the measures thereby violating the disclosure requirements of CEQA. DPR believes that the DEIR needs to be amended and additional public review provided to address this issue.

18) Section 2.2.1. Water Quality and Storm Water Runoff. Environmental Consequences. The DEIR states that the proposed action will result in a 0.3 acre increase in the amount of impervious surfaces within the project area. Where will this increase occur? Will it be in the structural root zone of old-growth redwoods? Given that the alteration of the existing hydrology and reduction of water has been documented as significant adverse effects to old-growth redwoods in State Parks along HWY 101, how will this increase in impervious surfaces affect the water transport and availability to old-growth redwoods? As the results of this assessment may result in the identification of additional significant adverse affects additional public review may be required.

19) Section 2.2.1. Water Quality and Storm Water Runoff. Avoidance, Minimization, and/or Mitigation Measures. The DEIR clearly states that mitigation measures are provided to reduce impacts to Water Quality yet no enforceable measures are disclosed, nor are they documented in Section 3.3 that says there are no mitigation measures. This is an example within the DEIR where the Environmental Consequences section documents significant adverse affects and are either not mitigated for, for which the mitigation is not

enforceable, or left to a later date for development. Because of these discrepancies throughout the DEIR it is not possible to evaluate potential adverse affects and the mitigation measures proposed to mitigate them to a level of less than significant.

20) Section 2.2.1. Water Quality and Storm Water Runoff. Avoidance, Minimization, and/or Mitigation Measures. The spill contingency plan should be part of the DEIR so that the effectiveness of the plan can be evaluated and so that it can be made an enforceable part of the document. This may require the opportunity for additional public review.

21) Section 2.2.4. Air Quality. Avoidance, Minimization, and/or Mitigation Measures. The DEIR states that "trucks will be washed as they leave the right of way as necessary to control fugitive dust emissions". Washing areas for vehicles are not identified in the DEIR nor are potentially adverse affects (e.g. sediment entering watercourses or introduction of sudden oak death) associated with this evaluated in Section 2.2.1. or in Section 2.3.2. Identify the areas where truck washing will occur and state what will be done to assure that this does not result in introduction of sediment or hazardous materials into wetlands or a degradation of water quality.

22) Section 2.2.4. Air Quality. Avoidance, Minimization, and/or Mitigation Measures. The DEIR states that the contractor will develop a dust control plan. As fugitive dust may result in significant adverse effects to visitors and residences of RGSP and to sensitive natural resources the dust control plan should be provided in the DEIR so that the measures can be evaluated by the trustee agencies and affected parties, and so that the measures can be made enforceable as required by CEQA. The dust control plan should include disclosure of where it will obtain water (if drafted from river or other natural sources it could result in take of listed species or significant adverse affect), that it has legal water rights for extraction, what measures will be applied to assure that it does not result in a degradation to water quality or increase of sedimentation to wetlands or streams, and what additives may be added to the water.

23) Section 2.2.4. Air Quality. Avoidance, Minimization, and/or Mitigation Measures. The DEIR states that equipment and material storage sites will be located as far away from residences and park use areas as practical. Potentially significant adverse affects to park visitors, residents, and resources cannot be evaluated due to the lack of disclosure regarding equipment and material storage areas. For example, the storage of equipment or material within the critical root zone of old-growth redwoods could result in significant adverse affects to these irreplaceable resources. Or it could result in significant air quality or visual affects to park visitors and residents. The location of equipment and material storage sites needs to be disclosed in the DEIR so that it can be evaluated by the trustee agencies and affected parties, and so that the measures can be made enforceable as required by CEQA.

24) Section 2.2.4. Air Quality. Avoidance, Minimization, and/or Mitigation Measures. The DEIR states that "to the extent feasible, Environmental Sensitive Areas will be established for sensitive air receptors". As previously discussed in these comments terminology such as "to the extent feasible" is not enforceable and it must therefore be assumed that these measures will not be applied. Furthermore, there is no disclosure as to what an Environmental Sensitive Area is. This term is used ambiguously throughout the DEIR for any potentially sensitive resource. Yet there is no disclosure as to what an Environmental Sensitive Area entails. For example, would an Environmental Sensitive Area for Air Quality be the same size or contain the same features as one proposed for sensitive plants. The DEIR needs to be amended to provide full disclosure of what an Environmental Sensitive Area is and so that measures that are included in the plan be fully enforceable.

25) Section 2.2.5. Noise. NEPA. The DEIR states that "noise abatement measures that are determined to be reasonable and feasible at the time of final project design are incorporated into the project plans and construction contract specifications". While it is correct that NEPA does not require the mitigation of significant adverse affects and that it contains an assessment of feasibility the same is not necessarily true for CEQA. CEQA requires the determination of an impact's significance and if that impact is determined to be a significant adverse affect then it requires full mitigation. Furthermore, under CEQA the complete or final project is analyzed and if modifications to the project are made they must either be amended into the EIR and may result in additional public review. Under CEQA, if the lead agency determines that a significant adverse affect cannot be fully mitigated then they must make a determination of overriding consideration. The DEIR's assessment of noise impacts appears to be based solely on NEPA and therefore the document should be amended to include an assessment that is compliant with CEQA.

26) Section 2.2.5. Noise. Environmental Consequences. The short-term impact analysis references that construction would occur during evening hours; however, in numerous other places the DEIR states that construction would or could occur throughout the night. This discrepancy needs to be clarified. Furthermore, if construction may occur all night then it appears that the short-term noise analysis needs to be redone to assess the impacts associated with noise on park visitors, residents, and on sensitive species such as the marbled murrelet.

27) Section 2.2.5. Noise. Environmental Consequences. The DEIR provides proposed noise ordnance standards by Humboldt County that state that between 2200 hours and 0700 hours noise should not exceed 55-75 dBA near residences. The DEIR also states that construction activities normally range between 70 and 84 dBA. The existing ambient noise level within Madrone Campground as documented by the DEIR is 64 dBA during the day and 54 dBA at night. Based on the DEIR's own analysis, the proposed night operations would result in significant adverse affects to campground users and park residents; however, the DEIR fails to document this either in the CEQA

checklist or in the Environmental Consequences section. The DEIR then goes on to provide numerous measures that may be considered for implementation, if determined to be feasible, to reduce the effects of construction-generated noise on campers and park residents. As previously documented in these comments, CEQA requires that all mitigation measures be enforceable. Therefore, the DEIR needs to be amended to acknowledge that construction activities will result in significant adverse effects on campers within the park as well as on park residents and then incorporate enforceable mitigation measures to reduce these impacts to a level of less than significant or make a determination of overriding considerations. Either one of these may initiate the need for additional public review.

28) Section 2.2.5. Noise. Environmental Consequences. The DEIR does not assess the effects of the increased noise, both during the day and at night on sensitive wildlife species. The DEIR needs to be amended to include this analysis.

29) Section 2.3.1. Natural Communities, Affected Environment. The DEIR does not acknowledge that the DFG has designated Redwood Forest as a Special Community type (DFG, List of California Terrestrial Natural Communities Recognized by The California Natural Diversity Database, 2003). The DEIR needs to be amended to disclose this and based upon this provide appropriate analysis.

30) Section 2.3.1. Natural Communities, Affected Environment. The DEIR appears to be using the classification system described in Sawyer and Keeler-Wolf (1995) for the Redwood Series; however, the document appears to be using an undefined classification for conifer/oak woodland community. This later classification is very generic and does not provide an adequate and recognizable description. The DEIR should be amended to reference the classification system used to describe the Redwood Series and describe the other vegetation types by the same classification system.

31) Section 2.3.1. Natural Communities, Environmental Consequences. The DEIR states that 29 trees will be removed from within RGSP, but does not provide an assessment of the number of trees that will have their structural root zone compromised through the placement of an impervious surface within the structural root zone or an estimate of the number of trees that will have structural roots severed. Without such an assessment the NCRD cannot adequately assess the proposed actions impacts on old-growth redwoods and other mature trees. The Department therefore must assume that the proposed action will result in significant adverse effects to old-growth redwoods and that adequate mitigation needs to be developed.

32) Section 2.3.1. Natural Communities, Environmental Consequences. The DEIR states that the proposed action will result in an additional 0.3 acres (an increase of 5%) of impervious surface within the structural root zone of trees within the project area. The DEIR does not state how much of this will occur within the

structural root zone of old-growth redwoods nor within RGSP. An additional, undocumented number of trees will have up to 4 feet of fill placed within the structural root zone. Based on this lack of information it is unclear that the proposed action will not result in significant adverse effects to trees, including old-growth redwoods, and that adequate mitigation may not have been incorporated into the DEIR. The DEIR needs to be amended to provide an accurate assessment of the ratio of old-growth redwood trees that would have their structural root zone impacted (either by impervious surface or fill) versus those that may have an impervious surface removed. This analysis should also include an assessment of the percentage of the individual old-growth redwoods structural root zone that will either be impacted or restored. Then, based on this information Caltrans needs to work with the NCRD in the development of adequate mitigation measures. These measures then need to be incorporated into the DEIR.

33) Section 2.3.1. Natural Communities, Avoidance, Minimization and/or Mitigation Measures. In both this section and in Appendix D, the DEIR states that mitigation measures are being proposed to mitigate impacts to the park, redwood trees, and listed species; however, the CEQA check list conflicts with these statements in that it indicates that the proposed action will result in less than significant adverse effects. The NCRD requests that the CEQA checklist be modified to acknowledge that the project may result in significant adverse effects to sensitive resources, including old-growth redwoods, listed species such as the marbled murrelet, and the park.

34) Section 2.3.1. Natural Communities, Avoidance, Minimization and/or Mitigation Measures. The DEIR states that "roots less than 2 inches in diameter that must be cut shall be cut cleanly with sharp instrument in order to promote healing". Does this mean that roots greater than 2 inches in diameter will not be cut or they be cut using a different methodology? The NCRD requires that the DEIR be amended to state that roots within the critical root zone 3 inches or greater in diameter not be cut.

35) Section 2.3.1. Natural Communities, Avoidance, Minimization and/or Mitigation Measures. The DEIR states that "no heavy equipment will be staged or parked within the drip line of mature trees in unpaved areas". The DEIR needs to define mature trees, preferably by stating a minimum diameter at breast height. The NCRD also requests that the DEIR be amended to state that heavy equipment will not be staged or parked within the drip line or critical root zone, whichever is greatest, of trees. This should at a minimum apply to trees greater or equal to 20 inches diameter at breast height.

36) Section 2.3.1. Natural Communities, Avoidance, Minimization and/or Mitigation Measures. The DEIR states that if nesting birds are detected within the project area then an Environmentally Sensitive Area will be established around the nest site. The DEIR needs to be modified to indicate the size of the Environmentally Sensitive Area that will be established around nest sites. Also, it should clarify if there will be different size Environmentally Sensitive Areas

established for different species of birds. For example, a buffer for a sharp-shinned hawk should be much larger than one for a passerine. Also, the DEIR needs to be modified to state that prior to conducting any surveys within State Park property that Caltrans will obtain a Scientific Investigation Permit from the NCRD.

37) Section 2.3.1. Natural Communities, Avoidance, Minimization and/or Mitigation Measures. The DEIR states that the "majority of the disturbed area will be replanted in kind". Identify all areas where revegetation will not occur and provide justification for not revegetating these areas.

38) Section 2.3.2. Wetlands and Other Waters, Environmental Consequences. In regards to the six culverts that will be modified or replaced in association with the proposed action will any of these be extended onto State Park property, or will any of these direct new drainage onto State Park property? If so, identify the locations, distance the culvert will be extended, and impacts to vegetation and watercourses within RGSP.

39) Section 2.3.2. Wetlands and Other Waters, Environmental Consequences. The DEIR states that the proposed improvements to the culverts would not result in the removal of any trees; however, will it require cutting any structural roots (3" diameter or greater)? If so, provide an assessment of impacts to the critical roots and trees affected.

40) Section 2.3.2. Wetlands and Other Waters, Environmental Consequences. The DEIR does not evaluate potential adverse affects to wetlands and waters in association with the proposed dust abatement and revegetation watering. Specifically, what measures will be incorporated into the DEIR to assure that this contaminated water (with sediment) does not enter into wetlands or waters.

41) Section 2.3.2. Wetlands and Other Waters, Avoidance, Minimization and/or Mitigation Measures. The DEIR states that Caltrans will "monitor all revegetation efforts up to four years or until 80 percent success rate is achieved". Please clarify the discrepancy between this statement and the one in Section 2.3.1. Natural Communities, Avoidance, Minimization and/or Mitigation Measures which states that the "majority of the disturbed area will be replanted in kind". Also, provide the methodology for how the 80 percent success will be determined.

42) Section 2.3.3. Plant and Animal Species, Affected Environment. The DEIR states that botanical surveys were conducted however, there is no record that a scientific investigation permit was obtained from NCRD; and it does not provide information as to how or where those surveys were conducted. The DEIR needs to be amended to provide the methods of the surveys and a map or detailed description of the areas surveyed. The DEIR needs to provide justification that the surveys were adequate to detect potentially sensitive plants on State Park lands, and to document that a scientific investigation permit was obtained.

43) Section 2.3.3. Plant and Animal Species, Affected Environment, Southern Torrent Salamander. What efforts will be made to make culverts PM 1.18 & PM 1.34 suitable for the up and downstream movement of salamanders? If this culvert is a barrier to wildlife movement, why wasn't it addressed in the appropriate section? Will the culverts currently at grade be maintained at grade? Will the culvert installation result in the dewatering or interruption of water flow?

44) Section 2.3.3. Plant and Animal Species, Environmental Consequences. The DEIR states that an Environmentally Sensitive Area will be provided to protect the population of sticky pea. Please provide the size of the buffer (setback) to be provided to this population?

45) Section 2.3.3. Plant and Animal Species, Environmental Consequences. The DEIR states that it will not adversely impact the osprey nest located adjacent to the project yet it proposes no temporal or spatial buffer for the nest and would even allow unrestricted night operations. Raptors are the most susceptible to disturbance at a nest site during the pair bonding or nest initiation, egg laying, and incubation stages. Once the birds have young in the nest they are still susceptible to disturbance but are less likely to abandon a nest at this stage then during the previous stages. A spatial buffer should be established around the nest site beginning February 1 and extending through at least the incubation stage. This buffer should restrict night and daytime disturbance. The exact distance of the buffer should be worked out with the Department of Fish and Game.

46) Section 2.3.4. Threatened and Endangered Species, Environmental Consequences. The DEIR states that no adverse effect will occur to listed salmonids due to the proposed action. However, the DEIR also states that water will be used for both dust abatement and for watering revegetation efforts but does not disclose the source of the water to be used. If the contractor were to draft water from within a fish bearing stream, it could result in direct mortality of listed salmonids or dewatering of their habitat. The DEIR needs to state where the water for these activities will come from and if from a watercourse evaluate potential affects to fish and other aquatic life. The DEIR should also document that Caltrans have water rights if drafting is proposed.

47) Section 2.3.4. Threatened and Endangered Species, Environmental Consequences. The project proposes to remove trees from within an area defined by the U.S. Fish and Wildlife Service (Service) as critical habitat for the marbled murrelet (MAMU). Even though most of these trees are lower or subcanopy trees, they constitute a component of a stand that is considered as critical habitat. Over the past 5 years, the NCRD has consulted with both Service and the DFG regarding removing hazard trees of similar species and size from within this same area and have been told that it would be determined to be take and that a habitat conservation plan would be required. This includes small understory trees (e.g. 15-20"dbh). A discussion needs to occur

between CalTrans, Parks, the Service and DFG that qualifies this difference in approach taken with CalTrans and State Parks by control agencies.

48) Section 2.3.4. Threatened and Endangered Species, Environmental Consequences. The DEIR states that as nighttime lighting will be directed downward that it will not substantially exceed the existing level of disturbance to the MAMU associated with traffic headlights. This assessment needs to be justified with substantial evidence as it is unsupported and implies that there is a steady stream of traffic all night long through RGSP. DPR believes that Caltrans needs to provide the documentation that having lights on all night long is the equivalent of the lights associated with existing traffic. Otherwise, it should acknowledge that the use of lights at night may result in disturbance of potential MAMU breeding and make them more susceptible to predation or nest abandonment.

49) Section 2.3.4. Threatened and Endangered Species, Environmental Consequences. The DEIR acknowledges that the status of the MAMU in RGSP is not known; however, it is assumed that the park is occupied by this state and federally listed species. Given that protocol surveys have not been conducted the habitat within the Park must be assumed to be occupied. The DEIR is proposing as mitigation, that post-project surveys be conducted to determine the status of the marbled murrelet in the project area. First, surveys or scientific investigations do not constitute mitigations under CEQA. Second, the project itself could increase the disturbance levels within RGSP to such a degree that it results in a modification of MAMU behavior or presence within the Park. The DEIR should be amended accordingly. Furthermore if surveys for MAMU are to be done on State Park lands, such surveys should be done by or administered by State Park Natural resource staff.

50) Section 2.3.4. Threatened and Endangered Species, Environmental Consequences. The DEIR states that for mitigation for the MAMU 13 corvid proof trashcans will be purchased for RGSP. The NCRD believes that this number is not sufficient and will not provide the number of receptacles necessary. In determining the number of receptacles Caltrans was provided an inadequate number by State Park staff. It is determined that the replacement of all non-predator proof trashcans, dumpsters, and faucet grates within RGSP is in line with other proposed mitigations for take of MAMU within the NCRD.

51) Section 2.3.4. Threatened and Endangered Species, Environmental Consequences. The DEIR needs to be corrected to indicate that the proposed action will result in significant adverse affects to listed species and depending upon the outcome of consultation this impact may be less than significant with mitigation.

52) Section 2.4. Cumulative Impacts. DPR is concerned about the impacts associated with Caltrans projects throughout the District. These projects as well as maintenance activities have resulted in the incremental loss of mature vegetation, impacts to streams and wetlands, loss of vigor to mature and old-

growth trees, changes in hydrology, disconnection of habitats and movements of wildlife, and infestations of invasive exotic plants. DPR is also concerned that a 4-lane highway will someday be needed and that it will either be proposed in such a manner that it eliminates the natural, cultural, atheistic, and recreation value of RGSP or will result in the construction of a by-pass which will mean that the incremental impacts associated with this project will have been an added burden to the Park's natural systems that may have been unnecessary.

53) Section 3.2. Discussion of Significant Impacts. In this section, the DEIR states that the proposed action will not result in any significant adverse effects to the environment and that no mitigation measures are proposed. These statements conflict with many of the Environmental Consequences sections of this document including Land Use, Community Impacts, Noise, Natural Communities, Plant and Animal Species, and Threatened and Endangered Species. The DEIR also contains mitigation measures which are not acknowledged in this section but are described in Appendix D. These measures need to be listed in this section and the CEQA checklist needs to be corrected to indicate that significant adverse affects will occur and then determine if those measures are adequately mitigated. The DEIR also contains other measures that should be listed as mitigation but which will only be done at the discretion of the contractor. These need to be measurable and enforceable and listed as mitigations.

The NCRD staff is available to continue discussions regarding this DEIR so we can be supportive of the project and sign the 4(f) letter and subsequent Right of Entry permit. However, we believe the issues presented here must first be addressed.

If you have any questions regarding our comments please feel free to contact myself, North Coast Redwoods District Planner, Roger Goddard, or District Sr. Environmental Scientist Jay Harris.

Sincerely,

Steve Horvitz
District Superintendent

C: State Clearinghouse by fax
Clarissa Sampaga, Natural Resource Division

The responses below correspond with the numbered comments in the letter above:

1. The final environmental document will be revised to note that the reduced speed limit of 35 mph became effective in fall of 2008.
2. Caltrans has committed to installing additional signage for bicyclist safety. It will be the "Share the Road" message.
3. The data included in both the CHP and the Caltrans statewide collision databases do not differentiate between STAA and non-STAA trucks that are involved in documented collisions. About eight percent of all collisions occurring on Route 101 between the City of Santa Rosa and the City of Eureka are related to truck traffic, based upon the most recent collision data. This has not been broken down further as it relates to STAA vehicles.
4. It is unlikely that the number of collisions will increase as a result of the project. Because there will be modifications made to non-standard highway design features such as curve radii and shoulder widths, it is expected that the roadway on this section of Route 101 will be safer for all users as a result. The presence of slightly larger STAA trucks is not expected to make the roadway any less safe as the comparative weights of the non-STAA and STAA rigs are relatively the same, with the STAA trucks having the potential to be slightly heavier due to a larger size tractor (if sleeper is included).
5. In the Engineering and Traffic Survey (speed zone survey) that was conducted in April 2008, it was found that 85th percentile of the traffic in the park was traveling from 41 to 49 mph while 85th percentile of the trucks in the park ranged from 39 to 44 mph. The information in the survey provided the justification to enable Caltrans to reduce the speed limit to 35 mph. While the realignment would be modifying the curve radii, the project actually introduces more curves into the alignment and changes the orientation of the fixed object (trees) in relationship to the vehicle. Because the roadway geometrics remain curvilinear with minimal shoulders, it is not estimated that the proposed modifications would result in facilitating greater speeds through the park.
6. The proposed disposal site is in Caltrans right-of-way at an existing maintenance disposal site located on Route 101 at PM 106.50 in Mendocino County. The area has permanent stormwater BMPs installed including a containment barrier around the perimeter. Drainage is then directed filtered across a grassy flat area and finally directed to culverts. The flows eventually connect to the South Fork of Eel River.
7. The proposed transfer of land is part of the project description as stated in the EIR/EA and Programmatic 4(f) Evaluation. Caltrans acknowledges that this proposed land transfer effort is ongoing. This land transfer concept has been discussed with several park representatives in various meetings including field meetings. The proposed revegetation plan for this area has been reviewed by Stephen Underwood, Eel River Environmental Scientist of North Coast Redwoods District. Maps of the land transfer have been included in Appendix B. The process

for the transfer cannot be initiated until after the final environmental document is approved.

8. The final document will revise the terminology and use the term “old growth.” For the purposes of this document, the definition of “old growth” would refer to redwood trees over 30 inches in diameter at breast height, i.e., 4.5 feet above ground level. This is defined in the FEIR in the introduction section. Other language was used following preliminary comments received by park staff objecting to the term, “old growth.”
9. It is estimated that there would be approximately 0.26 acre increase in hardened surface (pavement) in the park overall. While the roadway would move away from seven redwoods, there would be a net increase of approximately four percent of roadbed and pavement in the structural root zone (the area 3 times the diameter of the tree trunk) of redwoods over thirty inches in diameter.
10. An approximate 1:1 land transfer is being proposed with State Parks: 0.56 acre (24,625 square feet) is to be transferred to State Parks from the existing Caltrans easement and 0.56 acre (24,599 square feet) is proposed to be added to the existing Caltrans easement. Revegetation of the land to be relinquished to State Parks is proposed as part of this project, and meetings with State Parks staff regarding the proposed revegetation efforts is ongoing. The land to be transferred to State Parks currently contains some mature vegetation and trees. The proposed revegetation efforts would be to enhance what is already established. In addition, replanting will be done in the areas to be disturbed by the cuts at PM 1.36 and 2.04 as well as the land transfer area described above and at the retaining wall location north of the park. The area to be replanted total approximately 32,480 square feet. The Revegetation Plan includes a slightly higher than 2:1 ratio for the tree replacements. The planting palette is included in Appendix J.
11. The most likely elements of construction that might be done as night work in the park would include removing the existing open grade (cold planing), paving with the new open grade overlay, placing shoulder backing, applying dense grade AC for supervelevation and leveling, and replacing culverts. Because working at night is not as productive, and therefore is more expensive, it is anticipated that night work would only be considered if the contractor gets behind schedule. The maximum number of days of night work would include the following: five days for cold planing, two days for paving, two days for shoulder backing, seven days for superelevation corrections, and four days for culvert improvements.
12. Most of the special conditions discussed in the document are minimization measures identifying how construction within the park would occur. Measures include such items as using handwork (for example shovels or pneumatic excavators such as an air spade) within structural root zone of redwoods thirty inches in diameter or greater; providing irrigation during the summer after excavating within the structural root zone of redwoods thirty inches or greater; incorporating the roots into the structural section instead of cutting them; having an arborist monitor construction activities in the park; and utilizing a structural section that is thinner than normal to minimize excavation. These minimization measures will be included in the plans and specifications for the construction project. These

measures are outlined in the document in Appendix D as well as the Programmatic Section 4(f) Evaluation found in Appendix B.

13. The current Route Concept Report, which functions as the General Plan for the highway facility, shows Route 101 as a two lane conventional highway through Richardson Grove. The report has a general planning horizon of twenty years. In the feasibility study completed in 2001, it was determined that the four lane alternatives studied previously, including a bypass of the park as well as new alignments within the park and widening on the existing alignment, were infeasible due to the environmental impacts that would result from any of the proposed alternatives as well as the high costs ranging from $75 to $600 million dollars. Programming a project costing this amount is not likely in the foreseeable future.
14. The contract specifications would require the contractor to maintain access to driveways at all times during construction including the park entrance. Cones will be used to identify access points that need to remain clear. In addition, when the park entrance is within the work area or within the traffic queue, flaggers will be used.
15. As stated in response #11 above, night work might not occur at all. Night work would only be considered if the contractor got behind in certain elements of work in the contract. If night does occur, there are caps for the number of nights that could occur for specific activities as identified in Response #11 above. If night work occurs, it would be spaced out throughout the project limits and would not be concentrated in one location. Caltrans is willing to discuss reconsidering night work within the park or confining it to a certain time of year. Caltrans proposed monetary compensation for impacts to the campground but State Parks, as stated by Steve Horvitz, declined the offer.
16. As stated in the Transportation Management Plan and the EIR/EA, the maximum delay for traffic would be no more than fifteen minutes. The average expected delay is five to ten minutes. This is fairly standard for construction on state highways within the District. Emergency vehicles are given priority by flaggers, so the delay at any construction areas where traffic control is performed by flaggers would likely be a maximum of five minutes. At the signal, the delay would vary based on the amount of traffic going through and when in the cycle the emergency vehicle came upon the signal. The red time at the signal is likely five minutes in length. The expected average delay would be on the order of five minutes for emergency vehicles.
17. The EIR/EA does not state that the proposed project would result in significant delays for emergency service providers. As stated above, the delays expected at Richardson Grove due to construction are no different than elsewhere on two lane conventional highways. A Transportation Management Plan is developed for every construction project on a State highway. The Transportation Management Plan identifies anticipated traffic control and any restrictions or special conditions on traffic control, number of working days, estimated maximum delays, anticipated traffic impacts resulting from construction, restrictions on road closures, and special conditions (like when flagging would be required, type of signage required, etc.). The Plan identifies what kind of public notice is required including notification to emergency service providers. In addition, the contractor is required to submit to

Caltrans a document called a Traffic Handling Contingency Plan addressing such items as emergency opening of a lane closure, and contingencies for unanticipated delays or emergencies. A meeting prior to construction will be held with law enforcement and emergency responders to discuss how this process will work. Ideally, dispatch can contact construction at the time that emergency responders are contacted to give advance warning to the construction staff in the field and better accommodate the emergency vehicles.

18. About 0.26 acre of increased impervious surface will occur in the structural root zone area of old growth trees. The remainder would occur outside the park boundaries. In the park this represents about a four percent net increase in impervious surface in the structural root zone area of old growth redwood trees. Additional information will be provided in the final environmental document as to the quantities of cut and fill in the structural root zone of old growth redwood trees. The proposed project does not alter the existing drainage patterns within the project limits in the park with the exception at PM 1.78 where the potential for erosion would be eliminated with the addition of a downdrain being installed to direct overside drainage into an existing culvert. Dennis Yniguez, a registered consulting arborist contracted by Save the Redwoods League, stated that the proposed project would not be expected to have a substantial detrimental effect on the availability of water to the roots of old growth redwoods adjacent to the highway construction.
19. Standard erosion control measures and storm water control measures employed to reduce impacts to water quality are not considered mitigation measures per se. They are, instead, regarded as Best Management Practices for construction activities. The Environmental Consequences Section 2.3.2 of the DEIR/EA does not state that there would be significant impacts; it states that there would be "minor temporary impacts and minimal permanent impacts to Waters of the US due to culvert improvements." A Water Pollution Control Plan or Stormwater Pollution Prevention Plan prepared by the contractor will identify all erosion control and storm water control measures. It is common practice for the Contractor to prepare these plans for all construction work on State highways. As stated in this section, permits from the US Army of Corps of Engineers, California Department of Fish and Game, and the Regional Water Quality Control Board will be obtained, and it is anticipated that each of these permits will also identify conditions to be incorporated into the contract specifications. As permits are not obtained until after the environmental document has been finalized, these conditions are not identified in the environmental document. The project does include mitigation for water quality. The public restroom adjacent to the Visitor Center, which is currently closed due to the threat of a hazard tree falling into the structure, will be removed including the foundation which will decrease the amount of impervious surface in the general project area by 870 square feet. Other improvements for water quality included in the project are the culvert improvements to replace deteriorating culverts as well as the new overside drain at PM 1.78 that will stop the current erosion that is occurring at this location. In addition, the mitigation required by the US Fish and Wildlife Service to install corvid proof equipment in the park will also provide some measure of water quality improvement by reducing the amount of litter and food stuffs on the ground.

20. See Response #19 above. The Spill Contingency Plan is part of the Water Pollution Control Plan or the Stormwater Pollution Prevention Plan. This is typical for construction projects on State highways. The Water Pollution Control Plan or Stormwater Pollution Prevention Plan is typically prepared by the contractor as a first item of work before any ground disturbing activities are initiated.
21. Vehicle washing will not be done onsite and the final document will be revised to reflect this. The Water Pollution Control Plan or the Stormwater Pollution Prevention Plan will reflect this restriction.
22. Water needed for construction including the dust control plan would be obtained from a commercial source. Water will not be drafted from the South Fork of the Eel River. The Dust Control Plan would be part of the Water Pollution Control Plan or the Storm water Pollution Prevention Plan. This is typical for construction projects on State highways.
23. Long term equipment and material storage sites will not be located within the park and the document will be revised to reflect this. Equipment and material for immediate use would not be stockpiled off the paved area without concurrence from the biological monitor. Within the park, equipment would only be off pavement in those areas which will be ultimately disturbed such as areas that would be under a fill, with the exception that the unpaved turnout at PM 1.79 +/- to the west of the roadway would likely be used. While these areas are in use, it would detract from the existing aesthetics of the area, but this would be temporary. When equipment is being stored it is not in operation, thus it not anticipated that air quality would be substantially affected.
24. An environmentally sensitive area with regards to air quality would include areas where there are residences, campsites, or other use areas with long-term human presence adjacent to the construction. Such areas would include the Visitor Center and the park residential units at northern boundary of the park. In addition to the construction equipment itself, it is anticipated that the pneumatic excavators would require an air compressor and generator and in the event of night work, the lights would require a generator. The work with the pneumatic excavator would be mobile and would not be situated in one location for long periods of time. The night work, if it occurs, would only be a matter of a few days at maximum for any specific activity. These temporary impacts would not be anticipated to have any long-term effects on air quality.
25. Per the CEQA guidelines, Section 15382, construction phase impacts on traffic, transit, noise, air quality, and the visual environment would generally not be considered significant since construction-related changes are by their nature temporary. A significant impact would only occur if temporary effects substantially affected accessibility to an area for a long period of time, caused a loss or relocation of substantial numbers of businesses or residences, or posed severe health or safety threats. This is not the case with the proposed project.
26. As stated in response #11 above, night work would only occur for a maximum of up to twenty days for the work within the park, if it occurs at all. Night work was disclosed in the Biological Assessment, and the Biological Opinion concluded that the proposed project would not result in any Marbled murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the “likelihood that the project

would result in direct mortality of marbled murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable." The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the marbled murrelet. Temporary noise impacts on park users is identified in Chapter 2 of the EIR/EA and in Appendix B, the Programmatic Section 4(f) Evaluation.

27. See Response #25 above about noise impacts during construction.
28. Construction noise was identified in the Biological Assessment (BA) and the Natural Environment Study prepared for this project. Night work and construction noise was also discussed in Sections 2.3.3 and 2.3.4 of the DEIR/EA which disclosed impacts on plant and animal species and threatened and endangered species, respectively. The US Fish and Wildlife Service concurred with the findings in the Biological Assessment which stated that noise was not anticipated to result in a substantial adverse effect to listed species.
29. The final document will be revised to disclose that the redwood forest is designated by California Department of Fish and Game as a special community type.
30. The text in the final document will be revised to be consistent with the Sawyer and Keeler-Wolf classification system.
31. Information will be added to the final environmental document. In total in the park there will be 68 redwoods thirty inches in diameter or larger that will have some construction occurring within the structural root zone. Fifty eight of these trees would be affected by excavation depths of up to 24 inches deep. Fourteen of these trees would be affected by excavation of six inches or less. Thirty two of the trees would be affected with excavation depths up to eighteen inches in depth. Forty four of the trees would be affected with the placement of fill with depths up to 3.5 feet. Twenty four of the trees have fill depths of six inches or less and of these, eleven of the trees have fill depths of two inches or less. Thirty three of the trees affected by fill have fill depths of twelve inches or less. Only six trees would have fill depths over 24 inches. Of the 68 redwoods thirty inches in diameter or greater affected, thirty five trees would be affected by both excavation and fill activities within the structural root zone. The certified arborist for the project has evaluated the impacts from these construction activities and has determined the project would not result in a substantial adverse effect on the viability and root health of the old growth redwoods adjacent to the highway. This conclusion is based upon the protection measures that would be in effect for work within the structural root zone of redwoods thirty inches in diameter and greater. These measures include hand work instead of heavy equipment, using the air spade for excavation, incorporating the roots into the structural section rather than cutting, using permeable base material, incorporating the thinner structural sections minimizing excavations, and the fact that the impervious surface is increasing less than five percent. Dennis Yniguez, an independent certified arborist contracted by the Save Redwood League, concurred that the project would not have a substantial detrimental effect on the root health of the old growth trees.
32. The 0.3 acres of increase of impervious surface is the total amount within the project area which includes areas in and outside of the park. The increased amount of impervious surfaces within the park totals 0.26 acres and includes areas within

the structural root zone of old growth trees as well as other areas within the park boundaries where there are no old growth trees immediately adjacent to the roadway. In some cases, the roadway would be moved away from existing old growth trees. It has been determined that there would be a net increase of less than five percent of impervious surface within the structural root zone of redwoods thirty inches in diameter or greater. Additional information will be provided in the final environmental document about the impacts that would occur at each of the sixty seven redwoods trees thirty inches in diameter or greater in the park where construction occurs within the structural root zone. Locations of these trees are shown in Appendix L of the document.

33. With the minimization measures incorporated into the design and construction methodology for the trees, it has been determined that the project impacts to the redwoods would be less than significant. This is reflected in the CEQA checklist.
34. The intent of requiring the use of the pneumatic excavator and hand work within the structural root zone of redwood trees thirty inches in diameter or greater in the park is to avoid cutting the roots greater than two inches in diameter. In some cases, in areas of cut at PM 1.35, PM 1.65/1.75, and PM 2.04, and the culvert improvement work for example, it may not be possible to avoid cutting roots greater than two inches.
35. See response #23, stating that within the park, equipment will not be staged or parked off pavement with the exception of the unpaved turnout at PM 1.79.
36. The final document will be revised to state the size of the buffer area that will be established around nest sites. Prior to conducting any surveys for nesting birds within the park, a Scientific Investigation Permit will be requested from State Parks.
37. At the request of representatives from the Intertribal Sinkyone Wilderness Council, the archaeological site will not be revegetated.
38. The culvert improvements within the park would take place entirely within the existing Caltrans easement.
39. It is not possible to know where roots may be encountered. It is the intent not to cut any roots larger than two inches in diameter with the culvert improvements. The existing culverts were installed adjacent to the trees and it is expected that the limited area of work at the culvert replacement locations would have impacts similar to the other proposed construction activities occurring adjacent to the trees.
40. The Water Pollution Control Plan or Stormwater Pollution Prevention Plan would require installation of applicable Best Management Practices to stabilize bare soil areas for both the short and long term. These Plans are prepared by the contractor and approved by Caltrans. These Plans are also submitted to the State Water Resource Control Board for review, published on their website, and available for public review. Water used for revegetation would come from a commercial source and is not expected to degrade water quality in the receiving waters. If water is used in dust abatement, the measures in the Water Pollution Control Plan or Stormwater Pollution Prevention Plan would ensure water quality is not degraded.
41. There is no discrepancy between the two statements. All revegetation efforts will be monitored; however, not all disturbed areas will be revegetated (see #37 above). The revegetation plan will be amended to identify the strategy used to determine if success criteria has been met.

42. The botanical surveys performed for this project included a summer floristic survey encompassing the entire area where any ground disturbing work is proposed to occur, and areas to be added or relinquished from the Caltrans easement in July 2007. An additional late season floristic survey of the entire project area was conducted in October 2007. Early Spring and late Spring surveys of the entire project area in February 2008 and May 2008 respectively, were also conducted. The majority of the surveys took place within the area of the existing Caltrans easement. The results of the botanical surveys are included in the Natural Environment Study included as Appendix I.
43. The culverts currently at grade will be maintained at grade. Culvert work will be done in the summer so drainages would likely be dry, but if not, water would be diverted during construction. With regard to the culverts at PM 1.18 and 1.34 being a barrier to Southern Torrent Salamander, the drainages are too steep a slope to feasibly design a correction that would allow for upstream movement, and the culverts currently allow for downstream movement. Information on the culverts' ability to accommodate the salamander is provided in the EIR/EA in Section 2.3.3.
44. This population of sticky pea is outside the area where ground disturbing work is proposed. The buffer area will be staked around the area where the plants are present to ensure no inadvertent trespass would occur in the area. The proposed buffer area is shown in the plans provided in Appendix L.
45. The osprey nest is adjacent to the park road accessing the park maintenance yard and is located about 250 feet from Route 101. The osprey, if present during the construction of the proposed project, would be acclimated to a certain amount of noise and human activity originating from the park maintenance yard. Caltrans coordinated with California Department of Fish and Game and park staff and determined a buffer area is not needed during construction for the nest adjacent to the park maintenance yard. The results will be included in the final document.
46. Any water needs would be obtained from a commercial source in the local area. Water would not be drafted from the drainages or from the South Fork of the Eel River.
47. The Biological Opinion for the proposed project has been received from the US Fish and Wildlife Service. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled murrelet based on the following factors: 1) The removal of second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available within half mile and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) The trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current Marbled murrelet nesting habitat; and 3) the project

includes measures to avoid and minimize impacts to old growth redwood tree roots during construction.

48. The DEIR/EA stated that, “noise, lights, and activity disturbance generated by the construction of the project may disturb breeding and migration patterns in the project area.” The US Fish and Wildlife Service concurred that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled murrelet or Northern Spotted Owl in and near the project area as stated in their Biological Opinion for the proposed project.
49. The Biological Assessment prepared for this project did presume presence of Marbled murrelet and Northern Spotted Owl within or adjacent to the project area. Surveying potential breeding habitat to identify potential nesting areas is identified as a recovery action in the Marbled murrelet Recovery Plan (US FWS, 1997). The two year survey for Marbled murrelet that Caltrans has proposed to do at Richardson Grove State Park would aid in the recovery of the species by providing information to the US Fish and Wildlife Service about the population in inland nesting areas. In addition, the acreage to be transferred to State Parks would be revegetated to enhance that area as habitat. US Fish and Wildlife Service determined that the construction disturbance would not be expected to have a long term influence on the breeding performance of the Marbled murrelet. Thus, it was determined that the proposed project would not result in substantial adverse effects to the Marbled murrelet that would necessitate mitigation under CEQA.
50. Caltrans has agreed to provide the equipment or funding to State Parks to purchase the equipment described in the e-mail from Roger Goddard dated June 8, 2009. Caltrans disagrees that the proposed project would result in significant adverse effects to listed species.
51. Caltrans disagrees that the proposed project would result in significant adverse effects to listed species.
52. As stated above in Response #13 regarding the Route Concept Report, the current long term concept for Route 101 in this area is for a two lane conventional highway on the current alignment.
53. The final document will be revised to identify the avoidance and minimization mitigation measures.

STATE OF CALIFORNIA Arnold Schwarzenegger, *Governor*

NATIVE AMERICAN HERITAGE COMMISSION
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February 3, 2009

Deborah Harmon
CALTRANS
P.O. Box 3700
Eureka, CA 95502

RE: SCH# 2009012070 Richardson Grove Operational Improvement Project; Humboldt County.

Dear Ms. Harmon:

The Native American Heritage Commission has reviewed the Notice of Completion (NOC) regarding the above referenced project. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

✓ Contact the appropriate Information Center for a record search to determine: 1
- If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded on or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present. 2

✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

✓ Contact the Native American Heritage Commission for: 3
- A Sacred Lands File Check. **Sacred Lands File check completed, no sites indicated**
- A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**

✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence. 4
- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez

Katy Sanchez
Program Analyst
(916) 653-4040

CC: State Clearinghouse

Native American Contact
Humboldt County
February 3, 2009

Round Valley Reservation/Covelo Indian Community
Eugene Jamison, Jr., President
P.O. Box 448
Covelo , CA 95428
(707) 983-6126
(707) 983-6128 - Fax

Yuki ; Nomlaki
Pit River
Pomo
Concow
Wailaki; Wintun

Eel River Nation of Sovereign Wailaki
Rhonda Hardy, Secretary
PO Box 156
Redway , Ca 95560
707-923-2797
707-223-2797

Wailaki

InterTribal Sinkyone Wilderness Council
Hawk Rosales, Executive Director
PO Box 1523
Ukiah , CA 95482
(707) 463-6745

Mattole Sinkyone

Fred "Coyote" Downey
P.O. Box 846
Covelo , CA 95428

Wailaki

Eel River Nation of Sovereign Wailaki
Ken Horn, President
PO Box 156
Redway , Ca 95560
707-923-2797
707-223-2797

Wailaki

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2009012070 Richardson Grove Operational Improvement Project; Humboldt County.

1. A record search was conducted. The results are included in the Historic Properties Survey Report.
2. An archaeological reconnaissance survey was performed. The results are included in the Archaeological Survey Report which is an attachment in the Historic Properties Survey Report.
3. Caltrans did request a search of the Sacred Lands File as noted and consultation with appropriate Native American groups was conducted. The results are in the Historic Properties Survey Report.
4. In the event that an inadvertent discovery of unknown archaeological resources is made during construction Caltrans will follow the requirements set forth in 36 CFR Part 800.13 which addresses post review discoveries.

Index to Letters from Organizations

The following letters from interested organizations have been separated from the general public letters and are alphabetized by organization name:

California State Parks Foundation
The Environmental Protection Information Center
Friends of the Eel River
InterTribal Sinkyone Wilderness Council
Lost Coast League
Natural Resources Defense Council
Piercy Fire Protection District
Save the Redwoods League
Sierra Club

CALIFORNIA
STATE PARKS
FOUNDATION

March 12, 2009

Via Email and U.S. Mail

Deborah Harmon
Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka, CA 95501
SENT VIA ELECTRONIC MAIL AND U.S. MAIL

RE: Richardson Grove Operational Improvement Project Draft Environmental Impact Report/Environmental Assessment and Programmatic Section 4(f) Evaluation, December 2008

Dear Ms. Harmon,

On behalf of the California State Parks Foundation ("CSPF") and our 100,000 members statewide, I am writing to comment on the above-referenced Draft Environmental Impact Report/Environmental Assessment ("DEIR/EA") and Programmatic Section 4(f) Evaluation ("Section 4(f) Evaluation") of the California Department of Transportation ("Caltrans").

The California State Parks Foundation is the only statewide non-profit membership organization dedicated to protecting, enhancing and advocating for California's 279 natural, cultural and historic state parks. Through programs that help restore park properties, educate teachers and students about environmental resources in parks, build volunteerism and stewardship in our state parks, and promote sound public policy, we work to protect countless natural, cultural and historical treasures found within our parks, as well as the 280 miles of coastline, 625 miles of lake and river frontage, 18,000 campsites and 3,000 miles of hiking, biking and equestrian trails. On behalf of our members, we are committed to ensuring that state parks continue to provide recreation, adventure, renewal, and inspiration to all Californians.

Headquarters
50 Francisco Street
Suite 110
San Francisco, CA 94133
OFFICE 415-262-4400
FAX 415-772-8969
EMAIL members@calparks.org

Southern California Office
714 W. Olympic Boulevard
Suite 717
Los Angeles, CA 90015
OFFICE 213-748-7458
FAX 213-748-7495

Sacramento Office
1510 J Street
Suite 120
Sacramento, CA 95814
OFFICE 916-442-2119
FAX 916-442-2809

www.calparks.org

Your Voice for Parks

In recent years, it has become clear that California's 279 state parks are vulnerable to proposals to use these lands for purposes that are inconsistent with their acquisition and development as state parks. Every year we monitor parkland for these proposed "non-mission" uses. Last year, our survey identified 122 proposals for 73 state parks. This means that more than 25% of our state parks are confronting these non-conforming uses. We consider these proposals, individually and collectively, to be a significant threat to the California State Park system. We are confident that Caltrans is all too familiar with the heated public dialogue around the toll road proposal for San Onofre State Beach and the power line through Anza Borrego Desert State Park.

Fundamentally, we believe that parks are designated for their protection and preservation on behalf of future generations, not for road development, which is inconsistent with park purposes. New road construction or road widenings negatively impact recreational opportunities, disrupt habitat and wildlife, impact water quality, diminish visual aesthetics, and create noise pollution. The burden of proof, both legally and morally, is on Caltrans to make a case sufficient to justify such disruption. 1

The Richardson Grove Operation Improvement Project (the "Project") is no exception. The majority of the Project would run through Richardson Grove State Park ("Richardson Grove"), a unique and valuable recreational area that protects old-growth redwoods in Humbolt County. The project proposal threatens to impact the redwoods grove and degrade the recreational experience for the park's visitors as well as the visually stunning views of redwoods that are enjoyed by millions of people who drive through Richardson Grove on Route 101. 2

Based on the environmental documentation provided, CPSF does not believe this proposal can proceed without violating one of the nation's strongest environmental laws – Section 4(f) of the Department of Transportation Act ("Section 4(f)"). Section 4(f) plainly bars the use of parklands for transportation projects absent exceptional circumstances, and such circumstances have not been demonstrated for the Project. Notable deficiencies in the Section 4(f) Evaluation include the failure to examine all prudent and feasible alternatives and the failure to identify all possible planning measures to minimize harm to Richardson Grove. 3

Equally as troubling, the environmental documentation fails to achieve its fundamental purpose of informing the public under the California Environmental Quality Act ("CEQA") and the National Environmental Protection Act ("NEPA"). A thorough analysis of significant environmental impacts is still needed; a full discussion of alternatives has yet to be performed; and mitigation measures are insufficient and often unenforceable. The ability of CSPF and the rest of the public to fully understanding the Project's impacts is therefore severely compromised. 4

REQUESTED ACTION: CSPF requests that the Section 4(f) analysis be redone in its entirety, a revised DEIR be circulated, and a full EIS be performed. A more detailed explanation of our concerns follows. 5

The Project Violates Section 4(f) of the Department of Transportation Act

Congress enacted Section 4(f) to protect parklands from development. This statute establishes the national policy that "special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands." 49 U.S.C. § 303. To effectuate this policy, federally-funded roads are prohibited through parklands unless "(1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use." Id. The Project fails to clear these legal hurdles.

Failure to Examine Feasible and Prudent Alternatives. The environmental documentation for the Project provides almost no analysis to determine whether alternatives to the project are "feasible and prudent." Caltrans has summarily dismissed alternatives without adequate explanation or supporting documents, in clear violation of the mandate that section 4(f) evaluations "shall include sufficient supporting documentation to demonstrate why there is no feasible and prudent avoidance alternative." 23 C.F.R. § 774.7. The DEIR/EA, in fact, only fully analyzes the proposed project, and the no action alternative. 6

CSPF objects to the DEIR/EA's analysis consisting of only the proposed project and the no action alternative. Several alternate options referenced in the DEIR/EA receive what appear to be cursory review in the narrative, without sufficient technical analysis. The lead agency is responsible for providing a full analysis of potential alternatives. Caltrans, however, appears to have abandoned the study of alternatives in 2007, after consulting with a Technical Advisory Group and concluding that "since the preliminary information indicated improving the existing alignment was feasible, the study efforts to consider alternatives for goods movement was dropped." DEIR/EA, p. 13. Prematurely ending the analysis of alternatives based on a finding that the desired project is "feasible" is contrary to the spirit and letter of the law of Section 4(f). 7

Only one alternatives study is referenced, the Richardson Grove Bypass Feasibility Study, dated September 13, 2001. However this study is not provided, appears unattainable via the internet (a search of Caltrans' website was attempted to no avail), and no instructions are given to enable the public to access it. DEIR/EA, p. 11; DEIR/EA Appendix B, p. 136. Confusingly, the DEIR/EA claims that this bypass alternative would "also bisect the park," which seems to indicate that no alternatives were considered that avoid running through Richardson Grove. DEIR/EA, p. 20. As a consequence, CSPF is unable to even ascertain the route of the bypass alternative that was supposedly examined. 8

The following is a non-exhaustive list of potential alternatives that must be fully evaluated under Section 4(f):

- Highway alternatives that bypass Richardson Grove. The Richardson Grove General Development Plan, dating back to 1956, shows a proposed highway that appears to bypass the park in its entirety. The Section 4(f) Evaluation fails to consider this alternative.

- Less invasive improvements to the existing Route 101 (e.g., speed limit changes, signalization alternatives, elevating portions of the road above tree root systems). Signalization alternatives, for example, are dismissed without any traffic engineering studies or other documentation to demonstrate that they are infeasible. DEIR/EA, p. 20. Elevating the road to avoid damaging root systems of redwood trees is an option also worthy of consideration. All of these alternatives, plus others not identified here, need to be reexamined in full. 9

- Other transportation methods. Rail, aircraft, and ocean shipping all have the potential to meet the objective of enhancing the movement of goods through Humboldt County, and might do so without damaging park resources. The DEIR/EA fails to consider these options. 10

Lack of Planning Measures to Minimize Harm. The Section 4(f) analysis fails to meet the obligation to ensure that all possible planning was performed to minimize harm from the Project. 49 U.S.C. § 303. The discussion of measures to reduce impacts to Section 4(f) resources is notably scant. Campers, hikers, motorists, and other recreational users, for example, all will be impacted by the Project, yet almost no planning measures are proposed to minimize these recreational impacts. The conclusion that the proposed action includes "all possible planning to minimize harm" to Richardson Grove is therefore completely unjustified. DEIR/EA, Appendix B, p. 140. 11

The limited planning and mitigation measures identified in the environmental documents are deferred, ineffective, unenforceable, and vague. No technical reports or other documentation are provided to demonstrate that proposed planning measures will be effective. As but one example, the measures to protect redwood trees (i.e., construction excavation by hand, use of an air spade, cutting roots with a sharp instrument, use of high porosity cement materials, and use of a brow log) are undocumented as being effective to minimize harm to redwoods. Moreover, the provision of 13 corvid-proof waste receptacles – cited as out-of-kind mitigation for potential structural root zone impacts to large redwoods – is irrelevant to mitigate harm to redwoods. DEIR/EA, Natural Environment Study, p. 27. 12

Other mitigation measures can be easily envisioned that were not considered. For instance, elevating portions of the road to avoid soil compaction of tree roots or re-configuring campgrounds to avoid new and unsightly road conditions are just a few examples of potential mitigation measures. As part of a Section 4(f) evaluation, avoidance, minimization, and mitigation measures should be developed in consultation with the California State Parks and Recreation Department ("DPR"), as the official agency responsible for Richardson Grove. 13

Need for Individual Section 4(f) Evaluation. The abbreviated, 8-page Programmatic Section 4(f) Evaluation is insufficient and inappropriate. The Project should be subject to a full individual section 4(f) evaluation. Programmatic evaluations are only indicated for projects that "shall not impair the use of the remaining Section 4(f) land, in whole or in part, for its intended purpose" and where the "officials having jurisdiction over the Section 4(f) lands… agree, in writing, with the assessment of the impacts of the proposed project on, and the proposed mitigation for, the parklands." *Final Nationwide Section 4(f) Evaluation and*

Approval for Federally-Aided Highway Projects with Minor Involvements with Public Parks, Recreation Lands, and Wildlife and Waterfowl Refuges, see http://environment.fhwa.dot.gov/projdev/4fmparks.asp.

Here, the Section 4(f) evaluation fails to demonstrate that the Project will not impair remaining areas of the park. Potential impacts to trees, campers, cyclists, and wildlife would qualify as impacts to remaining areas of Section 4(f) parklands, thus precluding the use of a programmatic evaluation. Furthermore, the officials having jurisdiction over Richardson Grove are not identified (presumably they would be DPR officials), and no evidence is submitted or referenced demonstrating that such officials have entered a written agreement regarding project impacts. Regardless of whether a programmatic or individual evaluation is used, the Project must comply with Section 4(f) laws. The use of a programmatic Section 4(f) does not relax the Section 4(f) standards of feasible and prudent and minimization of harm. 14

CSPF requests that an Individual Section 4(f) Evaluation be prepared that remedies the aforementioned deficiencies.

The DEIR/EA is Inadequate and Fails to Comply with CEQA

The location of this Project – through the heart of a state park – mandates careful analysis under CEQA to fully inform the public and decision-makers as to potential environmental impacts. Yet the DEIR/EA fails to meet basic CEQA standards. The Project's stated need and benefits are too vague to allow meaningful analysis, and the DEIR/EA fails to recognize and analyze the Project's significant impacts.

Particularly troubling to CSPF is the omission of a full discussion of impacts to recreational resources.

Vague and Inadequate Project Description, Need, and Benefits. Contrary to well-established CEQA principles, the DEIR/EA provides only an abbreviated description of the Project. Fundamental aspects of the Project – such as a description of how "current design standards" will be met, see, e.g., DEIR/EA, pp. 2, 41; diagrams depicting structural root zones of the potentially impacted redwoods; maps of independently proposed bicycle routes; and the location of right-of-ways to be acquired or relinquished to DPR – are absent. Without a comprehensive and detailed description of the Project, as CEQA requires, CSPF cannot fully understand how changes to Route 101 might affect Richardson Grove. 15

The DEIR/EA also fails to support its conclusion that the Project is needed to improve the safety and operation of Route 101. According to the DEIR/EA, traffic collisions in the project area most commonly are caused by scenic distractions and drivers hitting trees. DEIR/EA, p. 9. Yet the DEIR/EA concedes that these hazards "cannot be improved within the scope of the proposed project," id., and there are no traffic-engineering studies to support the conclusion that traffic safety will be enhanced. The contrary conclusion – that traffic safety conditions might actually deteriorate with the Project – could easily be reached. Eighty-five percent of the traffic on the existing road travels above the speed limit, see DEIR/EA, p. 10, but the DEIR/EA does not consider that straightening the alignment might 16

actually enable and encourage more speeding, not less, thereby increasing the number and severity of accidents.

Moreover, no data is presented regarding the number and severity of bicycle accidents on Route 101. Route 101 in the project area is on the Pacific Coast Bike Route, and the safety of the numerous cyclists, drawn to both the park and the scenic values of Route 101, is not discussed in any significant manner in the DEIR/EA. The DEIR/EA needs to analyze the before-and-after safety risks to bicyclists of the Project. 17

The DEIR/EA also is vague and ambiguous regarding the Project's benefits to traffic congestion. The conclusion that the proposal will not "result in substantial changes to the number of truck trips, percentage of trucks on the highway, prevailing speed, travel times, roadway capacity, [or] fuel economic of trucks or non-truck vehicles" is not supported by traffic engineering studies and, at face value, seems improbable. Although the DEIR/EA asserts that Caltrans will be pursuing speed reductions through Richardson Grove independent of the proposed project, an alignment that creates a straighter thoroughfare will inevitably encourage more rapid driving and reduce an existing "meandering" pace through the state park. Additionally, the DEIR/EA asserts that the proposed project is not intended to increase travel volume by STAA trucks through the Richardson Grove area. Given the DEIR/EA's emphasis on goods movement and the allegedly stifling effect the current road configuration has to Humboldt County's economic climate, it is unrealistic to expect that a realignment of Highway 101 in the project area will not result in an increased volume of traffic. 18

Finally, the DEIR/EA presents a one-sided analysis of the Project's economic benefits. While we are sympathetic to maintaining a positive economic climate in Humboldt County, the County's own identity – Home of the World Famous California Redwoods – and tourism industry rely on a healthy redwoods ecosystem to attract tourists and out-of-area visitors who contribute heavily to the local economy. California state parks provide a significant economic benefit to the people of California, generating, according to estimates from the DPR, about 80 million visitors from around the world who spend approximately $2.6 billion directly with an additional $4 billion in indirect contributions. On a local level, the scenic value of Route 101, Richardson Grove, and the surrounding redwood groves, is a critical component of the economy in Humboldt County. The DEIR/EA therefore should evaluate any *negative* economic impacts the Project might have by degrading scenic values on Route 101 and the attractiveness of Richardson Grove as a tourist destination. 19

Failure to Identify Significant Impacts to Park and Recreational Values. CSPF is especially concerned by the DEIR/EA's lack of analysis regarding impacts to the park and recreational resources. Richardson Grove and Route 101 provide campers, hikers, motorists, riverine enthusiasts, and cyclists with the quintessential experience of being among old-growth redwoods, many of which are over 1000 years in age and 300 feet tall. Simply put, the park is a resource of great value.

There is a sense of place and a certain park experience that is created by the current road configuration and speed restrictions through Richardson Grove that will be disrupted by the proposed project. The DEIR/EA, however, has failed to identify, analyze, and mitigate

impacts that would directly and indirectly affect Richardson Grove. The ultimate conclusion that the Project will have *absolutely no significant impacts* and that, with respect to impacts to Richardson Grove, "the long term impacts resulting from the proposed project are minimal," is unsupported by the evidence. DEIR/EA, p. 29 and Appendix A. The Project involves: ground disturbance, slope excavation, a retaining wall, culvert work, a stream diversion, disposal sites, equipment staging areas, utility relocation, right-of-way acquisitions of parklands, temporary construction easements, and vegetation and tree removal. Modifying a road through a state park with these activities, we believe, will undoubtedly have significant impacts. 20

Construction activities alone raise serious concerns for the park. The majority of construction work within the park, expected to take place in spring and summer 2010, would take place at the height of park visitation and utilization of park facilities such as campgrounds, picnic areas, and the visitor center. During that time of construction, reduction in park visits can be reasonably predicted. An unknown factor is whether the alignment of the roadway will result in a degraded park experience for future park visitors, given the reduction in understory vegetation in the redwood canopies, increased exposure to the highway in areas of tree removals, and increased noise and light impacts. As such, it is inappropriate to conclude that the long-term impacts of this project to Richardson Grove will be minimal. 21

In general, CSPF opposes road developments that negatively impact state parks and are unrelated to park purposes. In some limited cases, the existence of a road that pre-dates designation of a state park results in that road's incorporation into part of the park experience. Richardson Grove currently offers outstanding scenic values for motorists passing through on Route 101. The road threads and weaves through majestic old-growth redwoods, large trees abut the edge of the pavement, and drivers have up-close, breathtaking views of the forest. Not surprisingly, this section of Route 101 is "eligible" for scenic highway status on the California Scenic Highway System, and millions of motorists are drawn to Humboldt County, in part, for the scenic drive through Richardson Grove. This section of Route 101 therefore serves both transportation and scenic purposes. It is distinctly different from portions of Route 101 that run through cities or highly developed areas, and in this regard, is similar to California's Route 1 along the coast and merits equivalent protection for scenic values.

Loss of vegetation, new grading, curve radii adjustments, damage to trees, construction activities, and other road modifications would alter the highway's scenic beauty for motorists. The DEIR/EA fails to fully recognize and analyze these impacts, and instead simply states that the Project would not affect Route 101's eligibility status on the California Scenic Highway System. There is no discussion of the eligibility criteria and no meaningful explanation for why the Project would not otherwise diminish park values for passing-through motorists. 22

Long-term and short-term impacts also must be analyzed for specific users. A non-exhaustive list of those users is as follows: 23

- **Campers**. Richardson Grove has three campgrounds adjacent to the highway: the Huckleberry, Madrone, and Dawn Redwoods Group Campgrounds. See Figure B1. Although the DEIR/EA recognizes that these campgrounds are adjacent to the Project, no details are given regarding potential impacts to campers. For example, basic questions such as how far the closest campsites in each campground are to the highway remain unaddressed, and information showing the before-and-after visual affects of the Project to campers is not provided.

- **Hikers**. Over 9 miles of hiking trails exist in Richardson Grove, and significant portions of at least two trails are adjacent to the roadway. See Figure B1. The DEIR/EA recognizes that hiking trails include views of the project area but fails to meaningfully discuss impacts to hikers and provides no depictions of before-and-after views of the project area from trails.

- **Visitors to Lookout Point**. Although Richardson Grove has a Lookout Point located adjacent to Route 101, DEIR/EA, Figure B1, the DEIR/EA makes no mention of how the Project will affect scenic values from the Lookout Point.

- **Users of the Visitor Center**. The DEIR/EA recognizes that park users at the Visitor Center will have views of the project area and that utilization of the facility will be affected by construction activities, including noise, lights, traffic delay, and interruptions to views. DEIR/EA, pp. 30, 46. No details are provided, however, regarding whether the Project would reduce the overall use of the Center; and the DEIR/EA does not address potential long-term visual or other impacts to the facility.

- **Cyclists**. Route 101, as it runs through the park, is an important resource for cyclists and part of the Pacific Coast Bike Route. Despite this, the DEIR/EA ambivalently concludes that the Project would neither appreciably improve nor diminish the existing conditions for bicyclists. DEIR/DA, p. 43. Again, no analysis is offered to support this conclusion, which is seemingly inconsistent with other statements in the DEIR/EA, such as the acknowledgment that bicycles and pedestrians will have to be redirected during construction activities. Id., p. 44. Additionally, new bicycle paths in the park may have been proposed independently from the Project. If so, the DEIR/EA needs to discuss these proposals in detail, including any cumulative impacts with the Project.

- **Riverine Enthusiasts.** Eel River runs parallel to Route 101 in Richardson Grove, is designated as "recreational," and qualifies as a state and federally designated Wild and Scenic River. Notwithstanding the obvious value of this river to park visitors, the DEIR/EA glosses over any potential project impacts, simply concluding that "[f]or the most part, within the project area, views of the roadway are screened from the river by vegetation." DEIR/EA, p. 29. This lack of analysis is grossly inadequate under CEQA, and CSPF is unable to ascertain how the views from the river will change and what park users (i.e., boaters, swimmers, fishers) might be impacted.

To allow the public and decision-makers to evaluate the repercussions of the Project, CEQA requires a full analysis of impacts to the recreational, aesthetic, natural, and scenic environmental qualities of Richardson Grove.

Inadequate Analysis of Impacts to Redwood Ecosystem and Other Biological Resources. In general, the discussion of biological impacts lacks crucial information necessary to allow a complete assessment of impacts, and thus the environmental consequences of the Project are not fully assessed and are under-represented. Particularly concerning are the potential impact to redwood trees, which are critical for maintaining the ecology and scenic beauty in Richardson Grove. Right now the road and the ecosystem appear to be in balance. Substantial modifications to the road, however, will upset this balance, especially for the redwoods directly adjacent to existing pavement.

The DEIR/EA recognizes that the Project will remove 7 redwoods and impact the root systems of 25 large redwoods. The analysis supporting these conclusions is difficult to understand, however, and particularly the layout maps of Appendix L. Missing is a detailed depiction of the structural root zones of trees that might be affected by the Project. Additionally, the removal of even immature redwoods that have taken root in the grove ecosystem contribute to the complicated root system for the entire grove, and the Project may have impacts that are simply unknown to planners at this time. CSPF is therefore concerned that the damage to redwood trees could be far greater than currently estimated. 24

Impacts to other sensitive biological resources, natural ecosystems, and special status flora and fauna also are of concern to CSPF. In general, the Biological Assessment appears deficient. It does not include detailed analysis of impacts to Bald Eagle, Coho salmon, Chinook salmon, or Steelhead trout species despite recognizing that all these species are all found in the project area and are a valued part of the ecosystem in Richardson Groove. Water quality and runoff changes from the Project, for example, may affect the Eel River, which provides habitat for fish species and food sources for the Bald Eagle. 25

Misleading and Inadequate Studies of Visual Impacts. The existing visual quality of Richardson Grove and the surrounding Route 101 is extremely high and provides a major tourist attraction. CSPF is concerned that the Project will diminish this visual quality and consequently the use of the park, and we are disappointed with the lack of visual-impact analysis in the DEIR/EA.

The Project's maximum realignment would shift the centerline of the existing road by 17 feet, DEIR/EA, p. 45, a significant change, especially considering the attendant vegetation and tree removal. According to the DEIR/EA, cabin structures within the park will be more visible from the roadway if the Project proceeds, thereby impacting the scenic views for motorists. Id. Additionally, the DEIR/EA states that views of the project area would "*primarily* occur adjacent to the visitor center, campground areas, and from portions of two trails that run parallel to the highway," which suggests that park users in other locations, not addressed in the DEIR/EA, might also have views of the project area. Id., 46 (emphasis added). But beyond briefly identifying these potential impacts, the DIER/EA fails to provide a useful and detailed analysis of visual changes to park users. 26

The Visual Impact Assessment is misleading and erroneous. For example, the report asserts that "[t]he northern half of the project is located outside the park boundary in more of a commercial setting," giving the false impression that only half of the project runs through the park. Id., Appendix K, p. 161. Rudimentary calculations demonstrate that approximately *75%* of the project (from Post Mile 1.25 to 2.04 (.81 miles)) is within park boundaries. This discrepancy undermines the credibility of the remaining report, and any such deficiencies must be corrected in a revised DEIR/EA. 27

Noise Impacts. The DEIR/EA fails to adequately analyze and mitigate noise impacts under CEQA. Current traffic noise levels, approximately 100 feet from the road centerline, are 64 dBA leq in the daytime and 54 dBA leq at night. DEIR/EA, p. 74. Noise levels during construction, however, will be considerably higher, up to 82 dBA leq at a distance of 100 feet from the road. Id., p. 75. These impacts are substantial, especially to recreational users, but are nonetheless dismissed in the DEIR/EA as less than significant. DEIR/EA, Appendix A. Additionally, the DEIR/EA fails to indicate whether park users (e.g., campers, hikers, riverine enthusiasts) will be closer than 100 feet to the road and subject to even greater levels of noise, and the DEIR/EA fails to provide a long-term analysis of the increased noise volumes from newly accommodated STAA trucks. 28

Other Considerations. The DEIR/EA fails to adequately analysis alternatives and proposed mitigation measures are generally deficient. See discussion above relating to Section 4(f).

A Full EIS is Required to Comply with NEPA

It is well-established under NEPA that an Environmental Impact Statement ("EIS") *must* be prepared if substantial questions are raised as to whether a project *may* cause significant degradation of the environment. Ocean Advocates v. U.S. Army Corps. of Engs., 402 F.3d 846, 864 (9th Cir. 2005); Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998). The potential significant impacts of the Project, as discussed above, preclude a finding of no significant impact under NEPA. As such, we urge development of an EIS to provide more thorough analysis of the impacts of the project, particularly with respect to impacts to Richardson Grove and impacts of soil compaction and road construction on old-growth redwoods. 29

The Project Potentially Violates Numerous Other State and Federal Provisions

To adequately inform the public and decision-makers under CEQA and NEPA, the DEIR/EA must analyze whether the Project would violate any other state and federal provisions. The following laws and land-use plans potentially apply to the Project:

> Public Park Preservation Act of 1971, Cal. Pub. Res. Code § 5400 et seq. The Public Park Preservation Act restricts the ability of public agencies to use parklands for other purposes. The Act provides that a public agency that acquires public parkland for non-park use must either pay compensation sufficient to acquire substantially equivalent substitute parklands or provide

substitute parklands of comparable characteristics. Pub. Res. Code § 5401. Caltrans' obligations under the Act, pertaining to the acquisition of an easement in Richardson Grove, have yet to be discussed in the DEIR/EA. 30

Public Resources Code ("PRC") Section 5019.62 (A.B. 1701). PRC Section 5096.516 prohibits the transfer of any land being used as a public park unless: the selling or transferring agency prepares a detailed report and specific finding that the land no longer serves a needed conservation purpose; a public hearing is held; and the transfer gains Legislative approval. Pub. Res. Code § 5019.516(a). Several exceptions apply, including for the sale or transfer of property with less than $1 million in fair market value; however, parklands with high scenic values, like Richardson Grove, could potentially have market values in excess of this minimum requirement. (The general rule in California for establishing just compensation is the market value of the property determined by the highest and most profitable use for which the property is adaptable.)

Richardson Grove State Park General Development Plan. Although the General Plan for Richardson Grove was developed in 1956 and consists of only a site map, it clearly shows a "proposed highway 101" that appears to bypass the park. The DEIR/EA never addresses this General Plan or discusses its proposed bypass, an alternative to the Project that might fully protect against damage to the park. 31

California Wild and Scenic River Act, Cal. Pub. Res. Code § 5093.50, et seq. The California Wild and Scenic River Act sets forth the State policy to preserve "rivers which possess extraordinary scenic, recreational, fisher, or wildlife values." Pub. Res. Code § 5093.50. State agencies must exercise powers in a manner that protects the "extraordinary values" of any rivers included under the Act. Id., § 5093.61. In 1972, the Eel River was included under the Act. In Richardson Grove, the extraordinary values of the Eel River provide recreational activities for riverine enthusiasts as well as habitat for several endangered or threatened species, including the Chinook salmon, Coho salmon, Steelhead trout, Marbled Murrelet, and Northern Spotted Owl. The DEIR/EA recognizes the Eel River designation but omits any analysis of the Act's provisions or a detailed explanation of how the Project would comply. 32

Federal Wild and Scenic Rivers Act ("WSRA") of 1968, 16 U.S.C. § 1271 et seq. Similar to its California equivalent, the purpose of the WSRA is to protect designated rivers and their immediate environments "for the benefit and enjoyment of present and future generations." 16 U.S.C. § 1271. In 1981, the Eel River was designated as a "recreational" river under the WSRA. The DEIR/EA fails to discuss the specific provisions of the WSRA that must be complied with.

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Road projects should avoid parklands if at all possible, and we are not convinced that this Project is necessary or justified. Richardson Grove, moreover, is a unique resource meriting the utmost protection of our environmental laws.

CSPF respectfully requests, for the reasons set forth above, that Caltrans prepare an Individual Section 4(f) Evaluation, revise the DEIR, and prepare a full EIS to comply with Section 4(f), CEQA, and NEPA.

Yours Truly,

Elizabeth Goldstein
President

CC: Will Kempton, Director, California Department of Transportation
Ruth Coleman, Director, California Department of Parks and Recreation
Honorable Patricia Wiggins
Honorable Wes Chesbro

1. The majority of the work that is proposed for the Richardson Grove Operational Improvement project would occur within the existing DOT easement. The improvements proposed would occur on the existing US Route 101, which predates the establishment of Richardson Grove State Park. While some of the curve realignments would necessitate acquiring 0.56 acre beyond the boundaries of the existing easement, Caltrans has proposed to relinquish 0.56 acre of land that is currently in the DOT easement back to State Parks as part of the proposed project. The minimal widening proposed within the park is to provide two foot shoulders where possible.
2. It is not anticipated that the proposed project would result in substantial impacts to the visual setting of the park. Only two redwood trees within the park would be taken, and are less than eight inches in diameter. Half of the trees proposed for removal in the park are tan oaks, the majority of which are 12 inches in diameter or smaller. The project includes revegetating the areas disturbed during construction. Twenty four of the thirty trees to be removed in the park occur on two previous cut slopes. One third of the trees to be removed occurs at the northern boundary of the park on a previous cut bank below the park staff housing depicted in Figure 7B of the final document. The second location is the proposed cut at PM 1.36 which is shown in Figure 6B of the final document. These cut slopes are not visible from the campsites. The views for the motorists would not be substantially altered as the areas would be revegetated.
3. Section 4(f) does have provisions for projects that have minor impacts on public recreational land. The proposed project does meet the criteria set out in the "Final Nationwide Section 4(f) Evaluation and Approval for Federally-Aided Highway Projects with Minor Involvements with Public Parks, Recreation Lands, and Wildlife and Waterfowl Refuges," namely, that: a) the proposed project is designed to improve the operational characteristics, safety, and/or physical condition of existing highway facilities on essentially the same alignment; b) the amount and location of the land to be used shall not impair the use of the remaining Section 4(f) land, in whole or in part, for its intended purpose; c) the total amount of land to be acquired from any Section 4(f) site shall not exceed the value of one percent of the site; and d) the proximity of impacts of the project on the remaining Section 4(f) land shall not impair the use of such land for its intended purpose. A number of measures have been incorporated into the project to minimize impacts from the proposed project. These measures have been developed in coordination with staff from State Parks.
4. Caltrans believes that the Draft Environmental Impact Report and Environmental Assessment do disclose the anticipated impacts to result from the proposed project as well as the proposed measures to minimize harm. The alternatives of do nothing, improve the highway without using the adjacent public park, and build an improved facility on new location without using the public park were considered as part of the Section 4(f) Evaluation.

5. Caltrans has prepared an Environmental Assessment which demonstrates that the Richardson Grove project will not significantly affect the human environment. Therefore, an EIS is not required.
6. Caltrans has provided sufficient documentation that demonstrates that there are no feasible and prudent avoidance alternatives. The Section 4(f) Evaluation in Appendix B does provide an evaluation of the following alternatives: do nothing, improve the highway without using the adjacent public park, and build an improved facility on new location without using the public park.
7. Caltrans considered a variety of alternatives that would result in sufficient modification of the roadway geometrics that would allow the STAA restriction to be lifted, including: widening only at selected locations where the STAA vehicles off-track, widening to provide a minimum shoulder width throughout the project limits, and realigning the short radius curves up to current design standards in addition to widening to provide shoulders. Staff also considered bypassing the State Park on new alignment and elevating the highway through the park. These options of shoulder widening or realigning the curves to eliminate the STAA restriction would require removal of several old growth redwood trees and these alternatives were eliminated from further consideration. A bypass alternative of this section of Route 101 was studied in 2001 and was determined to be infeasible due to the substantial cost and environmental impacts. In addition to physical modifications of the roadway, various signalization alternatives were also considered but were deemed to have a number of issues with them which are detailed in the FEIR/EA in Section 1.4.2.
8. The Feasibility Study performed in 2001 considered five alternatives including a new four lane alignment that fully bypasses the park, a new four lane alignment for Route 101 that would bisect the park east of the existing highway and river, a new four lane alignment for Route 101 that included a tunnel near the eastern boundary of the park, and widening to four lanes on the existing Route 101 roadway. The fifth alternative was the no build alternative. The costs of these proposed build alternatives ranged from $75 - $600 million in 2001. Anticipated impacts from these alternatives include potentially substantial impacts to listed species and aesthetics resulting from large cuts and fills that are required to traverse the steep terrain; impacts to South Fork of the Eel River, a designated Wild and Scenic River from new bridge crossings; and impacts resulting from the large borrow and disposal requirements. Impacts to old growth redwood trees would also be probable. As stated above, the bypass alternative was considered in the Section 4(f) Evaluation. The Feasibility Study can be accessed on the Caltrans District 1 website, located at: http://www.dot.ca.gov/dist1/d1projects/richardson_grove/
9. Signalization alternatives and the issues with implementing such alternatives were considered in the DEIR/EA, see Section 1.4.2. Reducing the speed limit alone would not be sufficient for STAA vehicles to navigate the roadway and not off-track, thus it would not meet the purpose and need for the project. The degree of off tracking for a given truck is determined by the truck type and size and the curve dimensions of the road, not the truck speed. Elevating the portions of the roadway over the tree roots would increase the width and depth of fills needed

and would impact a greater number of trees as well as a greater portion of area in the trees' critical root zone area. It is also probable that this alternative would require additional property to be added to the DOT easement. If the elevated road was to be supported as a structure rather than fill (such as with a viaduct), the footings required would result in excavations up to fifteen to twenty five feet deep as opposed to the maximum two feet deep excavation proposed for the project. Due to the curvilinear alignment, the spans would have to be short and it is estimated that the footings would have to be on the order of every fifty feet or so and it is likely that there would not be much flexibility as to where the footings would need to be placed. Costs for elevating the highway would be greater than the proposed project, would likely require a longer construction period, and providing access through the work areas during construction would be more challenging.

10. Rail, aircraft, and ocean shipping might have the potential to meet some of the need for goods movement, however, both rail and ocean shipping would require substantial infrastructure improvements. In addition, the Humboldt County Regional Transportation Plan notes that Humboldt Bay's marine transportation industry is linked to growth in trucking and rail and, in the absence of rail service in the county, goods loaded on and off commercial vessels using Humboldt Bay would have to be transported to and from the port by truck. Funding for developing the port or reestablishing rail service has not been identified nor secured. Air freight is currently available however, trucking appears to be more viable at this time.
11. Campers, other park users, and motorists were considered in the development of the project. No long-term impacts are expected to affect park users as a result of this project. Construction impacts would be temporary. Access in and out of the park would be maintained during construction. A number of measures have been proposed that would minimize impacts to park resources during construction including handwork, special roadway structural sections that are thinner and more permeable than normal, special equipment like pneumatic excavators (such as air spades) to minimize impacts during excavation, incorporating tree roots into the structural section rather than removing them, and the use of brow logs to minimize the impacts of fill. In addition, weekly irrigation will be provided at large redwoods affected by excavation during the summer months. Areas disturbed by vegetation removal would be revegetated. Of the two areas where the majority of proposed tree removal occurs, one is at the very northern boundary of the park at an existing cut bank where there is little or no visitor use facilities. The other location is in the southern portion of the project between PM 1.35 and PM 1.36 on a previous cut bank. The southern extent of the Madrone campground sites are at the top of the slope with the cut bank and set back about 100 feet, thus the cut at the base of the slope would not be visible from the campsites. Park staff was consulted in the development of these measures to minimize harm and concurs that the project has included all possible planning to minimize long term harm to the park resources.
12. While there may be no documentation that measures such as pneumatic excavators, hand work, irrigation, incorporating roots into the structural section,

and using Cement Treated Permeable Base are effective in substantially reducing stress on the trees during construction, the measures have been reviewed by the Caltrans registered arborist, a consulting arborist contracted by Save The Redwoods League, as well as State park staff. In the professional opinion of the arborists, the project would not result in substantial adverse effects to the old growth redwoods. The State Park has concurred that the project includes all possible planning to minimize long term harm to the park resources. The measures identified will be written into the specifications of the construction contract.

Providing the corvid- proof trash receptacles is a conservation measure recommended by the US Fish and Wildlife Service during the consultation efforts for this project, and Caltrans incorporated this measure into the project. Conservation measures in the context of the federal Endangered Species Act represent actions that are intended to further the recovery of and/or minimize or compensate for the project effects on the listed species. In addition, construction activities would be restricted two hours before and after sunrise and sunset from March 24 through September 15, to accommodate the Marbled murrelet. Additional minimization measures can be found throughout the environmental document and summarized in Appendix D of the document.

13. There have been several meetings with park staff regarding this proposed project, the anticipated impacts, and proposed mitigation measures. Elevating portions of the road would require a greater footprint of impacts into the park from the fill, impacting a greater number of trees as well as a greater portion of the critical structural root zone of the trees. Or, if a structure is used, there would be more impact to the tree roots due to greater excavation being necessary. See Response #9 above providing more information about elevating the roadway.
14. It has been determined that the proposed project would not result in impairing the remaining areas of the park after the temporary construction impacts are concluded. The proposed project would not result in any substantial visual impacts for hikers or campers, views from the Visitor Center, or campfire center. The proposed project would not require any physical alterations to any campgrounds, trails, or other visitor use facilities with the exception of removing a restroom structure closed to public use due to safety concerns located adjacent to the Visitor Center. The roadway modifications would not substantially impact the setting or park ambience after construction. The roadway would remain a two lane curvilinear highway with minimal to no shoulders and large trees abutting the edge of the pavement creating a canopy effect. The California Department of Parks and Recreation (DPR) has jurisdiction over the park, and coordination with this agency has been ongoing throughout the planning of this project. Section 1.5 in the FEIR.EA does identify DPR as the agency involved in the Section 4(f) approval process. The concurrence letter for the Programmatic Section 4(f) Evaluation was received from DPR on November 18, 2009 and is included in Appendix B.
15. Existing and proposed right of way lines, cut and fill lines, as well as information regarding the existing and proposed modifications of the roadway are shown on

the layout sheets in Appendix L in both the DEIR/EA and FEIR/EA. On average, the centerline alignment is proposed to be shifted from two to six feet on average to achieve longer curves modifying the curve radii, and change the orientation of the fixed objects (trees) in relation to the curve. The project as proposed would not result in a facility meeting current design standards, which is why the design exceptions identified in the document have been requested. In order to meet current design standards on the existing alignment would require the removal of several old growth trees. The changes in the alignment as proposed would allow the STAA restrictions to be lifted. Additional information on the proposed excavation and fill within the structural root zone of the redwoods has been added to the final document. The structural root zone is defined as the circular area with the tree trunk at the center with a radius equal to three times the diameter of the tree trunk measured at 4.5 feet above the ground level. The proposed project does not include widening the roadway for a bike lane as the widening that would be required to provide such a facility would result in substantial impacts to redwood trees. To construct a bike/pedestrian path separate from the existing highway would have to be done on land under the jurisdiction and management of State Parks, thus the appropriate lead agency for such a facility would be State Parks. It is our understanding that State Parks is in the planning process for a bike path through the park. Maps of the area to be relinquished to State Parks as well as those areas to be transferred into the Department of Transportation easement have been added in Appendix B.

16. Improved safety is a secondary objective of the project. However, the incremental improvements such as increasing the amount of superelevation and modifying the compound curves to fixed radius curves would, in general, tend to result in some increase in safety. The primary purpose of the project is to eliminate the STAA restriction. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. It is not expected that the project would result in motorists traveling faster through the project area since the alignment would continue to be curvilinear and have trees abutting the roadway. In addition, Caltrans has also reduced the speed limit through Richardson Grove to 35 mph. But reducing speed alone won't correct the geometric deficiency of the roadway that would allow the STAA restriction to be lifted.
17. It is not expected that collision rate for bicyclists will change as a result of the proposed project. The project would not make the situation worse for bicyclists. The project will be adding shoulder widths where it is feasible to do so and the curve corrections would slightly improve stopping sight distance which would provide an incremental improvement for bicyclists in the park. North of the park, the project will be widening the shoulders to four feet to better accommodate non-motorized traffic.
18. Traffic forecasts have not indicated that the truck traffic is likely to substantially change as a result of this project. Any significant amount of increased truck traffic on Route 101 would be as a result of trucks diverting from I-5 and Route 99. Decisions made as to trucking routes are generally based upon travel times

and fuel consumption. Since most major coastal cities from southern California to northern Washington have readily available access to I-5 or Route 99, and due to the straighter alignments using these routes would result in less travel times and fuel consumption, it is not expected that a substantial amount of traffic will be diverted to Route 101 should the STAA restriction be lifted. The speed limit reduction to 35mph through the park was enacted in late 2008. The project doesn't straighten the highway. As the roadway would continue to be a two lane curvilinear roadway with minimal to no shoulders, it is not expected that the speed trucks traverse through the park would increase.

19. The most impact to scenic views would be as a result of the proposed retaining wall outside the park at the northern limits of the proposed project. Subsequent to the circulation of the draft, a design modification for the retaining wall was developed to reduce impacts. The modified wall in the preferred alternative would be 100 feet shorter and would be located below the road on the east side of the highway as opposed the original wall design which was an above the road soldier pile wall on the west side of the highway. Because the wall is constructed below the road it would not be visible to motorists except for the barrier rail. The shorter wall to the east also reduces the number of tree removals. The most impact to scenic views within the park would be the cut at PM 1.36. This is a previous cut slope and is expected to naturally revegetate and eventually resemble the existing view. The project includes revegetating this cut slope. With the revegetation, the views within the park for both motorists and park visitors would not be substantially altered as a result of the project.
20. The retaining wall, utility relocation, disposal site, some culvert work and the majority of ground disturbance from the proposed cuts are proposed outside the park. Ground disturbance within the park includes relatively minor cuts and fills. The culvert work includes improving existing culverts. While water diversion may be required during construction, the drainages are not fish bearing and the drainages are ephemeral and generally only convey water during the rainy season. The culvert work is proposed to be conducted during the summer and if a diversion is required, would likely only be in effect for a day. Culvert work on Route 101 that occurred in Richardson Grove State Park a couple of years ago did not result in any concerns or issues being relayed to Caltrans. The project will not require any removal of old growth redwoods. The largest redwood to be removed in the park is seven inches in diameter. The project includes revegetating areas where tree and brush removal would occur. For approximately one third of the project length (PM 1.70 to PM 2.04) the only modification being proposed to the existing facility is to provide resurfacing of the pavement and make one drainage improvement requested by the Department of Fish and Game to direct roadside drainage into an existing culvert. As stated above, it has been determined that the project would not result in long term substantial adverse effects to the scenic views. It has been determined that the impacts to Richardson Grove State Park would not be significant.
21. Where understory vegetation is proposed for removal, there is similar understory vegetation just beyond the extent of disturbance. The majority of trees proposed for removal in the park are 12 inches in diameter or smaller and nearly half of

these would be tan oaks. Only three trees larger than 20 inches in diameter would be removed from the park. The majority of trees to be removed (in the park are on two previous cut banks, those the tree removal does not There should be minimal to no change to the tree canopy since larger trees which make up the canopy won't be removed. The alignment shifts range on average from two to six feet, thus it is not anticipated that the long term impacts would be substantial. While there would be increased noise during construction, this would be of short term duration.

22. The current ambience for the motorist would not be altered substantially as a result of this project. The highway would remain as a curvilinear two lane road with minimal to no shoulders. The large redwood trees abutting the edges of the road and providing the canopy over the road would remain. The proposed project would not change any of the eligibility criteria as a scenic highway.
23. The uses listed have been considered. Section 2.2.5 of the DEIR/EA discusses noise impacts. Section 2.1.6 discusses impacts on visual setting. The closest campsites are about 90 feet from the roadway. The views of the roadway visible from the campground would not be substantially altered. For the most part, due to the vegetation screening the roadway, the improvements proposed would not be visible from the campsites. Portions of trails are adjacent to the roadway, some close enough that traffic traveling on the roadway is visible from the trail. Even after the project, there would continue to be vegetation partially screening the roadway from these trails. Lookout Point overlooks the highway at approximately PM 1.14. No tree removals would occur at this location. There would be some minor cuts and fills occurring but likely would not be discernable from Lookout Point. Impacts resulting from the road improvements should not appreciably affect the use at the visitor center with the exception that ingress and egress from the park entrance would experience traffic delays and some increased noise when construction activities are in the immediate vicinity. There should be no long term effects to the visitor center. What the environmental document states with regard to cyclists and pedestrians is that they would be directed by pilot car through the construction areas just as motorists are. In regard to an independent bicyclist path through the park, State Parks requested that the Caltrans not provide any specifics of the trail as it is still in their planning process. The roadway is not visible from the river in the park. Outside the park, the cabins and other associated buildings of the Singing Trees Recovery Center block views of the roadway from the river for the majority of the project limits except for most northerly limits of the project.
24. With the retaining wall design modification, one less redwood needs to be removed so the total number of redwoods removed by the project is now six, two of which are in the park. The structural root zone is defined as the circular area with the tree trunk at the center with a radius equal to three times the diameter of the tree trunk measured at 4.5 feet above the ground level. Information describing where the excavation and fill would be in relation to structural root zone of redwoods thirty inches in diameter or greater has been added in the FEIR/EA in Tables 9 and 10. The two redwoods to be removed in the park are six and seven inches in diameter. Several measures have been incorporated into the project to

minimize impacts to the redwoods during construction. The minimization measures have been reviewed by the Caltrans registered arborist, a consulting arborist contracted by Save The Redwoods League, as well as State park staff. In the professional opinion of the arborists, the project would not result in substantial adverse effects to the old growth redwoods. In addition, the State Park has concurred that the project includes all possible planning to minimize long term harm to the park resources.

25. Potential impacts to listed species were provided in the FEIR/EA in Section 2.3.4. Consultation with the appropriate State and Federal agencies was conducted. The Biological Assessment does not contain a discussion of the Bald Eagle, Coho salmon, Chinook salmon, or Steelhead trout as it was determined that the project would result in 'No Effect' to these species per the Federal Endangered Species Act. This 'No Effect' determination was identified in the environmental document. The Biological Opinion from US Fish and Wildlife Service was received on January 16, 2009.
26. Where the largest roadway shift would occur at approximately PM 1.4, the only trees proposed for removal are a six inch in diameter oak, a seven inch in diameter redwood, and a fourteen inch in diameter Douglas fir. While the residential cabins might be more visible to motorists due to removing some of the vegetation on the slope, they are visible currently as well. As the residential units are located on top of a slope, they are less visible to motorists than what is visible at eye level. The highway is visible from many use areas within the park since these use areas were developed adjacent to the roadway. There was no attempt to depict what the views might be from people walking off trail, or from every conceivable location from within the park where the highway is visible. Rather, characteristic views from primary use areas were described. As stated previously, approximately one third of the project length, which occurs within the park, would have no physical changes but for resurfacing and extending an existing berm to direct water into a downdrain to connect to an existing culvert. The average alignment shift is from two to six feet resulting in the modifications likely not being discernable to park visitors once the areas are revegetated and the plantings established. The areas where the greatest modifications are proposed have been described in the document.
27. The text will be revised in the final document.
28. Per the CEQA guidelines, Section 15382, construction phase impacts on traffic, transit, noise, air quality, and the visual environment would generally not be considered significant since construction-related changes are by their nature, temporary. A significant impact would only occur if temporary effects substantially affected accessibility to an area for a long period of time, caused the loss or relocation of substantial numbers of businesses or residences, or posed severe health or safety threats. This is not the case with the proposed project. Since the roadway alignment shifts so as to not move the roadway appreciably nearer to any trails or campsites, the traffic noise experienced in these areas would not be any greater as a result of the project.
29. Caltrans has prepared an Environmental Assessment which demonstrates that the Richardson Grove project will not significantly affect the human environment.

While there are effects, they are not significant given their context and intensity. Therefore, an EIS is not required.

30. As discussed in the DEIR/EA, Caltrans is proposing to relinquish a portion of land held in a DOT easement equal to the amount of land proposed to be added to the current DOT easement. Caltrans is in ongoing discussion with State Parks about this transfer in jurisdiction action.
31. Language about the 1956 General Plan will be added to the final document.
32. The proposed project is not expected to result in any impacts that would impair the values for which the Eel River was designated as a Wild and Scenic River. Additional language will be added to the final document.

January 30, 2009

Deborah Harmon, Senior Environmental Planner
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EPIC

RE: Richardson grove Operational Improvement Project
Draft Environmental Impact Report/Environmental Assessment and
Programmatic Section 4 (f) Evaluation

Dear Ms. Harmon:

This letter is submitted on behalf of the Environmental Protection Information Center (EPIC), the North Coast Environmental Center (NEC), Friends of the Eel River (FOER) and Californians for Alternatives to Toxics (CATs). EPIC is a Humboldt County based non-profit organization that actively works to protect and restore forests, watersheds, coastal estuaries, and native species in northwest California. EPIC was established in 1977 by local residents in Humboldt County. EPIC works to ensure that state and federal agencies follow their mandate to uphold environmental laws and protect endangered species. Many of EPIC's members use the Eel River for boating, fishing, bird watching and general recreation, as well as for aesthetic enjoyment. Particularly, members of EPIC visit and use Richardson Grove State Park, and rely upon its beauty and natural resources for personal and professional enhancement. Members of EPIC have an interest in knowing that California remains alive with wildlife and natural wonders, still beautiful and available to enjoy and utilize when they choose.

NEC is also a Humboldt County based non-profit organization, whose mission is to promote understanding of the relations between people and the biosphere and to conserve, protect and celebrate terrestrial, aquatic and marine ecosystems of northern California and southern Oregon. Since its establishment in 1971, NEC has worked to conserve the area's biological assets and to stimulate public awareness in securing the future of these natural treasures, which are vital to sustaining physically, economically, and culturally healthy communities. FOER is also a non-profit conservation organization based on the North Coast, whose primary mission is to restore the Eel River and all her tributaries to a natural state of abundance, wild and free. CATs is a public interest, membership non-profit organization whose mission is to give the general public, particularly residents of northern California, control over toxic chemicals in their environment. This mission arises from a broader underlying concern for our membership in relation to their dependence on the environment for their sustained health, education, cultural activities and livelihood.

The Environmental Protection Information Center
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EPIC, NEC, FOER and CATs (hereinafter 'EPIC') oppose this project as presented. Fundamentally, the DEIR/EA fails to adequately justify the need for the project, describe the project, and assess the project's significant environmental effects. On these grounds alone, the DEIR must be supplemented and recirculated. In addition, inadequate public notice requires that the DEIR be recirculated, per the requirements of the California Environmental Quality Act (CEQA) and its supporting regulations. As well, the DEIR fails to adequately analyze and disclose the potentially significant impacts of the proposed action sufficiently to support a finding of no significant impact (FONSI) under the National Environmental Policy Act (NEPA). Thus, an Environmental Impact Statement (EIS) must be prepared, and adequate public participation solicited and obtained, before any ground-disturbing activities can be undertaken pursuant to the proposed action.

The DEIR/EA suggests by its flaws a project that has been rushed to completion before thorough consideration of the potential impacts and implications of the proposed action, and a predetermined action that is being justified using carefully selected data and analyses that minimize those potentially significant impacts. Such analysis fails to meet the letter or the purpose of either CEQA or NEPA.

Inadequate Notice Requires Recirculation of the DEIR.

We have checked the CEQAnet website repeatedly during the week of January 26, 2009, and there is no record of CalTrans having submitted the Richardson Grove DEIR to the State Clearinghouse. Such submittal is required by law. It is our understanding, as of the date of these comments, that Caltrans submitted the DEIR for Richardson Grove to the State Clearinghouse on January 27, 2009; and that the document apparently won't be posted until February 5. We have been informed that the State Clearinghouse number is 2009012070. A search of the CEQAnet data base on the morning of January 30, 2009, does not include any documents for that number. 1

Because Caltrans has failed to follow mandatory public review requirements, by not posting the DEIR with the State Clearinghouse, EPIC and the public have been denied our right of full review. EPIC reserves the right to supplement these comments during the required review period, which properly commences when Caltrans complies with the requirement to post the DEIR with the State Clearinghouse.

Inadequate Project Description.

The DEIR advises that the purpose of the roadway realignment is to accommodate STAA truck travel, to remove restriction of STAA vehicles and improve safety and operation of Highway 101 and goods movement.

Assuming that the current roadway does not accommodate STAA trucks, the DEIR lacks a description of what engineering changes and criteria are necessary to accommodate STAA trucks. The project description includes a statement that the roadway is to be realigned so that two STAA trucks passing in the opposite direction can

be accommodated. But no standards are outlined to justify the realignment. It appears that Caltrans expects everyone to just assume that the realignment as proposed on the designs accommodates STAA truck travel as intended, without providing the public with the engineering specifications necessary for that truck travel. How wide must a road be for two STAA trucks at any given point? What must be the minimum curve distance or alignment? 2

Because the DEIR does not provide the roadway standards necessary for a STAA truck, it is impossible to evaluate whether the proposed realignment is adequate, necessary, the best alternative, or the most environmentally sound alternative. The DEIR lacks the very information necessary to evaluate what standards govern a realignment, and proceeds on the undemonstrated premise that such a realignment is in fact necessary.

The DEIR declares that the "current roadway geometrics do not meet current design standards for design speed, curve radii, shoulder width, superelevation rates, stopping sight and corner sight distances, distance to a fixed object, steepness of side slopes, and alignment consistency." (DEIR at p. 41.) However, the DEIR does not advise as to what are those current design standards, and how the proposed project will meet those standards. In the absence of this information, it is really impossible to evaluate the validity of the proposed project as the appropriate alternative, even if one were to concede that the project is necessary. The lack of this information also makes it impossible to evaluate the validity of the impact analysis, particularly on the natural resources to be affected. 3

Nor do the Layout Maps in Appendix L provide this information. All they do is layout the proposed design, without any indication as to whether the design satisfies standards necessary to accommodate STAA trucks as desired. Moreover, the layout maps have no engineering stamp on them, and bear a disclaimer that the State of California shall not be responsible for their accuracy or completeness. 4

EPIC questions the validity of the project description as well because it is not at all clear that the roadway needs to change to "accommodate" STAA trucks. An STAA truck is defined as any tractor-semitrailer combination or set of doubles with length configuration such that the truck may legally operate only on National Network Highways, Terminal Access Highways, or signed accesses to service. According to Caltrans Truck Route Classifications,[1] the STAA Network is the "National Network (NN), Terminal Access (TA) and Service Access routes together make up the 'STAA Network.' These are the routes that allow STAA trucks."

According to this same document, Terminal Access (TA) routes are portions of State routes or local roads that can accommodate STAA trucks. The Caltrans map for Truck Networks on California State Highways District 1 show Highway 101 to be a "Terminal Access (STAA)" route. A TA sign is posted on Highway 101 north, at the junction of Highway 1 and 101 at Leggett. Thus it appears from Caltrans' own statements and signage that the portion of road for which this project is contemplated already is currently designated for STAA trucks. 5

The necessity of the project is also in question because there appears to be little recognition of the need for this project by the California Transportation Commission or even Caltrans. EPIC reviewed the Caltrans website to locate listing of the proposed project. Certain documents are keenly relevant to statewide transportation planning, particularly in terms of identifying what is priority and necessary for California transportation. EPIC found a dearth of reference for this project.

The December 29, 2006 Corridor Management Plan for Route 101: Golden Gate-Oregon Border ("Corridor Management Plan") references only a feasibility study for STAA access to Humboldt County, but does not list the project as necessary.[2] "A Corridor Management Plan is a document that identifies the recommended system management strategies for a given State Highway System facility based on comprehensive performance and assessment and evaluation."[3] This document notes that Route 101 "is designated as a High Emphasis Focus Route in the State Interregional Transportation Strategic Plan (ITSP)."[4] The Richardson Grove project area is not identified as a segment which does not meet current Route Concept.[5] The project is also not listed in the 2006 State Transportation Improvement Program (STIP) Projects.[6] From this, once can ascertain that as of the end of 2006, the State did not recognize this project as necessary. 6

The project is not listed in the 2008 State Transportation Improvement Program. The project is included in an updated "Long Lead" list from August 27, 2008, which identifies the Richardson Grove project to realign the highway. A Long Lead list identifies projects for which development work has begun but is not currently programmed.

The project is not listed in the 2008 Interegional Transportation Improvement System. This is the listing that provides funding for projects "to improve movement of people and goods to and through urbanized areas." The project is not included in the 2008 State Highway Operation and Protection Program ("SHOPP") approved on March 13, 2008. However, the project is not included in the most recent January 2009 SHOPP list. The only listing for the area near Richardson Grove indicates, at line 18, an entry for area between MP 0.2 and 126.00 on Highway 101 to "reconstruct guard railing." 7

Given the apparent contradictions between the prioritization assigned this project in relevant planning documents and the priority claimed in the DEIR, EPIC questions the validity of the claimed necessity and urgency of the proposed project, and wishes to underscore the rapidity with which this project has proceeded under Caltrans' direction. Have all internal steps and Caltrans process requirements been followed as this project has moved toward to this point? EPIC is quite concerned that Caltrans may have ignored some of its own internal procedures in order to fast-track this project and its environmental analysis. Please document that all relevant procedures have been followed, or provide appropriate discussion clarifying what normally relevant procedures may not have been followed, why such decisions were taken, and what the possible implications may be of such short cuts around CalTrans' normal procedures for a project 8

of this type, magnitude, and potentially significant impact on the environment.

In its search to understand why and how this project has progressed to this point, EPIC also consulted the CEQAnet database, posted by the State Clearinghouse of the Office of Planning and Research.[7] When a state agency acts as a lead agency for a project, it must submit the draft EIR to the State Clearinghouse, even when it has independently provided notice of the DEIR to other agencies. (Guidelines § 15205.) The State Clearinghouse, in turn, posts notice of that document on the CEQAnet database. EPIC searched the CEQAnet database for all Caltrans planning projects and all projects in Dsitrict 1, for all environmental documents and within a time frame from January 1 2008 to the present. EPIC did not find the Richardson Grove DEIR listed anywhere on the CEQAnet database. The DEIR itself provides no evidence that it was submitted to the State Clearinghouse. This appears to be a clear violation of state law. The DEIR has not been properly circulated for public review. This seems to suggest yet again that this project has been fast-tracked without compliance with proper procedure. 9

The project also appears to be a done deal, a predetermined decision taken in advance of the analysis reflected in the DEIR. In additional to the strong circumstantial evidence that this is the case, the DEIR itself declares that "[a]fter the public circulation period, all comments will be considered, and ***the Department will confirm the proposed build alternative*** and make the final determination of the project's effect on the environment . . the Department ***will certify that the project complies with CEQA, prepare findings for any significant impacts identified, prepare a Statement of Overriding Considerations for impacts that will not be mitigated below a level of significance, and certify that the findings and Statement of Overriding Considerations have been considered prior to project approval.***"[8]

Such pre-determination nullifies the public's right of review, and prejudices CalTrans against any concerns and evidence which would urge a different outcome. It also makes a mockery of the CEQA review process, making the DEIR illegitimate. The DEIR does not provide a discussion of overriding considerations. In fact, it claims there will be no unavoidable significant effects. EPIC questions how it is that a project that has yet to even be identified by any of the major state transportation planning and funding mechanisms can be predetermined with issuance of only a DEIR. We believe this to be illegal. 10

The DEIR Does Not Establish That This Project is Necessary for Safety.

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The DEIR tries to support the need for the project on the basis of safety. On February 15, 2008, pursuant to a Public Records Act request, EPIC received from Caltrans the CHP information on traffic accidents in the Richardson Grove stretch of Highway 101. But the studies it refers to do not show what the DEIR states.[9] The report date is February 13, 2008. What the tables reveal is that for the stretch of Highway 101 from mile post 0.920 to 2.120 – which is the scope of the project, for a period of 5 years, there were only 6 accidents involving trucks, two of which occurred within one minute of each other on August 16, 2004 at 11:10 and 11:11 p.m, and only one of the five involved 12

two trucks going in opposite directions. Notably, there have been no truck accidents since June 21, 2005. The CHP Report to the Legislature from August 2005, which evaluated the effect of Vehicle Code § 35401.7[10] advised that "there were no collisions, citations, verbal warnings, complaints, or highway incidents involved licensed carriers of livestock vehicles on the identified portions of Highway 101.[11] Thus, the evidence does not support a claim that this project is necessary to allow more room for trucks because trucks are involved in or cause accidents. 13

The DEIR Fails to Establish That The Project Is Necessary for Goods Movement and the Economy

As noted in Mr. David Spreen's comment letter of January 23, 2009, the DEIR's economic analysis and rationale for the proposed project largely hinges on a suggestive but indeterminate economic survey (the Gallo report) and inappropriate use of the IMPLAN economic analysis tool. Having heard from many other local business owners, including small business and people involved in transportation, EPIC believes that the proposed project will benefit some local business while injuring others. While such actions may be valid public actions if properly analyzed and disclosed, a state agency may not legally proceed on the basis of one-sided analysis that minimizes or fails even to present the negative economic impacts of the proposed action. 14

The Project Fails to Provide for Nonmotorized Access, as Required by CalTrans Policy and the California Highway code

Contrary to its own policy, and California highway code, and despite the fact that its project will lead to more big trucks travelling at higher speeds through the narrow grove, Caltrans has failed to provide for improved bicycle or pedestrian access as part of this project. Highway 101 is designated part of the Pacific Coast Bike Route. Note that CalTrans' own guide to this section of the Pacific Coast Bike Route shows typical bicycle tourists travelling along the narrow roadway through Richardson Grove. There are no bike lanes along this stretch of Highway 101; indeed, there is in many areas no shoulder at all beyond the paved area of the road. Thus, bicyclists and pedestrians must either walk through the state park (where bicyclists may not ride, on or off the provided paths, which do not run the length of the park) or risk life and limb by attempting to share the road with motorized vehicles. 15

CalTrans Deputy Directive "Accomodating Non-Motorized Travel," dated 3-26-01, states that the "Department fully considers the needs of non-motorized travelers (including pedestrians, bicyclists, and persons with disabilities) in all programming, planning, maintenance, construction, operations, and project development activities and products." Similarly, California highway code (887.8. (b)) requires the agency to provide funding for bike access provisions as part of a project "(w)here the traffic safety or capacity of the highway would be increased." Caltrans has refused to do so here, suggesting instead that State Parks may build a bike path at some point in the future. 16

EPIC believes that the proposed action is likely to increase risks to bicyclists in particular, by leading to increased traffic, from larger trucks, and inevitalby travelling at 17

higher speeds due to the larger roadway. The DEIR fails entirely to analyze or discuss such impacts. Though the project clearly affects traffic safety and highway capacity, the project fails to provide any provision for bicyclists or pedestrians. Instead, it suggests that State Parks is considering the issue and may at some indeterminate point in the future construct an adequate bike and pedestrian path to channel non-motorized traffic off the stretch of Highway 101 under consideration in this project. 18

EPIC takes the position that CalTrans may not properly displace its responsibilities regarding non-motorized transportation to State Parks, nor may CalTrans defer provision of non-motorized access to some intederminate later date. It is in fact because such displaced and deferred responsibilities are routinely ignored that we have policies and laws requiring CalTrans to deal with such issues as part of a given project. In addition to this substantive point, CalTrans' failure to adequately disclose and analyze the relevant facts around these issues renders the DEIR/EA inadequate under CEQA and NEPA. The agency's failure to articulate a reasoned rationale for its departure from its stated policy, or any rationale whatsoever for its failure to provide adequate non-motorized access, suggests arbitrary and capricious agency action. 19

Finally, we note that because a bike route through Richardson Grove State Park will necessarily risk potentially significant impacts on important cultural and environmental resources, an EIR/EIS is required to properly analyze and document such a project. Because we believe that such non-motorized access must be provided as part of the present proposed action, it is our position that an EIS is required for this project. 20

Impacts to Ancient Redwood Trees and Groves.

The DEIR takes the remarkable position that the construction and cutting of the structural root systems of numerous ancient redwood trees will not cause harm to those trees, or the ecology which supports them and is provided by them. 21

Richardson Grove has existed for centuries. As William Cullen Bryant is quoted in the brochure for Richardson Grove State Park, "The groves were God's first temples." It is here where you first encounter significant old-growth redwood forests when driving north. The DEIR notes that the roadway was initially created in 1915, nearly a century ago. During this time, the grove remains intact, healthy, habitat for rare species, and a wonder for all to behold and experience. Richardson Grove is the threshold to the redwood region, and offers any traveler the cathedral experience as s/he drives through. It is an unparalleled experience along Highway 101 as one drives south from the congestion of the Bay Area and its North Bay region. There is a balance here that is finely tuned over time, and should not be undone. It particularly should not, and under CEQA may not legally, be undone on the basis of hasty and inadequate analysis of potential impacts.

This project will dramatically alter that balance, because of its impact on the many ancient trees which now shelter the road at its edge. Redwood science is clear that redwood root systems are shallow, lateral roots, which graft to other redwood roots to

develop an interconnected root system for several trees. It is common knowledge that redwood trees have a shallow and interconnected root system, and impacts to one tree's root system can mean the demise of several related trees in a grove. The interconnected root systems create a below ground network of trees.[12] "[W]hen marked radioactive water was injected into a tree in a study grove near Arcata, California, its trace was located in a tree 500 feet away."[13] In general, soil compaction of a tree's root system will disrupt respiration processes which power every function of the tree.[14] Redwoods are particularly prone to adverse impacts from soil compaction due to their shallow root systems. "Redwood trees have a tap root, but it is their shallow roots, stretching wide and interweaving with those of neighboring trees, that give them a firm base . . . The roots are sensitive, however, to compaction of the soil and may be suffocated by gravel and logging debris that does not allow soil aeration."[15] "An undisturbed layer of thick, damp mulch on the forest floor is essential to the health of these trees."[16]

The proposed realignment will harm that root system, by cutting and compacting structural root systems. This will occur through construction. It will occur from compacting the roots, as well as the road development with its associated creosote and tar elements. The project has the strong likelihood of smothering roots. This project has the potential for very negative effects on very old trees. The DEIR admits that roadbed material will be placed within the structural root zone of these ancient trees. Yet, there is no correlation between the location of large trees and the cut and fill activities. The Layout Maps do not provide this, nor does the Visual Impact discussion in Appendix K or the discussion in the Natural Environment Study in Appendix I. While it identifies an "additional 0.14 acre of roadbed material" it does not specify how much fill will occur on what trees. And because the Layout Maps are so difficult to read, particularly as to cut and fill, the DEIR does not provide adequate information to evaluate the full adverse effect which will likely occur. Moreover, in the long term the trees will suffer from increased root compaction and more intense vehicle impacts as a consequence of the road widening and realignment.

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The DEIR concedes that several of these ancient trees will be affected by construction activities, and in some cases the realignment will move the roadbed even closer to the trees. The list of trees to be affected is staggering: 40 trees, with nearly half of those over 6 feet in diameter and several in the range of 10-15 feet in diameter. The DEIR plainly acknowledges that adverse effects to large trees may be a significant impact to this unique natural community. It proposes mitigation, which simply is not adequate. To quote the Natural Environment Study,

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> "[t]o mitigate for potential structural root zone impacts to large redwoods and potential impacts to elements of marbled murrelet Critical Habitat Caltrans will implement out-of-kind mitigation. In coordination with California Department of Parks and Recreation, Caltrans will replace the 13 existing trash containers near parking, picnic and camping areas in Richardson Grove State Park with corvid proof waste receptacles to enhance habitat for nesting migratory birds in Richardson Grove
>
> . . .

> Before activities associated with vegetation removal and road construction (including culvert installation and wall construction) begin, a qualified biologist approved by USFWS will conduct a training session for all personnel."

The mitigation is focused on an effort to protect against harm to the marbled murrelet and the northern spotted owl, two protected bird species which depend upon the old growth habitat afforded by these ancient redwoods. It does not speak at all to the potential to kill these trees by cutting their root systems. Nor does it address the other environmental and cultural ramifications of such serious harm to these trees. This is a potentially significant environmental impact, which is neither adequately analyzed nor disclosed. Such outcome-oriented

The DEIR opines that the magnitude of compaction on these ancient trees will not substantially increase from what presently exists. What this glib conclusion ignores is that however remarkable it may be, the current relationship of road to ancient tree groves is in balance – the trees are healthy and not dying as a consequence of road adjacency. The DEIR does not analyze how the effect of cutting roots, and placing spoils and fill on root systems, and bringing the road closer to some trees will alter that balance. It does not bother to deal with this fundamental issue.

The other proposed mitigation amounts directly related to the structural root zone impacts to this:

- *excavating by hand, but with the caveat that mechanized equipment may be used with permission*
- *use of an air spade while doing excavation*
- *cutting roots less than 2 inches with a sharp instrument*
- *new pavement will be Cement Treated Permeable Base to provide greater porosity and minimize compaction.*
- *use of a brow log for ares where fill will be placed next to trunks of redwoods which are greater than three feet in diameter.*

None of these deal directly with the imperative to not cut roots, and to not compact the root systems. These are all measures which are not documented as capable of ensuring the long term safety of these trees. 25

Lack of consideration of viable alternatives.

The DEIR considers only the project and the no action alternative. By refusing to consider other, potentially lower-impact means to its chosen end, CalTrans has essentially predetermined the result of its CEQA and NEPA analysis. The consideration of alternatives is the heart of modern environmental analysis, and is necessary in order to insure that the agency has taken the required "hard look" at its proposed action and potential impacts. 26

Cumulative Impacts

The DEIR fails to mention the proposed Marina Center development within the City of Eureka, currently under review through circulation of its DEIR. It is relevant because that project states that it is being designed to accommodate STAA trucks. Is that project or its applicant driving this project, or had any influence on the manner in which this project is being forced? We believe the projects are related and Caltrans must evaluate the effects of increased STAA road traffic to accommodate the big box stores contemplated by the Marina Center development. The DEIR also fails to discuss the Humboldt Bay Harbor District plans to increase container shipping in the port, which will depend upon increased truck traffic down highway 101. 27

Significant Impacts and Analysis

The DEIR fails to mention the Richardson Grove State Park General Development Plan in its discussion of consistency with planning documents. All California State Parks must have general plans before permanent facilities can be provided, and once adopted, the plan is direct long-term management of the Park. The Richardson Grove General Development Plan was adopted in October 1956, according to the State Parks website, which provides a copy of the two-page plan. That plan shows a "proposed highway 101" as a bypass around the Park. While EPIC takes no position on such an alternative in the context of the proposed project, the Caltrans proposal is not consistent with the Park's management plan. The DEIR fails to address this issue. 28

EPIC found thee Layout Maps difficult to read, and incomplete. The legend on the first map does not include all the features that are inserted on maps which follow, such as on 7, 14-17, 19 and 20 have some orange features that are not defined. The legend refers to "existing hydraulics." Hydraulics is the study of water, yet it appears what is being referenced is pipes. The"proposed edge of pavement" light blue line is practically invisible on most of the pages, which further prevents the reader from understanding what is being proposed and based on what criteria. On sheet 13, it is unclear precisely where the modification of berm will occur - as the map does not precisely pinpoint the modification as is shown on other maps using arrows. There are yellow lines on some of the pages, such as on 14-16, yet the legend does not indicate what those represent. The proposed retaining wall does not appear to be depicted on the sheets for the area where it is proposed. And the reader should not have to see how contours are labeled to determine cut and fill. The designs should show the limit of cut slope and the limit of fill slope. The contours on the maps are not well labeled. 29

Nor do the maps show any proposed transfer of easements from State Parks to Caltrans. This is part of the proposed project and it is not disclosed for review. And there is no analysis of what effects the transfer of easements and/or right-of-way to Caltrans will have on the Richardson Grove State Park. By failing to provide this data and analysis, Caltrans is segmenting the analysis of this project, which is not permissible under CEQA and NEPA. 30

The DEIR states that "[f]loristic surveys were conducted in April and July 2007 (Appendix G)." (DEIR at p. 95.) Appendix G simply provides a list of trees, shrubs,

ferns and relatives, grasses and relatives, and herbs. There is no documentation of how this survey was conducted, who conducted it, and under what authority. Did State Parks participate in this survey, or authorize it? In order for the survey to be credible, it had to follow proper protocol. In the absence of any information as to how it was conducted, it is impossible to assess its validity. Moreover, since the area of the survey is on State Park land, at a minimum State Parks should have been involved, either by allowing the survey to occur, guiding it to ensure no harm to special species, and/or contributing to it given its particular and specialized knowledge and experience with the ecology and environment. 31

The mitigation ratio for disturbing habitat is not adequate. A significantly greater amount of habitat is being disturbed and impacted than is being replaced or mitigated. Replacing mature trees, no matter their size, with seedlings, does not provide a 1 to 1 ratio of mitigation, because there will be a 5 to 20 year temporal separation from the time of the impact to the time of actual mitigation. This is not accounted for, nor is this impact adequately evaluated. 32

It appears that CalTrans intends to excavate soils that contains hazardous lead, and keep, reuse it or dispose of it onsite, so as to avoid compliance with hazardous waste laws. This will also impact the overall redwood ecology and its health, yet the DEIR fails to even acknowledge the potential for heavier soils smothering tree systems. 33

The Biological Assessment notes the potential for impact to marbled murrelets and northern spotted owl. It does not adequately consider the best available scientific information for both species, which would indicate that both species are in serious decline, and that the key federal frameworks for the species' conservation and recovery, having been seriously damaged by the George W. Bush administration, may no longer provide an adequate set of measures preventing continuing jeopardy to both species. 34

The DEIR/EA Does Not Adequately Support a Finding of No Significant Impact; an EIS is required.

Given the potentially significant impacts noted above, and in the comment letters submitted by the Intertribal Sinkyone Wilderness Council, Bruce Campbell, and others, the DEIR/EA fails to provide a level of analysis and disclosure necessary to support a finding of no significant impact. Therefore, an EIS is required. Similarly, because potentially significant impacts go unaddressed in the document, adequate mitigations may not be prescribed. 35

Conclusion

As noted, the DEIR fails to make the case that the proposed project is necessary; both the document and external indicia indicate that the project has been brought forward in the CalTrans process much more rapidly than would normally be the case. The fact that the DEIR does not discuss or provide a reasoned argument for this acceleration, nor discuss the potential consequences of this acceleration, is an additional reason that the document must be rewritten and recirculated.

The existing balance within Richardson Grove is fundamental to maintaining one of the most extraordinary places, not only within California, but on Earth. CalTrans must undertake any modification to this balance with the utmost caution. This DEIR appears instead to offer a hastily assembled series of justifications for a decision already made. Such a process makes a mockery of the commitments that the people of California made in CEQA, and the people of the United States in NEPA, to ensuring that public agencies take a 'hard look' at decisions with potentially significant environmental impacts.

Sincerely,

/s/

Scott Greacen
Executive Director

enc.

List of enclosures for Richardson Grove Draft EIR

CalTrans Deputy Directive "Accomodating Non-Motorized Travel" 3-26-01
CalTrans Truck Route Classifications
CalTrans Truck Networks for California State Highways District 1
Corridor Management Plan for Route 101, 12/29/06
"California Department of Transportation OTM22131 Table B Accident Reports.
California Highway Patrol, *United States Highway 101 Over-Length Vehicle Study Report to Legislature*, August 2005, excerpts.
Richardson Grove State Park Brochure.
Coast Redwood: A Natural and Cultural History, Ed. by John Evarts and Marjorie Popper, Cachuma Press 2001, p. *, excerpts.
Eifert, Larry, *The Distinctive Qualities of Redwoods*, Humboldt Redwoods Interpretive Association 1998, p. 18, excerpts.
Coder, Dr. Kim D., *Soil Compaction Impacts on Tree Roots*, University of Georgia 2000.
Johnston, Verna R., *California Forests and Woodlands, A Natural History* University of California Press 1994, p. 16, excerpts.
Hewes, Jeremy Joan, *Redwoods, The World's Largest Trees*, Gallery Books 1984, p. 12, excerpts.
Richardson Grove State Park, General Development Plan, October 1956.

1. The comment period for the DEIR/EA was extended to March 12, 2009.
2. STAA defines a truck standard but it does not define prescriptive highway improvement standards. Standard design practice is to check the proposed roadway design and, where necessary, use truck turning templates specific to the type of truck needing accommodation. For this project, due to the number of curves, a software package "Autoturn" that models a truck's turning sweep was employed to identify where the deficiencies were that would cause off-tracking, as well as to ensure that the proposed geometric modifications would be sufficient to allow STAA trucks to traverse the curves without off-tracking. The proposed project would not bring Route 101 up to current design standards for the following areas: minimum design speed and curve radii; shoulder width; minimum superelevation rate; stopping sight distance; minimum distance to fixed object; and corner sight distance. Design exceptions would need to be approved for these deficiencies.
3. As stated above, the proposed project would not bring Route 101 up to current design standards in several areas and the project would require obtaining design exceptions in these areas mentioned above.
4. The plans provided in the Appendix are preliminary design plans and that is the reason they do not include an engineering stamp. Final design plans are typically developed after the environmental documents have been approved so that any design modifications resulting from the environmental review of the project can be incorporated into the final design. The computer software that was used to develop the design for the project is "Autoturn."
5. US Route 101 in Humboldt County can accommodate STAA vehicles with the exception of areas found within the project limits that are proposed for improvement in this project.
6. At the time the 2006 Corridor Management Plan for Route 101 was developed, it was not known that improvements to Route 101 that would enable the STAA restriction to be lifted were possible without either bypassing Richardson Grove State Park or removing several old growth redwoods, neither of which was deemed feasible. The reason the proposed project area is not identified as a segment which doesn't meet the current route concept is that the route concept was downgraded from the four lane expressway/freeway which is the concept for a majority of the corridor, to a two lane conventional highway. The project is not listed in the STIP as this kind of operational improvement project is not funded via the STIP.
7. The proposed project is not listed in the STIP, but it is included in the 2008 State Highway Operation and Protection Plan (SHOPP) as a long lead time project. The project was subsequently amended into the 2008 SHOPP and the 2009 federal Statewide Improvement Program (FSTIP) to program the funding.
8. All requisite environmental studies have been conducted.
9. The DEIR/EA was submitted to the State Clearinghouse and the public review period was extended to March 12, 2009.
10. The decision to make the selected alternative occurs after consideration of agency and public comments. The Statement of Overriding Considerations and Finding of

No Significant Impact, if appropriate, are prepared with the final environmental document, not the draft. CEQA will be complied with.

11. While construction of the proposed project should help to slightly improve safety with the shoulder widening, superelevation improvements, and curve corrections, the project is not identified as a safety project, but rather an operational improvement project with increased safety being an added benefit.
12. The collision data is dynamic as the number and types of collisions vary from month to month and year to year. From the information you provided in your letter, it is unclear what five year period was being shown. The collision data provided in the DEIR/EA was not limited to just trucks with the exception of the information provided from the "Route 101 Safety and Commerce Study."
13. STAA trucks, with a few exceptions, are currently restricted from traversing through Richardson Grove. The current roadway alignment has been analyzed for STAA use and the results indicate that STAA vehicles would likely off track.
14. The project was initiated well before the Gallo Report was commissioned. Improvements at Richardson Grove to facilitate goods movement is an objective identified in the County's Regional Transportation Plan. The findings and conclusions in Dr. Gallo's study were used as a broad brush look at the possible economic effects resulting from the project.
15. The project is not expected to result in higher speeds or substantially more truck traffic. In fact, the speed limit was reduced to 35 mph in this area in fall, 2008. The preferred alternative does provide some improvement for non-motorized travelers. The proposed project includes widening shoulders to four feet for improved bicycle and pedestrian access north of the park. Within the park, minimal shoulder widening (up to 2 feet) would occur where doing so is not precluded by the presence of large trees abutting the highway. Additional "share the road" bicycle signs will be installed as part of the preferred alternative.
16. California Streets and Highway Code, Section 887.8 does not provide or mandate that Caltrans construct non-motorized transportation facilities as part of a transportation project. The Caltrans Deputy Directive policy requires that providing for non-motorized travelers be fully considered when planning and constructing a project. It also states that providing such access should be in balance with community goals, plans, and values. These values are considered to include economic, social, and environmental effects such as the elimination or minimization of adverse effects on the environment, public services, aesthetic features, and the community at large. With the proposed project, providing for non-motorized access is problematic through the park since the shoulders of US Route 101 cannot be widened sufficiently without the removal of several old growth redwoods. Outside the park boundaries, the project does provide four foot shoulders for both northbound and southbound lanes to better accommodate pedestrians and bicyclists. To construct a bike/pedestrian path separate from the existing highway in the park would have to be done on land under the jurisdiction of State Parks, or would involve a longer and very steep detour of Route 101, which would likely make its construction not feasible. State Parks, as the agency controlling the management and approval of the type and location of any new facility within its jurisdiction, is the most appropriate lead agency for planning such a facility.

The project would not result in increasing the capacity of the highway, nor would it result in an appreciable increase in traffic safety. The project is not classified as a safety project, but rather an operational improvement project. The slightly improved safety resulting from the project is a byproduct of the shoulder widening, curve corrections, and superelevation improvements.

17. *See General Response #14* explaining why the project not expected to result in a substantial increase in truck traffic.
18. The proposed project would not be increasing the capacity of the highway and is not considered as a safety project where the safety conditions would be substantially improved. The safety improvements noted in the document would be minor and are a byproduct of improvements made to allow STAA vehicles, namely the shoulder widening, superelevation improvements, and curve corrections which would result in the roadway having incremental increases in distances to fixed objects and improvements in stopping sight distance. These improvements would not result in increased risk to bicyclists.
19. *See General Response #5* regarding the requirements of the Caltrans policy about including for non-motorized access.
20. Constructing a bike/pedestrian path separate from the existing highway would have to be done on land under the jurisdiction of State Parks, thus the appropriate lead agency for such a project would be State Parks. When such improvements are proposed, appropriate analysis and environmental review would be conducted at that time.
21. The environmental document acknowledges that the project would affect the trees. There are several special conditions that have been incorporated into the project that would minimize the construction impacts such as using hand tools or a pneumatic excavator (such as an air spade) in the structural root zone of redwoods thirty inches in diameter or greater within the park; providing irrigation for redwoods affected by excavation during the summer, and incorporating the roots into the structural section of the roadway rather than cutting the roots. The Caltrans certified arborist has determined that the project, with the special conditions in place, would not substantially impact the root vitality of the trees. The registered consulting arborist contracted by Save the Redwoods League, Dennis Yniguez, also stated that, "the existing root systems of old growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." Mr. Yniguez concludes, "My professional opinion is that the highway alterations, as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of old growth redwoods adjacent to the highway."
22. *See General Response #*3 regarding information on impacts to the trees.
23. Additional information showing amounts of cut and fill within the structural root zone of redwoods thirty inches in diameter or greater in the park has been added in the FEIR in section 2.3.1.
24. Providing the corvid proof equipment in the State Park is actually a condition listed in the Biological Opinion prepared by the US Fish and Wildlife Service. Several special conditions for tree protection have been incorporated into the plans and specifications for the project. Including irrigation, using pneumatic excavators or

hand tools adjacent to redwoods thirty inches in diameter or greater, using Cement Treated Permeable Base (CTPB) which reduces the amount needed for excavation and reduces compaction requirements, incorporating roots into the structural section rather than cutting them, and having arborists on site during construction to ensure the minimization measures are complied with in the park.

25. The intent of using the pneumatic excavator for excavation in the structural root zone of the old growth redwoods is to minimize stress to the tree roots and to enable incorporation of the roots into the structural section of the roadway rather than cutting the roots.
26. Numerous alternatives were considered including several signalization options as well as highway improvement alternatives on new alignments as well as on the existing alignment, warning system alternatives, and operational alternatives such as time of day truck restrictions. All these alternative were withdrawn from further consideration because they could not feasibly attain most of the basic objectives of the project while avoiding or substantially lessening most of the significant effects resulting from implementation.
27. The cumulative impact section was revised in the FEIR. Three areas were determined to have a potential for substantial cumulative effects: impacts to listed threatened and endangered species; impacts to old growth redwoods; and impacts to State Parks. The Marina Center would not be directly affecting Northern Spotted Owls or Marbled Murrelets; State Parks; or old growth redwoods. Numerous developments within Eureka can accommodate STAA vehicles; that, in and of itself, doesn't make a direct tie to the proposed project.
28. The proposed project is on the existing US Route 101 alignment which is portrayed on the 1956 General Development Plan. The FEIR does state that the Park development plan portrays a "proposed highway alignment" west of the existing highway and campgrounds.
29. New layout maps are provided in the FEIR.
30. The layout maps show the new proposed right of way. Some of the area proposed to be transferred to the highway easement held by Caltrans includes the areas of proposed cut where some trees would be removed. Areas beyond the actual cut would remain in natural vegetation and be within the "operating right of way" of the highway. In other words, the right of way of the highway extends beyond the edge of pavement to include a buffer area immediately adjacent to the roadway to allow maintenance activities to take place to maintain slopes and culverts.
31. Caltrans biologists and botanists conducted the floristic surveys. More information on the floristic surveys is contained in the Natural Environment Study included in the appendices.
32. What is being mitigated on a 1:1 ratio is the acreage of land that is being transferred between Caltrans and State Parks. The trees to be removed as a result of the project are being mitigated at about a 2:1 ratio. It should be noted that over thirty percent of the trees proposed to be removed are eight inches in diameter or less. In addition, nearly half of the trees to be removed are tan oaks. The removal of invasives and the weeding of the areas to be revegetated will also provide an enhancement of the natural communities.

33. Reusing soil on site is a common practice. Most of the excavation takes place on previous cut banks which would have very low levels of aerially deposited lead. Other soil excavated would contain the duff layer which is also important to retain and replace. The reused soil would not be substantially heavier.
34. The project incorporates some of the conservation measures identified by the US Fish and Wildlife Service in their Biological Opinion. The Biological Opinion determined that the proposed project would not result in jeopardy to the Northern Spotted Owl or Marbled Murrelet.
35. Caltrans has prepared an Environmental Assessment demonstrating that the project will not significantly affect the human environment. Therefore, an EIS is not required.

Thursday, March 12, 2009

Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501

via email: deborah_harmon@dot.ca.gov

EPIC

RE: Supplemental Comments: Richardson Grove Operational Improvement Project Draft Environmental Impact Report/Environmental Assessment and Programmatic Section 4 (f) Evaluation

Dear Ms. Harmon:

This letter is submitted on behalf of the Environmental Protection Information Center (EPIC). It supplements our letter of January 30th, 2009. Please do notify us, at the address below, of any decisions or additional environmental review related to this project.

As noted in our previous comments, EPIC does not agree that the proposed widening of Highway 101 through Richardson Grove State Park is necessary. Nor do we agree that alternative means of providing STAA truck access along Highway 101 are infeasible. In view of the feasible but unexplored alternatives, and of the substantial risks to the significant resources of Richardson Grove State Park, we urge Caltrans to choose the No Build alternative, or at least to undertake additional analysis of alternative means to provide STAA access through this area. In any event, the DEIR-EA fails to adequately analyze and disclose the potential impacts of the proposed action; the draft document must be supplemented and recirculated to meet the requirements of CEQA and NEPA. 1

The DEIR Fails to Analyze and Disclose the Potentially Significant Cumulative Impacts of Unlimited STAA Truck Access Through Richardson Grove

As previously noted, the DEIR fails to adequately analyze and disclose the potentially significant cumulative effects of the proposed action. The DEIR considers only a list of Caltrans projects within five miles -- a relatively short distance -- of the proposed project. Particularly in view of the regional scope of the DEIR's discussion of the need for, and benefits of, STAA truck access, the final EIR should consider potential cumulative effects on a similar scale. 2

The DEIR states (p 119) that "(w)ith the incorporation of minimization and mitigation measures, it has been determined that the proposed project would not result in significant cumulative impacts." Such a finding may not properly be made in the absence of an adequate discussion of potential cumulative effects.

One aspect of cumulative impacts that must be considered is the potential for dramatically increased use of Highway 101 by trucks seeking an alternate route to Interstate 5. Under the present configuration of highways serving the northwest coast of California, STAA trucks may legally access the population centers of Humboldt and Del Norte counties via Highway 299, Highway 199, and Highway 101 north of Richardson Grove. 3

In part because STAA-length trucks are restricted in their passage through Richardson Grove, Highway 101 does not provide a viable alternative to Interstate 5 for trucks traveling between central California and southern Oregon. The DEIR states that Richardson Grove is the only remaining area where STAA passage is restricted along Highway 101 between the Oregon border and the San Francisco Bay area. 4

If the proposed action is implemented as described in the DEIR, Highway 101 and Highway 199 may become a viable alternative route in the event of closures of Interstate 5. Such weather-related closures are not uncommon during the winter, particularly in the area near Mt. Shasta and Dunsmuir, California; given the importance of meeting schedules for truckers, it is not at all unlikely that some drivers may choose to use Highway 101 as an alternate route during winter closures of Interstate 5. 5

The DEIR fails to analyze or disclose any potential impacts from increased truck traffic, either in the Richardson Grove area, or with respect to the larger region, that might result from the proposed action. Given the high likelihood of such 'voluntary diversions,' particularly during periods when winter storms will also be affecting the coast, it is imperative that the final EIR fully analyze and disclose the potentially significant, cumulatively considerable, impacts of such periods of high intensity truck use. Such impacts are likely to include not only increased risks to public safety, including other traffic, but also to the roadways and other public resources of the northwest coast. 6

Please note as well that the potential delays which Caltrans identifies as among the factors that would make it infeasible to signalize the Richardson Grove area, or to create 'passage windows' that would allow STAA trucks to pass through an unmodified Grove area during the night, for example, could help to deter such intensive diversions of truck traffic from Interstate 5 to Highway 101 without significant impact to scheduled local traffic. The final EIR should consider, analyze, and disclose the potential benefits to the northwest coast of restricted STAA access. 7

Not All Trucks Will Be Longer STAA Trucks

The DEIR's analysis of the benefits and impacts of the proposed action is premised in part on a poorly founded set of assumptions about future truck traffic. In brief, the idea that nearly all trucks using the Highway 101 corridor in the future are going to be STAA trucks is simply not well founded. As the attached report from the Federal Highway Administration (available at www.fhwa.dot.gov/reports/tswstudy/Vol2-Chapter3.pdf) 8

details, the nation's trucking fleet will continue to include a wide variety of vehicles, including both the longer STAA trucks, as well as shorter trucks. Given the mix of freight passing to and from the northwest coast, it seems quite likely that this region will actually require substantially fewer large STAA trucks than other areas.

Much of the DEIR's analysis of the alleged economic benefits of the proposed action (ie, "this improvement in goods movement will help area businesses stay competitive in the marketplace," p 1) fails to capture the complexity of the present and likely future mix of truck types, and appears to improperly bias the analysis of impacts and benefits in favor of the proposed action. Please supplement the EIR with an analysis of future truck use that reflects the actual mix at present and likely in the future. 9

The Project Fails to Comply with Section 4(f)

The DEIR states (p 132) that:

> The programmatic agreement for the Section 4(f) Evaluation and Approval for Federally-aided Highway Projects with Minor Involvements with Public Parks, Recreation Lands, and Wildlife and Waterfowl Refuges (December 23, 1986) applies to the Richardson Grove Operational Improvement project <u>because there are no feasible and prudent alternatives to improving the existing alignment and because all possible planning to minimize harm resulting from such use has been incorporated into the project.</u> This evaluation is made pursuant to Section 4(f) of the Department of Transportation Act of 1966, 49 U.S. Code 202 and Section 18(a) of the Federal-Aid Highway Act of 1968, 23 U.S. Code 138. (emphasis added)

This finding of compliance with Section 4(f), aka 49 USC § 303, rests on the premise, underscored above, that there are no feasible and prudent alternatives, and that all possible planning to minimize harm has been done. However, there may be feasible and prudent alternatives, including not undertaking the proposed widening of Highway 101.

As noted in various comments, including our own comments of Jan. 30, many observers remain unconvinced by Caltrans' superficial analysis, and casual dismissal, of reasonable alternatives to the proposed action which would provide for STAA access. Again, we note that the Assembly has provided exemptions for certain STAA trucks which do not meet the present restrictions; that such vehicles are now passing through Grove without incident suggests that the analysis of the need for the proposed action is somewhat biased by Caltrans' perspective. 10

As well, just to note one example of a pattern of one-sided analysis of the cost of alternatives, the DEIR dismisses various possible alternative approaches to providing STAA access through the Grove in part on the basis that flaggers might be required at times (ie if signals were to break down). At one point, the DEIR states (p 23) that "(p)roviding flaggers negates the lower cost of using a long-term nighttime only signal." However, no actual analysis of costs is provided. 11

Given that the proposed action is projected to cost in excess of five million dollars, even if providing flaggers would cost fifty thousand dollars a year, it would take another century before the cost of flaggers would approach the cost of the proposed action. The final EIR should provide an 'apples to apples' analysis of alternatives and their potential costs.

Thank you for your consideration of these comments.

Sincerely,

/s/
Scott Greacen
Executive Director

Attachment: Chapter 3, Truck Fleet and Operations

1. Numerous alternatives were considered including several signalization options as well as highway improvement alternatives on new alignments as well as on the existing alignment, warning system alternatives, and operational alternatives such as time of day truck restrictions. All these alternative were withdrawn from further consideration because they could not feasibly attain most of the basic objectives of the project while avoiding or substantially lessening most of the significant effects resulting from implementation. The reasons why the alternatives were withdrawn from further consideration are discussed in Chapter 1 of the document.
2. The cumulative impact section was revised in the FEIR. Three areas were determined to have a potential for substantial cumulative effects: impacts to listed threatened and endangered species; impacts to old growth redwoods; and impacts to State Parks.
3. *See General Response #*14 regarding the potential for the project to result in increased truck traffic on Route 101.
4. US Route 101 is not a viable alternative for Interstate 5 because it is not more economical than I-5 for most major population centers. Truck traffic diversions from I-5 would depend on Route 101 being economically feasible either by decreasing the fuel consumption and/or travel times. Unless the destination was Humboldt or Del Norte County, diverting to US Route 101 would not decrease fuel consumption or travel time for accessing major coastal population centers from California to Washington.
5. While some drivers might divert off I-5 due to weather closures, it is not likely that a substantial number would divert to Route 101. Diverting to US Route 101 would likely take longer than the weather closure would last. In addition, the fuel consumption would be much greater due to the detour to US Route 101.
6. It is not anticipated that truck traffic would substantially increase. During winter weather, US Route 101 is also subject to closures due to slides, flooding, and snow or icy conditions on the highway. In addition, the weather closures on I-5 are not likely to last longer than detouring to US Route 101 would.
7. First, it has been determined that the project is highly unlikely to result in large volumes of trucks to be diverted from the major trucking route on I-5. Second, there are issues with signalizing at the grove that do, in fact, affect local traffic. These impacts are identified in Chapter 1 in the section discussing alternatives withdrawn from further consideration.
8. Caltrans concurs that a range of vehicles and sizes will continue to utilize US Route 101 and that the numbers of trucks is less than in many other areas of greater population. However, that doesn't negate the fact that economics is resulting in STAA- sized trucks being the industry standard. In addition, the 2008 Humboldt County Regional Transportation Plan states that truck length restrictions and backhaul opportunities in Humboldt County are preventing businesses from being profitable and competitive with other similar business along the west coast.
9. This section of US Route 101 will continue to support a mix of vehicle types. The County's Regional Transportation Plan identifies the STAA restriction at Richardson Grove as resulting in increased shipping costs for both imported and

exported goods. Implementing the proposed project would fulfill one of the objectives identified in the County's Regional Transportation Plan to support goods movement.

10. A limited numbers of STAA vehicles are currently granted an exemption from the STAA restriction at Richardson Grove. However, the current roadway geometrics are such that STAA vehicles off-track either over the center line into the opposing lane or onto the shoulders. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. The proposed project would correct the known geometric deficiencies and allow the restriction for STAA trucks to be lifted with no special permits being required.
11. The costs are not the sole reason the signalization alternative was deemed not feasible. Other issues and concerns regarding signals are identified in Section 1.4.2 of the document.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:08 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: comments RG

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:08 PM -----

Nadananda
<nada@eelriver.org>
03/11/2009 05:13 PM

To Kim_Floyd@dot.ca.gov
cc
Subject comments RG

Dear Kim, I guess I am just hitting the wire. I have been in meetings all day, much longer than anticipated. Please find my comments attached. It has been a difficult soul searching process.

CalTrans dEIR comments.doc

For our National Wild and Scenic Eel River,

Nadananda
Executive Director
Friends of the Eel River
707 923-2146 main office
cell: 415 717-9052
nada@eelriver.org
www.eelriver.org

From the Desk of
Nadananda
Founder
Friends of the Eel River

March 7, 2009

Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501

"A redwood does not have a taproot; it sends out shallow, lateral roots that usually reach no deeper than about 12 feet. The major roots are about one inch in diameter or larger, and they may spread outward more than 50 feet in every direction. The root system also consists of many small, fibrous roots that may form a dense mat in the top three feet of soil. Redwood roots often interlock with the roots of adjacent trees, forming extensive networks that stabilize the tree and help keep it upright during fierce winds or pounding floods."
Giants: The Colossal Trees of Pacific North America, by Audrey Grescoe, with references (but not tied specifically to text). Roberts Rinehart Pub. 1997 pg 21.

Dear Kim Floyd and Deborah Harmon,
California Dept. of Transportation (CalTrans)

I have attending several of your meetings and several times have read the draft EIR for the proposed widening of Highway 101 as it travels through Richardson Grove and listened or read many proposed questions and comments that have been making the rounds via email.

Because the membership of Friends of the Eel River is very large with members taking stands on both sides of this issue I realized that I can not speak for them all, I can only address this proposal as an individual.

I appreciate the extension for comments for I wrestled long and hard with the pros and cons, of what is being proposed for Richardson Grove. Questioning and researching and questioning again, realizing you really believe you can cut the roots of the shallow web that holds the redwoods up right, interfering with the trees support system. It is not without consequence. Holding the position that this act alone would not hurt the ancient redwoods reveals your lack of knowledge of these magnificent trees and what they need to continue to survive.

1

Over the year our members have talked with me about their concerns about this assault on this our most southern Redwood Grove in Humboldt county, saved for generations to come. Held with such esteem it was named for the first officer killed in World War I. Is nothing sacred any more? The paper you give us to read reveals the slight of hand, the

imprint of big business to bring into this area trucks that can only service the largest stores, or bringing in corn raised beef to be finished off with Humboldt grass, sold as grass fed. The lies spin their long tenacles out to rape the earth again. It is once again the populace who pay for the profits of the few. Bigger is not necessarily better, it is usually too big. Slowing down while driving through the grove is working. I have followed the trucks to observe the problems the larger trucks are having and what I see is that the slower they travel the easier it is for them stay on their side of the road. 2 3

I am having a very hard time getting beyond the statements or discussion points around the cutting of the root systems of old growth trees along side the road. It is so incomprehensible to read the DEIR statements that there will be no harm to these old growth trees it leaves me in utter disbelief that there is any true science done in the DEIR and that probably a large percentage of the report may not be factual. I am left with the impression that who ever your scientists are who did these studies may be book scientist in name only with no practical experience or on the ground observation. This DEIR has so many flaws and misstatements and contradictions it begs the questions of why this really is being proposed, who really wants it and what are the politics driving this now seemingly unrealistic proposal? 4

Please explain why CalTrans should not be compelled to study the impacts of this proposed project on compression of interconnected redwood root systems and effects of roots being cut *before* proceeding with a DEIR, in order to allow the public to make informed decisions based on sound biological facts, rather than confusing, contradictory, and unsupported assertions? 5

I wonder what is else is being spun. Is it true that the large trucks are really necessary to service only a relatively few businesses? That these large trucks will not handle the turn radius for smaller city streets so deliveries will be limited? Why was the early process so secretative in the beginning, with input so limited? Or is this the way CalTrans does on going business? 6 7

This past week I followed four trucks carrying extra long pilings that appeared to be about the size of STAA trucks for what ever new project PG&E is doing at their power plant at the south-end of Eureka. I came upon the first truck in Leggett where Highway 1 joins Highway 101 heading north. After a moments annoyance I realized I was being given the opportunity to observe for a significant distance how this extra long truck would handle the two lanes going thru the redwoods from that point all the way through Richardson Grove. After a bit it became obvious that the speed of the truck related directly to its ability to stay with in the outline of the lane being traveled. Tracking was easy to observe especially on curves. This truck then pulled into the Peg House across from Standish-Hickey Park so I stopped there too, briefly but with enough time to over hear a discussion with another driver about what was being carried and to where. As I got back on the road three more trucks carrying the same kind of long pilings passed me so I was able to resume my travels right behind them and watch from the Peg House through Richardson Grove how they maneuvered the two lane road through several pinch points. When they traveled at 35 miles per hour there was not problem with tracking. When the 8

road got to straighter and wider the trucks traveled at 40+mph and had trouble tracking. It is not rocket science to observe that it was speed and driver skill that caused tracking problems. When all three went through the grove the faster lead truck had trouble with tracking, but the slower 2nd and 3rd trucks had no trouble tracking.

I do not claim to be a scientist, but I am an open-minded observer. So I ask you after a year plus of studying this proposal why remove the opportunity for long distance truck drivers the few moments to traverse this small one mile in length gateway grove to slow down, observe the grace of the moment to be in an ancient forest and then resume their travels? How can a couple of pallets more be so much of a savings to a few businesses to justify the spending of $5 to $6 million dollars being proposed for this project? And just how does the local general population benefit if more products are moved about by a few local businesses to the north? Just how many locals are really employed? Or are these labors from else where, even another country? And just where is there anything real about increased safety if there is no accommodation for bicyclist or hikers through the grove, or do they not count in your equation of business needs?

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It is sad, but obvious, that there is little help for southern Humboldt businesses with this widening in a native site, and supposedly helps but a handful of northern businesses. All one has to do is travel Highway 101 from Ukiah north to see that CalTrans does not always know or understand the geology of this area as fully as it puts on. Just look at the section of the highway just south of Leggett at Cummings and along the grade from the Ukiah Valley to Willits. It is with trepidation I watch the by pass at Confusion Hill, not just because of CalTrans design, but the actual companies hired by low bid to do the job. CalTrans may assert they would do no harm, but how can we trust the low bidder construction company with employees who have little to no understanding of what they are doing? If you truly understand how the Redwoods respond to root disturbance then you know that you will be introducing an even more deadly problem; that of the very serious impacts of falling Redwood branches. Bottom line for me personally is your seeming lack of understanding the needs of ancient Redwoods and how they will respond to your actions that I must speak in protest of this proposed widening of Highway 101 through Richardson Grove. Yes I love these trees, for they are what supplies the air we breath and play a major role in the water we drink. I have to honor that and speak up for the trees.

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I hope you will hear the voices speaking up against this project. It would be a great irony, worth an insurmountable amount of PR, to note that Headwater Forest Funds were used to design this project that many of the same people who fought for Headwaters Forest will climb the redwoods to protect them.

16

Respectfully yours,
Nadananda
Founder, Friends of the Eel River

1. *See General Response #3* regarding minimization measures for impacts to the trees.
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction negatively impacts their business. These businesses represent a cross section of businesses including such diverse interests as equipment and clothing manufacturing firms, local cheese producer, seafood exporter, local brewery, construction industry representatives, dairy and ranching representatives, lumber product representatives, racing enthusiasts who transport their vehicles, local auto dealerships, and performing arts representatives using STAA vehicles to transport their sets. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The 2008 Humboldt County Regional Transportation Plan (RTP) also recognizes the importance of STAA access for goods movement and one of the objectives in the RTP is to eliminate the STAA restriction at Richardson Grove.
3. *See General Response #8* regarding the alternative of reducing the speed limit to 25 mph.
4. Caltrans acknowledges that the proposed project would impact old growth redwoods, but does not concur that those impacts would result in a substantial adverse effect. At many of the old growth redwoods affected by construction, the roots would be incorporated into the structural section; they would not be severed. Darin Sullivan, a Caltrans certified arborist and Dennis Yniguez, a registered consulting arborist contracted by Save the Redwoods League have both determined that the proposed construction would not significantly affect the roots of old growth redwoods with the minimization measures in place. The deepest excavation proposed near the old growth trees in the park is two feet deep, and 25 percent of the redwoods thirty inches in diameter or greater in the park would be impacted by excavation of six inches or less.
5. As mentioned above, the project's impacts on the trees was evaluated by the Caltrans certified arborist as well as the independent arborist contracted by Save the Redwoods League. The latter states, "the existing root systems of old growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." Both of these arborists concluded that the project impacts on tree roots of the old growth redwoods would not be substantial.
6. Lifting the STAA restriction at Richardson Grove is an objective identified in the County's Regional Transportation Plan to support goods movement. Existing STAA routes on local roads would be required to be compliant with standards accommodating STAA vehicles. It is at the local's discretion to propose STAA routes on the local road system.
7. The current project grew out of a joint effort by the County and Caltrans to explore options into providing for goods movement in 2006. This effort was a result of the concerns that arose with the STAA restriction on Route 101. A

Technical Advisory Group was convened for the purpose of providing input into the study to explore options as well as selecting a consultant to perform the study. A Stakeholders Group was also formed as part of this effort to provide input on various aspects of the study to be performed. These groups included representatives from County governments, State and US legislators, and representatives from various special interest groups and environmental organizations. In April 2007, as part of the preliminary research effort prior to contracting a consultant to initiate the study, it was determined that improvements on the existing alignment that would allow the STAA restriction to be lifted were possible. The first public open house to announce the initiation of the current project was held a few months later. None of these efforts were done in secret.

8. From the information provided, it is not possible to ascertain if the vehicles you observed would be classified as STAA trucks. Certainly slower speeds are a factor in how well a vehicle traverses the curves. However, as noted above, reduced speed alone is not sufficient to offset the roadway deficiencies that result in off-tracking of STAA vehicles.
9. Again, reducing the speed limit would not correct the existing deficiencies in the roadway geometrics resulting in the STAA restriction at this location. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed.
10. The Regional Transportation Plan notes that truck length restrictions and backhaul opportunities in Humboldt County are preventing businesses from being profitable and competitive with other similar business along the west coast. The Plan also states that the STAA restriction results in increased shipping costs for both imported and exported goods.
11. While the proposed project does not markedly improve the safety for pedestrians and bicyclists through the park, it doesn't worsen the existing situation. The project modifies the curves, provides some minimal shoulders through the park, and increases the amount of superelevation in most of the curves resulting in incremental increases in distances to fixed objects and improvements in stopping sight distances. North of the park, it is proposed to widen the shoulders to provide better access for pedestrians and cyclists.
12. Construction activities would affect Piercy businesses, most likely by traffic delays and queues. Delays resulting from the proposed project are not projected to be any worse than delays experienced elsewhere along two lane State highways and are expected to average from five to ten minutes. Caltrans is working with the affected local businesses to minimize impacts to their operations.
13. The geology in much of this area is unstable. It would be impossible to avoid the unstable areas without substantial and costly detours. In addition, the alignments for many of the current highways were established in the past, i.e., wagon roads which were ultimately paved for the highways. As so much of the area is geologically unstable, it would be cost prohibitive to do preventive or corrective projects to improve the stability for all the roadways. Caltrans deals with the instability when it affects the highway.
14. The protective measures for the trees will be written into the specifications for the construction project. Each of contractor's employees working on the construction

project will be mandated to go through an orientation as to the sensitive resources and the measures that will have to be in place to protect them. In addition, biological monitors will be onsite during construction to ensure the measures are implemented appropriately.

15. *See General Response #13* explaining that the project will not be appreciably widening the highway through the park.
16. No money from Headwaters Forest funds were or will be used to fund this project. There was a proposal to use these funds to help pay for a study to explore options for providing for STAA and multimodal access into Humboldt County. This study was never actually initiated and no funds were spent. Once it was discovered that the existing alignment of Route 101 could accommodate STAA vehicles with minor modifications of the roadway and without taking any old growth trees, it was decided to pursue the proposed project.

InterTribal Sinkyone Wilderness Council

P.O. Box 1523 Ukiah, CA 95482 Phone (707) 468-9500

InterTribal Cultural Conservation for Sinkyone Indian Lands

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January 29, 2009

Deborah Harmon
Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka, CA 95501

Re: Proposed Richardson Grove Operational Improvement Project

Dear Ms. Harmon:

This letter constitutes the InterTribal Sinkyone Wilderness Council's response to Caltrans' Draft Environmental Impact Report (DEIR)/Environmental Assessment and Programmatic Section 4(f) Evaluation for the proposed Richardson Grove Operational Improvement Project.

Founded in 1986, the InterTribal Sinkyone Wilderness Council (Council) is a nonprofit Native land conservation organization comprised of 10 federally recognized California Indian Tribes that retain important cultural, ancestral, and historic ties to the region of Humboldt County within which the proposed project is located. Our peoples have inhabited this region since time immemorial, long before the era when the Grove's now-huge trees were mere seedlings. Native people of this region view the redwood trees of Richardson Grove as sacred, and consider them to be an especially unique and important cultural resource that deserves special protection.

The Council is particularly concerned about the adverse impacts that the Build Alternative would pose to the root systems of the Grove's redwoods and to various other elements of the redwood ecosystem. The Council is strongly opposed to any actions that would threaten the well being of the Grove's redwood trees. 1

The proposed project, as outlined in the DEIR, would result in substantial and adverse impacts to the botanical, avian, wildlife, and other biological and aesthetic values of Richardson Grove State Park and the surrounding environs. 2

The DEIR's argument that the Build Alternative will produce economic benefits to the region is highly speculative. Further, the DEIR incorrectly assumes that these hypothetical economic benefits present sufficient justification for the irreversible environmental damage that would result if the proposed project were undertaken. 3 Because of these insupportable arguments, the DEIR's other numerous weaknesses, and the various reasons stated above, the Council is opposed to the proposed Build Alternative. The most sensible way to address traffic safety problems at this location is to adopt the No Build Alternative along with additional traffic-slowing measures. 4

Sincerely,

Priscilla Hunter

Priscilla Hunter
Chairperson

cc: North Coast Redwoods District, California State Parks
Save-the-Redwoods League
Environmental Protection Information Center
Northcoast Environmental Center

1. *See General Response #3* regarding minimization measures incorporated to protect the trees.
2. *See General Response #4* regarding information about impacts to the park and surrounding area.
3. The environmental document provides information that documents that the Richardson Grove project with the minimization measures in place, will not result in significant impacts.
4. *See General Response #8* for information regarding how reducing the speed limit does not meet the purpose and need for the project.

Deborah Harmon
California Department of Transportation
1656 Union Street
Eureka, California 95501

Dear Ms. Harmon,

The Lost Coast League is an organization with both local and national membership, which seeks to protect the natural resources and public trust values of the north coast of California. At the time of its inception it was instrumental in the protection of the Ki ng Range, and has been active with government agencies and in the courtroom for the last twentyfive years in the defense of our priceless forests and threatened wildlife populations.

We are writing to you in order to comment on the Draft Environmental Report for the Richardson Grove Operational Improvement Project. The League's concerns address the fundamental values alluded to above .However in our meeting to discuss this issue, the overrriding concern of our membership, who travel regularly through the Richardson Grove corridor, was safety. Personal experiences were related, of trucks failing to slow down during their passage through the Grove, of hazardous pedestrian crossing through heavy traffic, such as during the Reggae on the River festival. A friend of one of our members, Malcolm Jones, was killed in the Grove by an off-tracking truck coming from the opposite direction twenty or so years ago

In view of these concerns of our membership we recommend that, instead of widening the corridor to allow passage of larger, less controllable and therefore more dangerous traffic, the California Department of Transportation take measures to slow traffic down during the passage through Richardson Grove. Such measures have been effective in other areas such as the stretch between Eureka and Arcata. Since Richardson Grove is a campground, pedestrians should be afforded the same protections they receive in for example Laytonville or Willetts. Because it is narrow and dark, vehicular traffic needs ample notice, as it approaches the Grove, of the vigilance required of them ahead. 1 2

Humboldt County as a bioregion has been protected from many of the depredations of mass culture which are currently in the forefront of national news.Its coastline is rugged, its weather frequently inclement, its terrain mountainous.As a fortuitous result, we still retain more of the natural wealth of our bioregion than counties located further south. We still have native salmon and steelhead runs, old growth forest , and clean air and water. These elements of the public trust, protected by our physical conditions, are increasing in value as the rest of California grapples with problems related to congestion and development. The Lost Coast League believes that Richardson Grove is one of the

physical features which has allowed for the survival of these elements, It serves as a gateway, impressing upon the visitor some of the marvels of nature, inducing respect and reverence, and dispelling some of the haste and commerciality in which too many of us pass our days. 3

Meanwhile as a reaction to our protected state, in Humboldt County there has been a concentrated effort to become self-sustaining, and therefore more resistant to fluctuations in global conditions. Local industries have developed which employ a scale for which a huge express transportation corridor is not necessary and which can develop in greater harmony with our population if not forced to compete with elements of the global economy functioning on a much larger scale. 4

Industries marketing the traditional products of our local economy such a s beef and lumber are already able and used to driving through Richardson Grove. It is only the kind of expansion requiring much larger trucks such as containers which have inspired the project to widen the road through the Grove. Therefore we believe it is not in Humboldt County's economic or social interests to implement this plan. 5

Please take into considertion the recommendations of the Lost Coast League in making your decision.

Thanking you for the opportunity to comment on the EIR,

Yours truly,

Ellen Taylor

Ellen Taylor, for the Lost Coast League

1. *See General Response #8* for information regarding that reducing the speed limit does not meet the purpose and need for the project.
2. In terms of notifying motorists of the conditions ahead there is already a sign with a flashing beacon facing southbound traffic just before entering the park. There are also signs indicating that the road narrows for northbound traffic. In late 2008, the speed limit for this segment of Route 101 was reduced to 35 mph.
3. After construction, this segment of highway would continue to be a curvilinear two lane conventional highway with little to no shoulders and old growth redwoods abutting the edge of pavement creating the canopy effect. Long term effects to the character of the park resulting from the project would not be substantial.
4. *See General Response #12* regarding the impacts to local businesses.
5. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. The project does not substantially widen the roadway through the park. Rather, up to two foot shoulders are proposed where trees abutting the roadway do not preclude shoulder widening. The major shoulder widening occurs outside the park where four foot shoulders are proposed to better accommodate pedestrians and bicyclists.

NRDC
THE EARTH'S BEST DEFENSE

NATURAL RESOURCES DEFENSE COUNCIL

Via Email and U.S. Mail

March 12, 2009

Deborah Harmon
Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka, CA 95501
Email: deborah_harmon@dot.ca.gov

RE: Richardson Grove Operational Improvement Project Draft Environmental Impact Report/Environmental Assessment and Programmatic Section 4(f) Evaluation, December 2008

Dear Ms. Harmon:

On behalf of the Natural Resources Defense Council ("NRDC") and its more than 1.2 million members and activists, I am writing to comment on the above-referenced Draft Environmental Impact Report/Environmental Assessment ("DEIR/EA") and Programmatic Section 4(f) Evaluation ("Section 4(f) Evaluation") of the California Department of Transportation's ("Caltrans") Richardson Grove Operational Improvement Project.

NRDC's 250,000 members and activists in California care deeply about, and are committed to, California's state parks. Our cherished state parks serve as havens for California's unparalleled natural and cultural resources and, as economic engines for recreation and tourism, generate billions of dollars a year in spending in local communities and support over 100,000 jobs statewide. With the country in the midst of the worst financial crisis in a generation, California can ill afford threats of any kind to such an immensely valuable source of jobs and revenue for the state.

Unfortunately, California's treasured parklands are facing an unprecedented barrage of assaults. According to a survey conducted by the California State Parks Foundation, more than 25% of our state parks are threatened by projects that would encroach upon lands Californians had assumed were protected from harm. From a destructive six-lane highway through the heart of San Onofre State Beach, to miles of unnecessary transmission lines across sensitive areas of Anza-Borrego Desert State Park, these poorly conceived proposals comprise the most significant threats to California's state park system today.

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In that same vein, the Richardson Grove Operation Improvement Project ("Project") reflects an astonishing failure to understand the unique and irreplaceable environmental resources of the Richardson Grove – resources that would be significantly affected and even destroyed by this Project. For example, considerable adverse impacts to Richardson Grove State Park – an exceptional natural and recreational area and a refuge for old-growth redwoods in Humboldt County – would be unavoidable. In fact, the Project would impact the Park's iconic redwoods grove as well as the breathtaking views enjoyed by millions of tourists who drive through Richardson Grove on U.S. Highway 101.

Based on our review of the DEIR/EA and the Section 4(f) Evaluation for the Project, Caltrans has failed to fulfill the basic requirements of the California Environmental Quality Act ("CEQA"), the National Environmental Protection Act ("NEPA"), and Section 4(f) of the Department of Transportation Act ("Section 4(f)"). In that regard, we agree with the detailed comments submitted by the California State Parks Foundation ("CSPF") on March 12, 2009. A copy of CSPF's comment letter is attached below. By this reference, we hereby incorporate CSPF's concerns as our own, and submit CSPF's comments for the record as our own comments regarding the Project itself, the DEIR/EA for the Project and Section 4(f) Evaluation for the Project. 1

Furthermore, NRDC respectfully submits the following additional comments with regard to the DEIR/EA and Section 4(f) Evaluation:

Inadequate Analysis of Impacts to Biological Resources (Endangered Species)

The DEIR/EA acknowledges that the project limits and immediate vicinity contain suitable habitat for seven federally listed or otherwise impaired species, as well as designated critical habitat for the marbled murrelet. (DEIR/EA at 101.) With regard to the murrelet and northern spotted owl, Caltrans admits that the large trees within the project limits in the park may provide elements of suitable nesting habitat, and concludes the Project "[m]ay [a]ffect, and is likely to [a]dversely [a]ffect" those species. (DEIR/EA at 102-104.) In fact, U.S. Fish and Wildlife Service staff determined that mitigation was needed to offset impacts to the marbled murrelet. (DEIR/EA at 103.)

However, the DEIR/EA's mitigation measures for the murrelet and spotted owl are woefully deficient. For example, although Caltrans includes as mitigation a two-year survey to determine the extent of murrelet presence in the Project area, the DEIR/EA does not contain any binding mitigation measures to offset impacts to the species once its range of occupation is known. Another way to phrase this is that Caltrans has failed to explain how ordering a survey of the murrelet's presence in the area, without more, constitutes adequate mitigation for the species under CEQA. 2

Moreover, Caltrans fails to explain why the Project is not likely to adversely modify the murrelet's designated critical habitat or the spotted owl's habitat. The DEIR/EA claims that although a quarter of an acre of tan oak woodlands would be removed in connection 3

with the Project, the "quality" of the removed trees is reduced by their close proximity to the highway, businesses, and residences. (DEIR/EA at 104.) However, the Project's *true* impact is comprised of more than just the loss of those particular trees. In fact, new tracts of lower "quality" habitat would be created at the edge of the newly cleared area, and the remaining habitat would be even more exposed to the highway, businesses, and residences. By this logic, future projects could cause the area to die a "death by a thousand cuts," whereby while each individual project claims only a small, localized impact, soon the entire forest has been cleared. Caltrans should reexamine the Project's impacts to biological resources and provide full and effective mitigation, and explain how the proposed mitigation adequately addresses the predicted impacts. 4 5

Failure to Analyze the Project's Greenhouse Gas Emissions

The DEIR/EA fails to address the greenhouse gas implications of the Project. Through passage of Assembly Bill 32 in 2006, California has committed to reducing greenhouse gas emissions to 1990 levels by 2020. Moreover, last year's passage of Senate Bill 375 guarantees that regions will be looking closely at the greenhouse gas emissions associated with infrastructure projects, especially transportation projects. The DEIR/EA fails to analyze the impact that, for example, the anticipated loss of trees would have on CO_2 levels and the surrounding ecosystem. For this reason alone, a full EIS on this Project is required. 6

* * *

For all the reasons set forth above and in the attached comment letter by CSPF, which we have incorporated into our comments, NRDC respectfully requests that Caltrans prepare an individual Section 4(f) Evaluation, revise the DEIR, and prepare a full EIS to comply with Section 4(f), CEQA, and NEPA. 7

Thank you in advance for considering and responding to our comments.

Respectfully submitted,

Damon K. Nagami

Damon Nagami
Staff Attorney

Attachment

1. As the letter and responses to the letter submitted from the California State Parks Foundation is quite lengthy, it is not reproduced here. For the letter and the accompanying responses, please refer to their letter included in this section above.
2. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled Murrelet based on the following factors: 1) The removal of as many as 31 second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available to nesting Marbled Murrelets within half mile of proposed vegetation-removal activities and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) The trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current Marbled Murrelet nesting habitat; and 3) the project includes measures to avoid and minimize impacts to old growth redwood tree roots during construction.

   While there is no known cases of Marbled Murrelets nesting in Richardson Grove State Park, it is estimated that at least one nesting pair are present within the 250 acres of suitable nesting habitat which may be subjected to noise disturbance during the breeding season. The US Fish and Wildlife Service concurs that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled Murrelets or Northern Spotted Owls in and near the project area.

   Providing the corvid- proof trash receptacles is a conservation measure recommended by the US Fish and Wildlife Service during the consultation efforts for this project and Caltrans incorporated this measure into the project. Conservation measures in the context of the federal Endangered Species Act represent actions that are intended to further the recovery of and/or minimize or compensate for the project effects on the listed species. The revegetation of disturbed areas and the restoration of the half acre that would be relinquished back to State Park are also conservation measures. The restoration of the half acre would enhance foraging habitat for Northern Spotted Owls.
   Surveying potential breeding habitat to identify potential nesting areas is identified as a recovery action in the Marbled Murrelet Recovery Plan (US FWS, 1997). The two year survey for Marbled Murrelets that Caltrans has

proposed to do at Richardson Grove State Park would aid in the recovery of the species by providing information to the US Fish and Wildlife Service about the population in inland nesting areas.

3. See response to #2 above.
4. The roadway realignment shifts average two to six feet from the existing center line with the greatest shift being seventeen feet. Shifts this minor would not substantially alter the existing exposure patterns in the habitat of the listed birds. At PM 2.04, the area where there is the greatest loss of trees is not suitable nesting habitat for either Marbled Murrelet or Northern Spotted Owl. This area of tan oak woodland represents foraging area for the Northern Spotted Owl. The trees are located on a small slope that abutting Route 101 and is not high quality foraging habitat. In addition, the half acre that Caltrans is transferring back to State Parks includes area further away from the current highway alignment and the adjacent land is parkland, thus it could be said that once the property has been revegetated, that it would have a higher value for Northern Spotted Owl than the property that is proposed to be disturbed with the tree removal.
5. The US Fish and Wildlife Service concurs that no nesting habitat would be removed or degraded by the proposed project, as stated in their Biological Opinion. None of the trees proposed to be removed are potential nest trees. Since all potential nest trees will be retained, the US Fish and Wildlife Service determined that the impacts due to the proposed project do not reach the level of habitat degradation. In addition, Caltrans has incorporated into the project conservation and recovery measures identified in the Biological Opinion.
6. In Section 3.4 of the DEIR/EA climate change and greenhouse gas implications of the proposed project is discussed.
7. Caltrans has prepared an Environmental Assessment which demonstrates that the Richardson Grove Operational Improvement project will not significantly affect the human environment. Therefore, an EIS is not required. The project meets the applicable criteria for a Section 4(f) Programmatic Evaluation. State Parks has concurred that there are no prudent and feasible avoidance alternatives and all possible planning to minimize long term harm to park resources.

Comments, DEIR
Richardson Grove
Operational
Improvement
Project

At the public forums to discuss Cal Trans' proposals for changes to Hwy 101 in Piercy around Richardson Grove State Park, I have been excited to discover how many people outside the Piercy Volunteer Fire Department know this bit of road is highly problematic. I am distressed that so far the discussions have been divisive. But after long talks with community members who have both supported and opposed alt. 1, I believe we can design a set of changes that satisfies our goals and helps to unite us as a community rather than divide us.

Everyone I talk to wants safer conditions, efficient transport, great

aesthetic and environmental quality, and minimal delay. Some simply fear that alt. 1 is inadequate or unnecessarily destructive.

This draft EIR has almost all the information we need to satisfy a vast majority. With a little more research and some rewording, we can be more inclusive, less costly, and more timely. I have some research done. I suspect Cal Trans can pull most of the rest out of files that have not been published. My info and questions follow. What I call alt. 3, could be reduced to an amended alt. 1.

Comments, EIR, January 13th
Richardson Grove Operational
Improvement Project

Part I

When I first read this EIR I was shocked to find no mention of Piercy, our community inside of which CalTrans proposes to make this change to Hwy 101. But when I walked through the site, I realized there are no signs to reveal our presence. There is no way for CalTrans employees or consultants or any other non-resident to know where Piercy begins or ends. It is a ridiculous situation. I know of no other place where traffic on Hwy 101 receives no warning that it about to drive down the main street of a village's commercial district.

isn't ~~Our~~ failure to warn non-residents of Piercy's presence ~~has~~ not only resulted in this EIR presenting a totally inadequate analysis of the consequences of alternatives 1 and 2 to the human community, but also has kept a potentially more viable alternative from being considered? 1

An analysis of consequences to a community must include a current description and an historical review. I will provide a skeletal description and history for Piercy. More is needed ~~of course, but most important is alternative 3~~.
to consider a third alternative (alt 3)?

Part II **R Grove EIR**

B4 Rectifying this failure to warn non residents that they are about to drive through a long established community, could resolve the issue that gave rise to the proposed change to Hwy 101 while raising far fewer objections than the proposed build alternative? Furthermore, this third alternative would save $5,000,000 in construction costs, and let all STAA trucks pass through Piercy by summer 2009, or even sooner. According to the EIR, this would save the manufacturing and agricultural business of Humboldt county $5,980,000 more than alternative #1, and would not hurt the "leisure and hospitality" businesses at all. It would also provide welcome protection to our children, our work force, and our guests. 2

HEDIN Pg3

Why not

Treat Piercy exactly as we do other villages like Hopland, Laytonville, and Orrick whose main street is still part of Hwy 101? Place signs north of Legend of Bigfoot and south of Milky Way that say Piercy, Pop. 400. Elev. 600. Put pedestrian warning signs and crosswalks around the Patriot station/Bear Valley Restaurant/Grandfather Tree/Hartsook Inn area, at the Overpack/Singing Trees area, and at Legend of Bigfoot. Put signs where our school buses stop, make the signs at the state park borders more obvious, and from Milky Way north to past the Legend of Bigfoot parking area post speed limits that say 35 MPH maximum, all vehicles towing 25 MPH maximum. One local resident has suggested button controlled stop lights at pedestrian ~~xxx~~ crossings to stop traffic for the handicapped and for mothers with more than one child. 3

Couldn't

With this level of care and control, any STAA approved truck that can make the turn on Hwy 101 in Eureka where Broadway and 4th and 5th street fade into each other ~~can~~ also drive through Piercy without the changes proposed in alternative 1? If not, what changes would be needed to let all STAA vehicles through at 25 mph? Could we manage with just camber changes on the existing alignment? Can we eliminate the retaining wall? 4 5

~~Furthermore,~~ In the past few years, STAA ~~maximum~~ sized moving vans and cattle trucks have been given special permits to drive through this section of hwy 101, and the EIR does not report that any of them has been involved in any of the numerous accidents that have occurred here. How many have gone through? The DEIR explains in Section 1.3.2. pg24 that speed reductions, dynamic signing, and warning 6

HEDIA Pg4

systems are typically used to address existing safety concerns and not used to justify lifting a roadway restriction.

But does "typically" here mean absolutely? Has this approach ever been used to lift restrictions? and, is this a "typical" situation? 7

If this alt. 3 is not adequate to lift the restrictions, how much less adjusting of the roadway would be necessary with signs appropriate to our village, and 25 mph speed limits? Wouldn't such a combination make this part of Hwy 101 safer? Would it cut the total cost? 8

HEDIN P5

We need to resolve only one issue to implement this third alternative. Because of our bizarre, quirky history, Piercy straddles the border between Humboldt and Mendocino counties. Everyone living between Smith Point in Humboldt Co. and Bridges Creek in Mendocino Co. claims to live in Piercy. This is especially true prior to the Redwood Run and Reggae festivals when they all show up at the Piercy Volunteer Fire Department for resident passes. One neighbor told me the County line goes down his driveway between his house and his barn. At the worst, this can be resolved by pretending we are two villages, Piercy South and Piercy North, just like St. Louis and East St. Louis or San Francisco and South San Francisco.

Piercy got split this way in 1860 after Humboldt County petitioned the California legislature to legally define the border between the two counties. To avoid the cost of surveys, the legislature divided the counties at the 40th parallel. Later efforts to actually survey this line differed by two miles.

This did not, however, impede settlement by homesteaders. The local Wailaki/Sinkyone Indians had a system of mostly ridge top trails that permitted travel through the region on foot or on horse. Using these trails a new community nestled into this border area. George Ward wrote that in 1897 when his family moved to what is now South Central Piercy on Hwy 101 by exit 625 there were no roads. Later, "...those who could benefit by it got together and made a road from our place to where a road came down hill from the Medcalf place...this road joined the one that ran from Usal...to Garberville. This was our one road. If one wished to go in any other direction he went by trail, ether by horseback or on foot." A similar trail was slowly being turned into a wagon road at the Smith homestead, now called Smith Point.

What is now Hwy 101 did not exist until the State of California carved a road through the South Fork Eel River Canyon in 1918. In 1920, the same year Richardson Grove State Park was dedicated, Charles C. Kirk, a local resident, petitioned the US government for a post office. When granted, the government chose to name the district Piercy in honor of the "first white settler" in the area. The district served the people living from Richardson Grove to Lanes Flat (now Smith Grove State Reserve) in Mendocino Co.

With the highway the Piercy Postal District boomed. Ranches got large. Resorts were built. Stores and restaurants and gas stations flourished from one end of the postal district to the other. It was all Piercy, both sides of the county line. Even telephone service recognizes we are one community. If you live in Piercy you get a 247 prefix both sides of the county line. If in Garberville or Benbow, 923. If in Leggett, 925.

During the post World War II logging boom the mills clustered around Indian Creek became the commercial center of Piercy. It was then that the Piercy Volunteer Fire Department petitioned Mendocino County for official status and funding, and the Piercy Fire Protection District was formed.

But after the 1964 floods when the freeway bypass around Piercy was begun, the mills closed, and our resorts and stores along the bypassed parts of old 101 faded away. Now (especially since the old Piercy Post Office burned down) the commercial center of the Piercy Postal District, the Piercy community, is between Milky Way and Smith Point Bridge. Of the ten surviving businesses in Piercy, seven are located here. And every new business proposed would be located along this part of Hwy 101.

Let us also remember that none of these alternatives is a permanent fix for this part of Hwy 101. The economic urges that have led to the proposed alt. #1 will ultimately push for a four lane freeway from San Francisco to Eureka to Hwy 5. That freeway will never go through Richardson' Grove State Park. Eventually Hwy 101 will have to bypass all of Piercy. Let's not waste any more money on a band-aid fix than necessary, especially if it will cause permanent scars.

Part III **Community Impacts** **R Grove EIR**

1. Commercial Impact

Alternative 1: Will slow down business in Piercy at Bear Meadows, Grandfather Tree, and Richardson Grove State Park during construction. It will likely have a similar negative affect at Singing Trees and at Legend of Bigfoot. 10

After completion in 2010 the largest legal trucks will be permitted to drive through. This makes some business owners in Humboldt County feel they will be more competitive. The resulting visual changes make some tourist based business owners fear they will lose appeal. 11

The Humboldt County Visitors and Convention Bureau reports income from visitors in Humboldt County has grown steadily by 1 to 2% per year. Total spending in 2006 was $281 million. Total Bed tax in fiscal year ending June 31, 2008 was $5,592,000.

Alternative 2: Will not ease concern that restrictions on trucking are creating a competitive disadvantage for some local businesses.

Alternative 3: Will let all STAA approved trucks through. Will not affect the visual appeal of 101. Will likely increase business activity in Piercy. Can go into effect 12 mos. faster than Alt. 1. 12

2. Impacts on Emergency Services

The Piercy Volunteer Fire Department's primary response zone covers 97 square miles between Smith Point Bridge in Humboldt County and Bridges Creek in Mendocino County. We have mutual response agreements in both counties. Our active volunteer first responders live in both Mendocino and Humboldt counties. Yearly costs are $30,000 to $40,000. Federal, State and County contributions are about $10,000. The rest of our funding come from donation and benefits. As commercial activity has shriveled in Piercy, finding healthy adults with time for training has become very difficult. And having a daytime response team is even more difficult.

Since 2004 we have averaged 60 responses per year. Two thirds of our responses have bee to Highway emergencies. And each year the number of calls we have been unable to answer for lack of responders has increased. Without commercial growth, we will need to pay a professional response team to cover the district from 6 am to 6pm Monday through Friday. Since Piercy is unincorporated this will cost the State and Counties at least $300,000 per year (more likely$500,000).

Alt 1: During construction could cause us to miss more calls because our station is located south of the project while one volunteer, Ben Heyda, lives north of the project and another volunteer, John Laudenschlager works inside the project area at Singing Trees. 13

Our funding is also likely to be hurt. The success of our events depends on easy access and tourist participation. The current global and national financial climate change already seems o be affecting us. Donations following our annual calendar year letter/report to residents dropped from $1530 in winter 2007-2008 to $650 in winter 2008-2009. Any hit to the Piercy business community will threaten our financial capacity to provide emergency response to our residents and to non-residents driving through.

After completion, alt. 1 will not improve our response capacity. Until the scars in the park heal, since every business in Piercy except the Dimmick Bulk Plant is tourist dependent, it will likely affect our revenues and our ability to find local employment for our first responders. 14

Alt. 2: Won't affect emergency services. 15

Alt. 3: May increase revenues and increase the possibility of local employment for our volunteers.

Part IV Further Questions

A. Economic Analysis, Section 2.1.2.

16

1. Pg. 32. Does "agriculture" in this DEIR include marijuana cultivation and sales? Has this incomes influence in Finance, Insurance, Real Estate, Services, and Construction been factored? <u>S.F. Chronicle</u> Jan 12, 2009: "... In 2007 California dairies generated $7.3 billion..." <u>S.F. Chronicle</u> Jan 13, 2009: "... California marijuana crop valued over $13.8 billion..."

2. Pg. 33. Has there been a drop in employment in Leisure and Hospitality? The Humboldt Co. Visitors and Convention Bureau reports a 1% to 2% growth for this sector every year for this period.

17

3. Pg 35. Of the 39 businesses in the survey of 2008, how many were from each of the business sectors? If the $5.98 million savings per year estimated by Dr. Gallo were realized, how much would go into local government revenues? 18

4. Occupency (or bed) tax from motels and hotels in Humboldt Co., at 10% of gross, was $1,201,000 unincorporated, $4,391,000 incorporated = $5,592,000 total for 2008. Total hospitality spending in Humboldt Co. in 2006: $281,000,000. How will this project affect this tourism income? To what degree does "tourism" depend on ranching, dairy, timber production, and other industries affected by the trucking bottleneck in Piercy? Common ground? Does any form of development increase 19

local government tax revenues as fast as or faster than bed taxes?

5. How will this project affect Del Norte and Mendocino Cos.' businesses and tax revenues? 20

6. How valid are the economic projections in the DEIR given the economic downturn, bank failures, stimulous packages, bail outs, and bankruptcies such as Mervins in the past few months? 21

7. How much of our tourist revenues are from citizens of other countries? How can this project increase our appeal to this group? This is a U.S. Hwy. We want federal funding. Would not a positive shift in our balance of payments help entice federal funds? 22

8. Don't we want to be very careful not to depress some industries while we stimulate others? 23

9. Do the project cost estimates include non-productive time and cost of fuel due to traffic control during construction? What is this value? 24

10. What is the total carbon cost in biomass loss plus fuel burned, including idling traffic? 25

B. Emergency Services

1. Pg 26: "Project would not interfere with an adopted emergency response plan,..."

It would. Have staff reviewed the Humboldt Co. plan? Have they reviewed the Mendocino Co. plan? Has the MOU

between the Piercy Volunteer Fire Dept and the Garberville ~~Fire~~ Volunteer Fire Dept been reviewed? Would staff like information about the Piercy Volunteer Fire Dept's emergency response plan? 26

2. If alt.1 as described in the DEIR is approved, how will the current level of emergency response be maintained during construction? 27

If as a result of construction, commerce in Piercy can no longer support volunteer emergency response, what will it cost Cal Fire to provide a professional replacement? 28

3. Will diminished emergency response capacity on Hwy 101 increase our

governments' exposures to liability suits or similar? 29

C. Retaining Wall 2.1.6. Pgs. 46-47

1. Would this wall be necessary for STAA truck traffic with a towing speed limit of 25 MPH? 30

If so, what would be the added cost to cover it with a faux stone veneer like that at Confusion Hill? 31

Wouldn't moss, lichens, and small forbs cover such a wall more quickly than a wall of poison infused wood?

2. On what basis does the DEIR declare this moss and fern bank and surroundings not to be a "sensitive" visual resource? Is this not an opinion rather than a report? Have owners of tourist businesses weighed in? 32

3. Has staff considered the recent anthropological and psychological literature about the effects of setting on economic activity? Especially merchandising? Shouldn't such influence be considered when tourism puts $5,592,000 into Humboldt Co's local governments through occupancy taxes alone? 33

D. Aesthetics 2.1.6. + elsewhere

1. How do we assess aesthetics? Don't we seem to be floundering here? This DEIR says "insignificant", "minor", "the dominant visual resource" without any referential base (statistical or other). Is there any way to quantify aesthetics? Are there experts (artists, critics, plebescites?)? Isn't this very 34

important to the tourism businesses? Isn't this a way to get their support for addressin a fix for the problems we face here?

2. Can the final EIR be more inclusive in its wording? Example: Pg 45: how about '<u>a</u> (or <u>one</u>) dominant visual resource' instead of "<u>the</u> dominant visual resource...". Personally, I find the infinitely varied forest forms to be the dominant visual resource. Can we avoid squabble issues?

Example 2: Pg 46: "..., however, the Singing Trees facility directly abuts the highway at this location so the natural visual setting is already compromised."... "Removal of the majority of vegetation at this location and the addition of the wall would be an adverse visual

impact, however, it would not be a significant impact due to the lack of sensitive visual resources at this location."

Is staff aware of the history of this "location"? Logging is the original compromising. Singing Trees is part of the visual recovery. Does a building always compromise a visual setting? Does the Taj Mahal? Does staff know that the membership of the Mateel Community Center considers this "location" to be aesthetically worth cleaning up all the trash that accummulates here because of the traffic? Isn't this like saying that abusing a child that has already been abused is not significant? Isn't this cumulative impact?

E. Community Impacts 2.1.3.

1. Is every governmental directive important to funding or approval quoted in the DEIR? 37

2. How do we define community in this report and for this project? The DEIR mentions Garberville, Humboldt, Del Norte, and Mendocino Co.s. Since this project includes work to be done in a California state park does "community" extend to all the citizens of California? Common wealth? Which newspapers have carried announcements of these proposed changes? 38 39

3. How many people camped at Richardson Grove State Park in 2008? How many stayed more than one night? How many campers came without reservations? 40

HEDIN Pg 19

4. How do we assess cumulative impacts? Are there experts? Do we have to count how many Percy businesses have closed since freeway work began? How about loss of acres at Reynold's Wayside State Reserve? Loss of commodes at Smyth Grove? Where will Percy residents picnic with accomodations, quiet, and safe fire during construction? 41

5. Where do we address spiritual impacts in this DEIR? Is community spirit part of "community cohesion and character"? Are there experts in this field? Clergy? Psychologists? What about the 12 step spiritual community that convenes at Singing Trees every sunday to support each other's spiritual efforts to overcome and avoid addiction. Is their shared 42

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meal communion? How large is this community? When does a human ritual become traditional? What about the Native American sweat ceremony at Singing Trees every Sunday?

6. Community Cohesiveness.
Shouldn't we be trying to promote cohesiveness with this project's EIR? Shouldn't we eliminate adjectives and phrases that express potentially divisive opinions in this DEIR, a document that is supposed to be a report? 43

7. Page 27: "Project will not result in substantial adverse effects on people." 44
How do we define substantial? What about the emotional/spiritual effect of a patch of bare earth in a forest on a Viet Nam vet with agent orange

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problems? How does yet another wall effect those who grew up with the Berlin Wall? Etc.?

I do not consider myself very spiritual, but I appreciate the urge of those around me who wish to have this value considered. I must admit that when I am in this park I have an acute awareness of the crescendo of miracles that makes all there is possible.

F. Miscellaneous

1. Pg ii: "This one mile section is part of a three mile gap in an otherwise continuous 4 lane freeway/expressway from Cummings in Mendocino (PM 81.4) to Eureka (PM 74.6) a distance of 96 miles." Isn't this false? Aren't there at least

12 miles of 2 lane highway between these points? And misleading? How many miles of 2 lane highway are scattered between Cummings and Cloverdale? 45

2. Why no mention of retirees? Aren't they the fastest growing demographic in Piercy? 46

3. Do we need to consider special needs for the huge number of disabled veterans in the community? 47

Sincerely,

Jeffrey Hedin

JEFFREY HEDIN

Commissioner, Piercy Fire Protection District

Box 140,
PIERCY, CA 95587.

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1. While the DEIR/EA did not identify Piercy as the unincorporated community that is being impacted, it did identify that businesses and residences are present along Route 101 both adjacent to the project area as well as just beyond the project area. The final document has been amended to include mention of Piercy.
2. Installing signs informing motorists that they are entering the community of Piercy would not satisfy the purpose and need for the project as it would not correct the deficiencies in the roadway geometrics that led to the STAA restriction. The speed limit was recently reduced to 35 mph between PM 1.15 and PM 2.30.
3. While measures such as installing pedestrian warning signs, pedestrian-activated stop lights, and crosswalks in front of businesses may help slow down traffic or at least alert motorists to the presence of pedestrians in the area, most of the locations discussed in your letter are south of the project limits. There are already signs both north and south of the grove warning motorists of narrow road conditions in the grove. Signs or even signals would not correct the geometric deficiencies that result in the STAA restriction for this portion of US Route 101. To request additional pedestrian warning signage a written request should be made to Ralph Marinelli, in the District 1 Traffic Safety Branch explaining the need for the signs. Ralph would initiate an investigation and if it is determined warranted, would proceed with ordering and installing the signs.
4. *See General Response #8*.
5. In response to the public comments, a design modification for the retaining wall was developed. The wall design changed from one above the road to a design where it would be constructed below the road. To accommodate this change the wall was moved from the west side of the highway to the east. The design modification reduces the number of tree removals required as well. The below the road wall itself will not be visible to the motorist, however, a new guard rail will be visible. See figure 8B in the final document for a photo of a similar type wall.
6. Neither the California Highway Patrol nor Caltrans collision data records distinguish the size of truck, so the number of truck-related collisions involving STAA vehicles cannot be determined. In addition, the household moving vans and licensed livestock carriers that are covered by legislative exemptions do not get issued permits.
7. The primary purpose of the project is to lift the restriction on STAA vehicles on this portion of US Route 101. The current roadway geometrics are such that STAA vehicles off-track over the center line into the opposing lane. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. The proposed project would correct the known geometric condition and lift the restriction for STAA trucks with no special permits being required.
8. *See General Response #8* regarding information how reducing speeds does not meet the purpose and need for the project.
9. A Feasibility Study prepared in 2001 concluded that due to the substantial environmental impacts and high costs, a bypass of Richardson Grove State Park was not feasible. Subsequently, the Route Concept Report for the Route 101 corridor including Mendocino, Humboldt, and Del Norte counties, was revised to

show the ultimate facility for this segment of Route 101 from Richardson Grove to Smith Point Bridge as a two lane conventional highway. The Route Concept Report generally has a twenty year planning horizon.

10. It is acknowledged in the document that during construction adjacent businesses would be affected by traffic delays resulting from the one way traffic signal and traffic staging. The traffic delays that would occur during construction are expected to be typical for construction on two lane State highways, averaging from five to ten minutes with maximum delays estimated to be fifteen minutes under normal circumstances. Caltrans will be working with the local businesses located in close proximity to the project area to minimize the impacts of construction. Access into businesses will be marked with cones so traffic queues do not block driveways. A communication plan with the local businesses will continuously update the business owners of the planned construction activities and provide an avenue of communication for concerns to be raised to Caltrans engineers overseeing the construction. Since I-5 is the nearest alternative to using this section of US Route 101 and would constitute a minimum of a 300 mile detour, and the anticipated traffic delays are similar to delays experienced elsewhere along State highways due to construction, it is not expected that motorists with destinations in northwest California would modify their travel routes to avoid the construction at Richardson Grove. Since Singing Trees is an alcohol treatment and recovery facility, it is not dependent upon tourism traffic for business. Nor is it expected that traffic delays due to construction would substantially affect the decision of potential clients to conduct their recovery at this or another treatment facility.
11. *See General Response #2* regarding how the project impacts aesthetics.
12. As stated above, reducing the speed does not correct the geometric deficiencies in the roadway. Without correcting the deficiencies that result in off-tracking, the STAA restriction would not be lifted.
13. Some delay for emergency responders is unavoidable, but the delays during construction for the proposed project are not expected to be any longer than construction delays elsewhere on State highways for emergency responders. It is anticipated that average delays would be on the order of five to ten minutes with maximum delays being approximately fifteen minutes. For traffic control under the direction of flaggers, any emergency responders will be given priority access through the construction. Calling the dispatcher in advance can help Caltrans coordinate priority access through the project area.
14. The project area would be revegetated after the ground disturbing activities are completed. The park ambience for the motorist would not be altered substantially as a result of this project. The majority of tree removal in the park is located in two spots, at the cut bank below the park residential units at the northern park boundary at PM 2.04 and at the previous cut slope at PM 1.36. These two areas are where 24 of the 30 trees to be removed from the park are located. Half of the trees to be removed from within the park are tan oaks. The presence of old growth redwoods abutting the edges of a curvilinear two lane roadway with minimum shoulders would not be changed, nor would the canopy over the roadway be changed appreciably.

15. It is not understood how reducing the speed limit and installing signs and crosswalks would increase employment or revenues. As stated previously above, reducing the speed limit would not correct the geometric deficiencies of the roadway resulting in the STAA restriction. The biggest impact to local Piercy businesses is likely to be the delays and traffic queues experienced during construction. As stated above, delays would be on the order of five to ten minutes normally and are typical delay times for work occurring on two lane roadways. A meeting with business owners prior to construction will occur to discuss anticipated construction impacts and staging of the project. In addition, a communication plan will be developed to continuously update local businesses as to construction activities so that businesses can have relevant information to base operational decisions on. Part of the communication plan will be to provide business owners with a Caltrans contact person to report problems to so that issues can be resolved in a timely manner.
16. No, the economic analysis did not include marijuana cultivation and sales.
17. Information provided on Humboldt County's Economic Development website, specifically the "Humboldt County Snapshot," states that between 2002 and 2006 there was a drop in the leisure and hospitality industry. It is not known what information the Humboldt County Visitors and Convention Bureau is relying on for their projections.
18. The business sectors represented in the survey responses included the following three sectors: agriculture and fisheries; manufacturing, and retail sales (motor vehicle and parts dealers). Some business owners reported that the savings would be provided to employees in terms of higher wages and/or better benefits while others reported that they would expand their business.
19. It is not expected that the project would substantially affect the tourism income. The delays expected during construction are typical for two lane State highways and the nearest detour is I-5. There are very few lodging establishments in close proximity to the construction area so it is unlikely that construction would affect lodging establishments.
20. It is estimated that implementing the project would benefit businesses in Humboldt and Del Norte counties, based upon comments Caltrans has received from local business owners.
21. The project justification does not rely on the economic projections. Construction of the project fulfills one of the objectives identified in the County's Regional Transportation Plan. Opening access for STAA at Richardson Grove is identified in the current and past Regional Transportation Plans for accommodating goods movement in the County.
22. It is not known what percent of the tourists visiting or traveling through this area are from outside the USA. Regardless, the project is not expected to substantially detract appeal for foreign tourists as the long term park character will not be substantially altered and construction impacts are temporary.
23. The construction impacts that would affect local businesses in the vicinity of the project would be short term. The project is not expected to depress businesses in the long term.

24. The cost estimates for the project include direct costs of construction, mitigation costs, and right of way costs. The cost estimates do not include the cost of idling resulting from traffic control during construction. Traffic delays would be similar to those experienced at other locations under construction on two lane State highways.
25. The carbon cost in biomass loss for constructing this project was not estimated.
26. The project is not expected to result in any substantial changes to overall traffic volumes or the percent of trucks, thus it is not anticipated that the project would result in any long term changes adversely affecting emergency response plans. The alterations in roadway geometrics should slightly improve safety with the improvements in curve radii, minimal shoulder widening, and superelevation improvements. The Traffic Management Plan identifies the standard policies to be in place for emergency responders. For example, any emergency service agency whose ability to respond to incidents is affected due to lane closures must be notified prior to that closure. In addition the Plan states that flaggers will give priority to emergency responders during traffic control. The Traffic Management Plan also requires the contractor to prepare a contingency plan for unanticipated delays and emergencies.
27. Impacts to emergency responders resulting from this project are similar to that experienced in any construction project on a two lane State highway. It is not expected that the project would result in substantial adverse effect to emergency responders.
28. The project will not require the relocation of any businesses. Most of the commercial area of Piercy is located south the project area and the impacts limited to those resulting from traffic delays from one way traffic control during construction. A communication plan with the local businesses will be developed and in use during construction to address concerns that arise during construction.
29. See #27 above.
30. To accommodate the alignment and shoulder modifications that are necessary to lift the restriction of STAA vehicles north of the park, additional roadway width is required. To gain this width, a retaining wall is required. As stated previously, reducing the speed limit would not correct the existing deficiencies in the roadway geometrics resulting in the STAA restriction. The degree of off-tracking for a given truck is determined by truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off-tracking.
31. A design modification for the retaining wall was developed after the draft environmental document was circulated to the public. The retaining wall is now located below the road to the east of the highway and will not generally be visible to the motoring public, with the exception of the barrier rail. A faux stone veneer is an aesthetic treatment and since the wall is now below the road and not visible to motorists it doesn't warrant this aesthetic treatment.
32. The location of the above the road retaining wall described in the draft EIR was on a cut bank vegetated primarily with tan oak. Twenty two of the tan oaks that would have been removed with the above the road wall would have been twelve inches in diameter or less. A landscape architect made the determination of the quality of the

visual resource and prepared the report regarding the analysis of the impacts to visual resources. The Visual Impact Assessment containing this information is provided in Appendix K.

33. The project would not substantially alter the existing park ambiance. The primary visual characteristics of the highway, a curvilinear two lane highway with minimal to no shoulders and old growth redwoods abutting the roadway providing a canopy over the highway, would not change. Thus, any merchandising based on this setting should not be affected by the project.
34. The Visual Impact Assessment was prepared by a landscape architect and was included as Appendix K in the FEIR. A quantitative analysis of the project impacts on various viewsheds within the project area was included as part of the Assessment.
35. The accepted method for describing impacts to visual resources is to identify discernable viewsheds and then to describe what the changes would be to the primary constituents that compose that viewshed. Each viewshed is evaluated by its visual vividness, intactness, and unity. Refer to Appendix K for more detailed information on the scoring and visual impact determinations.
36. Visual resources can include structures and architecture. The project area was evaluated for important architectural structures. It was determined that the Singing Trees facility does not represent an outstanding example of architecture. And as it's been stated by numerous individuals including yourself, the outstanding visual characteristics within the project limits include the natural vegetation, not the architectural elements. Picking up trash, in of itself, does not provide the adjacent property with a sense of aesthetics. Adopt a Highway programs in urban areas provide litter cleanup throughout the state for the inherent aesthetic benefit of removing litter.
37. The document provides information on what NEPA and CEQA require. It is not clear what governmental directives are being referred to in your question.
38. How the document defines the term community in the document differs based on the context in which it is used. Sometimes the community can be a region or it can be a smaller area where the people involved share a common geography and sense of place.
39. Various newspapers have included articles or editorials regarding the project including the Times Standard, the Ukiah Daily Journal, The Redwood Times, and the North Coast Journal.
40. It is not known how many visitors camped at Richardson Grove State Park, nor how many stayed more than one night or came without reservations.
41. Cumulative impacts are assessed by identifying resources that would experience substantial direct or indirect impacts resulting from the project, then determining where those resources are currently in poor or declining health or at risk even if project impacts are relatively small. It has not been established that there is a relationship between construction of the freeway and Piercy businesses closing. Never-the-less, the project is not anticipated to substantially alter traffic patterns or traffic volumes for this segment of US Route 101 after construction and impacts to local businesses resulting from construction activities would be temporary. The

facilities at Benbow State Park could provide Piercy residents an alternative location to picnic during construction.

42. It is not anticipated that activities at the Singing Trees facility would be curtailed as a result of the project.
43. The terminology used in the document is dictated to a certain degree by the requirements in National Environmental Policy Act, the California Environmental Quality Act, and other regulations such as the Executive Order on Environmental Justice that uses such terms as “low income” and “minorities.”
44. In the context of NEPA and CEQA, when determining if a substantial effect occurs, one takes into account the magnitude of the impact and the context. The affinity for the old growth redwoods was taken into consideration.
45. The document will be revised to reflect that Richardson Grove is not the only gap.
46. The project would not affect retirees differently than other segments of the population.
47. The project would not affect disabled veterans differently than other segments of the population.

Save The Redwoods
LEAGUE

January 30, 2009

CALTRANS
Kim Floyd, Public Information Officer
kim_floyd@dot.ca.gov
Eureka District Office,
P. O. Box 3700
Eureka, CA 95502-3700

RE: CALTRANS Richardson Grove Operational Improvement Project Environmental Impact Report (EIR)/Environmental Assessment (EA) and Programmatic Section 4(f) Evaluation (PSE)

Dear Mr. Floyd:

Thank you for the opportunity to comment on the Richardson Grove Operational Improvement Project. We would like to express the following concerns centered on three main issues:

1. Impacts to the redwoods
2. Impacts to Richardson Grove State Park (Park) resources and the Park Visitor Experience
3. Lack of an adequate range of Alternatives in the EIR/EA and the need to prepare an EIS in addition to the EIR to adequately address significant impacts

These concerns are discussed in more detail below, followed by a list of requested follow up items.

1. Impacts to the redwoods *(Sequoia sempervirens)*

We are concerned that the EIR/EA does not adequately consider the significant cumulative impacts from the proposed project to individual ancient redwoods, including unquantified root impacts to 19 redwoods from 3.5 feet to 15 feet Diameter at Breast Height (DBH), and complete removal of an additional 89 other trees as part of the proposed re-alignment within 1

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the ancient redwood forest ecosystem of the Park (EIR & EA, design study map index sheet 10-14-08).

Top dieback in redwoods is a common sight along the Avenue of the Giants in Humboldt Redwoods State Park, much of this occurred after construction of the freeway and associated disruption of the roots and subsurface hydrology. In light of this, we are concerned that CALTRANS has not made more effort to ensure that top dieback in the redwoods does not also occur at Richardson Grove State Park. The EIR and EA does not analyze the potentially significant impacts that this project could have on the health and vigor of these redwood trees. 2

We are concerned that there is insufficient analysis of the potentially significant impacts, and that there are no mitigation measures proposed to ensure that the ancient giant redwood trees are protected from top dieback as a result of the proposed project. 3

2. Impacts to Richardson Grove State Park Resources and the Park Visitor Experience

Aesthetic, Noise, Light Impacts: Richardson Grove State Park is often referred to as the "gateway to the redwoods", since this is one of the first places along Route 101 that visitors can stop and walk through the giant ancient redwoods and camp among them in all their glory. Unfortunately, Route 101 already detracts from this experience, providing a noisy backdrop to the otherwise peaceful, tranquil redwood setting, particularly at night when each truck or car lights up the forest and floods it with noise. We are concerned that the Park visitor experience will be further degraded by noise and night lights during construction, and reduced vegetation in the understory from the proposed tree removal that will increase highway exposure for Park visitors. Reduced numbers of Park visitors during construction can be expected, and potentially reduced numbers of campers in the future due to increased noise and light levels in campsites. We are concerned that these potentially significant impacts to the Park visitor experience have not been adequately addressed or mitigated. 4

Save The Redwoods League Deed Restrictions And Groves: Save the Redwoods League purchased parts of the property that is now Richardson Grove State Park. It was the intent of Save the Redwoods League to transfer these lands into state ownership for permanent protection. In most cases the League transferred ownership with deed restrictions to ensure that these lands were protected in perpetuity for future generations as public park land. The EIR/EA does not provide adequate information related to the Park lands impacted, the location of the impacts, and any deed restrictions held over those lands by Save the Redwoods League that might be impacted by the proposed project. On sheet five of 20 and sheet 18 of 20 it appears that Park lands may be impacted outside of the CALTRANS Right of Way. 5

In addition, the proposed alternative also did not address potential impacts to redwood memorial groves that were previously dedicated in Richardson Grove State Park, including the Zierott Walton Grove, the Monna Jelenfy Grove, and the Edward Jelenfy Grove. These groves represent an important part of the cultural history of the park. Impacts to the groves were not adequately considered or mitigated. 6

3. Lack of an adequate range of Alternatives in the EIR/EA and the need to prepare an EIS in addition to the EIR to adequately address significant impacts

Based on the issues outlined above, we are concerned that this project will result in significant cumulative negative impacts to the redwoods, the Park, and the Park visitor experience that warrant an EIS under NEPA.

We had hoped that CALTRANS would also consider other alternatives that would potentially reduce the negative impacts on the redwoods, Park resources, and the visitor experience, such as constructing a bridge that spans the length of the Park above the existing road prism. Elevating the road would minimize impacts to the hydrology, root structures of ancient giant redwoods, and facilitate wildlife movement. At a minimum, the EIR did not evaluate the feasibility of raising the road rather than lowering it. 7

The proposed action was stated as the following,

> *"The purpose of the proposed project is to adjust the roadway alignment to accommodate STAA truck travel, thereby removing the restriction for STAA vehicles, and improve safety and operation of Route 101 while also improving goods movement."*

Based on the statement above, the proposed action must not only accommodate STAA vehicles; it must also improve the safety and operation of Route 101. However, the proposed alternative does not improve safety and operation for cyclists and pedestrians, which are expected to be at greater risk as a result of the increased vehicle speeds, reduced sight distances, and reduced shoulder widths. As a result, vehicles seeking to avoid cyclists and pedestrians will be forced into the oncoming lane of traffic, which will greatly compromise the safety and operation throughout the length of the project. 8

Deputy Directive 64 states the following directive:

> *"The Department fully considers the needs of non-motorized travelers (including pedestrians, bicyclists, and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products."*

Directive 64 clearly states the need for fully considering the needs of non-motorized travelers as part of this project. However, the proposed alternative does not improve safety and operation for cyclists, pedestrians, or vehicles; instead it forces them to share the same traffic corridor at increased speeds. 9

A dedicated pedestrian/cyclist trail appears to be an important missing component of the proposed alternative. However, because the EIR does not contemplate a pedestrian/cyclist trail as part of the proposed project, and instead defers this challenge to State Parks to resolve, the potentially insurmountable problems with a cyclist/pedestrian trail are never brought to light.

A trail for cyclists and pedestrians would require either a boardwalk or a compacted surface on the forest floor over the root systems of the redwoods. We are concerned that a cyclist/pedestrian trail through the Park would cause significant impacts on the ancient giant redwoods and on other Park resources, while not sufficiently addressing safety needs for cyclists and pedestrians. 10

If a cyclist/pedestrian trail were included in the proposed project, how would State Parks and CALTRANS provide for safe exit and entry for pedestrians and cyclists onto Route 101? How will a trail meet the safety standards of CALTRANS without an exemption or a variance? Widening the highway will increase traffic speeds at locations with short sight distances, decreasing the margin of error for a pedestrian or cyclist crossing the road to enter or exit the trail. We are concerned that the proposed action and the no action alternatives do not meet the purpose and need for the project, necessitating the need for consideration of other alternatives. 11

Requests

Based on the concerns raised above, the League would like to request that the following information be addressed in an EIS for the proposed project.

1. Please provide information quantifying how much of the root system will be removed from each tree, and the expected impacts that removal of those roots will cause. Please include information that analyzes the expected tree response of root removal at different water potentials (water stress levels) during wet/cold and dry/hot seasons (summer vs. winter) typical of our Mediterranean climate. 12

2. Please analyze the impacts of increased water stress on the ancient redwoods due to reduced soil moisture from ground disturbance, tree removal, soil aeration and soil removal, soil compaction, and altered hydrology, combined with car strikes, and the anticipated level of top dieback that will occur as a result. 13

3. Please provide information quantifying the expected impacts to the redwoods from the proposed cutbanks, tree removal, and other ground disturbing activities that will cause changes in solar radiation, temperatures, relative humidity, and soil moisture. 14

4. Please provide information quantifying the expected impacts on Park visitor use, and the projected decrease in revenue for the Park. 15

5. Please provide information that analyzes the impacts of the proposed project on existing deed restrictions and memorial groves held by Save the Redwoods League over the Park. 16

6. Please provide an alternative that evaluates the feasibility of including a trail that improves safety and operation of Route 101 as part of the proposed alternative. 17

In closing, we are concerned that the proposed alternative does not meet the stated purpose and need, and encourage CALTRANS to consider redefining the scope of the project. A comprehensive evaluation of the proposed project in an EIR/EIS may determine that a bypass around Richardson Grove State Park is the best viable alternative for accommodating STAA vehicles, improving safety and operation of Route 101 while minimizing significant impacts on redwoods and Park resources.

Save the Redwoods League has a long history of working cooperatively with CALTRANS to provide safe highway passage, while respecting the redwoods that draw so many visitors. We look forward to continuing in this spirit of cooperation to develop a plan for Richardson Grove that addresses our concerns while meeting the needs of Humboldt County. Please contact my colleague, Christine Ambrose, if you have specific questions.

Thank you for your time and consideration.

Yours sincerely,

Ruskin K. Hartley
Executive Director and Secretary

cc: Steve Horvitz, District Superintendent, California State Parks

1. With the design modification in the retaining wall for the preferred alternative, the total tree removal was reduced to 54 trees. 30 of those trees would be removed from within the park. The remainder of the trees to be removed are located on private property outside the park. Of the 30 trees to be removed from within the park, nearly half are tan oaks and 20 of the trees are twelve inches in diameter or less. Of the 51 redwood trees in the park thirty inches in diameter and larger the deepest excavation within the structural root zone is two feet. The average depth of excavation is about fourteen inches. Almost fifteen percent of the trees affected by excavation are with excavation depths of six inches or less. As stated in the DEIR/EA, the use of a pneumatic excavator such as an air spade would enable excavation to occur without major damage to the roots. Roots would be incorporated into the new structural section of the roadway rather than be cut. Other minimizing measures such as providing summer irrigation for old growth redwoods after excavating have also been incorporated into the project. With the proposed design and the minimization measures incorporated into the project, both the Caltrans certified arborist and the consulting arborist contracted by Save The Redwoods League have concluded that the project impacts to old growth redwoods would not result in substantial impacts.
2. Unlike the area north of the project where the tree dieback adjacent to US Route 101 is observed, the project area is relatively flat. The proposed project at Richardson Grove is not anticipated to substantially alter existing drainage patterns since impervious surfaces are only proposed to be increased for the whole project by four percent and the majority of that is outside the park where shoulders are being widened to four feet. About 58 percent of the existing roadway drainage is sheet flow, another 38 percent is collected in roadside ditches, and the remaining 4 percent of drainage is collected by an asphalt concrete dike. The existing drainage patterns would be continued since the drainage improvements consist of adding culvert liners, replacing two deteriorating culverts, and adding a downdrain to an existing culvert to reduce erosion. The proposed project would result in a less than five percent increase in impervious surface in place within the structural root zone of trees within the park. Dennis Yniguez, the consulting arborist contracted by Save The Redwoods League determined that the project would not have a significant effect on the availability of water to the roots of old growth trees adjacent to highway construction.
3. A certified arborist, Darin Sullivan, has been part of the project team and has helped develop several measures that have been incorporated into the project to minimize construction impacts to the redwoods which reduce the potential for significant impacts to old growth redwoods. It is believed that removing non-native vegetation will enhance the environment for the trees. In addition, Caltrans will also be relinquishing a little over a half an acre back to State Parks and redwoods could be reestablished there.
4. It should be noted that the establishment of the road in 1915 predates the establishment of the park. Given that, Caltrans acknowledges that park visitors would be affected by construction impacts. However, long term effects on the campgrounds should be minor. This is due to the fact that the one third of tree removal in the park would take place near the northern boundary of the park where the primary use adjacent to the highway is park staff residential units (Figure 7B in the FEIR/EA is a

photo showing the area). Another third of the tree removal is at a proposed cut face on the west side of the highway at about PM 1.35 to PM 1.36 (Figure 6B in the FEIR/EA shows this area) which is located near the southern extent of the Madrone campground loop. The campsites are upslope of the proposed tree removal and would not be visible from the campsites. Another four trees (6 inch tan oak, 7 inch redwood, 12 and 14 inch Douglas fir) would be removed from the east side of the highway at about PM 1.4 across from the Madrone Campground. Again, the tree removal would occur adjacent to the highway and the campsites are upslope. Across from Huckleberry Campground there would be three 10 inch in diameter tan oaks removed on the east side of the highway just south of the park entrance road at about PM 1.64. However, the nearest feature in the campground to the tree removal is the access road to Madrone Campground and there are no campsites along this access road. The greatest alignment shift, 17 feet, occurs at about PM 1.4. The roadway would be shifted east away from the Madrone campground, towards the Oak Flat Campground. However, campsites of the Oak Flat Campground are located across the Eel River and it not expected that any of the proposed highway modifications would be visible or noticeable from the campground.

5. A map has been added to Appendix B of the document to show where the proposed changes to the easement are. Caltrans proposes to transfer jurisdiction to State Parks of 24,625 square feet (0.56 acre) and request a transfer of jurisdiction to Caltrans a total of 24,599 square feet (0.56 acre). The amounts and affected parcels are as follows:

Parcel 12063-1 3,320 square feet	Parcel 12063-2 2,673 square feet
Parcel 12063-3 4,141 square feet	Parcel 12064-1 5,223 square feet
Parcel 12064-2 7,300 square feet	Parcel 12064-3 580 square feet
Parcel 12063-4 1,362 square feet	

   Caltrans has not initiated the transfer of jurisdiction with State Parks, as this process cannot begin until the environmental documents are completed. Caltrans is not aware of any deed restrictions on these parcels.

6. There would be impacts to the Zierott Walton Memorial Grove: property from within this Memorial Grove would be incorporated into the transportation easement, and the property Caltrans is relinquishing to the parks would be incorporated into this Memorial Grove.
7. Caltrans considered raising the grade of the roadway as well as constructing a viaduct (a bridge over land), but withdrew these from further consideration because they could not feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the impacts. To raise the elevation of the roadway through the park would increase the “impact footprint” of the project because fill would have to be extended further into the park. The trees abutting the roadway would have deeper fills with depths decreasing farther from the edge of the roadway. To construct a viaduct on the existing alignment would require excavating to place footings to support the structure. Construction staging would be problematic and would likely require more months of one way traffic control.

8. Improving safety was a secondary goal of the project. Widening the roadway to provide four foot shoulders outside the park would provide a much improved condition for bicyclists and pedestrians as compared to existing. Within the park, the proposed modifications to the roadway would add two foot shoulders where the presence of trees does not preclude it. It is not expected that speed rate would increase within the park as the proposed project would not be removing the curves from the highway, but rather would be modifying the curves. Although the proposed design would still require design exceptions to be approved, the alignment in the park would be slightly improved over the existing condition due to the superelevation corrections, curve modifications, and slightly wider shoulders where it is not precluded by the presence of trees. These modifications would result in incremental increases in the distance to fixed objects and improvements in stopping sight distance.
9. *See General Response #5* regarding compliance with Caltrans policy on accommodating non motorized travelers.
10. It is Caltrans' understanding from meetings with State Parks staff that their agency would be considering that effort and evaluating the associated impacts. To construct a bike/pedestrian path separate from the existing highway in the park would have to be done on land under the jurisdiction of State Parks, or would involve a longer and very steep detour of Route 101, which would likely make its construction not feasible. State Parks, as the agency controlling the management and approval of the type and location of any new facility within its jurisdiction, is the most appropriate lead agency for planning such a facility.
11. How any cyclist/pedestrian trail would connect with US Route 101 would be dependent upon where the connection is proposed to be located and the type of trail it is. Caltrans would work with the State Parks regarding any future trail connection with US Route 101.
12. Without performing excavation it is not feasible to know in advance what the density of roots is at any given location. As stated in the document, special construction techniques are being utilized in the project to minimize the amount of roots removed with the use of hand work, the use of thinner structural section, and the use of an air spade for excavation within the structural root zone of trees. For more information on the special measures, refer to Appendix B in the document.
13. The majority of the tree removals do not occur immediately adjacent to redwood trees. During construction, watering provisions will be made for the old growth redwood trees affected by ground disturbance during construction. The drainage patterns are not being substantially impacted and top dieback of redwoods is not expected as a result of the project.
14. Both the Caltrans certified arborist and the arborist contracted by the Save the Redwoods League determined that the project would not be expected to result in any long term substantial adverse impacts to the redwoods.
15. It is not expected that there would be a substantial decrease in park visitors. Caltrans offered the park monetary compensation which the park officials declined.
16. See Responses #5 and #6 above.
17. It is Caltrans' understanding that State Parks is currently looking at the feasibility of a bike and pedestrian path through Richardson Grove. Refer also to General Response #5 regarding accommodating non-motorized travelers.

"Diane Beck"
<dfbeck@northcoast.com>
01/30/2009 04:49 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove Operational Improvement Project

January 30, 2009

To: Deborah Harmon, Senior Environmental Planner
California Department of Transportation
1656 Union Street,
Eureka, CA 95501

Re: Richardson Grove Operational Improvement Project DEIR

The following comments are on behalf of the North Group, Redwood Chapter, Sierra Club, with ca. 1,200 members on the north coast.

1 Why is the proposed Richardson Grove Project not being considered as part of the larger project, which is to make all of District 1 compatible with STAA truck standards?

2 Why is this project necessary when it would be primarily to service Big Box/Big Business stores?

3 This project seems a particularly egregious use of taxpayer money when one considers the present starp downturn in the national economy and as one large company after another is cutting back stores.

4 Did your "internet survey" of local businesses ask what impacts STAA truck traffic, which favors the growth of Big Box/Big Business, would have on their businesses? It seems an appropriate--even vital--question.

5 The North Group is concerned that there is no real analysis or evaluation of the biological impacts to the roots of the old-growth redwood trees that will be affected. Lacking a taproot, redwood roots are relatively shallow and radiate for dozens of feet outward. Soil compaction and the disturbance of root zones will have adverse effects.

6 The project will do nothing to promote the safety of pedestrians and bicyclists, and in fact might make things worse--especially since you propose to increase the speed limit.

CalTrans has had to destroy hundreds of acres of redwoods in creating the modern Hwy 101. We do not think that this project is necessary, that you should leave this gem of a state park as it is.

Yours sincerely,

Diane Fairchild Beck, Conservation Chair
North Group, Redwood Chapter, Sierra Club
3657 Greenwood Heights Drive
Kneeland, CA 95549
dfbeck@northcoast.com

1. Project doesn't include Del Norte STAA projects because Richardson Grove project has independent utility.
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
3. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
4. The internet survey performed by the County did ask questions of local businesses whether and how STAA restrictions would affect their business. Local businesses have reported that the STAA restriction has resulted in shipping delays which in turn can require a larger inventory to be maintained to offset the delays. Merchandise can be damaged during the transfer of goods between STAA and non-STAA vehicles.
5. The most sensitive area for the trees can be found in what is called the structural root zone which consists of a circular area with a radius three times the diameter of the trunk of the tree. The roots found within this area are important for absorbing and delivering nutrients and water to the tree. The structural root zones for all trees adjacent to the roadway thirty inches in diameter and bigger have been mapped. All excavation below the finish grade within the structural root zone area except for the culvert work would be done with shovels, pick axes, or pneumatic excavators (such as air spades) to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with pneumatic excavators would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots. The Caltrans arborist and Dennis Yniguez, and independent arborist contracted by Save the Redwoods League to evaluate the project, have determined that the project as proposed with the minimization measures incorporated, will have no significant detrimental effect on the root health or on the availability of water to the roots of the old growth redwoods adjacent to the highway construction. The road was originally constructed in 1915 and the trees have coexisted adjacent to the highway in apparent good health.
6. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. Thus, it is not anticipated that this project would result in trucks traveling this section of Route 101 faster. It should also be noted that in fall of 2008 the speed limit in this area was lowered from 40 mph to 35 mph. There is no proposal to increase the speed limit on this section of US Route 101. While the proposed project does not markedly improve the safety for pedestrians and bicyclists through the park, it doesn't worsen the existing situation. North of the park, it is proposed to widen the shoulders to provide better access for pedestrians and cyclists.

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Ray Newkirk	Aletta Sauer	Roland Wentzel	
Donna Nieto	Frost Saufley	Lori Whalen	

"newmoon@well.com"
<newmoon@well.com>
01/29/2009 03:52 PM
Please respond to
newmoon@well.com

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove widening

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. I am concerned that this report is inadequate and insufficient in several ways. I also question the necessity of the project, and cannot find information within the report that explains how this project allows the restrictions for the longer trucks to be lifted by Caltrans. 1

The stretch of Highway 101 that would be impacted by this project provides motorists, bicyclists, and pedestrians with access to old growth redwood forest, and provides a gateway into the North Coast that defines the character of the region. This construction project would cause harm to this atmosphere and to the health of this prized redwood grove. These issues are not adequately addressed in the document. 2

I do not believe that cutting the roots of 30 redwood trees, some of which are 15 feet in diameter, could not possibly entail some significant impact, as the document concludes. The impacts cannot be adequately predicted, however, because there is no information in the document showing how cutting roots of the old trees would not adversely affect, or even kill, these ancient trees. Because the roots hold the soil in place, if the trees fall, the hillsides will slide, causing more problems. 3

Any industrial development in this sensitive grove is cause for alarm. Noise, air pollution, soil compaction, and many other effects from large industrial construction equipment will disrupt the serene environment, drive away wildlife, and discourage the public's use of the state park. An entire year of this could cause extreme impacts on the local forest ecosystem, and deteriorate the quality of the environment. 4

It is my understanding that Caltrans has a policy that whenever a highway improvement project is planned, bicycle access is considered and prioritized. This stretch of Highway 101 provides inadequate access for bicyclists. The narrow shoulders already ensure conflicts between bikes and vehicles. The narrow shoulders provide no room for bicyclists to ride along side vehicles already. This proposed project does not seem to comply with Caltrans' own policy. 5

I have grave concerns, as well, that a few businesses will benefit from this publicly funded project while businesses dependent on tourism may suffer. Local businesses located directly impacted by this project and not adequately acknowledged in the document, will suffer harm, especially during the construction phase. In a time of economic crisis, I fear that these shops and services may not survive the impacts. 6 7

Sincerely
Bernie Alie

---

mail2web.com - What can On Demand Business Solutions do for you?
http://link.mail2web.com/Business/SharePoint

The responses for the form letter above can be found in the General Responses #1-7 found at the beginning of this volume.

Jeanne Alan
Elisa Abelleira
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Concerned Traveler
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Leslie Lind
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L. Little Suzanne & Lewis Litzky
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Claire Lyon
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Maureen Meyer
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Ross Middlemiss
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T'sera Mingst-Belcher
J D Miskell
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Loma Moffat
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Charlotte Stuart
Mary Stuart
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Jacqueline Thorpe
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Kristin Vogel & Kurt Volckmar
Virginia & James Waters
Robin West
Joe Louis Wildman
Yvonne Winter
Len Wolff
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Barbara Penny
Fhyre Phoenix
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Katy Sanchez (NAHC)

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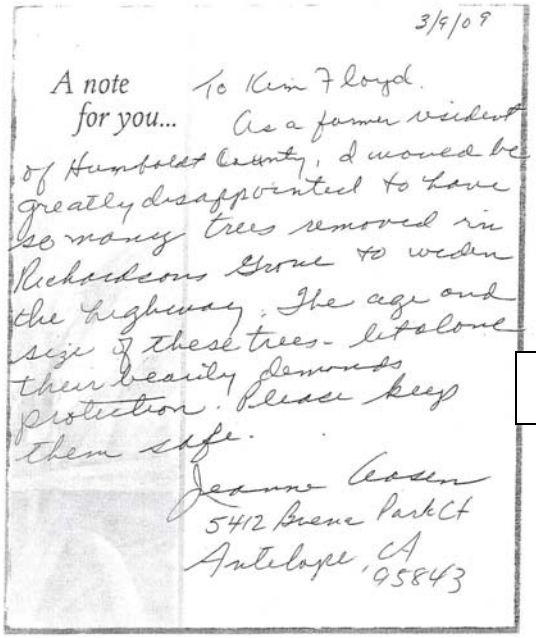

3/9/09

A note for you... To Kim Floyd.

As a former resident of Humboldt County, I would be greatly disappointed to have so many trees removed in Richardsons Grove to widen the highway. The age and size of these trees - let alone their beauty demands protection. Please keep them safe.

Jeanne Cosen
5412 Buena Park Ct
Antelope, CA
95843

1

1. While 54 trees are proposed for removal, including 30 in the park, only two redwoods are proposed for removal in the park and they are six and seven inches in diameter respectively. Twenty of the thirty trees proposed for removal in the park are 4 - 12 inches in diameter and half of the trees proposed for removal in the park are tan oaks. No old growth trees are proposed for removal. The largest tree proposed for removal in the park is a 24 inch in diameter tan oak.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 10:05 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Comments

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 10:05 AM -----

Elisa Abelleira
<elisaabelleira@yahoo.com>
02/23/2009 09:57 AM

To Kim_floyd@dot.ca.gov
cc
Subject Richardson Grove Comments

Dear Ms. Floyd:

First of all, I hope this finds you well.

Last week I read an op-ed piece in the Times-Standard written by Doug Tickner. I'm not sure if you read it, but I wanted to add my 2 cents. I agree with him completely.

His most salient point, in my opinion, is that businesses that are up here arguing for a wider road, established their companies without benefit of the wider road and factored that into their cost of doing business. 1

Driving through Richardson Grove is a magical experience. I love slowing down for it. No where else on earth are there trees like this and it sets our area apart. This is the VERY reason many people live up here. If we wanted to live in a fast-paced, easily

accessible area, we'd be there.

There's no "replacing" a thousand year-old tree. Sometimes the best improvement to an area is no improvement at all. 2

Thanks for considering this comment.

Kind regards,
Elisa Abelleira
2831 R Street
Eureka, CA 95501

1. The issue is that the size of vehicle in use commonly throughout the nation, including California, has changed to the STAA. While California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with the industry standard-sized vehicles. Thus, the non- STAA vehicles tend to be older vehicles as the newer vehicles are the industry standard–sized trucks. Smaller businesses, which depend upon trucking companies for importing and exporting their products, are finding it difficult to reliably access these non-standard sized vehicles.
2. No old growth trees are proposed for removal as a result of the project.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:21 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:21 AM -----

NANCY ABRAMS
<nanhum@sbcglobal.net>
02/21/2009 04:54 PM
Please respond to nanhum@sbcglobal.net

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

I am a Eureka resident and drive down and up 101 several times a year. I am neither a business person (I am retired) nor am I an ecologist, economist nor engineer. I only present a perspective of someone who values the pristine environment of the north coast. I want to see Humboldt County maintain a quality of life that a good economy provides. Conversely, I do not want to see environmental degradation be the price to pay for that good economy. When I was working, I made a personal decision that I would leave Humboldt County for some place less desirable if my being employed meant compromising my environmental values. Fortunately, based on conscious decisions about how I live my life I think my footprint has been relatively light.
From that perspective, I urge a "no-go" on the widening of Richardson Grove. As I told Bonnie Neely when there was the controversy over the ATVs on the beaches: the vehicles may have been designed for the beach but the beach was not designed for the vehicle. The Grove should not conform to the vehicles but the vehicles must conform to the Grove. 1

Nan Abrams
Eureka

1. The issue is that the size of vehicle in use commonly throughout the nation, including California, has changed to the STAA. While California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with the industry standard-sized vehicles. Thus, the non- STAA vehicles tend to be older vehicles as the newer vehicles are the industry standard–sized trucks. Smaller businesses, which depend upon trucking companies for importing and exporting their products, are finding it difficult to reliably access these non-standard sized vehicles.

alz@gotsky.com (Protecting this ancient grove)
01/28/2009 08:59 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Protecting Richardson Grove is more important than increasing size of truck and speed of traffic on this stretch of Hwy 101. CalTrans has not be forthright with the process. 1

Reject the proposal as stated. No trees for traffic!

P

Sincerely

Alan

1. The speed limit will not change as a result of the proposed project. Recently Caltrans did reduce the speed limit from 40 mph to 35 mph in this area, but additional speed reductions are not proposed as a part of this project. No old growth trees are proposed for removal as a result of this project.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:34 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:35 AM -----

Jon <john.ace1@gmail.com>
03/10/2009 11:51 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Project

Mr. Floyd:

I am writing to voice my opposition to the ill-conceived and poorly considered Richardson Grove Improvement Project. There are far too many reasons to oppose the widening of 101 in this location for me to discuss here. We have already done enormous damage to the wild, most of which cannot be undone. According to local trade officials we don't even need the widening for larger trucks! Please reconsider this project and cancel it altogether. Thank you very much. 1
Sincerely,

John Aceves
Eureka, CA

1. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders where there is no shoulder and there are no trees immediately abutting the roadway. The current alignment weaves through the forest with short or non-existent tangent (e.g., straight) sections followed by compound, reversing, and variable radius curves. The intent of the proposed realignment is to initiate the curves prior to the existing curves caused by the roadway weaving in between two groups of trees. In this way, vehicles would initiate curves earlier and by the time they reach the pinch point between the trees, the vehicles can more easily stay within their proper lane without off-tracking.

Margaret Allen
<margaretallen672@gmail.com>
01/30/2009 12:14 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Proposed Project for Richardson's Grove

Dear Ms. Harmon:

I am writing to express my support for alternative three- lowering the speed limit to 25 mph to mediate the traffic flow through Richardson's Grove. There are many substantial reasons why I believe this option should be chosen. Factors that support the least drastic choice include: the inconvenient calendar timing for public comment, the necessity to find a solution that represents the values of all stakeholders, (of concern is the loss of heritage and ongoing contribution of this beautiful stretch), the cost of the project and poor timing to expend these costs, and the likely outcome of being an inducement for making Humboldt County like the rest of the many cemented places in the state by inducing large scale commercial growth. 1 2 3

Because the public meetings were scheduled near the Christmas holiday, it was difficult for me and I believe many, to participate in these meetings. Besides the many other events and enlarged to do lists, many of us are traveling. I suggest that further public meetings be scheduled after the public has had an opportunity to review public comment. In this way, the views of all stakeholders could be reviewed and a more thoughtful sense of direction could be chosen. A comprehensive examination of all gains and losses is critical for public trust. 4

I am greatly saddened at the prospect of losing something I treasure. I have driven through this stretch of magnificence many 100s of times, looking forward to this stretch as a place for serenity, built into a long drive. I have enjoyed this place for over 40 years and want my grandchildren to have the same unique pleasure. This landscape took dozens of life times to create. Let us think hard about how we care for this awe inspiring gift to the traveler. Let us protect this heritage for us now and others who are park patrons. 5

The cost of the project both financially and in environmental damage is significant and unaffordable. I believe we need to start with the most cost effective option and monitor the effectiveness of truck transfer. When our econmy recovers, the millions of dollars for this unnecessary project could be spent on our crumbling infrastructure. I have spoken to some professioanl foresters who advise the severing of roots of 30 trees is in fact a death sentence for the redwood. We are fooling ourselves if we believe we can make such a significant change without a catastrophic outcome. 6 7

Humboldt County is a special place to live, one of few refuges in our state with a positive balance between the needs of commerce and residents. The lower population density means we have a more relaxed life style- I believe this is how we are meant to live. Over time, I have watched the 101 corridor get straightened in efforts to be expedient in how fast we can travel. I am grateful for these improvements. The Richardson's Grove stretch however, is through our state park and is a sacred grove. Let us take our time when driving this brief stretch, slow down

8

to accommodate needed commerce and remember why we live here. We don't need a high speedway the entire corridor; in fact, I believe the slowing down here helps regulate the speed of growth and a quality of life. Please consider my requests, especially, please take the no-build option on this project!

Sincerely,

Margaret M. Allen

1. Reducing the speed to 25 mph would not correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off-tracking. It should be noted that the speed limit through Richardson Grove has been recently lowered from 40 mph to 35 mph.
2. The circulation and comment period for the DEIR/EA began December 5, 2008 and closed March 12, 2009. Throughout the project planning process, which included four public meetings, Caltrans has heard from a wide variety of stakeholders and have taken the comments we received into consideration. The park ambience for the motorist would not be altered substantially as a result of this project. The large redwoods abutting the edges of the curvilinear two lane roadway with minimum shoulders would not be changed. The proposed project would not change any of the eligibility criteria as a scenic highway.
3. A qualitative rather than quantitative analysis for growth was done. The economic costs of not constructing the proposed project would fall on businesses currently located in Humboldt County including small, local businesses. Providing access for STAA trucks is not expected to substantially change the factors that most influence growth in Humboldt County. A study prepared by the Humboldt County Association of Governments (Cambridge Systematics, Inc., 1989) identified distance from major population centers, lack of direct access to the Interstate road system, lack of a completed four lane north-south or east-west highway, limited air service, unreliable and inadequate rail service, lack of industrial land zoned in Eureka, shortage of labor in some occupations, lack of diversity of tourist attractions and visitor activities and perception of the area by outsiders as remote as being the major constraints to economic activity and subsequent growth in Humboldt County (see page 35 in the Draft EIR/EA). Thus, providing STAA access is not expected to a primary factor influencing growth in Humboldt County, including “big box” development.

4. Any comments received during the circulation of the draft environmental document will be considered. Another public meeting to solicit comments on the proposed project is not anticipated at this time.
5. The park ambience for the motorist would not be altered substantially as a result of this project. The presence of large redwoods abutting the edges of a curvilinear two lane roadway with minimum shoulders would not be changed. The proposed project would not change any of the eligibility criteria for a scenic highway.
6. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
7. The project does not propose to sever all the roots of trees within the construction area in the park. There are a total of thirty trees in the park proposed for removal, twenty of which are 4 - 12 inches in diameter and half of the trees proposed for removal in the park are tan oaks. No old growth trees are proposed for removal. The largest tree proposed for removal in the park is a 24 inch in diameter tan oak. Construction would occur in the structural root zone (circular area with a radius three times the diameter of the trunk of the tree) of several trees within the park. However, all excavation below the finish grade within the structural root zone area except for the culvert work would be done via “hand work” with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots.
8. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency.

<maireallen@sbcglobal.net>
01/27/2009 11:13 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson's Grove

This is in protest to slashing roots of redwoods in Richardson Grove to enhance the highway. 1

Please consider lowering the speed limit instead. 2

Marilyn S. Allen
Eureka, CA 95501

1. Construction activities occurring within the structural root zone of the redwoods (circular area with a radius three times the diameter of the trunk of the tree) in Richardson Grove State Park would occur via "hand work" with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. It is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots.
2. Reducing the speed to 25 mph would not correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off-tracking. It should be noted that the speed limit through Richardson Grove has been recently lowered from 40 mph to 35 mph.

3/11/09

Dear Kim Floyd,

I am writing as a So. Hum. resident to strongly encourage that Cal Trans leave the road thru Richardson Grove as it is.

The heritage of our lost logging community is only imaginable by seeing; up close and personal, these magnificent trees.

That grove and the Avenue of the Giants are about the only places people can truly witness the scale of these monsterous wonders, and it draws tourists from around the world. In spite of Willits' lame claim as the gateway, ask anyone who's toured up 101 where the Redwoods start and they will site Richardson Grove... then they can camp there! 1

I do not even believe that another lowering of the speed limit is not an answer, as I have personally witnessed logging trucks - who's drivers are undoubtably over confident due to familiarity - charging through the 35 zone at an easy 45 mph. Yet new tourists instictively slow to their manageable speed, probably just to look.

Thank you for redirecting the money. Michael Alendorf

1. The presence of large old growth redwoods abutting the shoulder of the roadway would not be changed. The trees proposed for removal within the park include two redwoods, one is six inches in diameter and the other is seven inches in diameter. Twenty of the thirty trees proposed for removal in the park are four to twelve inches in diameter and half of the trees proposed for removal in the park are tanoaks. The largest tree proposed for removal in the park is a 24 inch in diameter tan oak.

Marion Nina Amber
<amberma@suddenlink.net>
01/25/2009 08:43 PM

To kimfloyd@dot.ca.gov, deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

Dear Kim Floyd and Deborah Harmon,

I come from an area that was not gifted with the natural wealth of the North Coast; it was simply farmland with a rich topsoil. Nevertheless, it was a haven. When I return there now, I would be sure I'd followed mistaken directions if I didn't see a sign for Spring Valley Road. No longer containing a spring and no sign of a valley, the topsoil was trucked away long ago. Now highways crisscross each other around malls, thieves ply parking lots, multitudes of identical houses run along featureless roads and nature has disappeared.

There was no evil genius behind the destruction of that area, no plan to erase a living environment; there simply was no plan nor thought to the humane needs of present and future generations.
And so it is with great sadness that I contemplate the widening of the 101 in Richardson Grove. It's as if nothing has been learned over the years relative to the way that first changes initiates others that soon are uncontrollable.

Humboldt is a very special place, one that is different from any other in the world. Many of us are here because we love its uniqueness, its nature, it's beauty. Richardson Grove is the narrow entry to Humboldt. In making it a little bit difficult to enter, the Grove protects the county from the wanton development that has occurred elsewhere. It is a natural barrier to a fragile area already under stress from over eager commercial interests.

When considering road work here, I urge you to think sensitively about Humboldt, and particularly about Richardson Grove. There's already too much die off of old growth along the highway, there's the threat of insect infestations in western forests...the last thing we need or want here is another cookie cutter community in what was once a glory of the west. 1

Sincerely,
Marion Nina Amber

1. The park ambience for the motorist would not be altered substantially as a result of this project. The presence of large redwoods abutting the edges of a curvilinear two lane roadway with minimum shoulders would not be changed. Construction activities occurring within the structural root zone of the redwoods (circular area with a radius three times the diameter of the trunk of the tree) in Richardson Grove State Park would occur via “hand work” with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. It is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:32 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:33 AM -----

Marion Nina Amber
<amberma@suddenlink.net>
03/10/2009 09:23 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Kim Floyd,

I am writing again as more information has become available, but I could not say it better than the articles below, which you may have read. The point is, we shouldn't spend $6 million dollars on a fix needed by just a few; besides, this is a state park, not a commercial property. And apparently, the roots of many trees will be cut in your current plan.

1

2

In this time of tight budgets, save the money for really needy projects! California has none to spare.
Slowing traffic and using traffic lights is the obvious solution.

3

Most sincerely,
Marion Nina Amber
>
> My Word
> by: Glenda Hesseltine
>
>
> So nice to see Alan Olmstead's editorial (3/3/09), reminding us
> that a balanced solution is required, and is indeed possible, in
> regards to CalTrans highly controversial proposed project for
> Richardson Grove. Mr. Olmstead is correct in saying that there are
> simple, low-tech solutions available that would save the trees,
> allow the trucks, and also save the taxpayer the waste of $6
> million on the cost of the ill-conceived proposed project. Slowing
> the traffic to 25 mph or establishing a traffic light would
> preserve the trees, and allow the trucks. With a little
> deliberation, cooperation, and common sense, everyone can be happy.
>
> A current misconception in the public mind is that only 40 trees
> are affected by proposed project. This is not true. CalTrans's
> own document, the DEIR, shows 87 trees designated for removal. This
> means a significant disturbance of the canopy in the less than one
> mile area of the project. Perhaps even more disturbing is the
> information (in the same CalTrans document) specifying the proposed
> cutting of the root systems of 30 of the largest redwoods in the
> Grove. While it is true that the largest trees will not be
> removed, it is also true that their roots will be cut. With no tap

>
> Bad for the Economy
>
> Most loads reach their weight limit before their cubic space limit,
> so the larger, heavier STAA trucks will result in more expensive,
> polluting trucking than the lighter trucks which can carry the
> 80,000 pound limit in a lighter truck (depending on the type of
> cargo.)
>
> Costco, Safeway and Winco are the largest importers of the most
> frequently imported products - food. These stores use smaller
> tractors (cabs) to accommodate the longer trailers legally, and
> will therefore not need nor benefit from the Caltrans project.
> Creameries everywhere routinely employ 45 to 48 foot trailers
> because these trailers accommodate the weight in the smaller,
> lighter space which translates to economic and ecological efficiency.
>
> Gasoline, diesel and propane are other imported products that
> attain their weight limit before their space limit, eliminating the
> need for the larger, heavier trucks. This is the same for most
> building products such as cement, block, plywood, sheetrock, etc.
>
> Light products can be shipped in the longer 48 and 53 foot trailers
> with the shorter, safer tractors (cabs) as currently utilized on
> the 62 other California State Highways with similar restrictions as
> 101.
>
> Trucking companies offer replacement tractors (cabs) at critical
> junctures and large moving vans and cattle haulers have exemption.
> Local trucking firms comprise hundreds of workers whose jobs might
> be threatened by allowing STAA trucks to endanger our crowded
> Eureka streets. The use of tractor-switching at critical junctures
> avoids crowding Eureka streets with large trucks, efficiently
> routes truck traffic onto major highways such as Route 5, and
> employs many local truckers.
>
> Bad for the Environment
>
> All trucks must comply with the same air quality regulations.
> Almost all loads imported into the County are transported
> efficiently in smaller trucks which accommodate the load weight
> efficiently. Larger, heavier trucks with a load that is at weight
> capacity but still leaves the truck partly empty are therefore
> inefficient carriers of heavy loads. Smaller tractors (cabs)
> pulling longer trailers with large but relatively lighter loads are
> more efficient than employing larger, heavier truck assemblies.
>
> Before we spend six million dollars on this project let's make sure
> it is really going to benefit all of Humboldt County rather than
> just a few. The facts do not indicate that most businesses in
> Humboldt County require STAA trucks. The results of an online
> survey conducted by the Humboldt County Economic Development
> Commission funded by a grant from the Headwaters Fund generated
> only 19 businesses that responded with dollar estimates of their
> transportation costs in all of Humboldt and Del Norte counties.
> This hardly justifies this project at a time of huge budget deficits.

1. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
2. Construction activities occurring within the structural root zone of the redwoods (circular area with a radius three times the diameter of the trunk of the tree) in Richardson Grove State Park would occur via "hand work" with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. It is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots.
3. Reducing the speed to 25 mph would not correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off-tracking. It should be noted that the speed limit through Richardson Grove has been recently lowered from 40 mph to 35 mph. Several variations of signalization alternatives were considered in the DEIR/EA. Each of the alternatives had various issues associated with them such as providing space for the vehicles to queue and how to deal with ingress and egress from the park entrance as well as other ingress/egress points within the park. See Section 1.3.2 of the document for more explanation.

Kim
Floyd/D01/Caltrans/CAGov
03/10/2009 10:00 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/10/2009 09:00 AM -----

"Chestine A."
<bandon48@gmail.com>
03/07/2009 08:13 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove Project

Dear Kim Floyd,

I am very much opposed to widening and straightening the road through Richardson Grove in Humboldt County. This beautiful stretch of road should be left alone, not rebuilt, widened, or straightened. Lowering the speed limit to 25 mph would reduce accidents, allow large trucks to move safely through the Grove, and protect the businesses along the roadside. There seems to be no money to fill the many potholes on the Briceland-Thorne Road where I live. I certainly don't want to see $6 million spen on a project that is unnecessary and detrimental to wildlife, the trees, and the environment.

1

2

Sincerely yours,
Chestine Anderson
95 Old Somerville Creek Road
Garberville, Ca 95542

1. Reducing the speed to 25 mph would not correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off-tracking. It should be noted that the speed limit through Richardson Grove has been recently lowered from 40 mph to 35 mph.
2. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Anita Alexander
<anitara@humboldt1.com>
01/28/2009 07:06 AM

To Deborah_Harmon@dot.ca.gov, Kim_Floyd@dot.ca.gov
cc
bcc
Subject Richardson Grove

No. Absolutely no. I will spend money and energy to oppose this.

There is no industry up here that requires huge trucks. This is a corporate timber industry ploy to get what they want. 1

Let them pay for a bypass... with help from their pals in other corportate resource industry interests.

Sincerely,

Anita Alexander
former labor market analyst for the northcoast

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.

February 28, 2009

Ms. Kim Floyd
P.O. Box 3700
Eureka, CA 95502

Re: Richardson Grove highway straightening

Dear Ms. Floyd:

I am strongly opposed to the straightening of highway 101. I have read everything published in the newspaper on this matter and understand the commercial concerns that drive the proposal. However, I teach environmental ethics at Humboldt State University and see the issue in the broader perspective of a clash between the economic interests of some and the beauty and integrity of the natural world which mean much to many. 1

I have lived in Arcata since 1972. This is a unique place. There are tradeoffs in living in such a place: some inconvenience due to remoteness from large urban centers, some increased price due to transportation costs of goods. However, there are also the beauty and privacy obtained from such a location.

Surely lowering the speed limit a bit would meet the concerns for large trucks, retaining the trees, protecting the wildlife, and the beauty of our area. Straightening the road so cars and trucks can go even faster will result in more wildlife deaths and collisions with cars and trucks, and more traffic and pollution overall. Not a good bargain! 2

Please consider lowering the speed limit. Thank you.

Sincerely,

Susan J. Armstrong

Susan J. Armstrong
1765 Virginia Way
Arcata, CA. 95521

1. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. The park ambience would not be substantially altered.
2. Reducing the speed would not correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed in and of itself will not eliminate off- tracking. The speed limit has recently been reduced in this area from 40 mph to 35 mph.

"aronson"
<aronson@humboldt1.com>
01/27/2009 11:29 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Public Testimony re: RG 101

Please take the no-build option on this project. Save public $. 1
Lower the speed limit through the Grove.
The trucks are large enough now. 2
Put public interests before commercial interests!

Peter Aronson
Eureka

1. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. The park ambience would not be substantially altered.
2. The issue is that the size of vehicle in use commonly throughout the nation, including California, has changed to the STAA. While California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with the industry standard-sized vehicles. Thus, the non- STAA vehicles tend to be older vehicles as the newer vehicles are the industry standard–sized trucks. Smaller businesses, which depend upon trucking companies for importing and exporting their products, are finding it difficult to reliably access these non-standard sized vehicles.

701 Milky Way
Piercy, CA 95587
23 January, 2009.

Caltrans Project Mgr.,
Kim Floyd

Sir,

My husband and I purchased Frenchie's Resort from Viola French forty years ago, knowing that the State of California had plans to re-align Hwy. 101 to the east side of the South Fork of the Eel River, on our newly-purchased property. In fact, surveyor stakes were already in place, and plans had already been prepared to alleviate congestion through Richardson Grove.

Where have all those preliminaries gone? Would it not be cost-effective to dust them off and continue with a vision that would save time and expense, while saving ancient redwoods?

The entrances and exits to this ± two-mile four-lane stretch have already been surveyed. Why go to additional expense to re-do calculations which have already been done?

The Confusion Hill project - six miles south - has men, road-building materials and equipment in place, so there's no need to spend unnecessary funds for procurement ... it's done.

President Obama has promised to help with re-building roads ... why shouldn't Humboldt County be included?

I would be willing to part with more property if it would help save our redwoods!

Sincerely,
Patricia C. Arthur

1

1. In the late 1950's several alternatives for Route 101 were studied. In 1968, a new alignment for Route 101 east of the Eel River but still within the boundaries of Richardson Grove State Park to the east was adopted (Alternative A). However, funding was dropped before the project could be constructed. In 2001 a Feasibility Study evaluating the alternatives developed previously was conducted. The alternatives included widening the existing roadway to four lanes through Richardson Grove State Park, and three alternatives with new alignments for Route 101 – Alternative A as discussed above, Alternative B which would include a tunnel at the edge of the park, and Alternative C which bypassed the park. The Feasibility Study concluded that each of the alternatives would have severe environmental impacts: widening on the existing alignment had substantial adverse impacts on the old growth redwoods as well as park facilities like the campgrounds, visitor center, and trails; the alternatives on new alignments would traverse steep terrain requiring large cuts and fills, large disposal sites and much vegetation removal, as well as impacts to listed species and a new bridge crossing the South Fork of the Eel River. The cost for the alternatives on new alignment were estimated to range from approximately $100 – $600 million. Due to the substantial environmental impacts and high costs, a bypass is not feasible and would not be pursued at this time. There is more discussion about this in the DEIR/EA in Section 1.2.

Kim Floyd/D01/Caltrans/CAGov
02/25/2009 03:20 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/25/2009 03:20 PM -----

Diana Ashley <Diana.Ashley@humboldt.edu >
02/25/2009 02:08 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Ms. Floyd:

Mark me down with those who protest the proposed widening and straightening of the highway through Richardson Grove. It will primarily benefit a few business owners, and the trucking companies who prefer to speed through our area. The detriments are too many to list! 1

Diana Ashley, PhD 2

1. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency.
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:31 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove comments

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:31 PM -----

Mark Bailey <baileym@eurekacityschools.org>
03/12/2009 12:31 PM

To "'Kim_Floyd@dot.ca.gov'" <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove comments

Dear Ms Floyd,

I am writing in regards to the proposed Richardson Grove widening project.

In light of the present fiscal crisis *and* because I find the plan overall offensive and wasteful, **I am opposed to the project** in its entirety. I think we do not need larger trucks on the road. This will not fail to produce a number of negative effects but I am basically opposed to my tax dollars paying for a project that seems to me completely unnecessary. **PLEASE DO NOTHING** about the road at Richardson Grove. 1

Sincerely,

Mark Bailey
2110 Greenwood Heights Drive
Kneeland, CA 95549

1. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency.

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:31 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:31 AM -----

Melinda Bailey <mbailey@humboldt.k12.ca.us>
03/12/2009 03:42 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

This email is to comment upon the planned road widening project on 101 at Richardson Grove State Park. I am a native northern California who has been brought up to enjoy nature and appreciate our boutiful and beautiful parks. For the last 14 years I have been a high school teacher with an emphasis in teaching Biology. For years, I have encouraged students to become environmental stewards and six years my environmental club planted trees in Richardson Grove to help restore the area above Hartsook Lodge. Only 4% of the old growth redwood trees are left. No more should be cut or harmed by the cutting of roots. This project should not go forward. Parks are lands that are put aside for all people to enjoy into perpetuity. I am against business interests winning over the public's interests. Large vehicles can slow down and get through this tight spot on the freeway or they don't belong. Under no circumstances should the roots of old growth redwood trees be cut. Please put a stop to this project

1

2

Thank you

Melinda Bailey

1. There are a total of thirty trees in the park proposed for removal. Only two redwoods within the park are proposed for removal, a six-inch diameter tree and a seven-inch diameter tree. No old growth trees are proposed for removal. Construction would occur in the structural root zone (circular area with a radius three times the diameter of the trunk of the tree) of several redwood trees within the park. However, all excavation below the finish grade within the structural root zone area except for the culvert work would be done via “hand work” with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots.
2. Reducing the speed would not correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed in and of itself will not eliminate off-tracking. The speed limit has recently been reduced in this area from 40 mph to 35 mph.

12/30/2008

California Dept. of Transportation
P.O.Box 3700
Eureka, Ca. 95502

Attention: Kim Floyd

Dear Ms Floyd,

I am writing this letter regarding the Richardson Grove realignment project in Southern Humboldt. My business, the One Log House Espresso & Gifts, is on the south end of the work area. We are very dependent on the flow of traffic past our business. In the past when CalTrans has done one day work in the "grove", our business has never been notified in advance of the work. We have never been given any advance notice of the project or the time frame to finish. Traffic barricades placed in front of our driveway, prevented southbound customers from turning into it 95% of the time and north bound traffic could only turn in every 20 minutes for a brief time. Mostly northbound traffic chose not to enter because they were afraid of being caught in our parking area when traffic lined up for the next 20minute release. During these one day construction projects, we lost 95% of our business! After several calls to CalTrans asking them to move a little north or south, they finally did late in the day. Simply moving the barricades 100 feet in either direction brought our business back to a 10% loss. This is no exaggeration! 1

The problem we have is a lack of communication. I have attended several of the meetings on the project. They are designed to inform the general public what you are going to do .....generally. There are no specifics on traffic flows, delays, time frames. Mostly all general information. I have been told that the traffic flow/barricades are up to the contractor who wins the bid. They will get some general guidelines, but nothing specific regarding helping the local businesses stay in business.

If CalTrans does this project without consideration for the local business accesses, then many of us will be put out of business! My understanding is that the ultimate goal is to help local business. Is that just Eureka? What about our very local businesses?

I would appreciate your consideration. Furthermore, I would like you to meet with me and the other "local" business that are going to be affected. We should work together to design traffic flow guidelines for the "contract" that are both safe for the contractor and workable for our businesses. I await your reply.

Sincerely,

Dan Baleme
One Log House Espresso and Gifts
705 Hwy 101
Garberville, Ca. 95542
707-247-3717

1. A meeting will be held prior to construction and local business owners, residents, and the public will be invited to discuss the communication plan that will be in place for this project and the traffic management plan. Caltrans is concerned about maintaining viability of existing businesses.

February 13, 2009

Deborah Harmon
Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka CA 95501

RE: Proposed Richardson Grove Operational Improvement Project

Dear Ms. Harmon:

Please reevaluate the current CalTrans plan for Operational Improvements to Richardson Grove.

CalTrans circulated inadequate notice of the initial Draft Environmental Impact Report. As of January 31, 2009, there is no record on the CEQAnet website of CalTrans having submitted the Richardson Grove DEIS to the State Clearinghouse. For CalTrans to remain within the boundaries of lawful action, such submittal is necessary to allow an appropriate period for public comment. 1

Furthermore, the DEIS considered only this project and no other alternative. A consideration of viable alternatives is essential and is one primary purpose of modern environmental analysis. 2

Finally, this project will dramatically impact the root structure of the redwood grove. Redwood science is clear that the redwood root systems are shallow, lateral roots, which graft to other redwood roots to develop an interconnected root system for several trees at once. The proposed construction project will harm this type of root system, and jeopardize the integrity of the forest ecosystem. Please reconsider the current plans for Richardson Grove. 3

Thank you for this opportunity to comment. I appreciate your willingness to consider the thoughts and concerns from the public.

Very truly yours,

Amanda Barker

Amanda Barker
1045 7th St.
Arcata CA 95521

1. The public review and comment period of the DEIR/EA began December 5, 2008 and was extended to March 12, 2009.
2. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.3.2 of the DEIR/EA.
3. While the exact impacts from construction cannot be accurately predicted, some generalizations can be made. The most sensitive area for the trees can be found in what is called the structural root zone which consists of a circular area with a radius three times the diameter of the trunk of the tree. The roots found within this area are important for absorbing and delivering nutrients and water to the tree. The structural root zones for all trees adjacent to the roadway thirty inches in diameter and bigger have been mapped. All excavation below the finish grade within the structural root zone area except for the culvert work would be done with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots. The road was originally constructed in 1915 and the trees have coexisted adjacent to the highway in apparent good health (successfully thriving).

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:32 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:33 AM -----

"fred baron" <twobarons@saber.net>
03/10/2009 09:23 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Re: Richardson Grove

----- Original Message -----
From: fred baron
To: kim-floyd@dot.ca.gov
Sent: Tuesday, March 10, 2009 1:39 PM
Subject: Richardson Grove

Kim, I would like to lend my sentiments against any radical changes in the Grove.It is much to beautiful to be tampered with by man, who doesn't have a very good record when dealing with nature. I would vote for either a traffic light or a lower speed limit. Lets be sensible and take the soft approach. Sincerely, Fred N. Baron, Garberville

1
2

1. Several variations of signalization alternatives were considered in the DEIR/EA. Each of the alternatives had various issues associated with them such as providing space for the vehicles to queue and how to deal with ingress and egress from the park entrance as well as other ingress/egress points within the park. See Section 1.3.2 of the document for more explanation.
2. Reducing the speed would not correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorist being more careful, lowering the speed, in of itself, will not eliminate off- tracking. The speed limit has recently been reduced in this area from 40 mph to 35 mph.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:51 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:50 PM -----

Sonia Baur <sbaur@wavecable.com>
03/11/2009 04:27 PM

To kim_floyd@dot.ca.gov
cc Darryl Cherney <dc@asis.com>, Richard Salzman <rws@inreach.com>
Subject Richardson Grove

To: Cal-Trans
Re: Richardson Grove

Richardson Grove is barely a "redwood grove" at all, any more. If you walk along the 101 highway in the grove you will see sunlight coming in on the cut-edges to the east and to the west. A redwood grove is a shady place. To let more sunlight in through the middle, on the highway, would destroy whatever small semblance Richardson Grove does now have to being a grove at all. Do you remember when you first drove north up the 101, and your pleasure and astonishment when you first encountered the grove? I am wondering how we could even consider destroying that pleasure for others (never-mind the harm to the tourist industry). 1

I'm thinking that if good-hearts and good-minds cannot prevail with our good thoughts and words to preserve the grove, civil disobedience is definitely in order. 2

I'm also thinking that if that big-business and big-commerce were really that "needy", you should build them the 4-lane bypass to the east which is already in your plans.

Sincerely, Sonia Baur

--
Sonia Baur, M.D.
779 Maple Lane
Garberville, CA 95542
phone/fax (707) 923-7068
sbaur@wavecable.com
No virus found in this outgoing message.
Checked by AVG - www.avg.com
Version: 8.0.237 / Virus Database: 270.11.10/1995 - Release Date: 03/11/09 08:28:00

1. *See General Response #2.*
2. It is not anticipated that the canopy or shade element would be substantially altered with the proposed tree removal as the majority of trees to be removed from the park are from four to twelve inches in diameter and would not be a major component of the canopy.

2/25/09

Re: Richardson Grove Cal Trans project

Kim Floyd
P.O. Box 3700
Eureka CA 95502

Dear Ms. Floyd,

Destroying a portion of the Richardson Grove so that larger trucks drive this area a little faster is not fulfilling the needs of the general public or the highest and best use of the GM it would cost of tree removal and to straighten the highway in that area.

1

This proposed "repair" would be a travesty, would not benefit travelers, the money could be used for betterment of our more immediate needs for road repair.

2

Mona Beaver
6930 Linda Road
Eureka CA 95503

1. The proposed project does not straighten the roadway, but realigns the curves such that the curves are initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. Thus, it is not anticipated that this project would result in trucks traveling this section of Route 101 faster. It should also be noted that recently the speed limit in this area was lowered from 40 mph to 35 mph.
2. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Deanna Beeler
<beeler@humboldt1.com>
01/23/2009 10:07 AM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

1

I hope you don't widen the Richardson Grove portion of 101. It's absolutely beautiful. I opposed the cementizing (?) of the Eureka waterfront for the same reason: if we look like everybody else, there will be no motivation for tourists to come here and the local residents will no longer feel like they are in the country but in the outskirts of Gardena.

1. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders where there is no shoulder and there are no trees immediately abutting the roadway. The current alignment weaves through the forest with short or non-existent tangent (e.g., straight) sections followed by compound, reversing, and variable radius curves. The intent of the proposed realignment is to initiate the curves prior to the existing curves caused by the roadway weaving in between two groups of trees. In this way, vehicles would initiate curves earlier and by the time they reach the pinch point between the trees, the vehicles can more easily stay within their proper lane without off-tracking.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:16 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:16 AM -----

Ellin Beltz
<ebeltz@ebeltz.net>
02/23/2009 08:59 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Ms. Floyd:

Regarding the proposal to spend the currently proposed and of course will be higher Six Million U.S. Dollars to fix a road which currently winds through trees and has concrete on it, to whit: Richardson Grove.

As far as I can see, merely slowing the traffic down to 25 or 30 mph would permit larger vehicles to go thru the Grove. Reducing speed can be accomplished by changing a few signs and asking CHP for some enforcement. Probable cost after several layers of bureaucracy: $50,000 or so - certainly a far cry from $6,000,000. 1

Let's look at the impacts of a lower speed limit:

A moment or two delay for every car thereafter, no CEQA or other expensive documentation, no loss of business to Humboldt and local shops from having the road torn up for God knows how long, no impact to fish or wildlife except fewer of them would get smooshed, no concrete/asphalt or other road construction materials added to what is now very clean place.

Seriously Ms. Floyd, I often wonder how "growth oriented" public agency workers can get up and look at themselves, after all the beautiful places on this earth that have been ruined by their effort to let some humongous piece of equipment into an area never meant for its presence.

In this ever-so-special place, nestled in the last remaining remnant of a species whose antiquity beggars our imagination, I beg you, get out the screw-guns, change the signs, study that impact and then - if it is still not satisfactory - ask a broken economy for six million dollars to spend silting our streams, hurting our trees, wrecking our businesses and eventually - after years of disruption - providing some unprovable benefit to a few, single-minded individuals on both sides of the Grove. 2

With personal respects for your most difficult job,
Sincerely yours,

Ellin Beltz
Ferndale, California

author: Frogs-Inside their Remarkable World

1. *See General Response #8.*
2. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:45 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Highway Project (proposed)

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:45 AM -----

Marilyn Bennett
<mcbennett400@yahoo.com>

02/19/2009 05:21 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Highway Project (proposed)

I am writing to say both my husband and I completely agree with all the points raised by Doug Tickner in his letter in the
My Word section of today's Times-Standard. I believe it is in the best multiple-use interests of the future to maintain this lovely 2-lane, slow-speed section of 101. I-5 exists for huge trucks and interstate traffic. The Northcoast region has for decades been off the path of major transportation and industry and I see no impelling reason to change that. 1

Marilyn Bennett
1374 Vancil Street
Fortuna, CA 95540

1. The issue is that the size of vehicle in use commonly throughout the nation, including California, has changed to the STAA. While California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with the industry standard-sized vehicles. Thus, the non- STAA vehicles tend to be older vehicles as the newer vehicles are the industry standard–sized trucks. Smaller businesses, which depend upon trucking companies for importing and exporting their products, are finding it difficult to reliably access these non-standard sized vehicles.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:44 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:44 AM -----

Stanley Binnie
<sbinnie@suddenlink.net>
02/19/2009 10:49 AM
Please respond to Stanley Binnie <sbinnie@suddenlink.net>

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Project

Kathy--I am writing to express my opposition to the widening and straightening of Highway 101 through Richardson Grove. This now serves as a welcoming gateway to "Redwood Country" for tourists traveling north from the Bay area. It is a close-up view of what is to come as they travel north to the State and National Parks north of Trinidad. This is what many of those tourists come here to see. It brings lots of revenue into our area. Removing even just a few of these magnificent redwoods would greatly diminish this experience. 1

The proposed 300 foot wall would also greatly diminish this natural experience in addition to damaging the root systems of nearby trees. 2

I am sure there are many others besides myself that would boycott any "big box" stores that would find it profitable to operate in this area as a result of completion of this project. I (and many others) have moved up here from areas to the south to escape the hassles of life in those areas. 3

I feel a reduction in the speed limit would be a very cheap and much more environmentally friendly approach to this problem. Why not try it for a while to see how it works. 4

Stan Binnie
Trinidad, CA

1. *See General Response #2.*
2. Subsequent to circulation of the draft document a new retaining wall variation was evaluated. The wall variation reduces the tree removal from 30 to 6. As the new wall is located below the road it would not be visible to motorists except for the barrier rail.
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
4. Neither reducing the speed nor installing signs would correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck

speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off- tracking. The posted speed limit in this area was reduced from 40 mph to 35 mph in fall 2008 after conducting an Engineering and Traffic Survey.

The California Vehicle Code requires that speed zones be set based on prevailing speeds, collision history, and highway, traffic and roadside conditions not readily apparent to drivers. Average 85th percentile speeds were measured on Route 101 through the project limits and ranged from 41 mph to 49 mph for all vehicles and 39 mph to 44 mph for commercial trucks. Setting the speed limit far below the 85th percentile speed would make a large number of reasonable drivers "violators" and set up an unenforceable "speed trap" which is not allowed by the vehicle code. The reduction of the previous speed limit from 40 mph to 35 mph was justified based on several factors including the roadside conditions. The close proximity of trees, while not hidden, may present an unusual or at least an unaccustomed driving environment to some highway users and many drivers seem to have difficulty judging the clearance to trees along the highway. Also on bright sunny days, there is an abrupt change in lighting conditions when the drivers enter and exit the grove. In addition, although Caltrans maintains a friction-course overlay through the park (a type of pavement that provides for more friction for tires), the year-round constant shade may contribute to a road surface condition of concern that is inconspicuous. Because of these factors, Caltrans believes that the existing speed limit of 35 mph is both realistic and enforceable.

3/13/09

Kim Floyd
Caltrans Project Manager
P.O. Box 3700
Eureka CA 95502
Dear Ms. Floyd,

A balanced approach needed for Richardson Grove

MY WORD

Glenda Hesseltine

So nice to see Alan Olmstead's letter on March 3, reminding us that a balanced solution is required, and is indeed possible, in regards to Caltrans' highly controversial proposed project for Richardson Grove.

Mr. Olmstead is correct in saying that there are simple, low-tech solutions available that would save the trees, allow the trucks, and also save the taxpayer the waste of $6 million on the cost of the ill-conceived proposed project. Slowing the traffic to 25 mph or establishing a traffic light would preserve the trees, and allow the trucks. With a little deliberation, cooperation, and common sense, everyone can be happy.

A current misconception in the public mind is that only 40 trees are affected by the proposed project. This is not true. Caltrans' own document, the draft environmental impact report, shows 87 trees designated for removal. This means a significant disturbance of the canopy in the less than one-mile area of the project. Perhaps even more disturbing is the information (in the same Caltrans document) specifying the proposed cutting of the root systems of 30 of the largest redwoods in the grove.

While it is true that the largest trees will not be removed, it is also true that their roots will be cut. With no tap root, severance of the shallow rooted network leaves the giant redwoods with a perilous future.

Some of these trees have been there since before the time of Christ. What a shame to lose them because of preoccupation with our personal profit and loss statements.

According to the same Caltrans document, in addition to severing the roots, more asphalt will be applied, and a 300-foot retaining wall will have to be placed to stop the erosion of the cut made through the grove.

This project, as proposed, significantly risks heritage trees that belong to every citizen in the state of California. We keep forgetting that Richardson Grove is a state park.

In the zeal to get the trucks through, the truth that this grove belongs to the whole state (and therefore cannot be altered to suit the business interests of a section of Northern California) keeps getting lost.

It will be interesting to see which prevails, self-interest or social interest. Ask Caltrans for a balanced approach — put in the stop lights, slow the speed to 25 mph, allow the big trucks to pass safely, save $6 million of taxpayers' money, and save these remarkable trees which do not belong to us but to the future generations.

Send this request to Kim Floyd, Caltrans project manager, P.O. Box 3700, Eureka CA, 95502, or e-mail kim_floyd@dot.ca.gov before the March 12 deadline for comments on the environmental document.

Opinions expressed in My Word pieces do not necessarily reflect the editorial viewpoint of the Times-Standard.

Glenda Hesseltine resides in Eureka.

The enclosed article expresses my objection to the Richardson Grove "improvement" by Cal Trans as travesty.

In my opinion the "repairs" is for the benefit of the trucking industry, not for the taxpayers.

The proposed 6 million cost could be used for necessary repairs to neglected roadways.

Please consider a balanced approach to save the Richardson State Park!

1

2

John Fischbeck
7080 LINDA RD
EUREKA CALIF. 95503

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
2. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:30 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove Comment

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:31 AM -----

Bonnie Blackberry
<lichen@humboldt.net>
03/10/2009 07:24 PM

To Kim Floyd <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove Comment

To: Kim Floyd, Project Manager
P.O Box 3700
Eureka, Ca 95502

Date: March 10, 2009

Re: Richardson Grove Operational Improvement Project Humboldt County, CA District 1 - HUM - 101, PM 1.1/2.2 464800 Draft Environmental Impact Report / Environmental Assessment and Programmatic Section 4 (f) Evaluation

Dear Kim Floyd and to whom it may concern:

1

I am opposed to widening the road through the Richardson Grove. Humboldt County needs to support local family businesses not Big Box stores.
The grove is much more important than widening the road for speeding vehicles and huge trucks.

2

Instead of permanently ruining the ambiance of one of our ancient assets, how about simply putting in a traffic light? Maybe with a keypad code so just those trucks that need to could activate it and not have to worry about oncoming traffic for some defined period? Seems like a low-tech solution that wouldn't need to disrupt anything and save millions of dollars at the same time.

3

Sincerely,

Bonnie Blackberry
P.O. Box 1777
Redway, CA 95560

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
2. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders where there is no shoulder and there are no trees immediately abutting the roadway. The roadway geometrics are the limiting factor in the ability of STAA vehicles traversing through the park without off-tracking over the center line.
3. Several variations of signalization alternatives were considered in the DEIR/EA including just controlling the STAA vehicles and controlling all Route 101 traffic. Each of the alternatives had various issues associated with them such as providing space for the vehicles to queue and how to deal with uncontrolled traffic entering the highway from the park entrance as well as other ingress/egress points within the park when the rest of the Route 101 traffic is under one way traffic control. Without making the modifications to the alignment the issue of off-tracking of the STAA vehicles would not be solved. Having the traffic stop at a signal before proceeding, even at a reduced speed, would not resolve the issue of STAA vehicles off-tracking and encroaching into opposing lane of traffic when there are little to no shoulders to use. See Section 1.3.2 of the document for more explanation.

mishalacker@yahoo.com
(Misha Blacker)
01/28/2009 02:39 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. This prohect, while desired by a few, is unwanted by most local humboldt residents. We like the area the way it is and do not want what comes with wider roads. Please remove this project from the agenda, thank you. 1 2

Sincerely,
Misha Blacker
2015 Lilac Ln
Eureka, Ca (5503

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
2. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders where there is no shoulder and there are no trees immediately abutting the roadway. The roadway geometrics are the limiting factor in the ability of STAA vehicles traversing through the park without off-tracking over the center line.

"Lalia Blake"
<lael14@suddenlink.net>
01/26/2009 10:46 AM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson's Grove Project

History: This message has been forwarded.

Jan. 26, 2009
Cal Trans
Ms. Harmon

When I was a child growing up in Humboldt County, our family often camped at William's Grove before the flood of 1955. Sometimes we camped at other campgrounds. After the flood, we chose to camp at French's campground. Usually we spent several weeks, up to 2 months.

When we were at French's, we could walk on a trail to Richardson's Grove. The trail went from the North West corner of the camp and we didn't need to walk on the Highway. After 50 years, I can't tell you exactly where the trail was, but if safety for bicyclists and pedestrians is important, building another trail would be a great idea. 1

As for your plan to realign the Highway through Richardson's Grove, I was glad to see that you aren't going to cut down any big trees. However, cutting the roots of these trees could be a disaster later. 2

This Grove of trees were set aside so that the public could enjoy seeing these beautiful Redwoods, not so that trucks could speed through the area. Please protect them for our children and grandchilden. 3

Lalia Blake
1765 Willow Dr.
Fortuna CA

707-725-5780
lael14@suddenlink.net

1. Shoulders are being widened outside the park to better accommodate bicyclists and pedestrians. Within the park, widening existing roadways to create wider shoulders for bicyclists is not possible without removal of several old growth redwoods. Any path beyond the highway would have to be done by or in association with State Parks since they are the agency owning the land.
2. While the exact impacts from construction cannot be accurately predicted, some generalizations can be made. The most sensitive area for the trees can be found in what is called the structural root zone which consists of a circular area with a radius three times the diameter of the trunk of the tree. The roots found within this area are important for absorbing and delivering nutrients and water to the tree. The structural root zones for all trees adjacent to the roadway thirty inches in diameter and bigger have been mapped. All excavation below the finish grade within the structural root zone area except for the culvert work would be done with shovels, pick axes, or other non-mechanized methods to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots. The road was

originally constructed in 1915 and the trees have coexisted adjacent to the highway in apparent good health (successfully thriving).

3. The proposed project does not straighten the roadway, but actually introduces more curves into the alignment. The proposed realignment changes the curves such that the curves are initiated earlier so that vehicles have initiated going into the curves prior to reaching the trees causing the geometric deficiency. Thus, it is not anticipated that this project would result in trucks traveling this section of Route 101 faster. The numerous curves as well as the roadway characteristics of minimal to no shoulders with large trees abutting the edge of pavement would not be changed by the project and would continue to discourage speeding. It should also be noted that in late 2008 the speed limit in this area was lowered from 40 mph to 35 mph.

Kim
Floyd/D01/Caltrans/CAGov
03/12/2009 03:14 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: opinion

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:14 PM -----

"dblakely"
<dblakely@asis.com>
03/11/2009 09:44 AM

To <kim_floyd@dot.ca.gov>
cc
Subject opinion

Dear Kim Floyd
I'm writing to give my opinion on the Richardson Grove proposed by pass/road widening. 1
I read the MY WORD by Glenda Hesseltine in the Times Standard. I think that she has the right answer and I agree with her. I think that the smart and right thing to do is slow the traffic to 25 mph and install stop lights. 2
Please don't cut the roots of the trees this will kill them. 3
Sincerely
Dona Blakely

1. Neither reducing the speed nor installing signs would correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off- tracking. The posted speed limit in this area was reduced from 40 mph to 35 mph in fall 2008 after conducting an Engineering and Traffic Survey.
   The California Vehicle Code requires that speed zones be set based on prevailing speeds, collision history, and highway, traffic and roadside conditions not readily apparent to drivers. Average 85th percentile speeds were measured on Route 101 through the project limits and ranged from 41 mph to 49 mph for all vehicles and 39 mph to 44 mph for commercial trucks. Setting the speed limit far below the 85th percentile speed would make a large number of reasonable drivers "violators" and set up an unenforceable "speed trap" which is not allowed by the vehicle code. The reduction of the previous speed limit from 40 mph to 35 mph was justified based on several factors including the roadside conditions. The close proximity of trees, while not hidden, may present an unusual or at least an unaccustomed driving environment to some highway users and many drivers seem to have difficulty judging the clearance to trees along the highway. Also on bright sunny days, there is an abrupt change in lighting conditions when the drivers enter and exit the grove. In addition, although Caltrans maintains a friction-course overlay through the park (a type of pavement that provides for more friction for tires), the year-round constant shade may contribute to a road surface condition of concern that is inconspicuous. Because of these factors, Caltrans believes that the existing speed limit of 35 mph is both realistic and enforceable.

2. Several variations of signalization alternatives were considered in the DEIR/EA including just controlling the STAA vehicles and controlling all Route 101 traffic. Each of the alternatives had various issues associated with them such as providing space for the vehicles to queue and how to deal with uncontrolled traffic entering the highway from the park entrance as well as other ingress/egress points within the park when the rest of the Route 101 traffic is under one way traffic control. Without making the modifications to the alignment the issue of off-tracking of the STAA vehicles would not be solved. Having the traffic stop at a signal before proceeding, even at a reduced speed, would not resolve the issue of STAA vehicles off-tracking and encroaching into opposing lane of traffic when there are little to no shoulders to use. See Section 1.3.2 of the document for more explanation.
3. While the exact impacts from construction cannot be accurately predicted, some generalizations can be made. The most sensitive area for the trees can be found in what is called the structural root zone which consists of a circular area with a radius three times the diameter of the trunk of the tree. The roots found within this area are important for absorbing and delivering nutrients and water to the tree. The structural root zones for all trees adjacent to the roadway thirty inches in diameter and bigger have been mapped. All excavation below the finish grade within the structural root zone area except for the culvert work would be done with shovels, pick axes, or other non-mechanized methods to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots. The road was originally constructed in 1915 and the trees have coexisted adjacent to the highway in apparent good health (successfully thriving).

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:18 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove!

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:18 AM -----

"Harry Blumenthal"
<hryblumen@suddenlink.net>
02/22/2009 01:07 PM
Please respond to
"Harry Blumenthal"
<hryblumen@suddenlink.net>

To <Kim_Floyd@dot.ca.gov>
cc
Subject re: Richardson Grove!

As a resident of Eureka since 1989, I am making my comment in favor of leaving Richardson Grove as it is. For me and my family
it is a very sacred site indeed. When we decided to leave Los Angeles and move to Eureka the main reason was for the quality of
life, the largest aspect of which was the natural beauty everywhere one looked. Living in LA, we would come up on vacations that
corresponded to school holidays and came to appreciate the North Coast in all seasons. The absolute delight when we reached
Richardson Grove was palpable to all of us: Eureka! We have arrived!!!

I am certain the same is what invites most tourists to our area. The business interests that are wanting to 'straighten' the highway 1
in order to invite bigger trucks etc. will manage just fine the old fashioned way. Eureak always has. Their arguments pale in
relation to the damage they are willing to inflict on this beautiful Grove. I implore Caltrans and the State of CA to protect every 2
possible bit of our Redwood Heritage that is left to us. Say NO to those who are wanting to sacrifice the history and beauty of
Richardson Grove for their silly reasons. Let them 'slow down' and save lives and Redwoods!!! 3

Thank you for consideration of my views.

Harry Blumenthal
2773 Avery Lane
Eureka, CA 95501

1. The proposed project does not straighten the roadway, but actually introduces more curves into the alignment. The proposed realignment changes the curves such that the curves are initiated earlier so that vehicles have initiated going into the curves prior to reaching the trees causing the geometric deficiency. Thus, it is not anticipated that this project would result in trucks traveling this section of Route 101 faster. The numerous curves as well as the roadway characteristics of minimal to no shoulders with large trees abutting the edge of pavement would not be changed by the project and would continue to discourage speeding. It should also be noted that in late 2008 the speed limit in this area was lowered from 40 mph to 35 mph.
2. While the exact impacts from construction cannot be accurately predicted, some generalizations can be made. The most sensitive area for the trees can be found in what is called the structural root zone which consists of a circular area with a radius three times the diameter of the trunk of the tree. The roots found within this area are important for absorbing and delivering nutrients and water to the tree. The structural root zones for all trees adjacent to the roadway thirty inches in diameter and bigger have been mapped. All excavation below the finish grade within the structural root highway in apparent good health (successfully thriving).

zone area except for the culvert work would be done with shovels, pick axes, or other non-mechanized methods to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots. The road was originally constructed in 1915 and the trees have coexisted adjacent to the highway in apparent good health (successfully thriving).

3. Neither reducing the speed nor installing signs would correct the existing deficiencies in the roadway geometrics which result in STAA vehicles off-tracking over the center line and encroaching into the opposing lane. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off- tracking. The posted speed limit in this area was reduced from 40 mph to 35 mph in fall 2008 after conducting an Engineering and Traffic Survey.

   The California Vehicle Code requires that speed zones be set based on prevailing speeds, collision history, and highway, traffic and roadside conditions not readily apparent to drivers. Average 85th percentile speeds were measured on Route 101 through the project limits and ranged from 41 mph to 49 mph for all vehicles and 39 mph to 44 mph for commercial trucks. Setting the speed limit far below the 85th percentile speed would make a large number of reasonable drivers “violators” and set up an unenforceable “speed trap” which is not allowed by the vehicle code. The reduction of the previous speed limit from 40 mph to 35 mph was justified based on several factors including the roadside conditions. The close proximity of trees, while not hidden, may present an unusual or at least an unaccustomed driving environment to some highway users and many drivers seem to have difficulty judging the clearance to trees along the highway. Also on bright sunny days, there is an abrupt change in lighting conditions when the drivers enter and exit the grove. In addition, although Caltrans maintains a friction-course overlay through the park (a type of pavement that provides for more friction for tires), the year-round constant shade may contribute to a road surface condition of concern that is inconspicuous. Because of these factors, Caltrans believes that the existing speed limit of 35 mph is both realistic and enforceable.

Dear Kim Floyd

I strongly oppose the proposed plan to widen Hwy 101 through Richardson Grove. I feel that the increase in traffic it will allow to come into areas such as Eureka, Where the 101 runs through the midde of town, will create a larger threat of danger for pedestrians. 1
Local wild life will have a harder time surving the Hwy when they attempt crossing. 2 Bigger businesses will take advantage of the access and move in. Big Box stores is one of these businesss. If they move in, it will push out smaller local business. 3

Many or most, if not all people who live in the Humboldt County area live here because it is clean, beautiful, isolated and for the most-part free of corporations and housing developments. Widening the 101 will destroy more crucal and precious habitat as well as contribute to a longterm change in an unwanted direction.
I strongly oppose the proposed plan to widen Hwy 101 through Richard son Grove and hope it doesnot pass.

A concerned citizen

Christopher James Bondy

1. Shoulders are being widened outside the park to better accommodate bicyclists and pedestrians. Within the park, widening existing roadways to create wider shoulders for bicyclists is not possible without removal of several old growth redwoods. Any path beyond the highway would have to be done by or in association with State Parks since they are the agency owning the land.
2. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders where there is no shoulder and there are no trees immediately abutting the roadway.
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing

"Jane Bothwell"
<dandelionherb @att.net>
01/23/2009 10:48 AM

To <Deborah_Harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove

Dear Deborah,

I am writing to say that I oppose the proposed plans to" improve" the access at Richardson Grove. I do not agree with widening of the road, with concrete retaining walls or any tree cutting . I think the environment is manageable the way it is and that we need to adapt to it in awe of the beauty and magnificence that these giant trees bring to us. It is by far the most majestic part of the drive to the bay area. I would be very saddened by the loss of this beautiful inspiring piece of our Earth. We have so little left. May we preserve it! This quote I think says it well:

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Simple and inexpensive speed control, an added bike path, and judicious waivers for some STAA trucks, would make travel through RG safe and more enjoyable, and benefit local park businesses, with no ugly concrete retaining wall detracting from the spectacular scenery, or root compression killing old-growth redwoods. And the Eureka-Arcata corridor needs a safe bike/hike path, not an expensive high-speed freeway.
The keys are faith in our own resourcefulness, the wisdom to see the change that is in the making, the prudence and patience to be a vital part of bringing the new model of economic growth into reality, and the courageous vigilance necessary to resist the enormous pressures to conform.

3

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Thank you for considering my opinion and for all your hard work!

Sincerely, Jane

Jane Bothwell
Dandelion Herbal Center
4803 Greenwood Hts. Dr.
Kneeland. CA 95549
janeb@arcatanet.com

www.dandelionherb.com
(707) 442-8157 phone and fax

1. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders where there is no shoulder and there are no trees immediately abutting the roadway.
2. *See General Response #2.*
3. *See General Response #8.*
4. Shoulders are being widened outside the park to better accommodate bicyclists and pedestrians. Within the park, widening existing roadways to create wider shoulders for bicyclists is not possible without removal of several old growth redwoods. Any path beyond the highway would have to be done by or in association with State Parks since they are the agency owning the land. The retaining wall is located outside the park. A new wall variation was evaluated subsequent to the circulation of the draft document. The new wall would be located below the road so it is not visible to motorists.

SINGING TREES
RECOVERY CENTER

Alcohol & Other Drugs
Recovery Program

2061 Highway S. 101
P.O. Box 8
Garberville, CA 95542
(800) 344-3799
www.asis.com/strc

MARILYN BOWEN
Program Counselor
(707) 247-3495
FAX (707) 247-3334

Marilyn C. Bowen
P.O. Box 252
Redway, CA 95560-0252
(707) 923-2862

February 19, 2009

Re: Road Widening Project at Richardson's Grove

Dear Sirs and/or Ladies,

I'm writing to let you know my stance and fears regarding the proposed Road Widening Project at the Richardson Grove State Park area. Aside from being unnecessary, undesirable to the local residents, and destructive to the beautiful gateway to Humboldt County, I fear for my place of employment.

I believe that it would impact my place of employment, Singing Trees Recovery Center, in a very harsh way. The traffic and the speed at which it would come would destroy the very reason why people come to our Center for recovery. It is currently fairly quiet and peaceful and the setting is such that their spirits can rest and rejuvenate, while they learn how to live in and cope with the world soberly. 1

I believe that if this project is pushed through it would eventually impact the business so much that it could fold, and all of us that work there would be then unemployed. There is no other employment in the area that suits our skills so well and thus it would create a significantly destructive situation for all of us and our families, forcing us to either move, or take lesser jobs that do not fit our skills, nor fulfill us. I also believe that Singing Trees fills an important niche, not only in our community, but in California as a whole. Further, with economics being what they are currently in California, with no visible relief in sight, I think the money could be spent in much more constructive ways....perhaps the State could even pay those of us to whom it owes refunds, for just one example, or put it into our local schools, or law enforcement. It might even boost our local economy to do so, or at least keep it stable.

I think that spending money on the road is frivolous and unwarranted. I also take exception to the EIR which was inconsistent, contradictory and confusing. That issue alone makes this whole project suspect. What is this really about? We need, at the least, a presentable plan, that is helpful to all concerned and harms no one, which I have yet to see.

Thank you for your kind attention.

Sincerely,

Marilyn C. Bowen

Marilyn C. Bowen

1. Prior to construction, a meeting will be held with business owners and residents to discuss the project and present a communication plan. Temporary noise and traffic impacts are expected during project construction.

Welcome Center
<store@heartwoodinstitute .co
m>
01/29/2009 04:54 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject DEIR on Richardson Grove

Comments on the DEIR
On Richardson Grove

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

Sincerely,

David Boudreau

1. The project does not propose to sever all the roots of thirty trees in the park. There are a total of thirty trees in the park proposed for removal. Twenty of the thirty trees proposed for removal in the park are 4 - 12 inches in diameter and half of the trees proposed for removal in the park are tan oaks. No old growth trees are proposed for removal. The largest tree proposed for removal in the park is a 24 inch in diameter tan oak. Construction would occur in the structural root zone (circular area with a radius three times the diameter of the trunk of the tree) of several trees within the park. However, all excavation below the finish grade within the structural root zone area except for the culvert work would be done via "hand work" with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots.

2. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded, and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs, is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled Murrelet based on the following factors: 1) The removal of as many as 31 second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available to nesting Marbled Murrelets within one-half mile of proposed vegetation-removal activities, and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) The trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current Marbled Murrelet nesting habitat; and 3) the project includes measures to avoid and minimize impacts to old growth redwood tree roots during construction.
   While there are no known cases of Marbled Murrelets nesting in Richardson Grove State Park, it is estimated that at least one nesting pair is present within the 250 acres of suitable nesting habitat which may be subjected to noise disturbance during the breeding season. The US Fish and Wildlife Service concurs that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled Murrelets or Northern Spotted Owls in and near the project area.

   Providing the corvid- proof trash receptacles is a conservation measure recommended by the US Fish and Wildlife Service during the consultation efforts for this project and Caltrans incorporated this measure into the project. Conservation measures in the context of the federal Endangered Species Act represent actions that are intended to further the recovery of and/or minimize or compensate for the project effects on the listed species. The revegetation of disturbed areas and the restoration of the half acre that would be relinquished back to State Park are also conservation measures. The restoration of the half acre would enhance foraging habitat for Northern Spotted Owls.

   Surveying potential breeding habitat to identify potential nesting areas is identified as a recovery action in the Marbled Murrelet Recovery Plan (US FWS, 1997). The two year survey for Marbled Murrelets that Caltrans has proposed to do at Richardson Grove State Park would aid in the recovery of the species by providing information to the US Fish and Wildlife Service about the population in inland nesting areas.
3. *See General Response #8.*

Janette M. Bramlett
1502 Peninsula Drive
Arcata, CA 95521
skywriter.5@hotmail.com

January 29, 2009

Ms. Deborah Harmon
Caltrans District 1
Environmental Coordinator
PO Box 3700
Eureka, CA 95502-3700

Dear Ms. Harmon,

I am pleased to submit these comments on the Draft EIR produced for the Richardson Grove Operational Improvement Project. While it was a comprehensive effort, I feel strongly that some of the underlying assumptions (particularly the flawed and inadequate Gallo study) must be challenged as they hardly provide a solid rationale for the project. I also find that some of your own statements suggest that this project will not achieve the goals anticipated by its boosters, and stands to produce radical changes in our community that you have not acknowledged (and it would appear have neglected to examine in many cases).

The DEIR states that 16% of the collisions that occurred are attributable to trucks driving through Richardson Grove State Park. The majority of accidents were due to driver distraction and large objects--the ancient redwoods--standing on the edge of the roadway. Why would we spend $5.65 million to address a problem that will not affect 84% of the drivers that go through the State Park? If the problem is really not safety (since that, according to Caltrans, cannot be fixed with this realignment project), then why don't we just issue permits for the trucks that have to serve the 19 businesses that claim injury, lower the speed limit to 30 mph through the entire section of Richardson Grove State Park, as it is in the middle of Eureka, and use that money to shore up some of the other needy projects in the state of California? On what basis do you claim that safety will be improved (as you do on page 35) for both commercial and local traffic if in fact, the majority of accidents are not caused by trucks off-tracking? Please address these questions specifically.

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Given that this project is apparently geared to satisfying the purported transportation expenditures of a minority of the county's businesses, I will address most of my comments to the issue of the economic and environmental benefits vs. risks.

ECONOMIC RISK/BENEFIT:

First of all, I object to the fact that the details of the Gallo report are not revealed in entirety as part of this public disclosure. The study was paid for by public funds, and transparency is required in such circumstances as $5.65 million of taxpayer funding is being based on the veracity and logic of this rationale. As it stands, the study is a completely inadequate and biased assessment of transportation needs of business in this county.

1. Exactly who were the businesses who responded to the study and what was the basis for their estimates of transportation costs? In various public meetings, I heard the calculations being based on a direct and simple translation of pallet-loads in smaller trucks to pallet-loads in larger trucks. Having worked myself as a shipping supervisor and had responsibility for carrier selection and transportation strategies, I know that simply calculating pallet loads does not cover all the criteria one must consider in planning for transportation. Such minimalist projections cannot be relied upon for estimates of real-world conditions which involve a great many more variables than feet of space in a cargo hold. 5

2. In some situations, projections for annual transportation costs were based on 19 responses (and without knowing how the calculations were arrived at, I will that these methods were haphazard, as described above). Exactly what level of statistical reliability can you say this small sample size (not to mention the biased design of the questionnaire itself) holds for projecting its figures to entire sectors of the industry as Dr. Gallo has done? What is the significance of such a ridiculously small sample size when taken in context of not only Humboldt but also Del Norte counties, as this is what the Gallo report claimed to be addressing? Exactly how many businesses in the industrial sector that Gallo is considering actually exist in Del Norte and Humboldt counties? It would be useful to examine their calculations and projections in this regard. (I would however prefer to see more rigorous research on deriving transportation costs). 6

3. Besides these shortcomings, this study has been used to suggest that businesses in Humboldt and Del Norte counties across the board, universally, are harmed by the restriction of STAA trucks. In fact, how many businesses in Humboldt and Del Norte are in operation overall, and in what sectors are they classified? Have these other businesses actually been interviewed with respect to their perspectives on this matter? If not, why were they excluded? 7

4. There are several businesses within the limits of the project that stand to lose business on a scale that may put them out of operation and permanently decimate Piercy. How will this loss of employment and activity in this area affect the emergency services that depend in large degree on people who are currently working at these businesses? 8

5. How will Caltrans compensate these entities in the event they lose important volunteers for their fire brigades and emergency response teams as the result of this project? These businesses are important to Humboldt county; potential impact on the emergency services will affect Mendocino county; yet what consideration has been made for these contingencies? 9

6. How is it that the State of California agrees to spend $5.65 million of taxpayer money to benefit a very small percentage of businesses in Humboldt County (and possibly Del Norte, though we have no idea exactly how many in which county because of the unreasonable secrecy surrounding the Gallo report) when an assessment of the conditions and needs of a *representative* sample of **all** business sectors in the entire county (and Del Norte, and also Mendocino, since they will be affected as well) has not been made? We have no way of knowing how this transportation restriction affects other businesses. How will lifting this restriction affect businesses across the tri-county area? We need to know this before we can speak of an economic benefit. 10

7. The twenty-year income impacts are ridiculous. To project one year of costs or economic impact based on 19 responses is irresponsible, but to then to project those numbers over a twenty-year period is absolutely laughable. At BEST, these figures would need to be recalculated in consideration of the economic recession we are in, which makes Gallo's assumptions useless. 11

8. Please provide statistical evidence for your assertion o page 34 (in the Gallo report none is given) that truck traffic will be reduced by opening up the 101 to all STAA truck traffic. At the very least you would have to consider other road work that you have completed or are considering or planning in Del Norte and Mendocino and Shasta counties, because Richardson Grove State Park is not the only way in and out of this county. To quote the DEIR, "It is not anticipated that opening Route 101 at Richardson Grove to STAA trucks, by itself, will necessarily induce new business growth in the North Coast...it is not likely that there would be substantial increase in truck trips...Any increase in growth of industrial or commercial business would likely be primarily dependent upon the overall economy of the North Coast in general." In fact, isn't it true that Caltrans is considering, planning, or has completed several other road-altering projects with the purpose of opening the entire tri-county region up to STAA traffic? You have said 12 13

nothing of this as an overall goal, which would require a comprehensive assessment of how such a *network* of STAA access would impact growth. I would like to know what such a review of your projects reveals, and I would insist that in order to comply with CEQA regulations you complete an assessment that considers cumulative effects of increased truck traffic throughout this tri-county region in terms of energy use, growth and development, emissions, noise and environmental impacts. I believe the work you have produced is wildly inadequate and contains unwarranted conclusions in this regard.

9. The DEIR refers to the Regional Transportation Study that was done for Del Norte and Humboldt counties. In this study, a comprehensive transportation plan involved railroad, deep-water port shipping and improved highway access for STAA trucks. Please discuss how all of these projects, when taken together (as I am aware that there are also plans under consideration to establish a marina terminal and a major development on Humboldt Bay that involves such changes) affect Richardson Grove State Park in terms of energy use, growth and development, emissions, noise, and environmental impacts. 14

10. Your own DEIR states: "Some diversion of trucks might occur if 101 is deemed to be more economically feasible (less time, less travel distance) but the actual number is unknown." How many trucks are likely to be diverted? Exactly how much traffic of STAA trucks now traveling on Route 5 or other approved routes will be redirected to Route 101, via Route 299 or other roadways, given the construction changes you have made or expect to be making in the future on the relevant roadways? If you have not conducted the research necessary to assess these numbers, then you have not satisfied CEQA requirements. Transportation figures are available, as you well know and can easily access. Carriers can anticipate changes that might occur (if asked to produce calculations), and whatever other variables are involved must be named and evaluated. No respectable business would proceed in evaluating risk-benefit with such flimsy assertions. If we are going to endanger ancient redwoods and long-standing businesses, we need to be specific about the relevant stakes--especially in a time of economic downturn. Why risk ruining businesses that have been successful in keeping themselves alive through good times and bad over a period of decades? Please explain how you would choose to injure one group of businesses to increase profits for another group? What is the rationale? 15

11. The Gallo report claims that lower emissions will result because there will be 758 fewer trucks on the road, given the estimates of the 14 businesses that responded to questions about truck traffic. FOURTEEN BUSINESSES in all of Del Norte and Humboldt counties! See my previous questions on assessment of traffic impacts. CEQA requires a proper assessment of impacts on energy, noise and emissions, and this does not satisfy that requirement. 16

12. There is no survey of common carriers to ascertain precisely how the new emissions regulations set to take place in 2010 will affect transportation in general, rates and methods of shipping, and availability of truck formats. There have been wild claims in this regard, such as there will be NO smaller trucks (if one can consider a 65-foot truck to be small) available after 2010, but I have seen no evidence of this in any transportation trade magazine or website. If there is such evidence, please provide it as part of this study. 17

ENVIRONMENTAL RISK/BENEFIT:

1. Please provide information about scientific studies done on the impact of compacted roots on tree health and growth. Please provide specific information on how the sudden cutting and/or deprivation of air, water and nutrients of or from tree roots, particularly in the shallow root systems of an established redwood forest, will affect the health of the trees in that forest. Without such studies we cannot properly assess the potential impact of the realignment on the health of the forest in Richardson Grove State Park. 18

2. Please explain how your round-the-clock construction plans will impact the lives of nocturnal animals whose activities will be massively disturbed by a year-long construction schedule. How will you prevent long-term damage to this natural community from the severe disruptions of noise and erratic alterations in light that will inevitably take place? Please explain your conclusion that the noise levels will not exceed that of the normally occurring levels when you will be breaking up concrete, using cement trucks and other heavy equipment, over a period of several months? 19

3. Have you applied for incidental take permits for any of the endangered species within the limits of this project? If so, why have you checked, "less than significant impact" under IV.a) on page 124? I would assert that harassment, injury and possible death is clearly a significant impact. 20

4. With regard to your CEQA checklist on page 123, I can't understand how you can say that this project would have a "less than significant impact" with respect to the following points: (a) "have a substantial adverse effect on a scenic vista"; (b) "substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway"; and (c) "substantially degrade the existing visual character or quality of the site and its surroundings". I would have checked "potentially significant impact" and replaced, "potentially" with "absolutely". That wall across from Singing Trees Recovery Center will never be the same. The canopy that shades that stretch of roadway will no longer exist. 21

5. This project involves the use of a 300-foot wall along the west side of the road. Please specify whether the wood will be chemically treated and if so, with what chemicals, and describe the impact of that wall in terms of the potential leaching of toxic chemicals into the watershed. 22

6. In the area where you propose to remove trees and construct a 300-foot retaining wall, please explain how the geology and soil structure differ from that of the area just north of that stretch where there has been significant instability and landslide activity. 23

7. I believe that your information under NOISE in section XIa), XIb), XIc) and XId) of the CEQA checklist (p. 128) cannot be properly assessed as accurate without a more complete and reliable study of transportation changes that could manifest as a result of your projects to open access to STAA trucks in the tri-county area as a whole. Please provide adequate and verifiable data to substantiate these claims. 24

8. Similarly, your contention under XII. Population and Housing (a), on page 129, is impossible to evaluate based on your lack of information about changes that will occur as the cumulative result of several projects in which Caltrans and other agencies have been involved—projects that are aimed at changing infrastructure which would open the county to a completely new level of commercial and industrial activity. Caltrans has not shown adequate consideration of these issues in this DEIR and therefore this project should not be permitted to go through as designed. 25

9. Under XV Transportation/Traffic (a) (p.130), Caltrans has not demonstrated that making Highway 101 through Richardson Grove State Park accessible to all STAA vehicles will have no effect on the existing traffic load. There is ample evidence from other highway projects that road improvements bring about increased volume, and here we are talking about a project that is specifically designed for allowing more, and larger commercial vehicles, to enter the area. Please provide data that substantiate your claim that there will be no significant change in truck traffic. 26 If more rigorous study predicts an increase in truck traffic, please provide a corresponding and thorough assessment of air quality impacts in the affected region. Also, please provide information on the impact that these larger roads are likely to have on Humboldt County roadways and whether or not there will be commensurate increased funding to keep up with any increases in rates of deterioration and breakdown of our road surfaces as the result of these larger trucks. 27

10. In XVII Mandatory Findings of Significance, (a) (p. 131), if Caltrans has applied for an incidental take permit, how can you mark this item as a "less than significant impact"? 28

11. In XVII Mandatory Findings of Significance, (b) (p. 131), please explain why you have not considered the devastating impact of unsustainable logging of ancient redwoods in this entire region when determining that this project will have "less than significant impact". Without studies of how the ancient redwoods in Richardson Grove State Park will be affected by the work you propose in cutting roots and laying down concrete and asphalt over remaining intricate root systems, how do you reach this conclusion? 29

12. Why are you recommending that a field study of the marbled murrelet in this area be done AFTER the construction? This is an endangered species that nest in this area and a complete field study should be conducted PRIOR to any potentially damaging or life-threatening activity. Please explain this backward plan. 30

13. What analysis have you made of the shifts in commercial transportation that are likely to occur as the result of decreasing oil supplies? Have you conducted research in Europe, where generally higher oil prices have forced industries to consider more innovative solutions to similar problems? Given the current world-wide recession, how wise is it to endanger our sacred natural heritage in order to accommodate a business condition that will not even persist long into the future? 31

There are many specific questions that need to be answered before we can make a reasonable assessment of this project. Please respond directly to each of my concerns. I hope that when this has been done you will agree with my recommendation that we lower the speed limit to 30mph throughout the area of Richardson Grove State Park, and extend the already-existing program of issuing special permits for specific trucks that cannot legally travel on this route at the current time. If the speed limit is strictly enforced, and if special self-monitoring signs are installed like those used along the Eureka-Arcata corridor, we are likely to see an increase in safety statistics that would not come if we pursue this improvement project, and we would help the State of California restore some of its more damaging budget cuts. 32

Thank you for your consideration.

Sincerely,

Janette M. Bramlett

Janette M. Bramlett

cc: Ms. Kim Floyd, Project Manager

1. The primary purpose of the project is to lift the restriction on STAA vehicles. The current roadway geometrics are such that STAA vehicles off-track over the center line into the opposing lane. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. If a collision were to occur involving a STAA vehicle that was given a permit to traverse the park and off-tracking was found to be the reason for the collision occurring, Caltrans would be liable because 1) Caltrans knew there was a geometric problem associated with STAA trucks traveling through the area and 2) Caltrans did nothing to correct the known issue. The proposed project would correct the known geometric condition and lift the restriction for STAA trucks with no special permits being required.
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
3. *See General Response #8.*
4. Safety would be improved from minor geometric improvements and providing minimal shoulders where none presently exist.
5. Dr. Gallo's Study utilized information from a survey that was conducted by the Humboldt County Economic Development Office. Participation in the survey was voluntary. Did not sponsor, develop, or oversee the survey. Caltrans was not provided access to the information. The survey instrument did not request detailed information. The findings and conclusions in Dr. Gallo's Study were not used to justify the project. The information provides a broad brush look at the potential economic impact from the project.
6. For those industry sectors that participated in the survey, the response rate was significant. It is likely that the participants were those who were most concerned about shipping costs.
7. The results of the study were not used to justify the project. The project fulfills an objective identified in the County's Regional Transportation Plan for improved goods movement at Richardson Grove.
8. Caltrans disagrees that businesses in Piercy will go out of business as a result of this project. Caltrans will be working closely with these businesses during construction.
9. As stated, Caltrans believes this project can proceed, working in association with businesses just as numerous other construction projects have, without having substantial adverse effects on the viability of those businesses.
10. Caltrans and the County of Humboldt believe that this project will benefit numerous local businesses. Of the over 180 letters of support received for this project, most were from business owners or employees of businesses who felt that the project would benefit their business operations. The conclusions and findings in the Gallo Report were used as a guide to see if the cost benefit ratio appeared positive and to get an indication if the project would result in substantial adverse effect. An economic study conducted in Del Norte County resulted in similar findings.

11. The information in the Gallo Report is not the primary justification for the project. As stated, the information is being used as a guide.
12. Economic activity and subsequent growth in Humboldt County faces a challenge in the form of distance to major markets with or without the proposed project. The inaccessibility of the County to larger trucks is not the most important constraint on business development in this portion of northern California. A study prepared for the Humboldt County Association of Governments identified the factors that are important to facilitating growth in this area include distance to major population centers, lack of direct access to Interstate road system, lack of completed four lane north/south or east/west highways, limited air transportation system, and unreliable or inadequate rail service among others (Cambridge Systematics, Inc., 1989). These factors would not be changed as a result of the project. For more information refer to Section 2.1.2 of the DEIR/EA.
13. Yes, Caltrans is in the planning phase for projects that would open Routes 199 and 197 in Del Norte County and Route 299 in Shasta County to STAA vehicles.
14. The railroad won't likely be viable into Humboldt County for the foreseeable future.
15. While some diversion from I-5 and Route 99 may occur, the proposed project will not be increasing the capacity of Route 101 as no new additional travel lanes will be added. Any diversion from other north-south routes would depend upon it being economically feasible for trucking companies to change the existing truck routes based upon fuel consumption and travel times. Since all major coastal cities from southern California to northern Washington have readily available access to I-5 and U.S. 99 corridors, which have straighter alignments and faster travel times, the opening of STAA access to US 101 through Richardson Grove State Park is not expected to generate a substantial amount of diverted truck traffic from either I-5 or US Route 99.
16. The expected lower emissions result not only from fewer truck trips but also due to the non-STAA vehicles tending to be older vehicles. As companies replace vehicles in their fleet, they are typically replaced with the industry standard- the STAA vehicles. The newer vehicles tend to have better fuel efficiency and lower emissions than the older vehicles.
17. Caltrans has never stated that no non-STAA vehicles will be available after 2010.
18. A certified arborist proposed the measure that will be used during construction to minimize impacts. The trees along Route 101 at this location have coexisted with the highway since 1915 and are still healthy. In the professional opinion of the arborist, the proposed construction would not result in substantial adverse impacts.
19. Wildlife inhabiting the area adjacent to the highway and campgrounds in the park is already affected and have adapted to noise, lights, and human activity associated with the campfire programs, campground activities including generator noise from the RVs, and general maintenance activities conducted by the park staff to upkeep the park facilities and roads as well as traffic and maintenance activities associated with Route 101. There might be limited night work, but as productivity is not as great during night construction, and therefore is more expensive, it would likely only be utilized sparingly.
20. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled

Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable, thus, no incidental take permit is required.

21. Where the retaining wall is proposed is outside the park boundaries in an environment that has been altered with numerous buildings, private access roads, utility poles, and other associated development. While the construction of the wall would eliminate vegetation on the lower slope, the upper slope would remain vegetated and thus, the canopy which shades the road would remain.
22. Yes, the wood would be treated and its application would be in accordance with approved handling and uses.
23. The areas mentioned are outside the project limits of the proposed project. While there may be historical geological issues, as so much of the area is geologically unstable, it would be cost prohibitive to do preventive projects to improve the stability for all the roadways.
24. It is not anticipated that truck traffic would increase on Route 101 as a result of the proposed project. The project will not be increasing the capacity of highway as no additional travel lanes will be constructed. The potential for increased truck traffic would be due to diverted truck traffic that currently uses other north/south routes such as I-5 and Route 99. Diversions from these other routes would depend upon it being economically feasible for the trucking companies to change their existing routes based upon fuel consumption and travel times. Since all the major coastal cities from southern California to northern Washington have readily available access to the I-5 and Route 99 corridors which have straighter alignments and faster travel times, the opening of STAA access to Route 101 through Richardson Grove is not expected to generate a substantial amount of diverted truck traffic. If the project is constructed, some of the truck traffic that currently use Route 101 through Richardson Grove would likely switch form non-STAA trucks to STAA trucks which has the potential to reduce the number of truck trips.
25. See Response #12 above.
26. See Response #24 above.
27. The same maximum weight restriction applies to STAA and non-STAA vehicles.
28. As noted in Response #20 above, no mortality is expected to occur.
29. As noted previously, it is not expected that the proposed project would result in substantial adverse impacts to redwood trees.
30. The Biological Opinion from the U.S. Fish and Wildlife Service recommended that a survey be conducted as a conservation measure. The protocol for Marbled Murrelet surveys requires a two year survey. The first year the survey will be performed is 2009, and the second year it will be conducted is 2010.
31. Other modes of transportation appear not to be viable in the near future.
32. As stated previously just reducing the speed and adding signing won’t resolve the issue of STAA vehicles off-tracking and issuing permits increases liability which would not be a prudent use of public funds.

ocie@ociebridwell.com (Ocie Bridwell)
01/29/2009 10:23 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. I am concerned that this report is inadequate and insufficient in several ways. I also question the necessity of the project, and cannot find information within the report that explains how this project allows the restrictions for the longer trucks to be lifted by Caltrans. 1

I am not in favor of projects that promote habitat destruction for the benefit of industry. This beautiful stretch should continue to be protected as opposed to exploited. 2

Sincerely,
Ocie Bridwell
401 Fair Street
Petaluma, CA 94952

1. *See General Response #1.*
2. *See General Response #2.*

Kim@Kebrown.com
(Kimberlee Brown)
01/29/2009 10:34 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove

Dear Ms. Harmon,

We must remember, that there are very few ancient redwoods left at all, some estimates are less than 5% of what there once was, what took hundreds to thousands of years to reach such magnificent heights. 1

I am a humboldt resident and I believe it is far more important to do everything we can to protect these amazing trees than it is to allow a faster route for trucks, or a wider route for larger trucks. The risks are simply not worth it. 2

Sincerely

Kimberlee Brown

Sincerely,
Kimberlee Brown
PO Box 4536
Arcata, Ca 95518

1. While the exact impacts from construction cannot be accurately predicted, some generalizations can be made. The most sensitive area for the trees can be found in what is called the structural root zone which consists of a circular area with a radius three times the diameter of the trunk of the tree. The roots found within this area are important for absorbing and delivering nutrients and water to the tree. The structural root zones for all trees adjacent to the roadway thirty inches in diameter and bigger have been mapped. All excavation below the finish grade within the structural root zone area except for the culvert work would be done with shovels, pick axes, or air spades to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with an air spade would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots. The road was originally constructed in 1915 and the trees have coexisted adjacent to the highway in apparent good health (successfully thriving).
2. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders to better provide for bicyclists and pedestrians. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders in those spot locations where there is no shoulder and where there are no trees immediately abutting

the roadway that would preclude widening. The proposed project actually introduces curves into the alignment resulting in the curves being initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. Thus, it is not anticipated that this project would result in trucks traveling this section of Route 101 faster. The highway would continue to be a curvilinear two lane road with little or no shoulders with large trees abutting the edge of the pavement. It should also be noted that recently the speed limit in this area was lowered from 40 mph to 35 mph.

"Midge Brown"
<midgems@sbcglobal.net>
01/27/2009 09:25 PM

To <Deborah_Harmon@dot.ca.gov>, <Kim_Floyd@dot.ca.gov>
cc
bcc
Subject Richardson Grove

Please don't make Humboldt County an overly accessible community. The isolation is what makes this area what it is. If the Richardson Grove project goes through, the lives of everyone in the county will change, and not necessarily for the better! We like it here behind the Redwood Curtain. 1

Thank you,
Margaret Brown
Arcata, CA

1. *See General Response #12.*

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:48 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:48 AM -----

Pamela Brown <Pamela.Brown@humboldt.edu>
02/20/2009 09:13 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

I would like to register my perspective with you about Richardson Grove. I was lived in Southern California where I was born and moved to Humboldt County in 1989. I've made the drive south off and on and for a 2-year period, I made that drive every other weekend due to business. Of course, the drive south through Humboldt is spectacularly beautiful and every time I come to Richardson Grove, I realize how healthy and vital the beauty of the nature is to everyone's well being--emotionally and physically. We have something very special up here that is rare beyond this county. We have not yet become over commercialized, retaining the quaint honesty and connectedness that was present in many places I grew up along the coast in the southern parts of the state.

I'm asking, probably pleading, to not widen Richardson Grove. I doubt very seriously that doing that will add anything to our economy. I've drive that road hundreds of times behind or in front of big rigs coming this way to deliver something, and there is no problem. Slowing down in that small patch of beauty only benefits us, including the drivers who could probably care less if for that mile they could keep going 50 instead of 30. What we gain by leaving it as it is far outweighs what we will lose.

1
2

Please leave Richardson Grove alone. Thank you, pam

Pamela Brown, Professor, Chair
Department of Social Work
Humboldt State University
Arcata, CA 95521 U.S.A.
pb4@humboldt.edu
707/826-4564

1. The majority of widening proposed for this project is outside the park limits where the road is being widened to gain four foot shoulders to better provide for bicyclists and pedestrians. Within the park boundaries, the road is not being widened so much as it is being realigned, although the goal is to provide two foot shoulders in those spot locations where there is no shoulder and where there are no trees immediately abutting the roadway that would preclude widening. The proposed project actually introduces curves into the alignment resulting in the curves being initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. Thus, it is not anticipated that this project would result in trucks traveling this section of Route 101 faster. The highway would continue to be a curvilinear two lane road with little or no shoulders with large trees abutting the edge of the pavement. It should also be noted that recently the speed limit in this area was lowered from 40 mph to 35 mph.
2. *See General Response #8.*

Kim Floyd
P.O. Box 3700
Eureka, ca. 95502

2/21/09

I wish to express my opinion relative to the proposed changes to the road now that goes through Richardson Grove in Southern Humboldt.

This stretch of the highway has unimaginable beauty seen as one passes through as those magnificent old redwoods are purely breathtaking each time one passes. To me they seem a precious treasure much too beautiful and precious to destroy. Redwood trees do not grow in many places in our world and to destroy them, as many have been already, would be a terrible shame. 1

Slowing down the traffic in that area would be a cost-effective measure in the long run and be a reasonable solution, it seems to me. 2

Respfully submitted,
Mildred Brooker, resident
and taxpayer, at Pinder Ridge, McKinleyville, Ca

1. *See General Response #1.*
2. *See General Response #4.*

millinerymadness @yahoo.co
m (Ellen Bryant)
01/27/2009 08:01 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

In some ways, it is not reasonable to widen this stretch of road... Because of the Techtonic Uplift, Ring of Fire,general Mass Wasting, etc., all along the coast.. It's seems to be a long range waste of Taxpayer's dollars to do anything more than just the standard upkeep of the existing roads.

If you really want masses of cars, trucks of all sizes and expansion comparable to that of the Bay Area and Southern California... Please put the Freeway into Humboldt County from Freeway 5 to Hwy 101 via the Hwy 36 route.....it just makes more sense. The majority of it is better road and easier to expand.

I question the necessity of the Richardson Grove project. I don't see how this project allows the restrictions for the longer trucks to be lifted by Caltrans. 1

The stretch of Highway 101 that would be impacted by this project defines the character of the region. This construction project would cause harm to this atmosphere and to the health of this prized redwood grove. These issues are not adequately addressed in the document. 2

Any industrial development in this sensitive grove is cause for alarm. Noise, air pollution, soil compaction, and many other effects from large industrial construction equipment will disrupt the serene environment, drive away wildlife, and discourage the public's use of the state park. 3

I'm concerned that a few businesses will benefit from this publicly funded project while businesses dependent on tourism may suffer. In a time of economic crisis, I fear that these shops and services may not survive the impacts. 4 5

Sincerely,
Ellen Bryant
3545 M St
Eureka CA 95503

1. *See General Response #1.*
2. *See General Response #2.*
3. *See General Response #4.*
4. *See General Response #6.*
5. *See General Response #7.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:33 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:33 AM -----

steve bullas
<steve.bullas@gmail.com>
03/10/2009 10:42 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

As a longtime resident of Humboldt Co. I urge Caltrans to find a solution that does not involve cutting the trees of Richardson Grove. Thank you Steve Bullas 1

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:17 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:17 AM -----

Pamela Cahill <northcoastpam@suddenlink.net>
03/08/2009 11:17 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson's Grove

Dear Kim,
Instead of chopping down the beautiful trees and damaging the whole grove on the corridor into Humboldt Co., please consider reducing the speed limit and/ or allowing all hauling business to be exempt as the cattle industry is. Also what about one-way traffic controlled by a light as a possibility? In times of saving money, reducing air pollution and global warming, why are we cutting trees to increase speed and the use of bigger trucks? I have lived in Humboldt Co. for nearly 60 years and have traveled that corridor hundreds of times. I have seen the logging and timber industry, cattle and dairy industry use the corridor along with travel trailers and buses. It works and will continue working if we slow it down and work hard to get the railroad back into the county.
Sincerely,
Pamela Cahill
2723 Graham Rd
Bayside, CA95524

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3
4
5

1. *See General Response #2* regarding how the project affects the park.
2. *See General Response #*8 regarding how reducing the speed limit does not meet project purpose and need.
3. Truck exemptions will not provide the necessary roadway improvements to prevent off tracking. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. The proposed project would correct the known deficient geometric conditions and lift the restriction for STAA trucks with no special permits being required.
4. *See General Response #10* regarding signal alternatives that were evaluated .
5. The issue is that the size of vehicle in use commonly throughout the nation, including California, has changed to the STAA. What has been reported is that while California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with industry-sized vehicles (STAA trucks). Smaller businesses which depend upon trucking companies for importing and exporting their products are finding it difficult to reliably access these non standard-sized trucks.

April Caito
1061 Vernon St.
Eureka, CA 95501

March 11, 2009

Kim Floyd, Project Manager
P.O. Box 3700
Eureka, CA 95502

Dear Kim Floyd,

Please consider building a highway around Richardson Grove so our future generations will be able to see and enjoy a piece of beautiful history. 1

Thank you for your time.

Sincerely,
April Caito, Humboldt Resident

1. *See General Response #9* regarding information about the bypass alternative.

Kim Floyd - March 10, 09

I am sending this newspaper editorial dated March 10th because I agree with what the person, Glenda Hessellund wrote.

Cutting down these trees is and will be a great tragedy. If we can have a 'corridor' from Eka to Arcata, WHY can't we have a 10 minute light (similar to the one going under 101 in the Sausalito area to get to the west coast of the Marin headlands) That particular light has been there 4 at least 40 yrs to MY knowledge! And my kids loved the ride!

$6,000,000 dollars to cut down a few (disputed #'s here) trees is totally absurd. There has to be a much much less costly approach to this and 10 minutes (at a timed light) is nothing out of anymes life! As for ER

1

2

Vehicles, provide 2 turnouts (this is what a mile?) so the ER vehicles, CHP, + so forth could trap the lights the like the law enforcement officials do in Seattle (change red to green). Signs along the route could alert vehicles to move to pull outs.

It does not take a rocket scientist to figure this out AND it doesn't take 6,000,000 either.

Cynthia Rudolph-Forcier
725 8731

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A balanced approach needed for Richardson Grove

MY WORD

Glenda Hesseltine

So nice to see Alan Olmstead's letter on March 3, reminding us that a balanced solution is required, and is indeed possible, in regards to Caltrans' highly controversial proposed project for Richardson Grove.

Mr. Olmstead is correct in saying that there are simple, low-tech solutions available that would save the trees, allow the trucks, and also save the taxpayer the waste of $6 million on the cost of the ill-conceived proposed project. Slowing the traffic to 25 mph or establishing a traffic light would preserve the trees, and allow the trucks. With a little deliberation, cooperation, and common sense, everyone can be happy.

A current misconception in the public mind is that only 40 trees are affected by the proposed project. This is not true. Caltrans' own document, the draft environmental impact report, shows 87 trees designated for removal. This means a significant disturbance of the canopy in the less than one-mile area of the project. Perhaps even more disturbing is the information (in the same Caltrans document) specifying the proposed cutting of the root systems of 30 of the largest redwoods in the grove.

While it is true that the largest trees will not be removed, it is also true that their roots will be cut. With no tap root, severance of the shallow rooted network leaves the giant redwoods with a perilous future.

Some of these trees have been there since before the time of Christ. What a shame to lose them because of preoccupation with our personal profit and loss statements.

According to the same Caltrans document, in addition to severing the roots, more asphalt will be applied, and a 300-foot retaining wall will have to be placed to stop the erosion of the cut made through the grove.

This project, as proposed, significantly risks heritage trees that belong to every citizen in the state of California. We keep forgetting that Richardson Grove is a state park.

In the zeal to get the trucks through, the truth that this grove belongs to the whole state (and therefore cannot be altered to suit the business interests of a section of Northern California) keeps getting lost.

It will be interesting to see which prevails, self-interest or social interest. Ask Caltrans for a balanced approach — put in the stop lights, slow the speed to 25 mph, allow the big trucks to pass safely, save $6 million of taxpayers' money, and save these remarkable trees which do not belong to us but to the future generations.

Send this request to Kim Floyd, Caltrans project manager, P.O. Box 3700, Eureka CA, 95502, or e-mail kim_floyd@dot.ca.gov before the March 12 deadline for comments on the environmental document.

Opinions expressed in My Word pieces do not necessarily reflect the editorial viewpoint of the Times-Standard.

Glenda Hesseltine resides in Eureka.

1. *See General Response #2* regarding project impacts to the park.
2. *See General Response #10* regarding information on the signal alternatives that were evaluated.
3. Widening the roadway to construct turnouts in this area would require removing several redwood trees.

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:23 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:23 AM -----

Chris Callahan
<ccc@humboldt1.com>
02/21/2009 12:09 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Project

To Whom It May Concern,

Please add our voices to the many who object to the widening of that stretch of road and removal of those ancient trees.
Simply put: they are a national (and international!) treasure. They deserve preservation for future generations. No economic hardships have bearing weight in this issue. 1
Save the grove in its entirety!
Thank you,

Chris and Gene Callahan
Black Oak General Contracting
172 Puddleby Lane
Fieldbrook CA 95519

1. *See General Response #2* regarding project impacts on the park.

January 27th, 2009

Bruce Campbell
1158 26th St. #883
Santa Monica, CA 90403

Deborah Harmon, Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka, CA 95501

Re: Richardson Grove Operational Improvement Project Humboldt County, CA District 1 - HUM - 101, PM 1.1/2.2 464800 Draft Environmental Impact Report / Environmental Assessment and Programmatic Section 4 (f) Evaluation

Dear Ms. Harmon and to whom it may concern:

These are my comments on the Draft EIR/EA and the Biological Assessment for the highway widening / re-alignment scheme targetting the most beautiful area of the "Redwood Highway" in the only location along its route where ancient redwood canopy covers the majority of the highway in a one mile stretch -- in the Richardson Grove State Park area of southern Humboldt County.
****

Here is a brief summary of 15 very important issues which were not adequately addressed (if at all) in the DEIR/EA (as well as Biological Assessment) for the highway project in the Richardson Grove area:

1. MARBLED MURRELET - a much more thorough analysis needs to occur, including consideration and analysis of the Marbled Murrelet Conservation Zone approach to CONSERVATION and RECOVERY of the species -- see all my points from my 6-5-08 scoping comments which were never addressed, plus clarify when this murrelet survey will be done and whether construction is planned before the completion of the survey; 1

2. CUMULATIVE IMPACTS relating to how much the highway project by Richardson Grove would promote GROWTH and CHANGE IN COMMUNITY CHARACTER -- be sure to consider that project in conjunction with many proposals and reasonably forseeable projects, and how this could influence shifts in commerce and possible increase in extractive industries in the county (such proposals and reasonably forseeable projects which should be analyzed in this regard include the "Balloon Tract", port development at Humboldt Bay, possible railroad revival, other developments, the proposal seeking stimulus assistance and how much may be included in such a federal bill, etc.) -- which businesses would likely benefit, and which most likely would suffer (?) -- thus do not just consider the "Action Area" and local area in cumulative impact considerations; 2

3. CUMULATIVE IMPACTS relating to the Marbled Murrelet, Northern Spotted Owl, Pacific Fisher, and listed native fish species -- such an analysis must also consider how growth in various parts of Humboldt County somewhat promoted by the proposed project at Richardson Grove could lead to damage to habitat for these species in other areas of the county such as marine areas, timberlands, river beds, etc., besides impacting habitat for these species at the project site; 3

4. STAA Trucks, and the coalition actively promoting them, should be placed in a clear LEGISLATIVE and REGULATORY CONTEXT; 4

5. STAA TRUCKS -- precisely where are they allowed or not allowed in Humboldt County at present, and if the highway project is completed at Richardson Grove, what are your estimates for the areas where these STAA trucks would be allowed to travel in the future, and how does the larger turning radius of these trucks impact safety and necessitate widening of arterial roads and highway ramps in Humboldt County(?); 5

6. REDWOOD TREE ROOTS -- there must be much deeper analysis of possible impacts (including in mid and long-term) from cutting redwood tree roots, paving up to the base of some trees, use of heavy equipment in the area, alteration of hydrology which could impact food and nutrient sources for some trees, impacts on MYCORRHIZAL FUNGI relating to tree root tips, etc., as well as the uncertainties in knowledge in regards to biological study of such alterations; (the DEIR/EA claimed that no roots greater than 2 inches would be cut, but the BA says no redwood roots larger than 3 inches would be cut -- which is it??) 6

7. OPENING CANOPY and IMPACTS to SPECIES from INCREASED EDGE and FRAGMENTATION -- this needs to be seriously addressed in future documents because there is canopy over most of the Richardson Grove section of highway, and opening it up would have damaging consequences, while much more the hillside by the proposed wall would lose various levels of canopy -- impact of climate change on a more fragmented forest should be assessed; 7

8. OUTSTANDINGLY REMARKABLE VALUES related to federal Wild and Scenic Rivers -- though I mentioned "scenery" and "fish" (the designated ORVs for the South Fork Eel River), these were not even acknowledged (let alone analyzed) in the DEIR/EA or the BA; 8

9. HAZARDOUS WASTE / MATERIALS -- there needs to be analysis of hazardous waste and materials in the materials which will be used for paving and striping, for dust suppression, for vegetation suppression, and for any other use in the project area (merely mentioning lead in paint stripes and lead residue on vegetation is insufficient); 9

10. INSUFFICIENT ALTERNATIVES -- lowering the speed limit at Richardson Grove as an offered alternative should take place in future documents, but if not, it is clear that STAA access is the driving force for the project rather than safety; 10

11. EFFECT on TRAVEL and BUSINESSES during CONSTRUCTION in the Richardson Grove area; 11

12. IMPACT on WAGES in Humboldt County, on SMALL BUSINESSES including TOURIST BUSINESSES, impact on wages for truckers, and impact on businesses in Leggett and elsewhere which re-loads some cargo from STAA trucks to smaller trucks for passage into Humboldt County; 12

13. SINGING TREE RECOVERY -- assess whether construction noise, lights, and fumes would be detrimental to attendance (thus impacting its income) at this alcohol and drug recovery center, and what are the odds that the therapy would be less successful with all these nearby disturbances; 13

14. STAGING, EQUIPMENT, and DISPOSAL AREAS -- there needs to be great detail on these matters especially if there are plans for heavy equipment parking or use further from Highway 101 than where the re-aligned highway is to run (the combination of "equipment staging areas", "temporary construction easements", "disposal/barrow sites", and "potential temporary stream diversion" sounds like there is considerable impact from the project even if the actual tree removal and construction did not occur -- please carefully analyze such impacts including upon redwood roots and mycorrhizal fungi (one reason detail is needed here is that it is very disturbing to see that despite a maximum 17 foot lateral movement of the road under the project proposed for the Richardson Grove area, that the so-called "action area" would could stretch a full 30-65 feet from the edge of the paved roadway to the west, and stretch about 40 feet east of the highway); 14

15. LIGHTS and NOISE -- seeing that the document downplays lights involved with highway work at night, the next documents must analyze this situation in terms of what the number of lights would be in regards to this night-work and how many watts would be used, and how far would the light travel -- as compared to basic traffic headlights through the Richardson Grove area. In addition, such an analysis including measured decibel levels should occur regarding usual highway noise as versus additional noise used for demolition, tree removal, grinding, construction, etc. 15

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In reviewing my scoping comments dated 6-5-08, I note that I called for a thorough Environmental Impact Statement in my very first paragraph. I still call for this more thorough document because the DEIR/EA was fairly skimpy, and we need a much more thorough analysis on a number of fronts including on federally-related issues. A full EIS is necessary because Highway 101 is a federal highway, pressure and likely funding is coming from some federal sources like the Federal Highway Administration, the project site is within a quarter mile of the South Fork Eel River which has been designated as a National Wild and Scenic River due to its "outstandingly remarkable values" of "scenery" and "fish", because there are federally-listed species known to occur (or with potential to occur) in the project area, and because Richardson Grove State Park was designated as critical habitat for the federally-threatened Marbled Murrelet on May 24, 1996. 16

In the very first paragraph of my 6-4-08 scoping comments on this matter, I mentioned the "outstandingly remarkable values" of "scenery" and "fish" which were declared so that the South Fork Eel River could qualify as a national Wild and Scenic River. Despite this, there is no mention (at least in the context of the Wild and Scenic Rivers Act) of "scenery" and "fish" as outstandingly remarkable values. If one heard a 30-second

summary of the national Wild and Scenic Rivers Act it would be that a river segment is designated (as either "wild", "scenic", or "recreational") due to "outstandingly remarkable values" which in this case were declared to be "scenery" and "fish". There are supposed to be protections to prevent deterioration of the outstandingly remarkable values within a quarter mile of a designated river segment. Yet, not only is there not an analysis of these outstandingly remarkable values in the Draft EIR/EA, but there is not even an admission that there is such a thing as outstandingly remarkable values and there is no mention of "scenery" and "fish" in this context. (Three of my paragraphs from my 6-5-08 scoping comments – minus the numbered points before 2 of the paragraphs –on this topic will be included near the end of this document) 17

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Following re-reading again and again everything mentioned about the Marbled Murrelet in the DEIR/EA, Natural Environment Study, and the Biological Assessment, I reviewed my comments dated June 5th, 2008, and discovered that in my numbered points/questions in that scoping comment pertaining to the Marbled Murrelet, NONE of the points/questions were addressed in the DEIR/EA !!! I now shall bunch up the murrelet points/questions in order, and shall call them alphabet letters rather than numbers. Thus, point 1 is now A, point 2 is now B, point 3 is now C, point 7 is now D, point 8 is now E, point 9 is now F, and point 10 is now G. I shall put point 17 next as H, and then I shall put the somewhat murrelet-related point 4 as point " I " in this comment on the DEIR/EA, and I shall put somewhat murrelet-related point 14 as point "J". (In between points B and C below is a revision of the paragraph – for more clarity – which I had in my scoping comments as to when a study based on the Leslie model along with sensitivity analysis and demographic information declared that there is 100% likelihood of extirpation of the Marbled Murrelet from Marbled Murrelet Conservation Zones 5 and 6.)

A. Thoroughly evaluate the impact of direct (as well as eventual or indirect) CANOPY deterioration or REMOVAL (under the Richardson Grove proposed "re-alignment") on MARBLED MURRELET HABITAT (including "social activity" areas, "fly-through" areas, and nesting or potential nesting areas) in terms of Marbled Murrelet CONSERVATION and RECOVERY. 18

B. Examine whether the Richardson Grove area could play a role in helping to re-inhabit Marbled Murrelet Conservation Area #5 with murrelets, and whether the highway proposal in the Richardson Grove area could impact the chances for north coast murrelets to ever interbreed with murrelets in MM Conservation Area #6 (without being captured and relocated). 19

In my scoping comments of 6-5-08 in between my numbered points 2 and 3, from memory I mentioned that a study predicted 100% likelihood of extirpation of the murrelet from the area south of the Humboldt / Mendocino County line by 2040. While recently examining the document which I got this information from, I noticed that it appears to be from a 2004 study using the Leslie model (along with sensitivity analysis and demographic information) which predicted 100% likelihood of extirpation from this area after a 40-year period. Thus, to be precise, the report prediction is for no murrelets surviving south of that county line in 2044 (which is 40 years later than when the report emerged in 2004). This is not to imply that any murrelets will still be surviving in that area in 2040 (the year which I mentioned in my Richardson Grove project scoping comments), but 2044 is the more proper date since it is 40 years after the McShane et al team's look at likelihood of survival in various Marbled Murrelet Conservation Zones (these conservation zones were established in the 1997 Recovery Plan for the Marbled Murrelet from the U.S. Fish and Wildlife Service). My Point B above is made because just one mile south of "the project" at Richardson Grove is that dividing line between Marbled Murrelet Conservation Zone #4 and Marbled Murrelet Conservation Zone #5 – the Humboldt / Mendocino County line. While I am not saying that Richardson Grove is a prolific center for murrelet activity such as the Headwaters and lower Redwood Creek / Prairie Creek areas, but I do see that it is absolutely vital that murrelet habitat in the Richardson Grove area not be degraded to have a chance for increased migration from MMCZ #4 to MMCZ #5. Then, it gets even tougher for the fog lark to survive in those largely cutover counties to the south to have a prayer of successfully travelling far enough south to reach the murrelet habitat (to interbreed for more genetic diversity) in the Santa Cruz Mountains area which is MMCZ #6 so that the species has a chance of surviving over the decades with a decent geographical range and reasonable genetic diversity. 20

I hope to attach a pdf file with several key pages from the document which had this info, but now I will at least name the document and quote most of a key paragraph here in regards to likelihood for extirpation of the murrelet in MMCZ 5 and MMCZ 6. This quote is from Page VII.6.6-74 of Volume 1B from the Draft EIR for the Draft Jackson Demonstration State Forest Management Plan prepared for the California State Board of Forestry and Fire Protection dated December 2005. "The Zone Model projected an extirpation probability of 100% within 40 years for Recovery Zones 5 and 6 with a 2% annual migration rate into the zone. This projection is consistent with other sources and modeling efforts (population decline of 4-7% per annum)

(USFWS 1997, Beissinger and Nur 1997). Higher fecundity and immigration rates would lengthen the time to extirpation in Zones 5 and 6. Conversely, slightly lower immigration rates in Zone 5 would hasten extirpation."

Further up on the page of the Jackson Forest document mentioned in the previous paragraph is more info on the model used which predicted this extirpation within 40 years (thus about 2044). To briefly summarize, McShane et al. 2004 did the 5-Year Murrelet Status Review building on prior work to prepare the Leslie Matrix models for each Marbled Murrelet Conservation Zone (considered vital for the species recovery), and the conclusion was summarized in the quoted section in the previous paragraph regarding 100% likelihood of extirpation from MMCZ 5 and MMCZ 6 in 40 years -- which would be about the year 2044.

C. In regards to opening up the predominately redwood canopy under the Richardson Grove "re-alignment" proposal, how would this impact "DIE-BACK", "WIND-THROW", and "BLOW-DOWN" of redwood and other trees? This analysis must also consider the damage to roots of redwoods and other trees due to grinding, root-cutting, paving, and other facets of the construction process which disturb soil (including its micro-organisms like mycorrhizal fungi) and tree roots. HOW WOULD SUCH CANOPY-OPENING COMBINED WITH SOIL AND ROOT DISTURBANCES (and shifts in drainage due to construction) IMPACT SHORT, MIDDLE, AND LONG-TERM HABITAT FOR THE MARBLED MURRELET? Weather disturbances must also be considered in such calculations. 21

D. Examine approximate sizes of predominately ancient coast redwood stands from the Oregon border south through the Santa Cruz Mountains (if not to the Big Sur area) -- while examining in greater detail the size and quality of such stands to provide various kinds of habitat for the Marbled Murrelet from the Humboldt Bay area south through Marin (or at least Sonoma) County.

E. If the document claims that mixed conifer stands can help pick up the slack as far as providing some habitat for the Marbled Murrelet (due to dwindling numbers of predominately ancient redwood stands), then the document must provide sound scientific evidence that there is a reasonable likelihood of nesting success by murrelets in mixed conifer stands in the state of California. 22

Point E is raised since, though it is not mentioned in the DEIR/EA, murrelets in California generally seem to require a large mossy horizontal conifer branch to nest with ancient redwood canopy further up (preferably in a reasonable size stand) to guard against nest predation. Richardson Grove is the furthest south reasonable size ancient redwood forest stand along the Redwood Highway. The next biggest along Highway 101 and the South Fork Eel River may be the Confusion Hill where Caltrans has very seriously fragmented the stand of redwoods, and the next best is the little stand between Hwy. 101 and the South Fork Eel River at the Smithe Redwood State Reserve. Going south, once one passes the Leggett area, the forest is essentially mixed conifer while what few redwoods in the area were near the watercourse and generally logged decades ago. Thus, can the mixed conifer stands take up the slack providing murrelet nesting habitat in the northern part of MMCZ 5 (despite a number of studies concluding that the likelihood of nest success for murrelets in California is extremely low and perhaps impossible without ancient redwood canopy over a murrelet's nest to guard against predator corvids)? If there is no such scientific proof that mixed conifer stands can provide sufficient habitat for successful murrelet nesting, then isn't habitat protection in the ancient redwood stands and fragments along the South Fork Eel River in southern Humboldt and northern Mendocino County especially vital not only for possible successful reproduction but also for migration from MMCZ 4 to MMCZ 5? 23
There will be various quotes later in these comments pertaining to the "gap" between this county line and the murrelet population in the Santa Cruz Mountains in which murrelet feeding and especially nesting activity is very scarce, and how this area is nonetheless vital for murrelet recovery and for more diverse gene flow to help assure survival of the species throughout its range.

F. Highway 101 is known as the "Redwood Highway." Can you name one location anywhere along Highway 101 where the redwood canopy goes as far over the road for as far of a distance as at Richardson Grove State Park? Can you name any predominately ancient redwood stand as large as Richardson Grove within a half dozen miles of Highway 101 anywhere to the south of the Humboldt / Mendocino County line? 24

G. What are likely cumulative impacts of projects by Caltrans including (but not limited to) the work in the Confusion Hill area, the proposed "re-alignment" in the Richardson Grove area, and other projects on Marbled Murrelet CONSERVATION and RECOVERY, as well as on CONSERVATION and RECOVERY of Coho Salmon and other native fish of the South Fork Eel River? Since I have heard suggestion of widening of the Smith River Highway, please include possible highway expansion (and impacts on murrelet conservation and recovery) in that area in these calculations and analysis. 25

H. Examine how an increase in ship traffic to Humboldt Bay and elsewhere in northern/central California would increase the risk of oil, bunker fuel, or other hazardous spills in the Pacific Ocean and in Humboldt Bay, and how might this impact the population of the Marbled Murrelet in California since it spends much of its life at sea (while some also spend time in Humboldt Bay)? 26

I. What will the cumulative impacts of the Richardson Grove project be from the removal of some trees, from the cutting of the roots of some trees, from using equipment (including heavy machines and tools) in many phases of the construction process, from allowing heavier trucks on the roadway when the project is completed, from soil compaction, and from raising the elevation of the forest in the short, mid, and long-term including on the trees, on micro-organisms including mycorrhizal fungi, and other species which inhabit and/or pass through the Richardson Grove area? 27

J. Examine the impact of the Richardson Grove road alteration and tree-removal project on tree transpiration, fog-drip, the hydrologic cycle, rainfall, temperature extremes, fire risk, and on temperature and sedimentation of the South Fork Eel River and its tributaries. (Caltrans has admitted that "Some drainage systems will need to be extended and inlets modified." Also, waterlogging from impeded drainage has been traced to killing tops of redwood trees, while roads have been known to dry out some redwood forest areas which is responsible for deterioration of habitat and die-back as well.) 28

The following are **important quotes in regards to likely predation on Marbled Murrelet adults** (thus not just predation on murrelet chicks and eggs). The first of these is from Chapter 3 - 303 of the Final Environmental Impact Statement for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Volume I October 2008: "Studies about the relationship between the proximity of human-modified habitat and an increased abundance of avian predators and increased predation on marbled murrelet nests include:" ... (the last bullet point reads) .... "If the surrounding landscape has been permanently modified to change the predators' numbers or densities due to agriculture, urbanization, or recreation, and predators are causing unnaturally high nest failures, then reproductive success of the marbled murrelet may remain depressed. Because corvids account for the majority of depredations on marbled murrelet nests and corvid density can increase with human development, corvid predation on marbled murrelet habitat is a primary consideration. **The threat of predation on marbled murrelet populations (both nests and adults) appears to be greater than previously anticipated (McShane et al. 2004).**" Another quote is this from the same set of documents – this time in Appendix H page "Appendices - 208" which says, "Current evidence suggests that the cause of this low reproductive rate may be due to **high rates of predation on eggs, young, and possibly adults at the nest site**." This quote also mentions predation on murrelet adults – it is from the final document relating to the Western Oregon Plan Revisions proposed on BLM lands, but I believe this wording is quoted from the murrelet recovery plan of 1997 and used in the WOPR document. It is under the topic "3.1.1.2 Maintain potential and suitable habitat in larger contiguous blocks while maintaining current north/south and east/west distribution of nesting habitat." It reads (on Appendices - 207) "By maintaining occupied sites and suitable habitat in larger blocks with low levels of fragmentation, several objectives will be met. Larger stands will" ... "(4) provide greater interior forest habitat conditions (**to reduce potential nest and adult predation**, increase protection of nests from windstorms and environmental changes, and reduce loss of habitat from windthrow and fire)." 29

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The following are some important excerpts from the Final EIS for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management which pertain to the **Marbled Murrelet.**
The word chapter and the chapter number is written on each page, followed by a hyphen and then the page number of the volume. Chapter 3 - 299 says that, "The short-term actions that are necessary to stabilize the murrelet population according to the recovery plan include: * maintain occupied habitat * maintain large blocks of suitable habitat * maintain and enhance buffer habitat * decrease risks of nesting habitat loss due to fire and windthrow * reduce predation * minimize disturbance." The asterisks in that quote were delineating bullet points in the document. I contend that the proposed highway and retaining wall project in the Richardson Grove would have an opposite impact than what biologists say is necessary to assure murrelet survival and have a decent chance for species recovery. 30

From the same document and page: "The long-term conservation needs for the murrelet according to the recovery plan include: * increase productivity (abundance, ratio of juveniles to adults, and nest success) and population size *** increase the amount (stand size and number of stands), quality, and distribution of**

suitable nesting habitat * protect and improve the quality of the marine environment * reduce or eliminate threats to survivorship by reducing predation in the terrestrial environment and anthropogenic sources of mortality at sea". It continues: "The U.S. Fish and Wildlife Service (USDI USFWS 1997) estimates that recovery of the marbled murrelet will require at least 50 years." It continues: "Six conservation zones were designated in the marbled murrelet recovery plan (USDI USFWS 1997). The recovery objectives for the marbled murrelet are measured in each conservation zone with the objective of ensuring a well-dispersed population of marbled murrelets."

The top of Chapter 3 - 300 says, "The following recent documents summarize the condition of the marbled murrelet across its range and are incorporated by reference: * evaluation report for the five-year status review of the marbled murrelet in Washington, Oregon, and California (McShane et al. 1994) * marbled murrelet five-year review (USDI USFWS 2004b) * status and trends of populations and nesting habitat for the marbled murrelet (Huff et al. 2006)". I do want to point out that one should take the USFWS report with a grain of salt due to undue political pressure on biologists during the George W. Bush Administration -- for instance, there were efforts during that administration to eliminate 96% of the designated critical habitat for the murrelet, and there were attempts to de-list the murrelet from the federal Endangered Species Act as well.

On Chapter 3 - 301, a couple of the bullet points which were conclusions reached by the team of Huff et al. (2006) as part of an evaluation effort following ten years of the Northwest Forest Plan being in effect are: " * The highest densities of marbled murrelets occurred along the Oregon and northern California coasts" and " * **The lowest densities of marbled murrelets occurred from the Mendocino and Humboldt county line south to San Francisco Bay**."

Chapter 3 - 302 says, "Actual nests and behaviors indicate that marbled murrelets select old-growth forests for nesting. The proportion of older forest (mature and old-growth) on the landscape and the size of the forest patch were greater in occupied sites than unoccupied sites. **Marbled murrelets nest in landscapes with larger stands with less edge**, farther from logged areas than random watersheds."

Here is the first full paragraph on Chapter 3 - 305: "**McShane et al. (2004) produced a demographic model of marbled murrelet populations in Washington, Oregon, and California by each of the six conservation zones**. Similar to previous studies, they found that populations in all conservation zones are in decline with mean annual rates of decline between 2.1 percent and 6.2 percent. The highest rates of decline were in Zone 6 at the southern extent of the range. Furthermore, **they conclude it is likely that populations in Zone 5 and 6 could become nonviable in the near future**."

The last paragraph on Chapter 3 - 305 reads: "The recovery plan states that four of the six zones must be functional in order to effectively recover the marbled murrelet in the short term and long term (e.g., to maintain viable populations that are well distributed). However, based on the newest population estimates, it appears only three of the zones contain relatively robust numbers of marbled murrelets (Zones 1, 3, and 4). Zones 1 and 4 contain the largest number of marbled murrelets compared to the other four zones, but areas of concern remain. Of the population in Zone 4, there were 10 percent killed in oil spills in 1997 (Bentivoglio et al. 2002; Ford et al. 2002)."

The following are quotes from the Appendices Volume 3 Appendix H. Wildlife. Appendices - 204 begins a section called Management Opportunities on BLM-Administered Lands in the Recovery Plans for the Columbia White-Tailed Deer and Marbled Murrelet. Under the Marbled Murrelet section, it says that, "Portions excerpted from *Recovery Plan For The Threatened Marbled Murrelet (Brachyramphus marmoratus) in Washington, Oregon, And California* (pages 125- 160 in USFWS 1997)." It next says "D. Narrative Outline for Recovery Actions. 1. Implement management plans for each Marbled Murrelet Conservation Zone". **The following are 3 of the 4 paragraphs of the subsection entitled "1.4 Siskiyou Coast Range Zone (Zone 4)." Those paragraphs read (page Appendices - 204 into Appendices - 205):**

"The Siskiyou Coast Range Zone extends from North Bend, Coos County, Oregon, south to the southern end of Humboldt County, California. It includes waters within 2 kilometers (1.2 miles) of the Pacific Ocean shoreline (including Humboldt and Arcata bays) and, in general, extend inland a distance of 56 kilometers (35 miles) from the Pacific Ocean shoreline and coincides with the 'Zone 1' boundary line described to the Forest Ecosystem Management Assessment Team with minor adjustments (U.S. Department of Agriculture et al. 1993). The boundary encompasses all of the marbled murrelet critical habitat units designated (the boundary extends slightly beyond 56 kilometers (35 miles) in certain areas."

"Recovery actions should be focused on preventing the loss of occupied nesting habitat, **minimizing the loss of unoccupied but suitable habitat**, and decreasing the time for development of new suitable habitat. Much marbled murrelet nesting habitat is found in state and national parks that receive considerable recreational use. The need to maintain high quality marbled murrelet terrestrial habitat should be considered in planning any modifications to state or national parks for recreational purposes. **Both highway and campground construction**, including picnic areas, parking lots, and visitor centers, **could present threats to the marbled murrelet through loss of habitat, nest disturbance, and/or increasing potential predation from corvids associated with human activities such as Steller's jays and crows.** Implementing appropriate garbage/trash disposal may help decrease potential predator populations in high human use areas such as county, state and national parks.

This zone has large blocks of suitable habitat critical to the three-state marbled murrelet population recovery over the next 100 years. However, the amount of suitable habitat protected in parks is probably not sufficient by itself to guarantee long-term survival of marbled murrelets in this Zone. On the other hand, a considerable amount of habitat is preserved in parks such that survival may be more likely in this Zone than in several other Zones. Private lands at the southern end of this Zone are important for maintaining the current distribution of the species. **There is already a considerable gap in distribution between this area and the central California population in Zone 6. Efforts should be implemented to, at a minimum, not expand the current distribution gap."**

A key sentence later on Appendices - 205 under "2. Delineate and protect areas of habitat within each Zone. 2.1 Protect terrestrial habitat essential for marbled murrelet recovery" says, "Marbled murrelet population trends described above (also see Appendix B) have led the U.S. Fish and Wildlife Service to conclude that **a number of areas, including nesting areas and feeding sites well-distributed throughout its terrestrial and marine range, are essential to the conservation of the species**."

On Appendices - 206, after "2.3.1 Develop and implement management plans that incorporate the needs of the marbled murrelet for each protected habitat area on Federal lands" and after another paragraph, it says, "Management plans should be based on the best available information on the biology and recovery needs of the marbled murrelet and should be able to adapt to new information as it becomes available. For example, a variety of management activites could decrease predation mortality at marbled murrelet nests (e.g., silvicultural practices designed to provide shelter to nest sites or to speed development of marbled murrelet habitat; garbage removal from state and national parks). **Efforts to reduce or eliminate these manmade food sources in state and national parks are currently being discussed**."

Under "3.1 Implement short-term actions to stabilize and increase the population. 3.1.1 Maintain/protect occupied nesting habitat and minimize loss of unoccupied but suitable nesting habitat. 3.1.1.1 Maintain occupied nesting habitat", it says, "In the short-term (the next 5 - 10 years), until additional information is obtained, **loss of any occupied sites or unsurveyed suitable habitat should be avoided** or the potential impacts significantly reduced through a habitat evaluation and ranking process outlined in the Habitat Conservation Plan." (On the North Coast, HCPs are mostly held by large timber companies so that if they do not log some areas, they are permitted to "take" listed species as long as they got a permit to do so and as long as the "take" occurred in the standard operation of the company. I was seeking to emphasize that "unsurveyed suitable habitat" -- like that at Richardson Grove -- should not be destroyed seeing that the murrelet is in a precarious state.)

I shall now quote **"3.1.1.2 Maintain potential and suitable habitat in larger contiguous blocks while maintaining current north/south and east/west distribution of nesting habitat."** "By maintaining occupied sites and suitable habitat in larger blocks with **low levels of fragmentation**, several objectives will be met. Larger stands will (1) have more nesting and hiding opportunities, (2) provide for multiple alternative nesting sites for individual pairs of birds over time, (3) facilitate nesting for multiple pairs of birds (and thus promote increased social contact), and **(4) provide greater interior forest habitat conditions (to reduce potential nest and adult predation, increase protection of nests from windstorms and environmental changes, and reduce loss of habitat from windthrow and fire).** Larger stands also may provide a core of birds to attract or develop sufficient activity and eventual nesting by subadults or nonbreeding adult birds to replace breeding adults lost from this habitat over time due to natural causes or human activities. **The more contiguous the habitat distribution, the lower the likelihood of future large gaps in distribution of the species due to catastrophic events such as oil spills or large wildfires. Preventing further erosion of the already patchily-distributed nesting habitat is a key element in buffering the species against such catastrophic events. This is especially important in areas where gaps already occur.** Furthermore, it is

currently unknown how nesting success differs with distance from the coast, and far inland habitat may be as important to species survival as those nearer the shore. Therefore, it is important to maintain both **north/south** and east/west **distribution of suitable habitat**."

On the bottom of Appendices - 207 is "3.1.1.3 Maintain and enhance buffer habitat surrounding occupied habitat." That section reads (on the following page): **"Maintaining buffers around occupied habitat will mediate the effects of edge by helping to reduce environmental changes within the stand, reduce loss of habitat from windthrow and fire, reduce fragmentation levels, increase the amount of interior forest habitat available, and potentially help reduce predation at the nest.** To have the greatest benefits, buffer widths should be a minimum of 300-600 feet and should consist of whatever age stand is present, including existing plantations (which should be managed to provide replacement." A key sentence under "3.1.3 Minimize nest disturbances to increase reproductive success" says, **"Higher than normal predation levels are likely to occur in nesting habitat due to forest fragmentation and other causes in many cases."**

Under "3.2 Implement long-term actions to stop population decline and increase population growth. 3.2.1 Increase the amount and quality of suitable nesting habitat", it says, **"It also would be desirable to increase and block up suitable nesting habitat in the Mendocino and Santa Cruz Mountains Zones.** Little habitat remains outside of parks in these two zones, such that an increase in the short term does not appear feasible." Under "**3.2.1.1 Decrease fragmentation by increasing the size of suitable stands to provide a larger area of interior forest conditions.**, it says, "The majority of suitable nest stands currently exist as small islands within a matrix of younger forests. Although these **fragments** will provide critically important habitat during the several decades required for younger stands to develop structural characteristics suitable for marbled murrelet nesting, **they cannot be considered high quality habitat because of vulnerability to wildfire and windthrow, and perhaps a higher abundance of avian predators.** Research is needed to develop judicious ways to use silvicultural techniques such as thinning in young (nonhabitat) stands to hasten development of large trees and decrease **vulnerability of habitat fragments to fire, wind, and perhaps predators.**"

On Appendices - 209, under **"3.2.1.2 Protect 'recruitment' nesting habitat to buffer and enlarge existing stands, reduce fragmentation, and provide replacement habitat for current suitable nesting habitat lost to disturbance events"**, it says, "Stands (currently 80 years old or older) that will produce suitable habitat within the next few decades are the most immediate source of new habitat and may be the only replacement for existing habitat lost to disturbance (e.g., timber harvest, fires, etc.) over the next century. Such stands are particularly important because of the **vulnerability of many existing habitat fragments to fire and wind and the possibility that climate change will increase the effects of the frequency and severity of natural disturbances.** Such stands should not be subjected to any silvicultural treatment that dimishes their capacity to provide quality nesting habitat in the future."

On Appendices - 209, under "3.2.1.3 Use silvicultural techniques to increase speed of development of new habitat", several key sentences read: "Nesting marbled murrelets select stands with large trees that provide suitable nesting platforms (large, protected branches, preferably with moss). When available, **large stands appear to be preferred over small ones**." It goes on later on that page and into the next: **"Landscapes with a higher proportion of older stands should be less susceptible to catastrophic wildfire (providing reduced hazard from thinning slash)."**

And finally, my last quote from this document, under "3.2.2 Improve Distribution of Nesting Habitat", some key sentences read: "**3.2.2.1 Improve and develop north/south distribution of nesting habitat. Improving the distribution of nesting habitat helps to buffer existing populations against poor breeding success and catastrophic loss and probably facilitates gene flow among separated populations.** Three major gaps in existing habitat are particularly apparent: (1) from the southern Olympic Peninsula in Washington to Tillamook in northwestern Oregon; (2) between Patrick's Point and southern Humboldt Bay in northern California (see Figure 1); and **(3) throughout most of the Mendocino Zone and the northern part of the Santa Cruz Mountains Zone (between southern Humboldt County and central San Mateo County).** These three geographic gaps represent **probable partial barriers to gene flow** across them." That paragraph also says, **"Portions of the Mendocino Zone and Santa Cruz Mountains Zone also contain blocks of unsuitable habitat that probably naturally created small gaps in the murrelet's terrestrial range. Again, loss of suitable habitat around these small natural gaps has greatly widened them. These gaps have probably grown together and eliminated suitable nesting habitat over a large section of their range."**
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I wanted to give some quotes from the document which makes it sound like legal statutes require consideration of geographical and ecological distribution of a species -- in this case the murrelet. Here is an

important quote from page 100-101 of the DEIR/EA: "Primary constituent elements of the designated critical habitat for the Marbled Murrelet consist of physical and biological features that are essential to the conservation of the species within areas occupied by the species at the time of listing that may require special management considerations and protection. These include such factors as space for individual and population growth and for normal behavior, food, water, air, light, minerals, cover or shelter, sites for breeding and rearing of offspring, and **habitats that are protected from disturbance or are representative of the historic geographical and ecological distribution of a species**." Thus, this is where concerns about murrelet north/south distribution comes into play, while the Marbled Murrelet Conservation Zones are a good help in analyzing likelihood of survival and recovery (or extirpation).

I want to point out that the DEIR/EA stated that USFWS designated critical habitat for the MAMU of 5-24-96 including 39,958 acres in southern Humboldt County including Richardson Grove State Park. There is also admission that, "due to the sensitivity of the species, it was determined that the project 'May Affect, and is likely to Adversely Affect' Marbled Murrelet." (pg. 103). Documents relating to this project also admits that Richardson Grove is suitable nesting habitat and that the South Fork Eel River is a migration corridor for the murrelet. Seeing that there were inadequate considerations of opening the canopy, damaging roots (including mid and longer-term impacts), and other factors, it was improper to conclude that the project would not adversely impact murrelet designated critical habitat. Both a quote which I think I included from the WOPR, as well as personally hearing that state parks is looking at closing picnic areas, campgrounds, and even parks on the North Coast if murrelet population numbers continue to plummet -- thus, the corvid-proof trash containers should occur without a damaging project prompting it! 31

The Natural Environment Study was incorrect in stating that the murrelet is a "threatened" species for both the federal and state levels. It is actually listed as state-endangered (as it says in another document). I find it telling that there is mention of preventing root impacts under the single MAMU-related paragraph in that study -- this indicates to me that there is concern among biologists that larger redwoods will be negatively impacted which could seriously impact the canopy, fire danger, vulnerability to natural disturbances, etc. due to the proposed project in the Richardson Grove area. There is the ridiculous claim that the noise and activity around tree removal and construction will be not much more than background -- give us watt and decibel estimate numbers please!! There is an admission that, "the temporary noise, night work, and activity associated with project construction, is likely to disturb murrelets that are nesting in the area." But then a lawyer apparently concluded that the project will not adversely modify MAMU Critical Habitat. What time frame did that last conclusion consider -- just the short-term? 32

The Biological Assessment admits that, "Noise and activity of construction workers and construction equipment may disturb breeding NSO and MAMU. Construction activity may also disturb NSO foraging and MAMU migration patterns in the Project Area." Please note that trees and vegetation help absorb sound, so that removing such will then get higher decibel sound travelling farther in the area which could disturb listed species. 33

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Due to the listing of the Marbled Murrelet as "endangered" under the California Endangered Species Act, California state agencies have the duty to help recover this endangered species according to Fish and Game Code sections cited below:

2053. The Legislature further finds and declares that it is the policy of the state that state agencies should not approve projects as proposed which would jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available consistent with conserving the species or its habitat which would prevent jeopardy.

2055. The Legislature further finds and declares that it is the policy of this state that all state agencies, boards, and commissions shall seek to conserve endangered species and threatened species and shall utilize their authority in furtherance of the purposes of this chapter.

2061. 'Conserve,' 'conserving,' amd 'conservation' mean to use, and the use of, all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this chapter are no longer necessary. These methods and procedures include, but are not limited to, all activities associated with scientific resources management, such as research, census, law enforcement, habitat acquisition, restoration and maintenance, propagation, live trapping, and transplantation, and, in the extraordinary case where population pressures within a given ecosystem cannot be otherwise

relieved, may include regulated taking."

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Page VII.6.6-75 of the Jackson Demonstration State Forest Draft Management Plan told of researchers C.J. Ralph and Miller's findings that "the most important factor in indicating occupied stands was density of old-growth canopy cover" -- still referring to the murrelet obviously.

I shall now quote part of the group comments by 26 environmental groups on the Draft EIS by the Bureau of Land Management's Western Oregon Plan Revisions in regards to the marbled murrelet. "Low fecundity levels across Washington, Oregon, and California as measured by nest success indicate a population that cannot maintain itself (McShane et al. 2004, Beissinger and Perry 2003). Lower nest success is caused primarily by nest predation, which in turn is affected by forest fragmentation and proximity to human developments (McShane et al 2004, Raphael et al 2002). Thus, in order to diminish the threat if nest predation and increase in reproduction, the forest landscape and its surroundings must be protected to provide large, contiguous blocks of suitable nesting habitat." (from page 26 of those comments)

The 1997 Marbled Murrelet Recovery Plan at page 119 says, "To fulfill the initial objective of stabilizing population size, this recovery plan focuses on protecting adequate nesting habitat by maintaining and protecting occupied habitat and minimizing the loss of unoccupied but suitable habitat". That same MM Recovery Plan on page 121 said that short-term actions "are critical because of the length of time necessary to develop most new nesting habitat (100-200 years). ... Short-term actions include: (1) maintaining occupied habitat; (2) maintaining large blocks of suitable habitat; (3) maintaining and enhancing buffer habitat...."

In relation to the three paragraphs above and some other Marbled Murrelet points made and questions asked in these scoping comments, even if corvids feeding on human food scraps at campgrounds and in truck stop / areas with stores in the Richardson Grove area results in no current Marbled Murrelet nesting in the fairly immediate Highway 101 area, yet still the Richardson Grove so-called "re-alignment" should not negatively impact what biologists call "short-term actions" which are needed to protect murrelet habitat. Please examine how each of the offered alternatives (including the "No Action Alternative") impact the important short-term actions which are summarized as "maintaining occupied habitat" -- I would add occasional habitat rather than just current nesting habitat -- plus "maintaining large blocks of suitable habitat" and "maintaining and enhancing buffer habitat."

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CALTRANS PROCESS, PRESSURE, ECONOMICS, AND GROWTH

There needs to be a more thorough history in future documents in regards to who has been pressuring and contacting Caltrans for years to get various studies to conclude that the proposed project will be good for the economy and for certain larger businesses, but that it would not promote growth which would then require a more thorough analysis under CEQA.

Who paid for the one study (Cambridge Systematics, Inc. 2003) which claimed that local residents pay 10 to 15% more for goods due to "poor truck access" which was said to increase the decline in locally-owned business out of Humboldt County? 34

It appears that Caltrans (and likely the FHWA and powerful elements of the business community) has been laying the groundwork for the Highway 101 widening / re-alignment at Richardson Grove since perhaps around 2002. In future environmental impact documents, please include all Caltrans correspondence with government agencies and the business community regarding the highway project in the Richardson Grove area. 35

I note that Cambridge Systematics, Inc. apparently got hired and wrote a report entitled "Transportation for Economic Development". This same company has also done a study and report in regards to expanding the 710 Long Beach Freeway whose southern end is around the giant Ports of Long Beach and Los Angeles. Does this group focus on advising how to expand port and transportation infrastructure to help major commercial interests move goods, or what would you say is their focus? 36

In the DEIR/EA, I noticed two mentions about a possible end to manufacture of trucks which do not meet STAA standards. One mention says that such trucks will no longer be manufactured as of 2010, while the other seems to indicate that manufacture of such vehicles has already ceased. Can you confirm through other sources (besides CS, Inc.) in future environmental impact documents relating to the Richardson Grove project about this matter? And, if such CA Legal vehicles were no longer produced, do you mean the trailer portion of 37

the vehicle, or the cab??

It is claimed that, "Several businesses, including lumber, floral, food, and other manufacturing, as well as the local newspaper, have noted higher costs and have considered relocating out of the County." Companies like Maxxam / Pacific Lumber has essentially liquidated their forests, taken the proceeds out of the county, and have declared bankruptcy. Timberland areas and floral farms have their land (with the floral farm being raided due to hiring a lot of illegal workers since apparently the boss did not even want to pay the already pretty low wages paid to legal workers in Humboldt County, so it is difficult for them to pick up and go. A local newspaper relocating is almost a contradiction in terms, and if they did and remained sort of a local newspaper, would they print the paper elsewhere and truck copies into the Humboldt Bay area in STAA trucks? 38

If "Dr. Gallo" is such a profound scholar on commerce on the North Coast, please either publish his report and associated surveys, or leave any mention of him out of future environmental impact documents. 39

Besides the alleged economic boom for larger companies, did Dr. Gallo, CS Inc., or anyone else study what the impact of "opening the Redwood Curtain" at Richardson Grove means for tourist businesses, other smaller businesses, basic wages, and trucker wages in Humboldt County? Also, in my 6-5-08 scoping comments, I specifically asked about companies and personnel in the locales where some trucks are reloaded so as not to bring STAA trucks along Highway 101 at the Eel River Canyon and through Richardson Grove. I saw no response to this query or mention of the issue. Here is what was numbered point # 24 in my scoping comments of 6-5-08: 24. I notice that there are nine companies mentioned on this URL http://www.dot.ca.gov/hq/traffops/trucks/routes/eureka.htm which geographically range from Petaluma to Crescent City to Redding who are "Companies for Hire" in order to reach Eureka legally. What will the economic impact be on these companies if the proposed project on Highway 101 in the vicinity of Richardson Grove is carried out? Also, what will the impact of this highway project be (in post-construction phase) on the employment rate and economy of Leggett, California? 40

Note that even your document admitted a "psychological" effect from further widening of Highway 101 by Richardson Grove. Is this effect included in your analysis in regards to potential growth impacts resulting from the project near the Grove? Do you know of any advertising campaigns in the works to get investors and companies to focus on economic development in Humboldt County? 41

I find it somewhat ironic that comments on this highway project at Richardson Grove are due one day before the comments on the Balloon Tract are due. These two proposed projects, along with a huge stimulus request to the federal government from powerful players in Humboldt County (among other actions and proposals), indicate that various forces are poised to change the nature of commerce on the North Coast by promoting growth of big-box stores, port development, likely other infrastructure development, etc. Thus, future environmental impact documents regarding the highway project in the Richardson Grove area should seriously address the various proposals (including proposed and perhaps actualized funding for transportation infrastructure and port and rail expansion in Humboldt County) and how each one (and/or combinations thereof) could change the community character and promote growth of big-box, extractive, and other sectors in Humboldt County -- and how that could impact current wages, small businesses, tourist businesses, etc. 42

There must be a realistic estimate as to how many days (and/or possible evenings), and approximately how many hours on those days or evenings, that one or both lanes of Highway 101 would be blocked in the Richardson Grove vicinity to accomodate large earth-moving and construction vehicles, logging, root-cutting, road widening / re-alignment, shoulder-construction, and wall construction associated with this project? What impact would this have on the economy of Humboldt County, as well as on the exasperation level of its residents and on travellers to or through the north coast? 43

What percentage of highways, ramps, and roads throughout the state of California can accomodate STAA trucks? How many more acres of pavement would be needed to accomodate these larger vehicles to get to basic services and to their destinations in Humboldt County, and what would the carbon footprint of that be? While those pushing globalization may feel that "industry standard" is taking huge loads from ports to big-box stores (or bringing huge trucks in from Mexico or Canada), but since California tends to be sprawled out, it is presumptuous to call something an industry standard if such trucks cannot access a significant area within the state or even a significant area near designated routes for these giant trucks? 44

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Even if Caltrans continues to stubbornly refuse to conduct a thorough NEPA analysis and Environmental Impact Statement on the Richardson Grove "re-alignment" matter, still the effect of the proposal on "scenery"

and on "native fish" should be analyzed in the EIR / Study. "Scenery" and native "fish" happen to be the designated "Outstandingly Remarkable Values" within a quarter mile of the National Wild and Scenic South Fork Eel River which certainly encompasses the portion of the Richardson Grove area in which the re-alignment is proposed. I would also like to note that National Wild and Scenic River goal 1.1 is not only protection of "outstandingly remarkable values" but it also calls for "to the extent practicable, such values would be enhanced." 45

Note: The effect of the highway project in the Richardson Grove area on "scenery" should be evaluated for drivers, vehicle passengers, bicyclists, hikers, others visiting or passing through the area by whatever means, as well as for local residents, those in rehabilitation at Singing Tree, those who work in the immediate or general area doing whatever task including store employees, law enforcement personnel, highway workers, and state park employees. 46

There needs to be a thorough analysis of the effects of the various alternatives on not only temperature and sedimentation in the Eel River, but also in the tributary streams including in the Richardson Grove area and the area to its north. How might each of the alternatives impact the slope stability situation not far north of where much of the hillside removal and shoulder creation work is projected to occur – seeing that a large storm, seismic disturbance, and/or further highway or slope deterioration there could result in more catastrophic collapse and clearly impact both sedimentation and water temperature in the South Fork Eel River. 47

The document says that stumps (I imagine from the mid-size and larger trees to be cut) would remain in place. While this would be better for redwood tree roots than uprooting the stumps, but it is a serious visual blight for park visitors and for those travelling through the Grove along the highway as well – this deterioration of an Outstandingly Remarkable Value must be carefully assessed. 48

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While clearly I have focused this comment more on the Marbled Murrelet than other species, but I wanted to make several points regarding the Northern Spotted Owl. In various parts of the DEIR/EA and BA, I read that there was a NSO nest a quarter mile to the north of the project, that there was no known NSO nest within a quarter mile of the project site, and that the nest to the north is a half mile away. Please get clear and share the correct info on such. Since the NSO is to the north of the project, removing many trees in its foraging territory between the stand to the north (which I imagine may have some remnant large conifer trees) and the ancient stand at Richardson Grove State Park would hurt NSO foraging habitat. Also, night-work with bright lights would illuminate the ground which might discourage some rodents from their usual activities and thus not be available for consumption by the NSO. Have there been any studies whether opening up canopy more can encourage barred owls to become more established in the vicinity? 49

Also, impacts to the NSO must be evaluated not only in the local region, but also in regards to indirect and cumulative impacts if allowing STAA truck movement would encourage a rash of additional extractive activities which could have deleterious effects on NSO habitat. 50

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What fill dirt will be used to raise the roadway several feet for at least one of the proposed areas for realignment, what will the source of the fill dirt be, what toxic materials may be present in the fill dirt, and what non-native plant species seeds may be in the fill dirt or on tires of construction vehicles, and might this promote non-native plants and an increase in the use of herbicides in the vicinity? Will the fill dirt to raise the elevation of the road interfere with the root-structure of the forest or interfere with the "A horizon" (top layer of soil) since what was the "A horizon" will no longer be the top layer of soil? Also, due to plans of shaving some hillsides and building a major retaining wall, will this increase use of herbicides on highway shoulder(s) north of Richardson Grove State Park? 51

One serious drawback of the DEIR/EA and BA is the almost absent section and analysis on hazardous waste/materials. From my reading, only the striping paint with lead, plus the lead deposited on vegetation from vehicles, were mentioned under this heading. Besides including immediately below my wording from my 6-5-08 scoping comments, I wanted to also ask what CTPB is made out of and what its contaminants are. Would allowing more permeability through this substance lead to more toxic material reaching the roots of redwood trees including to mycorrhizal fungi? Also, what are the exact components and contaminants in "soil binders" and "dust palliatives"? So, please list all substances contained in CTPB and in hot asphalt mix as well. 52

"Hazardous waste" is the first bullet point under "studies have been conducted in the following areas" in the Caltrans brochure. I urge you to call that "hazardous materials" rather than waste, since some might claim that if one uses a hazardous material as part of normal operation that it is being used and thus is not a waste. I am

partly referring here to Caltrans' historic prolific use of toxic herbicides. If the "shoulder area" is expanded at least in portions of the Richardson Grove State Park and its vicinity along Highway 101, will it bring about an increase (or any) herbicide use in these specific areas? If so, list all active and inert ingredients in each formulation which may be used, the synergistic impact of these ingredients mixed together, and the impact of these on human health and on native salmonid species. We also need more info on why certain disposal sites were chosen related to this project, and what the likelihood is of sediments and other materials from the project entering the South Fork Eel River. 53

It is disturbing that page iii of the DEIR/EA says that, "the Department will confirm the proposed build alternative". I believe that will be the case – however, one is supposed to be considering submitted evidence rather than just rubber-stamping what Caltrans is under pressure to approve. 54

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Here is an important quote from page 100-101 of the DEIR/EA: "Primary constituent elements of the designated critical habitat for the Marbled Murrelet consist of physical and biological features that are essential to the conservation of the species within areas occupied by the species at the time of listing that may require special management considerations and protection. These include such factors as space for individual and population growth and for normal behavior, food, water, air, light, minerals, cover or shelter, sites for breeding and rearing of offspring, and **habitats that are protected from disturbance or are representative of the historic geographical and ecological distribution of a species**." Thus, this is where concerns about murrelet north/south distribution comes into play, while the Marbled Murrelet Conservation Zones are a good help in analyzing likelihood of survival and recovery (or extirpation).

The BA points out that consultation should involve, "Determinations of effect are based on the probable impacts to individuals, habitat, and local populations of the listed species as well as long-range effects on the species as a whole resulting from the action" (and I would say cumulative impact of the action throughout the region due to the project and its repercussions).

This single paragraph does not occur on my e-mailed version, but is in my comment which I am sending through the mail. In essence, a thorough analysis of the cumulative impacts of the Richardson Grove area highway project on the Marbled Murrelet would need to include a serious assessment of the higher level of noise from all the tree removal/demolition/construction activities from the project, the great increase in light from such activities (as well as fumes from diesel, asphalt-laying, etc.), the short-term opening of the mid-canopy and likelihood of opening of upper canopy due to impacts on tree roots (including impact of staging and construction and paving up to tree base and the impact of that and other activities on mycorrhizal fungi), the short and mid-term impacts from canopy opening making large trees more vulnerable to natural disturbances such as wind-throw, blow-down, and fire, the deterioration in habitat value from opening up the canopy creating more fragmentation and edge which corvids thrive in, the likely impacts in the marine environment seeing that highway, rail, and port expansion promotes seem to work together which could bring more marine traffic and related spills impacting the murrelet, as well as impact on extractive activities in the county in general which may be encouraged by use of larger trucks along Highway 101. And, of course, keep the larger picture of need for MMCZ 4 murrelets to re-inhabit MMCZ 5, and how even comparatively marginal (due to highway and campground) habitat can be vital in assisting the recovery of this species. 55

Sincerely yours,

Bruce Campbell

Attached in PDF and in U.S. mail is a cover page and several key pages from the Draft Environmental Impact Report for the Draft Jackson Demonstration State Forest Management Plan SCH# 2004022025 discussing murrelet populations, Marbled Murrelet Conservation Zones, and the probability of extirpation of the murrelet south of the Humboldt / Mendocino County line

1. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled Murrelet based on the following factors: 1) The removal of as many as 31 second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available to nesting Marbled Murrelets within half mile of proposed vegetation-removal activities and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) The trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current Marbled Murrelet nesting habitat; and 3) the project includes measures to avoid and minimize impacts to old growth redwood tree roots during construction. Since the information provided was sufficient for the US Fish and Wildlife to make its finding, no additional analysis is considered warranted. The survey for Marbled Murrelet is anticipated to take place in 2011 and 2012. Construction is expected to begin mid to late 2010.
2. It is not anticipated that the accessibility of STAA trucks would result in an increase of extractive industries in Humboldt County as other market forces have a greater influence. And, as far as encouraging big box development in Eureka and the surrounding area, other factors have been identified as being more influential. A study prepared by the Humboldt County Association of Governments (Cambridge Systematics, Inc., 1989) identified distance from major population centers, lack of direct access to the Interstate road system, lack of a completed four lane north-south or east-west highway, limited air service, unreliable and inadequate rail service, lack of industrial land zoned in Eureka, shortage of labor in some occupations, lack of diversity of tourist attractions and visitor activities and perception of the area by outsiders as remote as being the major constraints to economic activity and subsequent growth in Humboldt County (see page 35 in the Draft EIR/EA). Thus, providing STAA access is not expected to be a primary factor influencing growth in Humboldt County, including “big box” development. While port development at Humboldt Bay and reviving the railroad into Humboldt County are both being considered, neither is currently viable, as infrastructure improvements must be made and funding for these improvements have not yet been identified nor procured. There are no projects using ARRA funding proposed for Route 101 at this location.
3. Impacts to listed species occurring during construction would be temporary. As the project is not expected to result in a substantial increase in traffic volumes nor result in inducing growth, the primary cumulative effects for listed species would occur during construction.
4. This project originated as a result of several governmental and special interest groups expressing their concern for improving goods movement into Humboldt

County. The parties that participated in the Technical Advisory Group which initiated this project consisted of representatives from Humboldt County Association of Governments, Del Norte Local Transportation Commission, Mendocino Council of Governments, Redwood Region Economic Development Commission, Humboldt County Community Development and Public Works Departments, California State Parks, Save the Redwoods League, California Trucking Association, California Highway Patrol, Humboldt County Cattlemen's Association, Sierra Club, and the California Department of Forestry. Improvements at this location on US Route 101 for goods movement are also identified in Humboldt County's Regional Transportation Plan both in the current Plan as well as in the 2006 Plan. For more information on how the project was initiated refer to "Background" in Section 1.2 of the DEIR/EA.

5. STAA trucks are currently allowed on Route 101 with the exception of the one mile segment that is included within the project limits of this project. STAA truck route designations on local streets are determined by local governments. Any improvements needed to interchange on-ramps or off-ramps or at-grade intersections with State highway legs would have to be made on a case by case basis as local governments decide to create STAA routes on their local streets. The proposed project only addresses STAA access on US Route 101.
6. Information has been added to the document regarding the impacts to redwoods. Both the Caltrans arborist and Dennis Yniguez, an independent arborist contracted by Save the Redwoods League, have determined that with the special conditions in place as described in the document, there would be no significant detrimental effect on root health or the availability of water to the roots of old growth redwoods adjacent to the highway construction. Mr. Yniguez also noted that "the existing root systems of old-growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." Mr. Yniguez concluded that with the special conditions incorporated into the design and construction, the project "…as proposed will have no significant detrimental effect on root health or on the availability of water to the roots of old-growth redwoods adjacent to the highway construction." The intent of requiring the use of the air spade and hand work within the structural root zone of redwood trees thirty inches in diameter or greater is to avoid cutting the roots greater than two inches in diameter. In some cases, in areas of cut at PM 1.35/1.36, PM 1.65/1.75, and PM 2.04 for example, it may not be possible to avoid cutting roots, however, in the locations at PM 1.35/1.36 and 2.04, are areas of previous cuts so there are no old growth redwoods present in the areas of the cut. To further reduce potential stress on the redwoods, irrigation will be provided during the summer in areas where excavation occurs. The Biological Assessment used the threshold of three inch roots not being cut, however during ongoing discussions with Department of Parks and Recreation, the threshold was further reduced to two inches which is reflected in the DEIR/EA.
7. It is not expected that there would be much of a change in the tree canopy at Richardson Grove. The most noticeable change in the park would be the cut at PM 1.36 (see Figure 6B in the FEIR/EA and Figures 1 and 2 of the before and after simulations at this location in Appendix K). The most prominent trees at

this location are the Big leaf maples. The majority of the 30 trees proposed to be removed from the park are four to twelve inches in diameter and half are tan oaks. The largest tree proposed to be removed from the park is a 24 inch in diameter tan oak. The old growth trees providing the major portion of the canopy over the road would not be removed. Subsequent to the circulation of the DEIR/EA an alternative to the retaining wall was considered and ultimately selected as the preferred alternative. This new wall variation would be a soldier pile wall located below the road beneath the northbound lane. It requires much fewer trees to be removed than the previous retaining wall (five as compared to the estimated thirty trees for the original wall alternative). For more information refer to the final document. There is not expected to be any measurable change on climate change as a result of the project.

8. Additional information has been added in the FEIR/EA regarding the characteristics of the Wild and Scenic River. The project was determined to have no effect on listed fish. The proposed road improvements would not be visible from the South Fork of the Eel River. Thus, the project would not have any impacts on the values which enabled the South Fork Eel River to be state and federally designated as a Wild and Scenic River.
9. If chemicals are used for dust suppression, the use will be discussed in the Water Pollution Control Plan or Storm water Pollution Prevention Plan prepared by the contractor. It is not anticipated that any herbicide for vegetation suppression would be used during construction. The construction contract would employ the standard specifications for disposal of striping material and pavement.
10. The speed limit through Richardson Grove was lowered from 40mph to 35 mph in fall 2008. However, it should be noted that reducing the speed alone will not correct the geometric deficiency in the roadway which results in off-tracking. Because reducing the speed does not fulfill the project's objective, it was not an alternative under consideration.
11. Motorists traveling through the construction area would experience delays. These delays are anticipated to average five to ten minutes with a maximum delay expected to be fifteen minutes. These delay times are typical for construction along two lane State highways. Since the only detour would be hundreds of miles long, it is not anticipated that these minimal delays would alter itineraries for business or pleasure travel.
12. While a result of the project is an anticipated reduction in shipping costs for some businesses in Humboldt County and some of these savings may translate into higher wages for the affected businesses. This is not expected to result in large scale change on wages in Humboldt County overall. Access to local businesses within the project area would remain open during construction. A communication plan will be developed to keep residents and businesses apprised of the status of the project during construction.
13. There would be construction impacts on Singing Trees Recovery facility. Refer to Section 2.1.3 for discussion.
14. The probable disposal site used for this project would be located in Caltrans right-of-way at an existing maintenance disposal site. Long term equipment and material storage sites will not be located within the park and the final document

will be revised to reflect this. Equipment and material for immediate use would not be stockpiled off the paved area without concurrence from the biological monitor. Within the park, equipment would only be off pavement in those areas which will be ultimately disturbed such as areas that would be under a fill, with the exception that the unpaved turnout at PM 1.79 +/- to the west of the roadway would likely be used.

15. The most likely elements of construction that might be done as night work in the park would include removing the existing open grade (cold planing), paving with the new open grade overlay, placing shoulder backing, applying dense grade AC for superelevation and leveling, and replacing culverts. Because working at night is not as productive, and therefore is more expensive, it is anticipated that night work would only be considered if the contractor gets behind schedule. The maximum number of days of night work would include the following: five days for cold planing, two days for paving, two days for shoulder backing, seven days for superelevation corrections, and four days for culvert improvements. The lights would be directed downward and the area is heavily vegetated so it is not anticipated that light would travel very far into the surrounding area. The DEIR/EA did provide anticipated levels of noise during typical construction activities.
16. The project would be partially funded by federal funding from the Federal Highways Administration. Because the project is not expected to result in substantial adverse impacts including impacts on resources such as a Wild and Scenic River, Richardson Grove State Park, federally listed species, or cultural resources, it was determined that an Environmental Impact Statement was not required.
17. With the storm water best management practices in place, it is not expected that there would be any appreciable impacts to the water quality in the South Fork of the Eel River. It was determined that the project would not adversely affect listed fish. The changes in the roadway would not be visible from the river as the area between the river and the road is heavily screened by vegetation. Recreational uses of the river would not be impaired although construction noise might be heard from some locations. But the noise would be periodic and only for short stretch of the river. Thus, it was determined that the project would not have a substantial effect on the Wild and Scenic River.
18. The project is not removing any nest trees for the Marbled Murrelet. The project consists of improvements on an existing highway thus should not result in any substantial effects to “fly-through” areas or “social activity” areas, nor result in any substantial changes in the canopy. Providing the corvid- proof trash receptacles, grates, and other equipment in the campground is a conservation measure the US Fish and Wildlife Service recommended during the consultation efforts for this project and Caltrans incorporated this measure into the project. Conservation measures in the context of the federal Endangered Species Act represent actions that are intended to further the recovery of and/or minimize or compensate for the project effects on the listed species. The revegetation of disturbed areas and the restoration of the half acre that would be relinquished back to State Park are also conservation measures. The restoration of the half

acre would enhance foraging habitat for Northern Spotted Owls. Surveying potential breeding habitat to identify potential nesting areas is identified as a recovery action in the Marbled Murrelet Recovery Plan (US FWS, 1997). The two year survey for Marbled Murrelets that Caltrans has proposed to do at Richardson Grove State Park would aid in the recovery of the species by providing information to the US Fish and Wildlife Service about the population in inland nesting areas.

19. The survey that will take place would provide information as to how much the suitable habitat within Richardson Grove State Park is occupied presently by Marbled Murrelet. With this information, State Parks could work with US Fish and Wildlife Service to implement improvements that would benefit the murrelets. Since the impacts from the project would only be temporary, it is improbable that the project would impact the chances either way for the north coast murrelets to interbreed with murrelets in Marbled Murrelet Conservation Area #6.
20. Since the immediate vicinity of the road is not the ideal area for nesting habitat, and the project has been determined to not to remove any nesting trees, the US Fish and Wildlife Service concluded that the project would not likely adversely modify designated critical habitat. The Service also concluded "that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled Murrelets."
21. As can be seen in Appendices K and L, and photos 6B and 7B in Section 2.1.6 of the FEIR, the areas where the vast majority of tree removal is proposed do not contain large trees, thus, the tree removal is not expected to increase blow-down or wind throw of large trees.
22. The mixed conifer stands is more likely to be suitable habitat for the Northern Spotted Owl. However, the point that was being made in the document is that habitat would be relinquished to the park similar in values to habitat being removed.
23. See Responses #20 and #22 above. While old growth redwood forest habitat is preferable for the Marbled Murrelet, since the project was not determined to result in substantial adverse impacts to the species nor designated critical habitat, the mitigation measures proposed are for enhancing the habitat as well as conservation.
24. No other similar stands of redwoods abutting Route 101 presently exist in Humboldt County.
25. Refer to Chapter 3 in FEIR/EA.
26. The proposed project, while not precluding increased ship traffic to Humboldt Bay or elsewhere, it is not dependent on ship traffic either. The proposed project is an independent stand alone project. Any impacts to Marbled Murrelet due to increased ship traffic would more appropriately be addressed in the environmental documents related to the infrastructure improvements necessary to accommodate increased ship traffic.
27. See Response #6 above.

28. Project is not expected to have an appreciable difference on tree transpiration, fog-drip, the hydrologic cycle, rainfall, temperature extremes, and fire risk at Richardson Grove. The project is making minor changes to the alignment and shoulders of an existing highway. In addition, since no trees shading the river would be removed, the project would not result in any temperature alterations of the river. With the storm water best management practice measures in place, there should not be any appreciable sedimentation to the river or its tributaries. The improvements proposed to the culverts include replacement at four culverts and minor improvements at two others. If the water is present in the drainages during the improvements, water would be diverted around the work area. Two of the 18 inch diameter culverts will be replaced with 24 inch diameter culverts so there would be less chance of those drainages being impeded.
29. See Response #18 above.
30. The retaining wall is not located in the park but adjacent to the Singing Trees Recovery Center. A design modification for the retaining wall was developed subsequent to the circulation of the Draft EIR. The modification changed the wall type from an above the road wall to a below the road wall on the east side of the highway adjacent to the Singing Trees facility. The design modification results in a shorter wall that takes fewer trees, five as compared to the approximately thirty trees that would be removed in the original design Again, while suitable habitat may exist adjacent to the highway, it is not preferable habitat because of the edge effect of the roadway itself; trees adjacent to the highway are not as protected from predators as nest trees further away. Also, no trees suitable for nesting are proposed for removal. In addition, traffic poses a hazard for fledglings learning to fly which also make the trees adjacent to the roadway less desirable for nesting. The improvements are being proposed on an existing roadway, it is not opening up expanses of “untouched” habitat.
31. The US Fish and Wildlife Service concurred in the determination that the project would likely not adversely affect designated Critical Habitat, nor would the project result in take of Marbled Murrelet.
32. The NES will be revised. If any Marbled Murrelet are nesting adjacent to the project area during construction, it is likely that they will be temporarily affected. But given that there is a lot of suitable habitat away from the roadway and the human activity areas associated with the park visitors, it is likely that any nests would be further away from the project area. Since the trees that are proposed for removal are, for the most part, surrounded by larger trees that would not be removed, the noise effects from the traffic using Route 101 would not appreciable change with the project. The determination that the project would not likely adversely modify designated Critical Habitat was made considering the long term effects of the projects. This determination was concurred by US Fish and Wildlife Service.
33. While the project construction activities may affect breeding Northern Spotted Owl and Marbled Murrelets present in or near the project area, the effect would be temporary and the US Fish and Wildlife Service determined that the effects of construction is not expected to have a long term influence on the breeding

performance on these species. The amount of vegetation to be removed should not have any discernable effect on noise levels in the surrounding area.

34. Caltrans funded the study.
35. As stated in the document in Section 1.2, studies for improving US Route 101 including the Richardson Grove segment date back as far as 1955. The recent effort culminating in the current document began in 2006. Improvements for US Route 101 at this location to facilitate goods movement has also been identified goals in the County's Regional Transportation Plan.
36. Cambridge Systematics, Inc. advertise themselves as assisting in all transportation matters including strategic planning, forecasting, modeling, simulations, GIS and data management, and safety related research.
37. It has been reported to Caltrans that it has become increasingly difficult to find the shorter trailers. And as trucking companies replace the vehicles in their fleets with the industry standard sized vehicles, the smaller CA Legal vehicles would tend to be older vehicles which would have more challenges in meeting the air quality standards that will be implemented in the near future.
38. The statement only reflects what has been stated. As to whether the newspaper would actually relocate, Caltrans has no inside information.
39. Dr. Gallo's report, "Realigning Highway 101 at Richardson Grove: The Economic Impact on Humboldt and Del Norte Counties" is available upon request as are many of the technical studies.
40. Dr. Gallo's findings included impacts to small, local businesses. In addition, Caltrans has heard from many local business owners who have indicated that providing STAA access would result in cost savings for them. It is not likely that the project would substantially affect the tourist businesses once construction has been completed. It is not expected that providing STAA access at Richardson Grove would divert a substantial number of trucks from the primary truck corridor of I-5 because using I-5 would be more fuel efficient and less time for most major population centers in California. For the smaller businesses which do not maintain their own fleet, they will likely continue to utilize the local trucking companies for their shipping needs. It is not anticipated that the project would result in substantial impacts to Leggett. For a similar STAA improvement project proposed in Del Norte County, a survey performed including the trucking companies and the majority of trucking companies stated that they would be unaffected by the STAA improvements.
41. Commercial and residential development currently exists along Route 101 both north and south of the park. The terrain is steep and the developable area adjacent to the highway is constrained by the river on one side and the slopes on the other, thus, it is unlikely that any major development would be slated for this area in the near future. Caltrans is unaware of any advertising campaign for economic development in Humboldt County. The County staffs an economic development office and it is likely that this office is involved in various efforts to promote economic development.
42. Caltrans is aware of the County's efforts to develop the port and expand the railroad into Humboldt County. However, at present, funding to implement these infrastructure improvements has not been identified. The County General Plan is

the guiding force for identifying the desired community character and development in the County. The proposed improvement at Richardson Grove is currently in the County's Regional Transportation Plan (RTP) and was also identified in the previous RTP. Thus, constructing the project is implementing an element in the existing County RTP. These Plans go through a public review process and are used to identify major infrastructure projects needed to implement the goals in the General Plan.

43. Construction staging for this project would be similar for construction for any two lane State highway in the district. US Route 101 will remain open during construction. There would be sections of highway within the project limits that would have only one lane available for traffic. The traffic would be controlled by either the signal or by flaggers. Delays, as is typical for construction on similar State highways are anticipated to average about five to ten minutes with a maximum expected delay of twenty minutes. Since the nearest detour is several hundred miles in length, it is not anticipated that travelers would deviate from US Route 101 due to construction. There will likely be other portions of US Route 101 under construction in Humboldt County at the same time as the Richardson Grove project. Having more than one section of US Route 101 in construction in the County in any given year is fairly typical.
44. Figure 3 in the FEIR/EA shows what portions of State highways in Del Norte, Humboldt, Mendocino, and Lake Counties are accessible for STAA vehicles. Local agencies have the responsibility for the local roads. STAA vehicles are restricted to the National Network. In California, the STAA network includes the Interstate system, Defense Highways, and Terminal Access Routes. Terminal Access Routes are portions of State routes or other routes that allow STAA trucks to a) travel between National Network routes, b) reach a truck's operating facility, or c) reach a facility where freight originates, terminates, or is handled in the transportation process. US Route 101 in Humboldt County is designated as a Terminal Access Route with the exception of the section through Richardson Grove. There are no additional improvements that would be needed on US Route 101 to accommodate STAA vehicles. In fact, STAA vehicles can already access Humboldt County via US Route 101 from the north. Thus, providing STAA access from the south would not be putting a "new element" onto the roadways in the County.
45. See Response #8 above.
46. Information on the visual impacts resulting from the project were included in the DEIR/EA, see Section 2.1.6 and Appendix K.
47. Section 2.2.1 in the DEIR/EA discussed the impacts to water quality due to the project. Each of the proposed cuts is on a previous cut slope. Geotechnical studies were performed for the project and concluded that the project is not expected to adversely affect the stability of any of these slopes.
48. The stumps would not be visible from the river. There are existing stumps adjacent to the roadway, thus leaving the stumps is in character with the existing roadway.
49. According to the information in the Natural Diversity Database, the nearest known nest of the Northern Spotted Owl is ½ mile from the project area. The

habitat within the project limits north of the park is marginal foraging habitat, partly due to all the residential and commercial development that is present. As stated previously, night work would not be the norm for the project. Over half of the trees to be removed for the project are twelve inches in diameter or less, so their removal should not substantially affect the canopy.

50. Indirect and cumulative impacts to the Northern Spotted Owl were considered. The US Fish and Wildlife Service concurred that the project would not result in a substantial adverse impact.
51. Fill material would come from two sources. Some material excavated for the project would be reused as fill material. In addition, some fill would likely come from commercial source obtained by the contractor. Caltrans cannot specify which commercial source the contractor may use. As described in Section 2.3.5 of the DEIR/EA, most of the areas subject to vegetation removal and soil disturbance in the project area will be revegetated. Revegetation efforts would include an application of local native mulch which includes the original topsoil and duff that was removed and stored form the cut slope areas and chips from the trees and shrubs that are removed. Revegetation also includes weed removal for a period of five years. Herbicides are not used in this area for weed removal.
52. Hot mix asphalt consists of asphalt that is heated. Cement treated permeable base (CTPB) is aggregate combined with cement which may have fly ash in it as an additive. The cement is composed of Portland cement containing gypsum and may also contain trace amounts of naturally occurring chemicals. Trace constituents may include up to 0.75% insoluble residue, some of which may be free crystalline silica, calcium oxide (quick lime), magnesium oxide, potassium sulfate, sodium sulfate, chromium compounds, and nickel compounds. Fly ash is composed of silica, alumina, calcium oxide, titanium oxide, ferric oxide, and magnesium oxide.
53. Herbicides are not used by Caltrans within Humboldt County with the exception of within the city limits of Rio Dell and Fortuna. The disposal site for this project is the existing disposal site within Caltrans right of way just south of the project limits. This site was selected due to its proximity to the project limits and the site is already developed as a disposal site.
54. You are correct; all the alternatives are under consideration prior to selecting the preferred alternative.
55. As stated above, it is not expected that there would be a discernable increase in noise that occurs as a result of the vegetation removal. The construction noise would be temporary and the US Fish and Wildlife Service has determined that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled Murrelet or Northern Spotted Owl in and near the project area.

Madroneweb@aol.com
03/12/2009 04:58 PM

To Deborah_Harmon@dct.ca.gov
cc
bcc
Subject Supplement to Comments on DEIR/EA & BA on Richardson Grove Hwy Project

March 11th, 2009

Bruce Campbell
1158 26th St. #883
Santa Monica, CA 90403

Deborah Harmon, Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka, CA 95501

Re: Richardson Grove Operational Improvement Project Humboldt County, CA District 1 - HUM - 101, PM 1.1/2.2 464800 Draft Environmental Impact Report / Environmental Assessment and Programmatic Section 4 (f) Evaluation

Dear Ms. Harmon and to whom it may concern:

First I want to add a small word and delete two words (while adding one word) from my earlier comments on this matter which were dated January 27th, 2009. In my Point #7 in regards to issues which were either inadequately addressed (or not addressed at all) in the DEIR/EA on the Richardson Grove project, one should insert the word "of" in the 2nd to last line so that the sentence reads like this following the last comma in #7: "while much more **of** the hillside by the proposed wall would lose various levels of canopy – impact of climate change on a more fragmented forest should be assessed;". Next, I want to remove the words "should not" which accidentally occurred in the paragraph preceding the section called "CALTRANS PROCESS, PRESSURE, ECONOMICS, AND GROWTH", and replace those two words with the word "would". Thus, that paragraph should now read: "In relation to the three paragraphs above and some other Marbled Murrelet points made and questions asked in these scoping comments, even if corvids feeding on human food scraps at campgrounds and in truck stop / areas with stores in the Richardson Grove area results in no current Marbled Murrelet nesting in the fairly immediate Highway 101 area, yet still the Richardson Grove so-called "re-alignment" would negatively impact what biologists call "short-term actions" which are needed to protect murrelet habitat. Please examine how each of the offered alternatives (including the "No Action Alternative") impact the important short-term actions which are summarized as "maintaining occupied habitat" – I would add occasional habitat rather than just current nesting habitat -- plus "maintaining large blocks of suitable habitat" and "maintaining and enhancing buffer habitat."

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Next, I want to emphasize certain words -- all of which were already mentioned in my comments dated 1-27-09 -- so that you are certain to analyze rather than ignore these words in forthcoming documents on the highway project in and near Richardson Grove. These words are: WIND-THROW, BLOW-DOWN, DIE-BACK, MYCORRHIZAL FUNGI, OUTSTANDINGLY REMARKABLE VALUES, TREE TRANSPIRATION, FOG-DRIP, FIRE RISK, and likelihood for CATASTROPHIC FIRE. How will the so-called Richardson Grove Operational Improvement Project impact these aforementioned words/terms, including what would the short-term, mid-term, and long-term impacts of the project likely be in regards to conservation and possible recovery of the Marbled Murrelet in Marbled Murrelet Conservation Zone 4 (and assess implications for murrelet populations in Marbled Murrelet Conservation Zones 5 and 6 when considering long-term impacts from proposed work at the site as well as the likely growth in transport and extractive industries in Humboldt County which the highway widening/realignment would likely spawn).

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In my earlier comments, I called for exact scientific measurements of the likely and actual levels of noise and light which would occur from all the various activities relating to the highway and wall projects in the area of Richardson Grove State Park. It must be pointed out that among the considerations of noise sources that the horns from vehicles of exasperated motorists stuck waiting to pass through Richardson Grove during construction phases should be considered. While examining the actual likely wattage to be used and the likely decibel level which would occur during grinding and construction phases of the project at and near Richardson Grove State Park (relating to my Point #15), please state whether diesel generators would be used to power lights for night-time construction. Also, please realize that when one removes over 80 trees plus some bushes, there is less vegetation to absorb the noise so that such noises would be louder. (I understand that Caltrans did not exactly comprehend the suggestion from some concerned citizens in Berkeley that bushes and trees be planted to lessen the impact of noise, rather than those highway noise walls -- graffiti walls to some -- which constantly sprout up around our state.) 5

I want to give an outline of what I would consider to be a thorough cumulative impacts analysis regarding impact of the Richardson Grove area highway project to the Marbled Murrelet and to other listed and candidate species:

1. analyze likely SHORT-TERM IMPACTS in the greater Richardson Grove area;
2. analyze likely MID and LONG-TERM IMPACTS in the greater Richardson Grove area -- this should also carefully evaluate the significance of the southern Humboldt County Marbled Murrelet population for the possible recovery of this species (or else the extirpation) in Marbled Murrelet Conservation Zones 5 & even 6; 6
3. analyze the MID and LONG-TERM IMPACTS in promoting a larger number of ships in Humboldt Bay and off of the Humboldt County coastline which would increase the likelihood of oil, fuel, and hazardous cargo spills to which the murrelet is especially vulnerable;
4. analyze the MID and LONG-TERM IMPACTS on murrelet forest habitat in Humboldt County due to larger trucks being able to legally travel through the Richardson Grove State Park area, due to growth of the port, due to encouragement of additional big-box stores on the North Coast, and due to possible resurgence of the railroad (under the purview of the North Coast Rail Authority) all of which would increase the likelihood for a resurgence in extractive activities in the county including the logging of trees which could provide current nesting, flyway, or social activity habitat for the Marbled Murrelet.

I believe I have mentioned that there will be some short-term implications by removing some mid-level canopy (and more in the proposed wall area), but I am even more concerned about the mid and longer-term impacts on murrelets from the cutting of redwood roots (which would weaken the root systems of large trees leaving them much more vulnerable to wind-throw, blow-down, die-back, and fire -- including catastrophic fire). Also, how would heavy equipment, paving up to trees, and soil compaction impact MYCORRHIZAL FUNGI and if they are reduced, the health of the tree is reduced and it would be more vulnerable to intense weather events. Thus, when giant redwoods are eventually blown down, there will be severe impacts on the upper canopy of this vital stand for murrelet gene flow. 7 8

The likelihood of oil, fuel, and hazardous cargo spills would increase upon the modernization and expansion of the port at Humboldt Bay, and I note that the Humboldt Bay Harbor, Recreation and Conservation District admits in their "Biological Report" document that there are three birds of the "Family Alcidae" in the Humboldt Bay and vicinity including the Marbled Murrelet, the common murre, and the pigeon guillemot. Will a tenth of the murrelets in Marbled Murrelet Conservation Zone 4 be killed by an oil slick or other spill someday on or near Humboldt Bay as they were by the New Carissa oil spill just over a decade ago near Coos Bay, Oregon? 9

I wanted to make even clearer the final paragraph of my snail mail comment which was not in my initial comments sent via e-mail to Ms. Harmon. It is in regards to the Marbled Murrelet, and how there must be very careful analysis in regards to cumulative impacts from short, mid, and long-term impacts from activities associated with the highway project at and near Richardson Grove, as well as the impacts on the murrelet due to the likely increase in extractive activities if larger vehicles can drive on this section of

101 and link up with port and big-box store expansion -- whether or not there is further encouragement for a new round of extractive plunder if the North Coast Railroad Authority rail line is rebuilt. Also, the likelihood of oil, fuel, and hazardous cargo spills would increase upon the modernization and expansion of the port at Humboldt Bay, and I note that the Humboldt Bay Harbor, Recreation and Conservation District admits in their "Biological Report" document that there are three birds of the "Family Alcidae" in the Humboldt Bay and vicinity including the Marbled Murrelet, the common murre, and the pigeon guillemot. Will a tenth of the murrelets in Marbled Murrelet Conservation Zone 4 be killed by an oil slick or other spill someday on or near Humboldt Bay as they were by the New Carissa oil spill just over a decade ago near Coos Bay, Oregon?

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These quotes are from a 5-9-08 letter from Jeffrey Holt, Vice-President for Public Sector and Infrastructure Banking for Goldman-Sachs (who is based in San Francisco) to the Chief Executive Officer of the Humboldt Bay Harbor, Recreation and Conservation District who is David Hull. The quotes can be found at this URL:
http://www.humboldtbay.org/harbordistrict/documents/terminalfeasibility/G-S%20letter%20of%20interest%205-9-08.pdf "The work that the district has done on its basic dredging and infrastructure has been fortuitous as interest in port terminal facilities has never been greater. Several North American ports have been auctioning concessions or are in the process of preparing concessions on terminal facilities focusing on containers, freight and logistics warehousing for distribution centers."

"The port and rail assets of the District and the Railroad Authority make an attractive third California freight gateway." "Humboldt is a natural gateway for such exports, as well as an attractive source for container capacity. Making the improvements to the port and rail assets will potentially bring thousands of jobs to the region, including jobs in warehousing, distribution centers and light manufacturing."

Goldman Sachs seeks to be the "exclusive financial advisor in relation to the possible concession, long-term lease or other arrangement involving of all or a portion of the District's Redwood Marine Terminal and certain other properties ('Terminal Facilities') currently owned by the District together with the 316 mile connecting rail line, yards and facilities ('the Railroad') owned by the North Coast Railroad Authority ('NCRA') and operated under a long-term arrangement by NWP, and the District's consideration of financing and refinancing alternatives in connection therewith."
****

Sincerely yours,

Bruce Campbell

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!

1. A design modification was developed subsequent to the circulation of the Draft EIR. The modification included a shorter wall on the east side of the highway which would be constructed below the roadway. This results in requiring only five trees to be removed rather than approximately thirty with the original design.
2. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled Murrelet. Since the information provided was sufficient for the US Fish and Wildlife to make its finding, no additional analysis is considered warranted
3. The project would not substantially increase the potential for wind-throw, blow-down, or die-back. The two areas in the park where the majority of tree removal is proposed are areas of previous cut so there are no old growth redwoods present. The duff will be collected and stored prior to ground disturbance occurring. When the work is completed, the collected duff would be spread out over the disturbed area. The mycorrhizal fungi would likely be present in this material. The outstandingly remarkable values of the Wild and Scenic River would not be adversely affected. The National Park Service which administers the federal Wild and Scenic River program for this segment of the South Fork Eel has concurred with this determination (See Appendix G). The project is not expected to substantially affect tree transpiration and fog drip. Irrigation is being provided during the summer for redwoods thirty inches in diameter or greater in the park where construction is occurring within the structural root zone to offset the effects of stress on the trees during construction. The project is not expected to increase the risk for fire or catastrophic fire. In those areas where additional shoulder width has been provided, it would reduce the risk of fires starting from sparks from the tail pipe.
4. See response #2 above regarding the impacts to Marbled murrelets.
5. Construction noise was considered in the Biological Assessment which was reviewed by the US Fish and Wildlife Service. Car horns wouldn't likely be louder than the construction equipment that was considered. The US Fish and Wildlife determined that the temporary construction impacts would not result in direct mortality to the Marbled murrelet or Northern spotted owl or their eggs or young. If night work is conducted, it is possible that diesel generators would be utilized. The two areas where the majority of vegetation is to be removed within the park are below two human use areas, campsites and park residences. It is unlikely that Marbled murrelets are nesting in these human use activity areas where the trees are not in protected "stands."
6. The Biological Opinion prepared by the US Fish and Wildlife Service for this project considers such factors as habitat loss, human disturbance, gill-net fishing, oil spills and marine contaminants, reduced prey availability, and disease. Their determination was that the project would not result in take of Marbled murrelet.

7. See General Response #3 regarding information about minimization features added to the design and construction to protect the trees.
8. Dennis Yniguez, a registered consulting arborist contracted by Save the Redwoods League to evaluate the project notes that, “the existing root systems of old growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height.” Mr Yniguez concludes, “My professional opinion is that the highway alterations, as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of old growth redwoods adjacent to the highway construction.”
9. The development of the port in Humboldt Bay is an independent project and impacts resulting from port development would be considered under the environmental document prepared for port improvements. It is not anticipated that the accessibility of STAA trucks would result in an increase of extractive industries in Humboldt County as other market forces have a greater influence. With regards to encouraging big box development in Eureka and the surrounding area, other factors have been identified as being more influential as well. (See response #2 for your January 27, 2009 letter above.)

Madronewsb@aol.com
03/12/2009 10:17 PM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Pt 2 of Supplement to Comments on DEIR/EA & BA on Richn Grove Hwy Project

March 12th, 2009

Bruce Campbell
1158 26th St. #883
Santa Monica, CA 90403

Deborah Harmon, Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka, CA 95501

Re: Richardson Grove Operational Improvement Project Humboldt County, CA District 1 - HUM - 101, PM 1.1/2.2 464800 Draft Environmental Impact Report / Environmental Assessment and Programmatic Section 4 (f) Evaluation

Dear Ms. Harmon and to whom it may concern:

Here is a quote from the Recovery Plan for the Marbled Murrelet: "Implementing appropriate garbage/trash disposal may help decrease potential predator populations in high human use areas such as county, state and national parks." Since the recovery plan produced in the 1990s says this, it is not a novel thought to call for trash cans which are corvid-proof. I have also heard that there has been discussion in state and federal parks further north in Humboldt and Del Norte Counties about eliminating camping and picnic sites in some parks due to the diminishing or the murrelet population due to corvids.

The Recovery Plan for the murrelet also says: **"Private lands at the southern end of this Zone are important for maintaining the current distribution of the species. There is already a considerable gap in distribution between this area and the central California population in Zone 6. Efforts should be implemented to, at a minimum, not expand the current distribution gap."**

The previous paragraph was mostly referring to some old-growth and selectively cut forests (residual old-growth as well as second-growth) on the lands of the Pacific Lumber Company which got taken over by Maxxam in September 1985, and not long ago declared bankruptcy so currently the land is in the hands of the Humboldt Redwood Company. Nearly all of this approximately 210,000 acres of land was heavily logged under the Habitat Conservation Plan / Sustained Yield Plan (or before the plan took effect) -- though a judge determined that the SYP did not actually exist. Researchers have found comparatively good habitat (including nesting habitat) for the Marbled Murrelet in the lower Redwood Creek of Redwood National Park and Prairie Creek Redwoods State Park area of northern Humboldt County (despite some problems with corvids) and comparatively good habitat in portions of the greater Headwaters Forest area especially in protected areas but also some in "set-aside" and other areas in the vicinity. But, despite fairly extensive old redwood forest in parts of southern Humboldt County, it does not have a sizable murrelet population although it has considerable primary constituent elements which could accomodate murrelets. The Bull Creek area of Humboldt Redwoods State Park is known for murrelets (for areas to the south of the greater Headwaters area, but not at the concentration one would find in the greater Headwaters and Prairie/Redwood Creek areas.

Thus, while the US Fish and Wildlife Service's Recovery Plan for the murrelet saw the crucial

importance of the murrelet habitat in the southern part of Marbled Murrelet Conservation Zone 4, it was not assuming a larger-scale liquidation of older forests on Pacific Lumber land in southern Humboldt County (as well as parts of the greater Headwaters area). Thus, the significance of the redwood ecosystem in the Eel River watershed (and on public land in this watershed including the designated critical habitat for the murrelet at Richardson Grove) is more significant than even biologists at the USFWS realized due to the intensive forest management which has occurred on PL lands since the Recovery Plan came out and since the approval of the PL so-called "Habitat Conservation Plan / Sustained Yield Plan" which even resulted in the logging of occupied murrelet habitat. (The California Supreme Court ruled that the Sustained Yield Plan essentially did not exist.)

In my "Supplement to Comments on DEIR/EA & BA on Richardson Grove Hwy Project", I wanted to add something regarding the paragraph following my 4 points as to some of the areas that should be analyzed as far as cumulative impact of the project and its repercussions on the conservation and possible recovery of the Marbled Murrelet. In the last sentence of that paragraph, I mentioned my deep concerns about the mid and long-term impacts / repercussions of the highway project due to what I believe will be a severe opening of the upper canopy due to making the trees more vulnerable to WIND-THROW, BLOW-DOWN, DIE-BACK, and perhaps even CATASTROPHIC FIRE, etc. In my mention that the ancient redwood stand at Richardson Grove is vital for gene flow, of course I meant that if there is further reduction in redwood canopy in the Richardson Grove, Confusion Hill, and other areas in southern Humboldt and very northern Mendocino County, it is very likely that the murrelet will not survive south of the Humboldt/Mendocino County line a few decades from now. Thus, the southern part of MMCZ 4 is indeed ecologically significant for the murrelet as well as for other species. 1

Please provide supporting documentation in future environmental impact documents regarding the so-called Richardson Grove Operational Improvement project in regards to the claim in the DEIR/EA that only STAA trucks will be made as of the year 2010. 2

I hereby call for the release of all correspondence between Caltrans and the Humboldt Bay Recreation and Conservation District (and related personnel) in the past 6 years (as well as all correspondence between Caltrans and Cambridge Systematics, Inc. and related personnel) -- including that correspondence regarding the project in the Richardson Grove area and implications for growth in Humboldt County in general upon port expansion and/or widening/realignment of Highway 101 in the Richardson Grove area. 3

The following quotes (between the two lines of asterisks) are from this URL:
http://www.dnltc.org/planningdocs/GoodsMovementActionPlan.pdf
which is the document from the Del Norte Local Transportation Commission which is entitled "Achieving STAA Route Status for the State Route 197/US Highway 199 Corridor A Goods Movement Action Plan" dated April 2007 and updated in October 1997. It shows that Caltrans is a key player hand-in-hand with global forces exerting pressure to widen "trade corridors" for goods movement which would change the community and environmental character of parts of the North Coast. While Caltrans pretends that the highway project in the Richardson Grove area would not encourage growth on the North Coast, check out the enthusiasm of powerful economic forces in Del Norte County who see a bonanza of growth following what they hope is widening of some portions of Highways 199 and 197 in that county. 4

****

"The County's 2006-2008 Comprehensive Economic Development Strategy (CEDS) lists local infrastructure improvement as its first goal. The creation of a viable transportation corridor will spur the expansion of existing businesses, encourage new business, create new jobs and enhance public safety. It is also vital in fulfilling the second goal of the CEDS, which is to expand the county's tourism industry.

Congressman Mike Thompson recognized the need for STAA Route access on the 197/199 corridor and helped secure $1.8 million in HPP funds for the project. This commitment is essential; however; it unlikely that enough HPP funds will become available to Del Norte County to complete the necessary operational improvements on U.S. Highway 199.

source for US Highway 199 design and construction. The amount of funding required for this

project is less than 1 percent (.007) of the total bond issue. The US Highway 199 problems are outmoded and obsolete compared to other trade corridor and goods movement problems in California. This is the most likely reason that basic STAA route access is not specifically listed in California goods movement descriptions. Nearly all other communities in California have had STAA Route access for decades.

A viable trade corridor is essential. A viable trade corridor is a right, not a privilege, for Del Norte County residents as citizens of the State of California. Caltrans has jurisdiction over the 197/199 corridor and must take the lead in securing STAA Route status for 197/199, acting as an advocate for Del Norte County residents. The DNLTC is providing support to Caltrans in achieving this urgent and essential goal. The DNLTC looks forward to working together with Caltrans in a highly productive partnership. This understanding of necessary partnership was demonstrated by the Del Norte Local Transportation Commission decision to fund the PA&ED phase of US Highway 199 for operations.

Guiding Principles

In achieving the goal of STAA status for the 197/199 corridor, the DNLTC is guided by the following principles:

- A viable trade corridor is a right, not a privilege, for Del Norte County residents as citizens of the State of California.
- Opting for "no build" would result in irreparable economic harm to Del Norte County and its citizens.
- Caltrans has jurisdiction over the 197/199 corridor and is responsible for route operations and safety. It must take the lead in attaining STAA status for the 197/199 corridor, acting as an advocate for Del Norte County residents.
- The DNLTC will provide necessary support to Caltrans, working together in a highly productive partnership.
- The DNLTC will involve all stakeholders and the general public in each step of the decision-making process.

The growth of retail business is similarly impeded. Home Depot opened a store in Crescent City in 2006—along with Wal-Mart, the only "big box" store in the county—but its trucks must re-load their cargo in Oregon from 70- to 45-foot trailers prior to traveling through Del Norte County.

Dwayne Reichlin of Hambro Forest Products has repeatedly stressed that his business is now competing on a global level: "The people of Del Norte County deserve to have access to the rest of the world."

Expansion of Existing Businesses. Businesses with growth potential in Del Norte County, such as bulb farming, will be able to expand operations, providing products to a global marketplace at lower costs and in a timelier manner.

Expansion of the Tourism Industry. Del Norte County competes with surrounding counties in California and Oregon for tourism dollars. The lack of improved highways in Del Norte currently impedes tourist travel, especially for visitors driving recreational vehicles or towing trailers. Del Norte has identified tourism as the industry with the greatest short-term growth potential: highway improvement is essential for the industry to expand.

Attracting New Business. Del Norte County has recently developed an Airport Master Plan that includes plans for an industrial park. Improving surface transportation will create synergies that will allow Del Norte to attract businesses to this new facility and to other sites in the county. Similarly, Crescent City Harbor is initiating plans for dredging to allow the return of ocean-going barge traffic to the county, offering potential synergies with sea and surface transportation.

The horizontal alignment of US Highway 199 is highly curvilinear, has many small radius curves, and frequently has narrow or nearly absent paved shoulders. Where short radius curves and narrow shoulders occur together, STAA trucks often off-track from their

lane.
State Route 197 is an interconnective leg between US Highway 199 and US Highway 101 north of Crescent City. Truckers use State Route 197 as an alternate route because extralegal loads are restricted on the westernmost section of 199, which passes through a portion of the Redwood National and State Parks. However, Highway 197 is also closed to STAA vehicles.

CONCLUSION: TAKING ACTION
It has been nearly a decade since the publication of the A Comprehensive Study of Routes 197 and 199 by the California Department of Transportation. During that decade, truck technology has continued to evolve, and the transportation industry has adopted STAA trucking as the universal standard of shipping. At the same time, the supply chain has become increasingly globalized. The State of California, recognizing the critical importance of the goods movement industry to its economy, is now implementing a Goods Movement Action Plan.
It is imperative for Del Norte County to have a viable trade corridor for the efficient movement of goods and people. Without necessary improvements to the 197/199 corridor, Del Norte will continue to be left out of the regional, statewide and global marketplaces, resulting in continual and irreparable harm to the county's economy and its citizens.
With this position paper, the Del Norte Local Transportation Commission issues an urgent call to action. By laying out strategies for funding highway improvements, we are presenting a foundation for decision-making and a framework for action.
We look to Caltrans to provide the leadership and advocacy necessary to secure STAA status for the 197/199 corridor. Working together in a productive partnership we can achieve our goal for the lasting benefit of the citizens of Del Norte County.
****

It is especially ironic that Del Norte County is under the ridiculous impression that tourists are wanting to drive down a wide highway along the Smith River and then spend lots of money in the county. If Del Norte does not respect one of the most scenic highways anywhere which is in their own county, then they do not deserve tourist dollars. I have not even heard a claim by Humboldt County that there would be more tourist money spent if the "redwood curtain" was parted in the Richardson Grove area -- likely because it is a presposterous notion and if one can conclude on the matter, it is that people would less likely want to support an area that does not recognize the vital ancient redwood canopy over most of Highway 101 through Richardson Grove State Park.

I also discovered in online documents that there are plans to create "Marine Highways" off of the West Coast. If there was such a concentration of ship traffic for global and regional trade, how would that increase the likelihood of accidents and spills which could impact murrelets, anadramous fish, and other marine, avian, mammal, and other life in the North Coast area.

This quote could well be from the Business Plan for the Redwood Marine Terminal: "The last study on the economic impact of port activity at Humboldt Bay was prepared in 1997 – "The Impact of Infrastructure Investment on Economic Development, Job Creation, and Real Estate Values: Financing Public Investment in The Port at Humboldt Bay", John M. Quigley, January 14, 1997. This study concluded that investment in port infrastructure at Humboldt Bay would generate jobs, income, sales taxes and other economic benefits for the region. The job multiplier in this study was similar to those found in the AAPA study and at otherWest Coast ports. Successful development of the Redwood Marine Terminal would be expected to:
- Provide direct port employment.
- Support induced and indirect jobs in the surrounding communities.
- Support higher tax revenues for local communities.
- Support higher real estate values.
- Support the local and regional tourist industry if cruise ship calls occur.
- Provide broader regional economic benefits for Northern California"

Sincerely yours,

1. There would be no old growth trees removed by the project. The majority of trees to be removed from the park are 12 inches in diameter or less and thus, are not the major constituents of the canopy.
2. This statement has been removed from the final document.
3. To receive these documents a Freedom of Information Act request should be submitted to Caltrans.
4. The Del Norte County STAA access improvement project is an independent project. The Richardson Grove Operational Improvement project has independent utility and the benefits achieved from this project occur whether or not the Del Norte STAA projects are constructed.
5. The port improvements in Humboldt Bay are independent projects. The Richardson Grove Operational Improvement project has independent utility. The environmental impacts from increased port activity would be covered in the environmental document for the port improvements.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:34 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove Improvement Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:35 AM -----

"Ross Carkeet" <carkeetr@yosemite.cc.ca.us >
03/11/2009 12:01 AM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove Improvement Project

To: Kim Floyd, Project Manager
Cal Trans
Eureka, California

From: Ross A. Carkeet, Jr.
Registered Professional Forester No. 1187 (California)
2301 First St.
McKinleyville, Ca. 95519

I have read the Draft Environmental Report/Environmental Assessment for the Richardson Grove Improvement Project and wish to enter my comments for the public record:

1) The draft report does considerable justice to pointing out the significance of the portion of State Highway 101 passing through Richardson Grove State Park as important to aesthetics and tourism and in essence represents the "de facto" old-growth redwood gateway to Humboldt County, historically and presently.

2) The report also recognizes the possibility and importance of short-term and long-term detrimental effects on the root systems of a number of large old-growth redwoods located immediately adjacent to the highway, whereby soil removal, fill, compaction and modification during construction may adversely affect these trees that are responsible for creating the visual character of the highway as a "slow curvy road with large old-growth redwoods dominating the landscape." (p. 169, Draft), and where "viewers through this area have a very high expectation of scenic quality." (p. 169, Draft)

3) Proposed mitigation measures to address the soil disturbance issues in no. 2, however, fail to describe previous case studies or scientific examples whereby these methods have been proven effective in old-growth redwood protection. For example, the draft does not enlighten the reader as to how the use of a brow log placed against the trunk of a large redwood will "help maintain circulation" (p. 83, Draft), implying the circulation for water and oxygenation. A sound and solid log is rather dense, and as it slowly decays while buried will emit carbon dioxide, whereby roots need oxygen for respiration. 1

4) The statement "the proposed project is not anticipated to substantially increase the magnitude of compaction that presently exists" (p. 84 Draft) is highly qualitative and appears to be unsubstantiated by any scientific testing, analysis or quoting of previous studies.

5) The List of Preparers (p. 118, Draft) fails to list the professional qualifications of those involved, and

2

appears to be devoid of any input from a Registered Professional Forester or Certified Arborist who has been involved with redwood protection and mitigation techniques. Three expert sources that come to mind are: William J. Libby, PhD, Emeritus Faculty, U.C. Berkeley School of Environmental Science & Forestry, John Stuart, PhD, Professor of Forestry and Dendrology, Humboldt State University, and Doug Jager, PhD, Emeritus Faculty (Forestry and Watershed Management), Humboldt State University.

I hope these comments will assist you in delving further to provide greater assurance the proposed project will not adversely affect the fine legacy we have in this portion of Richardson Grove State Park.

Sincerely,
Ross A. Carkeet, Jr.
707-839-2091

1. As placing fill directly against the trunk of a tree is not advisable, a brow log will be placed at the base of the tree and fill will be placed against the brow log rather than the trunk itself. The brow log allows oxygen and air movement around the base of the tree since the log does not fit snugly against the trunk. The brow log will break down slowly while releasing nitrogen into the soil. The rate of the breakdown is slow enough that the release of carbon dioxide is not an issue. The use of a brow log was recommended by the certified arborist assigned to the project.
2. Darrin Sullivan is a certified arborist and has been part of the project team developing protection measures for the trees and reviewing the design specifications.

garyhcarrasco @yahoo.com
(Gary Carrasco)
01/28/2009 08:48 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove

Dear Ms. Harmon,

I have been living in Arcata for almost thirty years and can still remember the first time I drove through Richardson Grove and decided shortly thereafter that I wanted to live in this ecosystem. I did not move here for economic opportunities which abound in southern and central California where I had lived previously. I came here to reside amid the redwoods and their rural surroundings and have never wavered in my commitment to living within the area.

Had we been corresponding about clearing ancient redwoods for road building before these giants had been almost completely decimated for lumber, it perhaps would be a reasonable option. Instead, these ancient forests have been depleted to a mere 1% of the original stands, which at this point in history, leaves no room for continued destruction. Considering the rarity of this original forest grove, I cannot with any clear conscience commend this decision, nor can I imagine that posterity will forgive our decision to cut these last remaining old growths for the purpose of enlarging the highway to accommodate even larger vehicles than the ones that currently traverse this road. 1

With oil running out and carbon dioxide reaching dangerous levels, we are at a threshold of a major transportation transformation. We are children who, for very short term desire, meddle in the very serious and mature workings of nature. Appropriate stewardship and humility require us to consider very carefully any further damage we engender to this magnificent arboreal phenomenon.

Sincerely,
Gary Carrasco
317 Shirley Blvd.
Arcata, CA 95521

1. *See General Response #2* regarding information that the project would not remove any old growth redwoods.

Kim Floyd/D01/Caltrans/CAGov
03/10/2009 08:58 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/10/2009 08:57 AM -----

Becky Carter
<r0wan0@yahoo.com>
03/06/2009 08:24 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

As a non-California native, I moved to this state with hopes for my son's future. In humboldt county there are incredible views, and small town feel in every place you go. I came from metro-Detroit, to get away from the big box stores, and the concrete, to feel the earth beneath my feet, and to hope my son would grow up in a place where he and nature could connect at any turn. Not only will the detroying of richardson grove destroy the future of humboldt county, it will destroy the dreams of thousands who wish to preserve nature and its beauty. Cutting down the grove will destroy the memories of the soldiers it honors, who bravely gave their lives so that you and I could live our lives to its fullest potential. Selling out humboldt county to a very small group of big box stores will destroy any sincerity and hard work put forth into this county by cheapening what it means to be a business owner. Many of the small business owners in this area are the hardest working people I've met and they truly love their county and their jobs. They provide a great service that places such as wal-mart and other such stores just dont provide - PERSONality. They make you feel like a person and not just another dollar. By destroying the grove it will allow larger stores to move in, push out the small business owner, and when they're done raping this beautiful area of all its worth, it will move on, leaving this county a mere shell of its former self, creating distrust and even more poverty than this world needs. By allowing richardson grove to be cut down, you're allowing the dreams of so many people to be deemed fantasies and worthless. Please make sure noone feels the sting of defeat. Save Richardson Grove.

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1. *See General Response #2* regarding project impacts to the park.
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:20 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:20 AM -----

"Zoe Chapman" <zoe@humboldt.net>
02/21/2009 08:06 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

Drove through Richardson Grove on Thursday and it's quite obvious that a few good speed signs at appropiate places along the grove would be far more effective and much cheaper than destroying this beautiful entrance to Humboldt County by straightening the road. 1

Shame on you Caltrans.

Zoe Chapman
Whitethorn, Ca.

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:32 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:32 AM -----

"Zoe Chapman" <zoe@humboldt.net>
03/10/2009 09:17 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove

I don't know which group is pushing you all at Caltrans to widen the Grove but why can't we just lower the speed limit to 25 mph, add a flashing light, and save us taxpayers 6 million. 1

I've seen the big trucks go through quite easily regardless of what you said tonight on KMUD news.

Wish I knew who is really pushing the widening of our (entire State of California) Grove. 2

Zoe Chapman, local resident

1. *See General Response* #8 regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #1* regarding information on project purpose and need.

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:26 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:26 AM -----

"Vicky Chaves" <vchaves@humsenior.org>
03/12/2009 04:27 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove

Dear Ms. Floyd,

I am sending this to request that CalTrans try a more balanced approach to the proposed project for Richardson Grove. As Humboldt County citizens who value the Redwoods and do not want to see them destroyed, my husband Robert and I are asking you to consider alternatives, such as lowering and enforcing the speed limit, adding traffic lights, etc. instead of cutting trees.

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Thank you for your time.

Sincerely,

Vicky Chaves

1091 Maxwell Street

Fortuna, CA 95540

This e-mail message, including any attachments may contain confidential and privileged information. Any unauthorized use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #10* regarding information on the signalization alternatives considered.

Charles Fielder and Deborah Harmon
CA Dept of Transportation
1656 Union Street
Eureka, CA 95501

January 30, 2009

Dear Mr. Fielder and Ms. Harmon,

Richardson Grove is a sacred grove. Sacred in the way that all things ancient are the living embodiment of our past. To mangle it more than it already has been, is to desecrate the sacred. And when I say sacred, I mean that it is rare, special and of special significance and purpose to all humanity, and to all the non-humans animals and plants that live there.

I would not be in Humboldt County if it were not for Richardson Grove. It is the place I first viewed the redwoods when I was on a cross-country trip in 1970, when I was 14 years old. We stayed at the Heartsook—Mom, Dad, Sis and two Siamese cats we traveled with—Mudkins and Squeaky. I never got those giant, God inspiring trees out of my mind.

I went back to Manhattan and dreamed that someday I might live among those trees—the trees of Richardson Grove. But in my provincial Manhattanite mind, I imagined that trees like those were too beautiful and therefore too unaffordable to live among. Never in my mind did I imagine that they could be cut! Who could know that 15 years later I would move to Piercy, caretaking the old Bridgewood Motel (when it was for sale) and live there my first four years in this community?

Of course, the reason for the widening is absurd: to bring and expand an obsolete, mega-polluting method of transportation more "easily" to the north coast. These goods are mostly not of essential needs. In fact, our entire economy is built on waste, which makes it an immoral economy. And those goods going back and forth through the grove and on all highways everywhere, are mostly just crap, things that people think they need rather than what they do need.

1

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And what they need is fresh and clean air, peace of mind and heart and the ability to create things here in the USA and even more locally, in Humboldt County. The larger trucks that the highway will enable will bring us smog, global warming, noise, traffic, highway deaths and not much in the way of necessary items.

Of course, the global, national, state and local economic depression should make this project a moot point. But only God and Governor Arnold *might* know the mysterious ways of Caltrans. 3

Please spare the words that the project will be done gracefully. If there is one thing the entire state can agree on, it's that Caltrans is not graceful. Yours is not a graceful business. And whatever your good intentions may be, Mr. Fielder and Ms. Harmon, they will not be the intentions of the operators of the contractor who do the work.

You will cut giant trees and in fact, have already gone back on your word that it will not happen. Big surprise, eh? Some of us have been in this business of protecting our planet too long to be fooled like that. 4

So I implore you, I pray to you and to God and Goddess, cancel this project. Make it an economic decision for the state is broke. Make it an economic decision that this is the gateway to beautiful Humboldt County that the tourists don't wish to see bludgeoned. And make it a decision of the heart that too many of these ancient redwood beings have already been sent to the sawmills.

Must we cut the ones we thought we'd already saved? It is time to restore the beauty of our county, not to import ugliness and desecration and plastic junk for the 99 cent stores.

Bless you in this most holy of decisions. Leave the grove alone. As the Beatles sang, "Let it be." *You hold the power of God, the power of creation and destruction in your hands.* And you hold the heart of Mother Earth. Treat it with reverence.

For the wild in us all,

Darryl Cherney

1. *See General Response #13* regarding information that the project is not substantially widening the existing highway.
2. The issue is that the size of vehicle in use commonly throughout the nation, including California, has changed to the STAA. What has been reported is that while California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with industry standard-sized vehicles (STAA trucks). Smaller businesses which depend upon trucking companies for importing and exporting their products are finding it difficult to reliably access these non standard-sized vehicles.
3. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
4. *See General Response #2* regarding information that no old growth redwoods would be removed by the project.

tchesmore@aol.com
01/29/2009 04:39 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject project

1

what is the project and it's purpose.
theresa chesmore
tchesmore@gmail.com

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!

1. *See General Response #1* regarding information on project purpose and need.

P.O. Box 394
Miranda, CA 9553
jvchristianson@asis.com

January 27th, 2009

Deborah Harmon
CA Dept of Transportation
1656 Union Street
Eureka, CA 95501

Dear Ms. Harmon:

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project.

I oppose any cutting of mature redwood tree roots. Both paving over mature roots and removing existing paving already covering mature roots can both negatively effect the healthy homeostasis of a mature tree's roots. 1

I understand the need to make travel through the Richardson Grove safer. I support reducing the speed limit to 25 Miles per hour for the entire stretch of Highway 101 that extends through the Richardson Grove. If drivers do not adequately comply with this speed reduction, I would support an increased police presence and electronic speed monitoring and display, as we now have on the safety corridor between Eureka and Arcata. 2

Respectfully yours,

John Christianson

John Christianson

1. *See General Response #3* regarding information on minimization measures to protect the trees.
2. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.

March 4, 2009

George Clark
1091 Vista Drive
Eureka, CA 95503
707-443-3555

Deborah Harmon
Senior Environmental Planner
Ca. Dept. of Transportation
Eureka, CA. 95501

RE: PUBLIC COMMENT
DEIR
RICHARDSON GROVE OPERATIONAL IMPROVEMENT PROJECT
HUMBOLDT COUNTY, CALIFORNIA
DISTRICT 1-HUM-101, PM 1.1/2.2 464800

Dear Ms. Harmon:

Thank you, in advance, for reviewing and responding to my comments and questions below, and for including them, and your responses, as a part of the RG project documents, and EIR.

My family and I operated our family business in Old Town, Eureka, for many years and, like many tourist-dependent businesses, we relied on all our aesthetic environmental resources to entice residents, tourists and entrepreneurs to our region. Aesthetics are inseparable from the quality of life that incentivizes capital investment to locate in our area; it's what attracted my family to locate our business here. The Richardson Grove provides every resident and tourist their first and lasting impression of entering California's only remaining temperate rain forests. Speeding up this brief and memorable experience by adding larger trucks traveling faster speeds defeats this park's primary purpose and would injure one of Humboldt County's historic highways and the unique locally-owned businesses that depend upon all our intriguing natural attributes. 1

If completed, this project will only diminish traveler's first glimpse of ancient redwoods while offering unproven, nominal benefits to two, or three large businesses that are currently downsizing or closing altogether, a trend expected to increase in frequency and magnitude in the coming years. 2

Eureka has always been at an "economic disadvantage" due to its isolation. Larger STAA trucks will have miniscule impact upon this overriding fact, and they will not benefit the vast majority of locally-owned businesses that will be placed at risk by accommodating more big-box retailers that use STAA trucks. In this respect, the RG project appears to be another public subsidy for national big box retailers, the primary beneficiary.

As the economy weakens further, we must be mindful of well-known economic magnifiers that enable sales at locally-owned businesses to recycle 3 times longer within a community than sales dollars spent at national retailers. Furthermore, when fuel prices soared to nearly $5.00 per gallon last year and it suddenly cost $3 million to fill a container ship instead of $1 million, local residents noticed that formerly inexpensive products at national retail store rose dramatically, while locally made products, (formerly considered "higher priced"), reflected only modest price increases. Thus, our independent, locally-owned business community has grown to become critical to Humboldt County's economic stability, both throughout the declining timber, fishing and construction industries, and now, as the national and world economies collapse. Our locally-owned economy will become even more critical as non-renewable energy and fuel sources naturally deplete. 3

The DEIR states that this project is necessary due to safety improvements needed; yet, the DEIR fails to fully evaluate implementation of a 25 mph speed zone through this area as an alternative. In fact, it defers pedestrian and cycling trails to another agency for, "future consideration", which conflicts with the Cal-Trans Department Directive to, "Accommodate Non-Motorized Travel" in new project designs. The reason we have these requirements is because they've already been repeatedly deferred until our roadway casualty rates have skyrocketed, especially in Eureka. 4 5 6

I am respectfully requesting that Cal-Trans please begin prioritizing shrinking public funds to mitigate Humboldt County's worst traffic problems that are having far more negative impacts upon safety and our economy. The City of Eureka currently has some of California's highest per-capita accident and fatality rates for motorists, pedestrians and cyclists, predominantly, but not limited to, Highway 101 on Broadway Avenue. 7

I believe that the DEIR provides insufficient analysis and disclosure to support its findings of "no significant impacts", its lack of alternatives, and its conclusions are based on extremely limited sources and surveys. I have listed brief questions below that I feel need to be addressed in an EIR. 8

PLEASE RESPOND TO THE FOLLOWING QUESTIONS:

1) How will Cal-Trans address the cumulative impacts of this project on the rapidly changing business demographics in the declining economy? 9

2) Current plans to development Humboldt Bay as a shipping port would have major Impacts on all trucking. Will Cal-Trans address these potential impacts? How will it do so? 10

3) What would be the economic impacts on large and small independent trucking companies currently serving this area if this project proceeds? 11

4) What kinds of new delays and/or higher fees can businesses expect when they use STAA trucks, if those trucks are not full? 12

5) Does the DEIR assume that small businesses will combine their shipments onto large STAA trucks? Are there STAA truck companies that allow this? Otherwise, small businesses will be placed at a competitive disadvantage. 13

6) Humboldt County is a rural area that has always had commensurate numbers of truck traffic on Highway 101. What study did the DEIR rely upon to determine that this traffic needs to be reduced? 14

7) Are the STAA trucks assessed fees that pay for the increased maintenance costs associated with these heavier vehicles? What are these costs? 15

8) Will research referenced in the Gallo Report be verified by independent analysis, in effect, an entity or individual located outside the area impacted by the research results? (Why not?). 16

9) The RG project will induce more national big box retailers to locate and expand in Humboldt County. The evidence for this is represented by the preferred use of STAA trucks by national retailers currently in Humboldt County, and the current plans for more national big box retailers in Fortuna and a Home Depot in the Marina Center development in Eureka. The negative cumulative impacts of this kind of continuing development are well-known and documented in numerous books and publications by economists and sociologists 17

In addition to more traffic, the inadequate tax base generating by national retailers, and the collapsing infrastructures in our communities, the negative impacts on small, local economies include lower wages; which quickly translates into unaffordable housing, poverty, crime, shrinking populations, closing schools and other indicators of blight that currently plague our cities. The interconnected complexity and importance of this issue merits an EIR to address the cumulative impacts on Humboldt County's communities.

Will Cal-Trans address the negative economic and social impacts leading to blight in our communities, as a result of this project? How will this be done, or, why won't it be?

10) What would the increase or decrease in common carrier rates be if this project is completed? 18

11) Maintaining restrictions for STAA trucks was estimated in the DEIR to cost effected sectors 16.9% more in moving freight. What dollar amount does 16.9 % represent using 2008 freight costs? What happens to the 16.9% figure if you include unaffected sectors? 19

12) The Gallo Report, page 3, "effects of annual trucking", is based upon 14 survey responses while page 9, "annual impacts", is based on 19 on-line responses. Will the statistical validity of these extraordinarily small samples be verified? (Why not?). 20

13) What are the minimum roadway standards to accommodate STAA trucks and how will the proposed project meet these minimum standards? 21

14) The State Transportation Improvement Program, Transportation improvement System, and the State Highway Operation and Protection Program do not include the Richardson Grove Project. Exactly how and why did this project become a priority? 22

15) The General Plan for the Richardson Grove State Park recommends a by-pass for Highway 101 to circumvent the park entirely. Why is this not listed as an alternative plan? Why are there no other alternative plans except for "no plan"? Why is a 25 MPH speed limit, with minor road adjustments, not fully analyzed as an alternative? 23 24

Due to increasing international economic instability, volatile and depleting energy sources, and global warming, community's world-wide, including Humboldt Bay, are considering the feasibility of short-sea shipping.

Will this additional, viable shipping alternative be considered within this project? (Why not?) 25

16) Has Cal-Trans completed a Comprehensive Performance and assessment evaluation within a corridor management plan? (Why not?). How do the results demonstrate that this project is necessary? 26

17) Will Cal-Trans seek outside, professional, independent scientific analysis of the potentially large negative impacts upon the many ancient redwood trees as the result of cutting their root systems, bringing the road closer to more trees and depositing and compacting additional fill material and gravel on top of their sensitive root systems? (Why not?). 27

Thank you for this opportunity, I look forward to reviewing your responses.

George Clark

1. *See General Response #13* regarding information that the project would not result in increasing speeds through the grove.
2. *See General Response #2* regarding information on project impacts to the park.
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
4. The project is not a safety project, but an operational improvement project to lift the STAA restriction at this location. The modifications made to the geometrics at this location would result in some incremental improvements in safety.
5. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
6. Shoulders are being widened outside the park to better accommodate bicyclists and pedestrians. Within the park, widening on existing roadways to create wider shoulders for bicyclists is not possible without removal of several old growth redwoods. Any path beyond the highway would have to be done by or in association with State Parks since they are the agency owning the land.
7. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
8. While many alternatives were initially considered, they were found either not meet the purpose and need for the project or would result in greater impacts to sensitive resources.
9. *See General Response #12* regarding information about how the project affects the small businesses.
10. While there has been some discussion from developers and some plans to develop Humboldt Bay into a major shipping port, there is no funding source that has been identified to implement these plans.
11. *See General Response #11* regarding how the project affects local trucking companies .
12. It is expected that businesses will choose the most cost effective method for shipping. Providing for STAA access at Richardson Grove would not mandate businesses to utilize STAA vehicles for their shipping, it only provides that opportunity.
13. No, the DEIR does not make the assumption that small businesses will combine their shipments onto STAA trucks, although that action is not precluded. From

the comments we have received from numerous local small business owners, lifting the STAA restriction is perceived as a benefit.

14. The volume of truck traffic is not expected to substantially change as a result of the project. The purpose of the project is not to reduce truck traffic but to lift the restriction that prohibits STAA vehicles.
15. STAA trucks are bound by the same weight restrictions as non-STAA trucks so it is not expected that the project would result in substantially greater maintenance costs.
16. No, an independent analysis is not anticipated to verify data in Dr. Gallo's report. The project was initiated prior to the results from Dr. Gallo's study being available. The findings and conclusions in Dr. Gallo's study were used to gain a broad brush look at the possible economic outcome as a result of the project.
17. *See General Response #12* regarding information about how the project affects big box development.
18. It is not known how the implementation of the project would affect carrier rates.
19. It is not known what the dollar amount would be. While a limited number of industry sectors were included in the economic study, it was sufficient to determine that there would be an economic benefit from implementing the project.
20. Dr. Gallo's study was not intended to be a comprehensive evaluation. Those businesses responding to the survey that his evaluation was based on were likely the businesses most concerned about the shipping costs. The responding businesses represent a limited number of sectors in the economy, but within those sectors, the response rate was significant.
21. There are no written curve radii standards per se. There are truck turning templates which are graphic portrayals. Caltrans used a computer model that utilizes these truck turning templates and applied it to the existing alignment to determine where curve modifications are necessary in order to pass STAA vehicles. The project would modify the curve dimensions that result in the STAA restriction.
22. The project will be added to the State Highway Operation and Protection Program. The project was initiated when it was identified that the curve corrections were possible without removal of any old growth redwoods. Caltrans has already established a group of interested stakeholders including the County, elected officials, and representatives from special interest groups and environmental organizations to explore options for improvements to goods movement in the County. Before a consultant to facilitate this study was contracted, Caltrans performed the modeling study which confirmed that the existing alignment could be modified sufficiently to lift the STAA restriction at Richardson Grove. The current project was a result of that effort.
23. A bypass alternative was considered as part of the Section 4(f) Evaluation. It was determined that due to the substantial environmental effects and costs of a bypass, it was not a prudent and feasible alternative. See Appendix B for more information.
24. *See General Response # 8* regarding information about how reducing the speed limit does not meet project purpose and need.

25. Currently short sea shipping is not a viable alternative. Substantial infrastructure improvement is needed in the port to facilitate shipping and funding sources have not yet to implement these improvements have not been identified.
26. *See General Response #1* regarding information on project purpose and need.
27. The Caltrans arborist is a certified arborist and has been involved in developing the measures to minimize harm that are to be utilized during construction of the project. In addition, Dennis Yniguez, an arborist contracted by Save the Redwoods League to evaluate the project notes that, "the existing root systems of old growth tees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." He further concluded that, "the highway alternations, as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of old-growth redwoods adjacent to the highway construction."

March 9, 2009

Cal Trans Project Manager
Kim Floyd
P.O. Box 3700
Eureka, CA 95502

Dear Ms. Floyd,

It is my understanding that a possible solution to the Richardson Grove traffic problem is to reduce the speed limit to 25 mph and leave everything else in its present state. The big trucks can get through safely at that speed and businesses can prosper. Daily, we are reminded of the sorry state of California's finances. We could actually help our financial picture by not spending the projected $5 million and setting up a new revenue stream with radar patrolling of this corridor. We would add revenue rather than spending more money that we don't have. 1

Richardson Grove acts as a gateway to our unique and beautiful area. It lets people know that they're entering a place that's special. Let's not disturb it, and let's not spend money that the state doesn't have. 2

Sincerely,

Roger Clark

Roger Clark
1693 Kimtu Dr.
Garberville, CA 95542

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #2* regarding information on project impacts on the park.

2/16/09

Mr Floyd - I am opposed to removing trees at Richardson's grove for additional Semi-truck traffic.

Although it will cost more, as a tax payer, I would rather pay more for an alternate by-pass of this very special area so that my grandchildren & great grandchildren can enjoy this very special place

Vaame Clark
945-2584

1

1. *See General Response #9* regarding information on the bypass alternative.

From: Susan Clennon
Garberville, CA
Jan. 18, 2009

To: Kimberly Floyd, project manager
(or whoever takes public comments)

Dear Kim Floyd,

I regret not being able to attend the public hearing on Dec. 15 regarding the Richardson Grove Improvement Project. I did, however, read much of the draft EIR available at Garberville Library.

One thing that became clear to me is that Caltrans seems to consider the road realignment project to be the only feasible solution. You rejected a bypass (too expensive) and stop lights (too much of a bottleneck, too noisy, too much possible "non-compliance".) You feel that it is imperative to allow STAA trucks access through the State Park area, since a road already exists which has been designated a part of US Rt. 101.

First, I have to say that the 35 MPH speed limit is still not slow enough. It will likely be ignored, and nothing will change. But here's an idea that wasn't considered in the DEIR: how about putting a stop sign or flashing red (stop-go) light at just north of the Legend of Bigfoot in the southbound lane, and at the Patriot Gas Station in the northbound lane. Everyone will be made to stop briefly, then proceed with caution at a 25 MPH maximum for approximately 2 miles until after they have passed the opposing lane's Stop light.

This serves several purposes: it keeps traffic moving, as it would through a town, reducing bottlenecks. Coming to a full stop causes peoples' "freeway consciousness" to be converted to a "slow-zone consciousness", alerting them to possible hazards, yet allowing them to keep moving along. A slow rate of speed would allow extra long loads to navigate that stretch of road, and allow other traffic time to make maneuvers.

It may not be as convenient, but it is certainly feasible. The whole stretch of 101 north of Laytonville through Richardson Grove is winding and subject to slow-downs, anyway. Also, placement of stop/go lights at the above-mentioned spots would mean less noise from the lights and from the slowing and gear-shifting of large vehicles.

All the park's denizens would appreciate that— the residents, the businesses whose stock-in-trade is the tranquility of the park's atmosphere, the tourists who come from continents away to experience a world-class area of nature without roaring traffic. Not to mention the animals, trees, and the Eel River itself, a delicate ecosystem which will suffer if construction of any sort proceeds.

The proposed project will involve much more construction—with all its attendant equipment,

noise, and traffic delays — than ordinary road maintenance (and installing a few signs) would.

Which brings me to my next point: as a 22-year resident in the area and frequent user of Hwy. 101 through Richardson Grove, I am constantly amazed at how well the roadway has been holding up with year-round traffic, including buses and heavy trucks. Someone did a really good job of engineering that piece of highway through there. And from all appearances, the redwood trees which stand right next to the road aren't suffering major damage from the road and traffic situation as it is now.

So I say, why mess up a good thing? Why risk our one defining feature in the service of convenience, conformity, and development?

Finally, as a resident of southern Humboldt County, I've learned that most people who live here are here by choice. We choose to stay in this area in spite of certain hardships and inconveniences because of the very nature of this place — semi-isolated and more serene than the "rest of the world" out there. It's not a small thing to give up, or even endanger, something this precious. There is so much we don't know about ancient forest ecosystems — so much that could be lost forever.

From that standpoint, I believe it is not in our best interests to proceed with a realignment project for the purpose of allowing easier access for the larger STAA trucks through Richardson Grove State Park. 3

We must take the time to find another viable solution, and not go for the quick fix.

Sincerely,

Susan Clennon

Susan K Clennon

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #12* regarding information about the impacts to small businesses.
3. *See General Response #1* regarding information on project purpose and need.

Tina Colafrancesechi
POB 201
Whitethorn CA 95589
fzypkbunnyslprs@gmail.com

Dear Ms. Floyd:

I am writing this in concern for the proposed widening of richardson grove. I am opposed to this project for many reasons. First with california's financial crisis the state does not have the 5.5 million it would cost for this project. 1 2nd piling mulch around the base of redwood tree's could damage the tree's health and cause death. also I do not want to have any tree's cut down. another alternative a 3rd one is better. save construction costs and simply lower the speed limit to 25 mph. allowing the trucks & tree's to co-exist. 2 3

Sincerely,

Tina Colafrancesechi

1. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
2. The mulch will be placed on disturbed ground and would function as erosion control.
3. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.

Sundara Collier-Clark
<sunni333@yahoo.com>
01/28/2009 03:37 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject save the redwoods!!!

Hello,

I am a member of "sohummommas" and I wrote this letter for the redwood project. I hope it helps.

KEEP REDWOODS ALIVE ---- DRIVE 25 !!!

We are a family of three who live in Humboldt County. A huge reason why we live here is the beautiful natural surroundings and the unique atmosphere that the redwoods bring. By widening highway 101 we are erasing is a piece of history that can never be replaced. While it is true that only two trees will be cut, over a dozen more will have their roots cut out, effectively killing them and all ecosystem that they provide for countless animals. Our federal and our own state government - which is on the verge of insolvency - is already so in debt, adding six million dollars to this already astronomical budget crisis seems ludicrous in so many ways. The other option which is on the table, and one that I believe that is the answer is in lowering the speed limit to 25 miles per hour. This solution will save the trees, save the states money, as well as saving lives-because a lower speed limit equals less vehicular death. I am writing this letter not for myself, but for my daughter. As I put her to bed at night and read her the Dr. Suess story, "The Lorax", I want her to know that her mother tried to be a force of good in the world-speaking for the trees when they need it most-NOW!

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2

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Sundara Collier-Clark
Garberville, California

1. *See General Response #13* regarding information about minor widening included in the project.
2. *See General Response #3* regarding information on the minimization measures incorporated to protect trees during construction.
3. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
4. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.

To Whom It May Concern:

This letter is being written in regards to the recent proposal to the Richardson's Grove realignment project. This proposal is being brought forward to allow STAA trucks into Humboldt County.

For the last ten years my employment in sales and service has required me to drive up and down Highway 101 between Santa Rosa and Crescent City on a weekly basis. I drive over 30,000 miles a year and share the same highway with the trucks that serve Humboldt County.

Over the past few months, since this issue has arose, I have paid special attention to truck traffic and what impacts this change may bring. I am deeply concerned with safety issues not only for myself, but for all the people that travel this highway in passenger vehicles.

For the past two months I have spent numerous hours researching this proposal. Several questions came to mind that needed answers in order to form an unbiased opinion. The following, I found to be a bit disturbing. "Profits over Safety."

If you have followed this issue, you will have found that there are basically only a few main advocates speaking out in favor of this proposal. They are Humboldt Auction Yard, Sun Valley Floral Farms, Fernbridge Tractor, Humboldt Creamery, and O&M Industries. 1

They all state that because highway 101 has length restrictions it greatly impairs the profits of their operations. I have contacted many businesses both large and small in Humboldt County. Also most all local trucking companies and many trucking companies from out of the area, to better understand trucking.

Trucking is broken up into specific groups. You have truck-load carriers and LTL carriers, (less than truck load shipments, by several shippers, combined to make a truck load). There are three major divisions of highway trucks being used; flatbeds, vans and tankers. There are also many small categories such as dump trucks, log trucks, cement trucks, etc. In California you also have a breakdown of equipment types. 1) "Semi" is usually a longer wheelbase 3 axle tractor pulling a longer single trailer with common lengths of 42', 45', 48' and 53'. 2) A "Truck & Trailer" is usually a very long wheel base truck with half its cargo contained in the area behind the cab, over the 2 rear axles of the truck. The other half of its cargo is hauled on a short, usually 24'-28' trailer known as a pull trailer. 3) "Doubles" consist of a short wheelbase 2 axle tractor that pulls two trailers usually 28' each in length.

There are some real misconceptions in the eyes of the general public as to STAA lengths vs. restricted lengths. Most people have been led to believe that the maximum length on all trucks is 65' and that maximum trailer length is 48'. In actuality doubles can be 75' long because of their ability to "track" well in a turn. A "truck and Trailer" is restricted to 65' yet most have a combined load space of 48' to 56'. The main difference between STAA trucks and restricted trucks is found in "Semis". STAA allows overall length of

75' whereas a restricted length is 65'. This is due to the fact that a "semi" does what is commonly referred to as "cheating". When the long wheel base tractor makes a turn the trailer tracks in a much smaller radius then the front wheels. The longer the wheelbase and the tighter the turn the worse the trailer cheats. This is why you see signs on the rear of semi trailers that say, "This Vehicle Make Wide Right Turns." It is to warn drivers of the trailer cheating. The real problem evolves not when you are following a semi, but when you meet one on a two lane road, traveling in opposite directions. Just imagine a trailer coming at you at 55 mph in your lane.

If Richardson's Grove was the only two lane road between Eureka and Santa Rosa, I would say fix it and allow the longer trucks. Being that this is not the case, you are only inviting disaster, accidents will be inevitable. A perfect example of only fixing one small section of the road and calling the problem solved occurred when recently Cal Trans widened one turn at Big Lagoon and now allows STAA trucks on highway 101 between Eureka and the Oregon border. I question this decision on Cal Trans part. 2

One can only ask themselves, "Why does both Cal Trans and the California Highway Patrol support this proposal?" I believe the answer is quite simple. Only a handful of local businesses have put pressure on them and the Chamber of Commerce. The more road construction that the Humboldt County division of Cal Trans can convince Sacramento is necessary, the more taxpayers money can be requested for the budget. The same holds true with the Highway Patrol. The more accidents, the more manpower to attend accidents and write reports, what happed to the "protect and serve" that it says on the side of the car? 3

Mr. Hockaday with the Eureka Chamber of Commerce has stated that everything people purchase in Humboldt County will be substantially cheaper when larger trucks are allowed. Here is the flaw in his theory. All freight is divided into two categories, those loads that reach maximum weight before they maximize their cubic space, and those that reach their maximum cubic space before their maximum weight allowed. All highway trucks both STAA and restricted are allowed the same maximum gross weight of 80,000 lbs. However, the larger the truck, the heavier it's empty weight is, allowing it to carry less product weight. Probably the number one commodity shipped into Humboldt County would be food products. The largest percentage of these products reach their maximum weight before the fill their cubic space. This would include meat, produce, canned goods, all liquids, such as milk, water alcohol, soda, juices, etc. These products would all cost more if shipped in larger trucks. The three largest food chain stores in Eureka are Costco, Safeway, and Winco. Safeway and Costco currently use 48' trailers, and Winco uses 53' trailers. All use tractors that are short enough to accommodate the longer trailer lengths legally. They do not anticipate any changes to their equipment being used today.

Gasoline, diesel and propane are all items that reach their maximum weight before cubic space also. Here again there is no need for larger trucks.

Most all building products fall into this category, also cement, block, brick, sheetrock, flooring, plywood and lumber. Being that is such, lumber is the number one product shipped by truck out of this area, the lumber mills have not advocated for larger, heavier trucks.

One important thing to keep in mind for people that do ship light products is that all the long trailers that STAA trucks use such as 48' and 53'ers are currently legal even on highway 101. The carriers just have to use shortened wheelbase, safer tractors to pull them in Humboldt County. I recently studied a map of all state highways in California. To my amazement, I counted 62 state highways that also have the same restrictions as highway 101. There must be good reasoning behind this. So why do these businesses feel that they are being singled out, and do they really feel that they cannot obtain adequate trucking transportation to fulfill their needs? 4

I believe that what these advocates are really trying to accomplish is increased competition between local and out of the area trucking companies. I therefore obtained freight rates from Humboldt County trucking companies, and compared them to companies in the Bay area, Los Angeles, and Portland. The majority of them had no desire to haul in or out of Humboldt County, and those that gave me rates were all higher than local truckers.

When I researched these advocate's companies it seems to me that the problem would not be that difficult to overcome, rather than put the public's well being at risk. If a truck from the mid-west loaded a full load of agricultural equipment and his tractor was too long to pull his trailer into Fernbridge California, there are local trucking companies that will pull his trailer from Leggett (where the restriction starts) and return it to him when it is unloaded, or he can have a local trucking company haul the load up to Fernbridge from Sacramento or the Bay Area. The trucking company that hauled it from the Midwest would probably discount most of that cost just so he would not have to leave the I-5 corridor.

Not all commodities can be easily transferred from one truck to another. Two such items would be household furnishings, which are hand-packed tightly into moving and storage trucks, and possibly livestock. Both of these commodities currently are exempt from the restrictions until the problem can be resolved. A moving and storage trailer can always be pulled through the restricted areas with a shorter, safer truck to it's destination. Although cattle could be somewhat difficult, they could also do the same or if their kingpin to rear axle measurement was too long, Humboldt Auction Yard could always purchase their own truck of legal length and transfer the animals either in Redding or Ukiah. The owner once stated that when this is done up to 50% of the cattle die in the heat. This is difficult for me to comprehend due to the fact that a lot of cattle are hauled in the heat (everywhere but Humboldt County) and they do not sustain such losses. Another even simpler solution could be that these two commodities are moved in the same manner as "over-sized" loads. When loads that are over width, over height, over length, or over weight are transported through restricted areas, the trucker simply calls Cal Trans and for a very minimal fee is granted a permit. 5

The products that most creameries deal in are most always a weight issue rather than a space issue. This is why dairy trailers are most always 45' or 48' in length. In talking to some other dairies and trailer manufacturers I was unable to find any with 53' trailers.

On December 23rd, 2008 the CEO of the Humboldt Creamery stated that they ship three thousand truckloads out of their facility annually and if they were allowed STAA trucks it would save them approx 10% of their annual six million dollar shipping costs. At first glance these numbers seem to be a bit inflated, after all these numbers have come from the same CEO that had his personal attorney confront Humboldt Creamery as to inaccuracies in his accounting when he resigned.

If shipping costs have impaired local businesses to the extent they wish us to believe, then why did Humboldt Creamery recently report in the Times Standard that they had an increase is sales for the year 2008 of 18%?

Another advocate for this proposal is Sun Valley Group in Arcata California. The raise flowers and ship them south daily as flowers are very delicate with a relatively short shelf life. They are currently being hauled in 48' trailers. When I read your local paper, "The Times Standard" I find it hard to believe that a few dollars that may or may not be saved in transportation costs are probably the least of their daily concerns. They have twice been raided by the I.N.S. and both times found to have illegal immigrants from Mexico working not only at their Arcata facility but also at a facility they operate in Oxnard California. They also were fined a large sum for failing to pay over-time to employees. With this in mind I can't help but ask myself, would these people really be concerned about my safety and well being on highway 101?

Over the last ten years I have noticed a steady increase in the number of trucks not based out of your area. Most of these trucks are from southern California. It appears that they haul a great deal of lumber, and up until about four months ago when the pulp mill ceased its operations they hauled all the pulp out in containers. It is my understanding that most of these trucks work for a broker out of the Port of Oakland. It came as no great surprise when I was told of a raid in the port last year in which they found over 50 drivers using false drivers licenses with all the same license number. This relates to drivers on our highways without proper training and testing. They were by far the rudest and unsafe drivers I have ever seen. If a person were to track truck involved accidents between Eureka and Santa Rosa I am compelled to believe that they would find the majority of these accidents are caused by trucks from outside of your area rather than your local drivers. Most STAA drivers travel daily on roads that are not as adverse as those in Humboldt County. If I have my choice I would much rather travel with drivers that are more experienced on these roads.

If STAA trucks were allowed into Humboldt County there are two more issues to consider. The first being the fact that in the winter months when highway 101 is being pelted by rain and making driving a real adventure, the Siskiyou's are constantly having traffic delays due to snow. If truck drivers feel that they have even the slightest chance of

being delayed, they will take the detour to the coast to avoid chaining and costly delays. Try to imagine Broadway with another 500 trucks passing through daily in the pouring rain. Is this really what the people of Humboldt County want? 6

If the Eureka Chamber of Commerce believes that this proposal may go through, perhaps they should start working on a new tourism campaign. Come to Humboldt County where we now allow oversized trucks on our two lane roads. It is a golden opportunity to meet new people in our community such as highly skilled wrecker drivers to tow what is left of your car. Also compassionate highly trained EMT's and ambulance drivers to transport you and your family to our area hospitals of which some are currently being enlarged to meet your needs. Many of the new rooms will have beautiful views to enhance your stay with us in Humboldt County.

Another important item to consider in the economy of Humboldt County is the vast number of people that are employed by local trucking firms. They total into the hundreds when you factor in all the local vendors that supply them, which equates into the millions of dollars in payrolls that would no longer be spent in Humboldt County. 7

When reading opinions expressed in the Time Standard by advocates for this proposal they have stated on several occasions that STAA trucks are more fuel efficient and more environmentally friendly. In researching this I found that there is no correlation between STAA trucks and fuel efficiency or emission standards. The size of a truck has nothing to do with either of these issues. All trucks that operate in the State of California are under the same air quality control regulations regardless of their size. These advocates have only tried to confuse the issue with these statements. 8

On December 4, 2008 Cal Trans issued its environmental document for public review. The public comment time line was to close on January 30, 2009. On January 28, 2009 there was an email that circulated throughout Humboldt County requesting all businesses to write letters to Cal Trans in support of this proposal. It stated that as of that date Cal Trans had only received two letters in favor of the project, whereas the opponents have deluged their office with letters of opposition.

Now, Kim Floyd with Cal Trans has extended the deadline for public comment until March 12th, 2009. To me this is a perfect example of they way our government works in today's society. If you don't like the answers to the questions, simply change the rules. However, when changing the rules under no circumstances should one be allowed to put the profits of a very few over the lives of so many on our highways.

Thank you for your time and consideration,

Concerned Traveler.

1. *See General Response #12* regarding how several small businesses in addition to others support lifting the STAA restriction.
2. US Route 101 at Richardson Grove is the remaining STAA restriction to Humboldt County from the south. Currently, the only STAA access to Humboldt County is from the north requiring a 300 mile detour for those traveling from the south or for those STAA vehicles with southerly destinations from Humboldt County.
3. STAA access improvements at Richardson Grove are identified in the County's current Regional Transportation Plan (RTP) as well as the previous RTP. Thus, construction of the project would implement one of the stated objectives of the RTP.
4. Because STAA trucks are the industry standard, the shorter wheel base tractors of the CA Legal vehicles are becoming harder to reliably access.
5. The same weight restriction applies to STAA and non STAA vehicles.
6. Even considering weather conditions, due to increased mileage, slower speeds, and increased fuel consumption from steeper terrain and the longer mileage, it is not expected trucks will divert from the Interstate system to use Route 101 as a detour. The time delay for the detour to Route 101 would be substantial as well. In addition, the major population centers in California, Oregon and Washington that are the most common trucking destinations are served by Interstate 5, not Route 101.
7. Lifting the STAA restrictions at Richardson Grove would not alleviate the need for trucking firms, but would allow greater flexibility in meeting customer needs.
8. It isn't a matter of truck size, but rather a matter of the age of the vehicle. Since the industry standard is the STAA vehicles, it has been reported that the non-STAA vehicles tend to be older vehicles which are less fuel efficient and may not meet more stringent air quality standards.

ben coolik
<cloudbaby@gmail.com>
01/27/2009 09:20 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject RICHARDSON GROVE PROPOSAL

To Whom It May Concern:

I have enjoyed traveling up Hwy 101 to the beautiful redwoods every summer for the past 4 years and I always love my arrival into Richardson Grove. I am shocked that there is talk of making this short and beautiful stretch of road wider to accommodate larger vehicles. This is absurd. This is a beautiful protected area that will undoubtedly be negatively impacted by such action. I have read of an alternative that I DO support: Simply lower the speed limit to 25mph. This will save time, money, resources and helps our environment and the Grove. Please to not disturb the Grove!!!

1
2
3

Thanks for your time and consideration.
Sincerely,
Ben Coolik

po box 1084
Athens, GA 30603

--
www.elinomad.us
www.democracynow.org

1. The widening that is proposed within the park is to add up to two foot shoulders where it is not precluded by the presence of old growth trees abutting the highway.
2. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
3. *See General Response #2* regarding information about how the project would affect the park.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:25 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Are we that Desperate

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:25 AM -----

"Conway, Lisa E CTR USA AMC" <lisa.conway4@us.army.mil>
02/17/2009 05:27 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Are we that Desperate

Ms. Floyd,
Let the redwoods live! I have to wonder if you've driven through Richardson Grove. If you had you would have felt touched by the hands of God - like all others who have driven that stretch. 1

We need to let them live - all of them that we can.

Lisa Conway
Left Behind Equipment (LBE)
Lockheed Martin
Contract Management, HQ ASC
Rock Island Arsenal, IL
COMM: 309-782-1456
DSN: 793-1456
Cell: 661-305-7277
BB: 309-716-1194
SIPR: conwayl@LADC-ROCK4.army.smil.mil

1. *See General Response #2* regarding information on how the project would affect the park.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:48 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:48 AM -----

Chelsea Cooper
<swingdancer87@gmail.com>

02/20/2009 01:13 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson's Grove

To Whom It May Concern:

I have just learned that CalTrans is considering removing some of the redwoods in Richardson's Grove to widen and straighten Highway 101. Though I understand the desire for highway improvement, the redwoods in the Grove are incredibly old and are a part of California's history. Redwoods are such a rare tree and our state is known for our beautiful collection of them. In addition, the Grove is such an old location, it holds great emotional value for many, myself included. To remove these trees would be a travesty. There would be no way to replace them. A wider, straighter highway is not worth the sacrifice. I urge CalTrans to reconsider this plan and develop a plan that does not include the killing of ancient trees.

1

2

3

Thank you.

Chelsea Cooper
swingdancer87@gmail.com

1. *See General Response #2* regarding information about the project would affect the park.
2. *See General Response #13* regarding information about how the project is not straightening the alignment.
3. *See General Response #3* for information on the minimization measures incorporated into the project to protect the trees.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:48 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:47 AM -----

Ellen Cooper
<ondine@sonic.net>
02/19/2009 07:07 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove project

I just learned of this proposal. PLEASE PLEASE PLEASE do not do this! There are so few places left in California that are as beautiful, awe-inspiring, and historically significant as that old grove! I have a photograph of my father, at the age of 18 months, standing in that grove with his family and their Model T. They traveled up from SF in 1923 to visit the grove. I know I should be much more rational in this letter and give objective reasons, weighing the needs to get large trucks through that area, but I just can't. Richardson's Grove has been a major part of my life for 53 years. Back in the '60's and '70's there was talk of widening the road or relocating the highway to the ridge across the river. We were so relieved when this horrible idea was taken off the table. 1

Big trucks have been getting through that area for over 50 years that I know of. Yes, people have to slow down. Isn't tourism one of Humboldt County's major money-makers? Let's take out the trees so people can get here faster to see the trees? Huh? Who on earth is thinking of vacationing in Humboldt County, but then thinks, "No, there's that stretch where I have to slow down for those darn big trees"? It's one little stretch of 101. 2

I was intimately familiar with all the improvements that have happened to northern California's stretch of 101 over the years, as my family is from Napa, and we vacationed EVERY SUMMER through the '60's and '70's at Richardson's Grove. In my mother's oral history, she stated that the camping trips to Richardson's Grove every summer were the happiest years of her life. I know you're not talking about closing the entire park; but to my thinking, the main grove is the heart of that park. Entering into Humboldt County by slowing down and driving through that ancient forest is such a spiritual experience, no matter how many times I experience it. To take that experience away for the expediency of STAA truck access seems absurd to me. The balancing of the preferences of trucking concerns against the desires of countless vacationers, as well as local residents, seems to be way out of whack. 3

Sincerely,

Ellen Cooper

1. *See General Response #2* regarding information on how the project affects the park.
2. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
3. The speed limit will not be increased as a result of the project. The speed was decreased from 40 mph to 35 mph in Fall 2008.

<bobirene@quik.com>
01/29/2009 08:58 AM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Highway 101 through Richardson Grove

Dear Ms. Harmon,

I am writing to urge the passage of Alternative 3, lowering the speed limit to 25 miles per hour through the one-mile section through the redwoods. This appears to be not only the most economically sound recommendation but also the best plan for the environment. I am opposed to the cutting of trees in the park, cutting the roots of other trees and the building of a 300 foot long, 18 foot high retaining wall. 1 2

I think that for everyone to slow to 25 miles per hour for one mile through one of the most beautiful parts of the California highway system is sensible and I strongly recommend this alternative. 3

Sincerely,
Irene Crichton
1515 Russ St.
Eureka, CA 95501

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. While some cutting of tree roots would be necessary, it is anticipated that many of the roots can be saved by using an pneumatic excavator like an air spade rather than heavy equipment to do the excavations near the large redwoods and once the soil is cleared away, the roots would be laid down and the fill placed over the roots. See General Response #3 for additional minimization measures incorporated into the project to protect the trees.
3. A design modification for the retaining wall was developed subsequent to the draft being circulated to the public. The wall would be located to the east of the highway below the road. Since the wall is constructed below the road it would not be visible to motorists except for the barrier rail at the edge of the pavement. See the simulations in Appendix K. This design modification for the wall also reduces the number of trees to be removed from thirty to five.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:47 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:47 PM -----

<bobirene@quik.com>
03/11/2009 07:40 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson's Grove

Please consider a balanced approach - put in stop lights and slow the speed to 25 miles per hour. This will protect the trees and help the truckers. Thank you. 1

2

Irene Crichton
1515 Russ St.
Eureka, CA 95501

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #10* regarding information on the signalization alternatives considered.

evcruz@ciclopdc.com
(Edward Cruz)
01/28/2009 04:48 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

I have lived in three continents.

I have been fortunate to experience many wondrous natural places.

But ever since my now High School children were 10 months old, we have never, anywhere, experienced the life-shaping awe and sanctity of nature that is Richardson Grove.

Richardson Grove is a place on this Earth that bestows the life-definitive reference of what it is to be a human on this Earth. There is a voice to that grove that would be unforgivable to imperil.

My family and I literally beg you, the relevant directors, the relevant courts of California to consider the palpable, real value of Richardson Grove so immeasurably beyond its happenstance proximity to some conduit of commercial goods.

My family and I see, live (and vote) through values such as these. Think of your own values: what shapes you and your loved ones: definitive places and experiences, or more boxed goods? 1

Please, at least consider alternatives to this tragic plan. Please slow down just a bit to truly evaluate options. You just may come back to that personal action as you gauge the central conduct of your own life. 2

Thank you.

Sincerely,
Edward Cruz
4693 Via Don Luis
Newbury Park, CA 91320

1. *See General Response #2* regarding information on how the project affects the park.
2. *See General Response #8 and #10* regarding how reducing the speed limit does not meet project purpose and need and information on signalization alternatives considered.

ryan@thecruzers.com (Ryan Cruz)
01/28/2009 05:39 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Some of my fondest memories as a child are getting up early in the morning, piling in the van, and heading up to the coastal redwoods for the weekend. I have no idea how younge I was when my parents first took me up to Richardson Grove but I do know it was when I was very little. That place has always held a strong meaning for me and for my family. I am nearly an eagle scout and still go camping at every oportunity. I have been to many different locations and have loved many but none have even come close to Richardson. Thats why i am writing. When heard of the plans to build a road through it, I was shocked. I very strongly believe that this area is worth protecting for future generations as well as my own. We must all do anything that we can to protect it from this kind of development for as long as we can. It is close to my heart and i know that i am not alone. Thank you. 1

Sincerely

Ryan A. Cruz

Sincerely,
Ryan Cruz
4693 Via Don Luis

1. The proposed improvements would occur on the existing highway which passes through and provides access to Richardson Grove State Park. No old growth trees would be removed as a result of this project. The majority of the 30 trees proposed to be removed in the park are four to twelve inches in diameter and half are tan oaks. The largest tree proposed to be removed from the park is a 24 inch in diameter tan oak and only two redwoods are proposed for removal in the park and they are six inches in diameter and seven inches in diameter. The current ambience of the area for the motorist would not be altered substantially as a result of this project as the roadway would remain a two lane curvilinear highway with minimal to no shoulders and large redwood trees abutting the edges of the roadway.

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:26 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: DEIR - Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:26 AM -----

"Holly Cunningham" <hollyc@humboldt1.com>
03/12/2009 05:08 PM

To <Kim_Floyd@dot.ca.gov>
cc <senator.wiggins@senate.ca.gov>, "'assemblymember.'" <chestbro@assembly.ca.gov>
Subject DEIR - Richardson Grove

Kim,

I'd like to voice my opposition to the DEIR for Richardson Grove. Anything done at this majestic grove to improve trucking without a thought to the esthetics is criminal. There is no more beautiful area in the redwoods to drive. It is a route I take continuously and am overwhelmed by it's beauty each and every time. 1

Please consider that our north coast is here to attract tourists and sightseers and not to improve trucking when there's no indication it will make a difference. 2

Thank you for listening, I'm sure there are many voices speaking out, please make sure they're heard.

Regards,

Holly Cunningham
2535 Drake Hill Rd
Fortuna CA 95540
707-725-4923
hollyc@humboldtgroup.com

1. *See General Response #2* regarding how the project would affect the park.
2. *See General Response #1* regarding the project purpose and need.

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:23 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Opposition to Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:21 AM -----

Doug
<dwdallam@yahoo.com>
02/21/2009 04:58 PM

To kim_floyd@dot.ca.gov
cc
Subject Opposition to Richardson Grove Project

I would like to add my name to the list of opposition voices for the Richardson Grove Project. This is simply a development project headed by Rob Arkeley mean to bring more people and congestion to our wonderfully opened spaced environment. We're doing just fine. I say NO to the expansionist, strip mall mentality. 1

Thank you for your time.

Doug Dallam
www.dwdallam.com

1. *See General Response #1.*

Tom Daly
<dalysuccess @gmail.com>
01/27/2009 03:20 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject What are you doing?

Dear Deborah Harmon:

What are you doing? Wouldn't it be wonderful--for you and for your organization--if you could creatively determine how to solve your problem without harming the trees in Richardson Grove?

Please think of the publicity, positive, you'd receive--nationwide--if you did indeed solve this problem of yours without harming the environment. Richardson Grove, such a beautiful place. I hope you've been there and seen how awe inspiring it is just to drive that short stretch of highway 101.

Please don't authorize the destruction of those one hundred trees. Cumulatively, they've weathered thousands of years of existence. Think of that please. Thousands of years. This country is just over 200 years in existence. Would you wipe that away for the easing of travel, commerce or convenience? No, you wouldn't. You'd find a better way. 1

The silent trees, that have been planted there for these thousand years or so, are a testament of the integrity of our morals as a people, a nation. Please don't cut them down--so that a truck can move along faster, easier. Find another way, another plan. Be the person inside your organization that stands up with a better idea. Try. It might work. And you might be the better for it, as we all will. Try. Please. 2

Sincerely,

Tom Daly

1. *See General Response #2.*
1. *See General Response #13.*

January 21, 2009

Dear Ms Floyd,

I have the following comments with regard to the Caltrans' Richardson Grove Realignment Draft EIR:

1) With the proposed project, Caltrans should find a significant cumulative impact to an already dangerously imperiled resource – ancient redwoods. Caltrans should consider human-induced climate change in addition to the massive cumulative impact of past actions upon ancient redwoods (reduction in acreage by 96%). 1

2) With the proposed project ancient redwoods will suffer a significant cumulative impact as well as significant effects to their structural root zone. 2

Therefore, Caltrans must perform a significant mitigation in the form of:

Restore Durphy Creek at this location, as this will yield an immediate removal of threat to extant redwoods along the creek both up and downstream of the culvert location, and is perhaps the most significant on-site mitigation that could feasibly be granted to the resource. (Durphy Creek currently flows under 101 through an undersized culvert; Durphy Creek provides habitat for federally listed fish.) 3

Further, full mitigation for the project must also include a significant land acquisition that either A) protects additional ancient trees from human-caused disturbance in perpetuity, or B) adds meaningful second-growth habitat to an existing protected ancient redwood area. Full mitigation will also include either some significant slope remediation decreasing risks for extant ancient redwoods and/or a significant putting "to bed" of unnecessary road networks whose presence threatens extant ancient redwoods.

3) In balancing significant impacts to ancient redwoods with the economic considerations driving the proposed project's purpose and need, Caltrans must also consider the long-term sustainability of the highway with regard to future expansion to accommodate increased capacity/safety needs. The best long-term solution to current and future traffic constraints through the grove may be to re-route the highway. Re-routing the highway to the opposite side of the river (through construction of bridges) may be the best long-term solution and may avoid all impacts to ancient redwoods. 4

4) Whether the proposed project is constructed or not, the undersized culvert at Durphy Creek must be addressed by Caltrans and could stand alone as a project to mitigate for past cumulative impacts to ancient redwoods and endangered fishes. 5

Thank you,

Brook Daniel

Brook Daniel

5

1. Cumulative effects are discussed in Section 2.4 of the document.
2. *See General Response #3.*
3. Caltrans disagrees that improvements to Durphy Creek are required as mitigation for the proposed project. Caltrans is proposing to relinquish 0.56 acre of land proposed to be added to the transportation easement.
4. The long term Route Concept Report for this section of highway is to remain a two lane conventional highway.
5. Caltrans routinely evaluates the culverts for replacement or repair and Durphy Creek culvert has not yet been identified as needing improvement.

January 16, 2009

Dear Ms Floyd,

With regard to the Caltrans' Richardson Grove Realignment Draft EIR I have the following comments:

Of the 2,0000,0000 acres of ancient redwood trees estimated to have been present pre-European settlement, approximately 85,000 acres exist today. Richardson Grove State Park consists of approximately 2,000 of those acres, and includes the ninth tallest tree on the planet. The giant trees within Richardson Grove are likely to be of an age between 1,500 and 2,500 years old. Extant ancient redwoods are a precious and irreplaceable resource.

Richardson's Grove is a unique treasure to the State and the People of California. Here the people of California are able to easily access and interact with these majestic giants because here, a roadway (now Hum 101) was constructed through the heart of the grove back "in the old days".

Having survived the road disturbance, trees far older than the "old days" yet line the road. While compaction and impervious surface affect their roots, to date, they still survive. Not enough disturbance to kill them – thus far.

However, the ancient trees at Richardson's Grove face imminent danger not solely from the proposed project's addition road disturbance but also, from the threat of the yet un-quantified vagaries of human-induced climate change. Just what amount of disturbance will serve as the tipping point causing the loss of this priceless resource? 1

Specific Comments

It may be a red flag to the reader of the Richardson Grove DEIR, that the State scientists and planners that penned the document fail to make use of the common scientific vernacular even once, throughout the document by consistently referring to ancient redwoods either as "old-growth" – a timber products related term, or simply as "large, mature". This wording may be indicative of an institutional pre-disposition within Caltrans towards minimizing the reported effects to the environment.

> Caltrans scientists and planners would better serve the State through the use of terminology that has been standard to their colleagues in the scientific community and academia for over a decade; Caltrans should make use of the term "ancient" to describe the trees at the Grove. This term accurately conveys the venerable nature of the resource, as opposed to a term that minimizes the significance of the subject. 2

DEIR, page ii – "construction would occur within the structural root zone of several, large mature redwoods"

The qualifier "several" in the introduction to the document is disingenuous and must be corrected to read ***numerous***, as the document currently discloses that *twenty-five* ancient redwoods ranging in size from 3-to-15 feet in diameter will be affected by construction of the project. 3

Total Disturbance Area to Structural Root Zone Unclear

On page 83 the DEIR states that the construction activities of greatest concern are those that produce impacts within the trees' structural root zone, and notes that an additional 0.14 acre of roadbed will be installed; resulting in a five percent increase in hardened surface within the structural root zone of trees present within the project limits. 4

Is this 0.14 acre the area of impact that will affect the 25 ancient trees?

Page 84 goes on to disclose that impervious surface will increase by 0.3 acres.

Per information given on page 84 one must conclude that the project will then actually result in a *ten percent increase in hardened surface* over the existing ancient trees' structural root zone. Will the project result in a five or a ten percent increase in impervious surface and does this additional acreage result in impacts to greater than 25 ancient trees? 5

Under the subject heading Environmental Consequences, on page 80, the DEIR states that "most of the ground disturbance results from the excavation and fill to support the proposed realignment" and goes on to document, by postmile, locations of proposed disturbance totaling approximately 3430 cubic yards of cut and 440 cubic yards of fill.

What is the total area that the cut and fill volumes given on page 80 represent? Do these areas represent additional locations of impact to the structural root zones of ancient redwoods? If so, these areas have not been clearly disclosed as such in the document. Have all impacts to ancient trees been quanitified or will greater than 25 be affected? 6

Page 21 of the Natural Environment Study (attached to the DEIR) discloses that proposed work at five culverts will each incur a 20ft x 20ft disturbance area at both culvert inlet and outlet – this computes to a total disturbance area of 10,000 sq ft (0.3 acre).

Does this additional 0.3 acre disturbance area involve disturbance to ancient redwoods' structural root zones? If so, this has not been clearly communicated within the document. Again, have all impacts to ancient trees been quanitified or will greater than 25 be affected? 7

Table 9 of the DEIR notes that a 6-inch diameter at breast height oak is to be protected from fill by placement of a "brow log".

Surely this in an error? That a 6-inch diameter tree would be protected with a brow log throws into question the accuracy of this table. 8

Cumulative Analysis

Page 21 of the NES states that impacts to the redwood forest and listed species are the principal environmental effects requiring a cumulative impact analysis. However the document provides no actual analysis. Per the Caltrans website[1]: "A cumulative impact includes the total effect on a natural resource… (due to past, present, and future activities or actions) of federal, non-federal, public, and private entities. Cumulative impacts may also include the effects of natural processes and events."

On page 22 of the NES, the simple listing of eighteen Caltrans projects within a five-mile radius of the proposed project, offers no accounting of the eighteen projects' impacts to ancient forest structural root zones (the primary effect to ancient redwoods that has been discussed with the proposed project) and fails to comprise a cumulative impacts analysis.

Caltrans must yet develop a cumulative analysis to achieve a full accounting of project impacts. Actions considered in the cumulative analysis must not be limited to Caltrans projects. 9

Further, a resource study area for cumulative impact analysis to ancient redwoods should not consist of an arbitrary five-mile radius, but should instead relate to the overall state of health of the resource being analyzed (i.e. the health of Richardson Grove itself [which is compromised by highway impacts, park residences and visitor facilities – buildings, campgrounds, trails etc…); the state of health all extant groves along roadways; and the state of health for all extant groves. A cumulative analysis must consider that this resource has been reduced by 96%.

Significant Impacts and Proposed Mitigation Measures

Page 21 of the Natural Environment Study (attached to the DEIR document) states "Additional paving and placement of shoulder backing could cause soil compaction and disturbance within the structural root zones of large redwoods. Studies have shown that compaction of the soils within the root zone can have an adverse effect on trees. Adverse effects to large trees may be a significant impact to this unique natural community."

Page 23 of the Natural Environment Study states "it is expected that the project would result in some impacts to the roots of larger redwood trees in Richardson Grove State Park, but these impacts *are not anticipated to be substantial adverse impacts with the proposed minimization measures in place*." 10

[1] http://www.dot.ca.gov/ser/cumulative_guidance/downloads/Approach_and_Guidance.pdf

Page 85 of DEIR concludes the following Avoidance, Minimization and/or Mitigation Measures:

• M-1. Restorative planting of 0.57 acre of former roadbed and transfer of ownership from Caltrans to Parks.

• M-2. 300 hours of weeding for each of four years. Weeding crews to be directed at discretion of the California Department of Parks and Recreation.

This measure is identified specifically as mitigation for impacts to the ancient trees' structural root zones. However, ancient trees are unlikely to experience competition with herbaceous or brushy vegetation. This measure wholly fails to comprise appropriate compensatory mitigation for the project's significant impacts to the ancient redwood forest. 11

• Proposed avoidance and minimization measures consist largely of the following: All excavation work "within a setback equal to three times the diameter of any redwood tree" will be done by hand except at culverts; smaller roots encountered (less than two inches) shall be cut cleanly; a more permeable road base layer shall be utilized, duff will be salvaged for re-use, and native plants will be re-planted.

How will the setback area "equal to three times the diameter of any redwood tree" for handwork/excavation feasibly be implemented? 12

Further, the proposed "avoidance and minimization" measures fail to reduce the project impacts to ancient trees to a less-than-significant level. 13

Suggested Compensatory Mitigation

A meaningful mitigation opportunity does exist on-site within the project boundaries. Durphy Creek flows through the project site within a culvert that is undersized to fit the 100-yr flow event. Sediment and debris volumes carried downstream by the '96-'97 high-flows resulted in an obstruction of flow at the culvert under the highway, causing the creek to jumps its banks. When this obstruction occurs, listed species (steelhead and coho), as well as ancient redwoods, are imperiled by the backed up flows and sloughing banks.

Replacing the existing Durphy Creek culvert will allow the creek to be restored to a natural channel below the highway and serve to implement the Federal Recovery Plan for coho salmon as well as the California Department of Fish and Game fish passage requirements, and also uphold both the Federal Endangered Species Act and California Endangered Species Act. 14

Restoration of the creek may entail a replacement of the 101 bridge above the creek. While replacement of the 101 bridge will no doubt be challenging, it is a problem that must be addressed someday, as it presents a significant safety risk to the traveling public that has not been considered within the scope of the proposed project. Further, replacing the 101 bridge

over Durphy Creek now, as opposed to at a later date, will reduce the cumulative impacts of second project's construction at the site and save money – as costs to replace this structure in future will only increase.

Caltrans should restore Durphy Creek at this location, as this will yield an immediate removal of threat to extant redwoods along the creek both up and downstream of the culvert location, and is perhaps the most significant on-site mitigation that could feasibly be granted to the resource.

Further, full mitigation for the project must also include a significant land acquisition that either 1) protects additional ancient trees from human-caused disturbance in perpetuity, or 2) adds meaningful second-growth habitat to an existing protected ancient redwood area. Full mitigation will also include either some significant slope remediation decreasing risks for extant ancient redwoods and/or a significant putting "to bed" of unnecessary road networks whose presence threatens extant ancient redwoods. 15

Thank you for the opportunity to provide comment. I believe that given the chance Caltrans can do the right thing.

Sincerely,

Manning Daniel
105 Palmer Blvd.
Fortuna CA 95540

1. Certified arborists have determined that there will be no substantial impacts to old growth redwood trees resulting from construction impacts. The project is not expected to substantially increase traffic volumes so the project would not result in substantial effects in climate change.
2. The intent of the environmental document is to disclose information to the public at large. The majority of the public is more familiar with the term "old growth."
3. The document discloses specific quantities of trees proposed to be impacted.
4. Some of the new roadbed would occur in areas where old growth trees are. The new roadbed is required where the curve modifications are located which are where the trees are. Other areas of new roadbed occur where shoulders are being widened.
5. No, as not all the new roadbed occurs in the park. Some of the new roadbed occurs outside the park where wider shoulders would be constructed. In addition, old growth redwoods do not abut the roadway for the entire segment that lies in the park. There is a five percent increase in hardened surface within the structural root zone area of the old growth trees.
6. All the areas proposed to be disturbed are shown in Appendix L. The areas of largest cut, such a PM 1.35/1.36 and PM 2.04/2.10 are on previous cut banks which is why there are no old growth trees present. A design modification for the retaining wall was developed subsequent to the circulation of the draft document. The modification included changing the location of the wall from the west side to the east side of the road and the from an above the road wall to a below the road wall. This modified wall is less visible to motorists, takes fewer trees, and is 100 feet shorter.
7. There have been some changes to the proposed culvert improvements that are identified in the final document. There is updated information in the final document as to impacts to old growth redwoods in terms of excavation and fill occurring within the structural root zone.
8. No, there will not be a brow log for the six inch in diameter oak. That was an error in the draft document.
9. The discussion on cumulative impacts has been revised, see Section 2.4 in the final document.
10. The environmental document acknowledges that the project may result in adverse effects to the redwoods. However, with the minimization measures in place, it is not expected to result in a significant impact as determined by the Caltrans arborist as well as an independent arborist contracted by Save the Redwoods League.
11. The removal of invasive plants would benefit the redwood community as a whole, enhancing the ecosystem. There are numerous measures incorporated into the project to minimize impacts to the redwoods such as irrigating during construction, not using large equipment to perform excavation near old growth trees, and special structural sections that minimize the amount of excavation required.
12. The areas where hand work (shovels, air spades, etc.) is required will be depicted in the plans. During construction in addition to the normal Caltrans oversight over the contractor, there will be an arborist on site in the park to also ensure that commitments in the plans are complied with.
13. *See General Response #3*.
14. Caltrans routinely evaluates the culverts for replacement or improvement. Durphy Creek culvert has not been identified as needing improvement at this time.
15. Caltrans has proposed to relinquish back to State Parks 0.56 acre of land that is currently in the transportation easement.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:11 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: proposed rape of richardson grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:11 PM -----

patricia daniels
<patriciaradiance@yahoo.com>
03/11/2009 07:47 PM
Please respond to patriciaradiance@yahoo.com

To kim_floyd@dot.ca.gov
cc
Subject proposed rape of richardson grove

dear ms. floyd:
so hard to believe that y'all are ever considering taking out even ONE SACRED REDWOOD TREE from Richardson grove - 1
and for only one gigantic reason of futile selfishness. not one person or tree or bird will benefit from such proposed profane distruction of that sacred grove. what evil is behind this, i do not know, but it IS evil. just so trucks can speed? are you crazy!?! how about we just leave those sacred trees, birds and nature right there - as is - pure love, healing and grace! let any of those giant trucks simply slow down. period. no killing, no raping. no distruction forever of that which blesses us here and now. I TOTALLY PROTEST ANY CUTTING DOWN OF TREES IN RICHARDSON GROVE, AROUND RICHARDSON GROW,NEAR RICHARDSON GROVE! I TOTALLY PROTEST THIS PROPOSED RAPE! there is SO LITTLE TIME left to grace this sacred earth...let us praise it all by leaving it all alone. 2
thank you, 3
patricia daniels
arcata.

1. *See General Response #1.*
2. *See General Response #13.*
3. *See General Response #8.*

February 13, 2009

Deborah Harmon
Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka CA 95501

RE: Proposed Richardson Grove Operational Improvement Project

Dear Ms. Harmon:

Please reevaluate the current CalTrans plan for Operational Improvements to Richardson Grove.

CalTrans circulated inadequate notice of the initial Draft Environmental Impact Report. As of January 31, 2009, there is no record on the CEQAnet website of CalTrans having submitted the Richardson Grove DEIS to the State Clearinghouse. For CalTrans to remain within the boundaries of lawful action, such submittal is necessary to allow an appropriate period for public comment. 1

Furthermore, the DEIS considered only this project and no other alternative. A consideration of viable alternatives is essential and is one primary purpose of modern environmental analysis. 2

Finally, this project will dramatically impact the root structure of the redwood grove. Redwood science is clear that the redwood root systems are shallow, lateral roots, which graft to other redwood roots to develop an interconnected root system for several trees at once. The proposed construction project will harm this type of root system, and jeopardize the integrity of the forest ecosystem. Please reconsider the current plans for Richardson Grove. 3

Thank you for this opportunity to comment. I appreciate your willingness to consider the thoughts and concerns from the public.

Very truly yours,

Camrin Dengel

1. The public review and comment period of the DEIR/EA began December 5, 2008 and was extended to March 12, 2009.
2. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.3.2 of the DEIR/EA.
3. *See General Response #3.*

Marc@bardicmedia.com
(Marc De Polo)
01/27/2009 02:32 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Highway 101 at Richardson Grove is a historic piece of California. To alter this roadway, to harm old growth redwood trees and increase truck traffic through this precious remnant of our state's heritage is unacceptable to the people of California. 1

I am intimately familiar with this park and with the effects of already heavy traffic on 101, to the enjoyment of the park as well as the impacts on wildlife and the environment. Do not allow any cutting of ancient trees, or their roots. The redwoods of the redwood highway are dying from root compaction up and down 101. Blow down from holes in the canopy and additional wind through the widened road risk the entire grove. Do not compound the adverse conditiond facing the long term survival of these irreplacable treasures. 2

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project.

These issues are not adequately addressed in the document.

Sincerely
Marc DePolo

Sincerely,
Marc De Polo
829 Hayes St, SF CA 94117

1. It is not anticipated that truck traffic would increase on Route 101 as a result of the proposed project. The project will not be increasing the capacity of the highway as no additional travel lanes will be constructed. The potential for increased truck traffic would be due to diverted truck traffic that currently uses other north/south routes such as I-5 and Route 99. Diversions from these other routes would depend upon it being economically feasible for the trucking companies to change their existing routes based upon fuel consumption and travel times. Since all the major coastal cities from southern California to northern Washington have readily available access to the I-5 and Route 99 corridors which have straighter alignments and faster travel times, the opening of STAA access to Route 101 through Richardson Grove is not expected to generate a substantial amount of diverted truck traffic. If the project is constructed, some of the truck traffic that currently use Route 101 through Richardson Grove would likely switch from non-STAA trucks to STAA trucks which has the potential to reduce the number of truck trips.
   A traffic study performed for the projects to lift STAA restrictions on Routes 197 and 199 in Del Norte County also found that there was very little latent demand expected with the lifting of STAA restrictions on these two routes. Latent demand is traffic that would use a route but cannot or does not for some reason. This would include STAA trucks that would shift onto the route because the STAA restriction was lifted as well as includes those trips that would switch from CA legal trucks to STAA trucks. For the study on Routes 197 and 199, it was determined that "only a small increase of about 8.25 new daily truck round trips are projected…" It is anticipated that the conditions on Route 101 in the southern portion of Humboldt County would be similar.

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 02:00 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 02:00 PM -----

Sylvia De Rooy
<oftheforest@suddenlink.net>
01/27/2009 10:29 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

I am writing in regards to the proposed Richardson Grove project. This project should never have gotten this far. If there is such a great need to bring the large trucks up here then a bypass should be created. 1

I do not see a demonstrable need to bring the "super" trucks here. This is a sparsely populated county and we have done quite well so far without these trucks. 2

Humboldt County is a very special place and will only remain so if access is somewhat limited and if we don't put greed and grab over the preservation of this very special place. 3

I am a volunteer at Prairie Creek Redwoods State Park and as such and as a long time visitor at the park I know what a difference the creation of the bypass has made to the sustainability of the park. The cut back in traffic and the elimination of large vehicles spewing noxious emissions has greatly helped the health of the forest. Visitors no longer need to breath the mass of unhealthy fumes and no longer have to deal with the noise and dangers posed by large vehicles. At Richardson Grove there are campgrounds close to where the trucks would be driving through. 4

We who live here have watched the decimation of the ancient redwoods. What few pockets remain of these great trees and great forests should be protected, not invaded. People from all over the world come to see these treasures. Last Sunday I spoke with visitors from Russia, Korea and Denmark.

I adamantly oppose this proposed project, it should be stopped right now.

Sincerely,
Sylvia De Rooy
618 Third Avenue
Westhaven, CA 95570

1. *See General Response #9.*
2. *See General Response #1.*
3. *See General Response #12.*
4. It is not anticipated that truck traffic would increase on Route 101 as a result of the proposed project. The project will not be increasing the capacity of the highway as no additional travel lanes will be constructed. The potential for increased truck traffic would be due to diverted truck traffic that currently uses other north/south routes such as I-5 and Route 99. Diversions from these other routes would depend upon it being economically feasible for the trucking companies to change their existing routes based upon fuel consumption and travel times. Since all the major coastal cities from southern California to northern Washington have readily available access to the I-5 and Route 99 corridors which have straighter alignments and faster travel times, the opening of STAA access to Route 101 through Richardson Grove is not expected to generate a substantial amount of diverted truck traffic. If the project is constructed, some of the truck traffic that currently use Route 101 through Richardson Grove would likely switch from non-STAA trucks to STAA trucks which has the potential to reduce the number of truck trips.
   A traffic study performed for the projects to lift STAA restrictions on Routes 197 and 199 in Del Norte County also found that there was very little latent demand expected with the lifting of STAA restrictions on these two routes. Latent demand is traffic that would use a route but cannot or does not for some reason. This would include STAA trucks that would shift onto the route because the STAA restriction was lifted as well as includes those trips that would switch from CA legal trucks to STAA trucks. For the study on Routes 197 and 199, it was determined that "only a small increase of about 8.25 new daily truck round trips are projected…" It is anticipated that the conditions on Route 101 in the southern portion of Humboldt County would be similar.

Susan Deyl
<sdeyl@suddenlink.net>
01/28/2009 09:47 AM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove, California, project

I don't see a need for bringing large trucks to sparsely populated Humboldt and
Del Norte counties. If there is such a pressing need, a bypass is the answer. 1 2

Cutting any of the few remaining ancient redwoods should be prevented. People come from all over the world to see them. In addition, there are campgrounds very close to where the trucks would drive through. These trucks would be a danger to passenger vehicles and to the considerable number of bicyclists who use this road in the summer. The truckers already drive through this area much too fast for safety and cutting the trees would encourage them to drive even faster. 3 4

A far better use of these funds would be to restore the railroad tracks through
this area and ship more goods by sea. 5

1. *See General Response #1.*
2. *See General Response #9.*
3. *See General Response #2.*
4. *See General Response #13*
5. Use of the railroad through the Eel River canyon would require a large amount of improvement before it would be viable. Short sea shipping would also require improvements in the port before being viable. Implementing these improvements would result in environmental impacts that would have to be evaluated.

February 13, 2009

Deborah Harmon
Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka CA 95501

RE: Proposed Richardson Grove Operational Improvement Project

Dear Ms. Harmon:

Please reevaluate the current CalTrans plan for Operational Improvements to Richardson Grove.

CalTrans circulated inadequate notice of the initial Draft Environmental Impact Report. As of January 31, 2009, there is no record on the CEQAnet website of CalTrans having submitted the Richardson Grove DEIS to the State Clearinghouse. For CalTrans to remain within the boundaries of lawful action, such submittal is necessary to allow an appropriate period for public comment. 1

Furthermore, the DEIS considered only this project and no other alternative. A consideration of viable alternatives is essential and is one primary purpose of modern environmental analysis. 2

Finally, this project will dramatically impact the root structure of the redwood grove. Redwood science is clear that the redwood root systems are shallow, lateral roots, which graft to other redwood roots to develop an interconnected root system for several trees at once. The proposed construction project will harm this type of root system, and jeopardize the integrity of the forest ecosystem. Please reconsider the current plans for Richardson Grove. 3

Thank you for this opportunity to comment. I appreciate your willingness to consider the thoughts and concerns from the public.

Very truly yours,

Bruce Dockter

1. The public review and comment period of the DEIR/EA began December 5, 2008 and was extended to March 12, 2009.
2. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.3.2 of the DEIR/EA.
3. *See General Response #3.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:59 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Save Richardson Grove--The Last of the Redwood Curtain

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:59 PM -----

Clan Ranald
<ztoneheart@yahoo.com>
01/29/2009 02:10 PM
Please respond to ztoneheart@yahoo.com

To Kim_Floyd@dot.ca.gov
cc
Subject Save Richardson Grove--The Last of the Redwood Curtain

Did Highway 101 exist in 1906, when the San Francisco Earthquake and Fire provided a great stimulus for logging Humboldt County Redwood trees in order to transport them south to be used in rebuilding our City by the Bay? If not, how was the lumber transported? By boat? 1

As a long-distance Dad for 30 years I drove back and forth over Highway 101 between the East Bay and Eureka and on 299 over to Blue Lake, where family and kinfolk lived. And still, to this day, whenever I pass through Richardson Grove I get the sensation of being immersed in another world, another reality. A passage through the Old Growth Forest which is Richardson Grove infuses a verdant sensibility to that otherwise dubious appellation--the Redwood Curtain.

As one of the last remaining groves of the less than 3% Old Growth Redwood forest, I urge you to deny any alterations to Richardson Grove involving cutting trees or compacting soil and roots. Save the Redwood Curtain! Mitigate Global Warming! Free your imagination to help in the new society! 2

Sincerely,

Robin M. Donald
1402 Allard
Eureka

1. The road was established in 1915. Much of the lumber used to rebuild San Francisco was shipped.
2. *See General Response #2.*

"maggi draper"
<maggi@humboldt1.com>
01/28/2009 02:14 PM

To <Deborah_Harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove project

Dear Ms Harmon,

I am writing to express my objection to the Richardson Grove "widening" project. It necessitates a logging operation that should simply not take place in an area reserved for Redwood habitat protection. "Set asides" are set aside for protection, not commercial priorities. In this case it is a mischaracterization of the protected status of the grove to place the needs of truckers and big box stores over health of the trees and their dependent species.. 1 2

Humboldt County does not need the kind of trucking that benefits Walmart and other large-scale commercial operations. We are trying to preserve family businesses here in the local economy; the existing roads are appropriate for our economy and actually level the playing field so that smaller businesss are competitive. 3

Please do not cut the trees, choose "no action, or end this project.

Margaret Draper
Attorney at Law
POB 176
Bayside, CA 95524

707.826.9072

1. *See General Response #13.*
2. *See General Response #11.*
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.

Kim Floyd/D01/Caltrans/CAGov
02/24/2009 09:34 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Comment period on Richardson Grove widening extended til March 12...

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/24/2009 09:34 AM -----

"maggi draper" <maggi@humboldt1.com>
02/23/2009 01:32 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Comment period on Richardson Grove widening extended til March 12...

Dear Ms Floyd,

I am writing about the Richardson Grove widening project, as the comment period has been extended, and I have things to add to the discussion. 1

Since this project began as a concept, we have seen some very serious problems in our economy here in California. Is this project a benefit? I contend that it is a moot point economically. Some may argue that this is a "shovel ready" project for stimulus that would benefit businesses here and put people to work on the highway. 2 I submit that the project may harm local business in another revenue producing area: tourism. This is one of the only roads in the nation that allow through traffic to marvel at our local redwood giants, one that expresses the mystery of the way the land used to be, so long ago. The feeling on that stretch of road is what people come to NW California to experience. I believe we would get more bang for our buck by funding the completion of the confusion hill remediation effort with more intensity and speed, crossing the river and securing the soil there, rather than impacting tourism and the environment. 3

As for safety, there is every reason to simply reduce the speed limit through the short section of Richardson Grove, both in order to ameliorate the experience of tourists, who may come to Humboldt because foreign travel is too expensive; and in order to allow the larger trucks to move through safely. 4

As for the nuisance of the slowing down or danger on the road, businesses are "coming to the nuisance". This road predates arrangements most businesses in the area, and they have projected for the costs of doing business in our county. Big box stores should not be given a boost at the expense of the tourist dollar. 5

In essence, it is time to put more investment into ecological systems, responsible ag, and our own survival, rather than making grand investments for a consumer economy whose time may have come and gone.

Sincerely,

Margaret Draper
Attorney at Law
POB 176

1. Numerous business owners have stated that implementing this project would be a benefit and the information provided in our economic study (the "Gallo Report") supports this.
2. This project was initiated prior to the enactment of the American Recovery and Reinvestment Act of 2009.
3. *See General Response #6.*
4. *See General Response #8.*
5. *See General Response #12.*

Kim
Floyd/D01/Caltrans/CAGov
03/12/2009 02:49 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Comments on Reconstruction of Highway 101 through Richardson Grove State Park

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:49 PM -----

"Kay Mitchell"
<kbmitch@centurytel.net>
03/11/2009 03:30 PM
Please respond to
"Kay Mitchell"
<kbmitch@centurytel.net>

To <Kim_Floyd@dot.ca.gov>
cc
Subject Comments on Reconstruction of Highway 101 through Richardson Grove State Park

1. My first suggestion is a 101 Bypass. However, I was told that a bypass was not economically feasible at this time. 1
2. My second suggestion is to do no reconstruction! 2
3. Instead, reduce the speed limit to 15 mph - hospital parking lot speed limit. (We gain physical health from hospitals, and from Redwood Groves, we gain emotional and spiritual health!) 3
4. Enforce the lower speed limit with day and night portable radar machines that reflect the speed of drivers, one in the northbound lane, one in the southbound lane. 4
5. Hire a motorcycle patroller to cruise and cite speed violators. 5
6. Do not suppress tourism, both international and national tourism, with 9 months of reconstruction.
7. I, and other drivers like me, need to drive slowly to reflect on, and savor the surrounding natural beauty.

From high school days onward, both Richardson Grove and Prairie Creek Redwoods literally became my "Paradises" on this earth! I have traveled 101 at least 200 times, absorbing the Redwood Grove's inspirational energy each time, for nearly 40 years when I lived in the SF Bay area and then in Humboldt County, CA.

Please change nothing but the speed limit!

Many Thanks,
Lois J. Drobish
836 E. Washington Street, Apt. I
Kalispell, MT 59901

1. *See General Response #9.*
2. *See General Response #8.*
3. Dynamic signing was not an option that was considered at this time since without improving the roadway geometrics, the deficiencies resulting in the off-tracking of STAA trucks would continue to occur.
4. Increasing enforcement might help motorists be more aware of the conditions in this segment of highway, but it would not correct the roadway deficiencies resulting in off-tracking of STAA vehicles.
5. The traffic delays that would result from construction of this project would be typical of those experienced elsewhere on State highways and are expected average five to ten minutes.

"Audrey Drynan "
<muffie2005@suddenlink.net
>

01/30/2009 02:59 PM

Please respond to
"Audrey Drynan"
<muffie2005@suddenlink.net>

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject OUR Redwoods

Dear Deborah:

The DEIR is insufficient in its mitigation measures for the proposed project. 1

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 2

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 3

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees.

Thank you,
Audrey Drynan
Eureka, CA

1. *See General Response #3.*
2. Several measures have been incorporated into the project to minimize construction and long term impacts to the redwoods which should substantially reduce the potential for significant impacts to old growth redwoods. Both the Caltrans arborist as well as an arborist contracted by Save the Redwoods League has determined that the proposed project would not result in substantial detrimental effect on the root health of the old growth redwoods adjacent to the roadway. While the mitigation measure to remove invasive species is "out-of-kind", it is believed that removing non-native vegetation will enhance the environment for the trees. In addition, Caltrans will also be relinquishing about a half acre back to State Parks and redwoods could be reestablished there.
3. *See General Response #16.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:28 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: richardson grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:29 AM -----

D Duncan
<dduncan362@gmail.com>
03/10/2009 05:40 PM

To kim_floyd@dot.ca.gov
cc
Subject richardson grove

Dear Mr. Floyd,

Please do not change the park to accommodate larger trucks. The trucks that fit now are big enough. The Humboldt economy does not need a faster or more quantitative development, but we need appropriate development, preserving our values. We do not want to look like Redding. We don't compete with Redding, with its I-5 restless, 24 hour consumer culture. That's why we choose to live here on the coast, behind the redwood curtain. We ENJOY our protection from the exploitation of natural resources that is the norm in other parts of the state, and we disdain the idea of unlimited development for material gain only. We are NOT against development, but we just want to take it at our own pace, to make sure that we don't pay with our souls.

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Please honor our values and keep Richardson Grove the way it is. Thank you for listening.

Dan Duncan

1. *See General Response #11.*
2. *See General Response #13.*
3. *See General Response #12.*

Kim
Floyd/D01/Caltrans/CAGov
03/18/2009 10:33 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:33 AM -----

Joan Dunning
<joandunning@gmail.com>
03/10/2009 10:07 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Kim,

Many children (and adults) never see the redwoods up close except when they pass through the trees of Richardson's Grove on 101. I, myself, find this stretch of road one of the holiest in the state. I think we are being short-sighted, as a people, to change it. When I learned how many trees will actually be removed and the extent of the disturbance planned, I was moved to write this email. 1

I am in favor of slowing the traffic with signs, putting in stop lights if necessary, and saving all of us $6 million we can ill afford to spend on such a sad and wasteful "luxury." With business slowing down, anyway, is there really the pressure everyone is talking about, or is this just another excuse to cut big trees, which seems to be a vindictive passion of a few? 2

Sincerely,
Joan Dunning
Author of From the Redwood Forest

1. *See General Response #2.*
2. *See General Response #8.*

Randy Eckardt
<randyeckardt@hotmail.com
>

01/27/2009 06:20 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject RE: Thanks for your REDWOODS email

Hi Deborah:

I sent you a little about the way I feel about Caltrans's DEIR plans, but I'll add a little bit more here as my comment.

As I mentioned, I grew up in Humboldt County and have visited Richardson's Grove hundreds of times over the years. It's one of the most scenic stretches of roadway in the world. I've lived abroad twice and have traversed the globe several times, including spending time in beautiful places like New Zealand, Nepal, etc. and nothing I have seen in any country compares to the beauty and majestic grandeur of our Redwoods in Southern Humboldt. And, especially in Richardson's Grove. I also feel that the lack of growth in Humboldt (the population has been between 23,000 and 28,000 for over 50 years) and the recent economic upheaval certainly doesn't justify widening a section or roadway so that larger trucks can gain access to Eureka, Arcata and McKinleyville. Five businesses that I know of closed in Eureka in the past 2 weeks, and it would be safe to say that at least 5 more will close by mid Feb. And that's a conservative estimate! There is never a good time to destroy parts of a public park by jeopardizing its inhabitants (its habitat/eco system) and killing it's trees, but if there was ever a worse time to do such a destructive thing it is now! Few humans could argue that fact. The economy is not going to become revitalized anytime soon here in Humboldt County.

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Thanks for your time and your commitment.

Best regards,
Randy Eckardt
randyeckardt@hotmail.com

> Subject: Re: Thanks for your REDWOODS email
> To: randyeckardt@hotmail.com
> From: deborah_harmon@dot.ca.gov
> Date: Tue, 27 Jan 2009 12:39:45 -0800
>
> Randy,
> You can send your comments regarding the Richardson Grove DEIR to me.
> Deborah
>
>
>
>
> "Rand"
> <randyeckardt@hot
> mail.com> To
> <deborah_harmon@dot.ca.gov>
> 01/27/2009 11:15 cc

> AM
> Subject
> Thanks for your REDWOODS email
>
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> Hi Deborah:
>
> I was born and raised here in the Redwoods and am highly disturbed about
> Caltran's lack of honesty with this project. I've attended two meetings on
> the Richardson's Grove project held by Caltrans, and they were quite
> heated. What else can we do, or who can we send our concerns to by the
> 30th?
>
> Thanks for all of your efforts.
>
> Best regards,
> Randy Eckardt
> randyeckardt@hotmail.com
>

Windows Live™: E-mail. Chat. Share. Get more ways to connect. See how it works.

1. *See General Response #11* regarding why there is a desire for STAA access.
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
3. *See General Response #2* regarding impacts to park character.

Julie
East/D01/Caltrans/CAGov
02/02/2009 09:50 AM

To bruce49@wavecable.com
cc
bcc Deborah Harmon/D01/Caltrans/CAGov
Subject Re: Caltrans web inquiry

Dear Mr. Edwards,

Your comments were received on January 30, and I will forward them to the appropriate staff.

Sincerely,

Julie East
Public Information Officer
Caltrans District 1
707-441-3998
bruce49@wavecable.com

bruce49@wavecable.com
01/30/2009 11:48 PM
Please respond to
bruce49@wavecable.com

To Julie_East@dot.ca.gov
cc
Subject Caltrans web inquiry

Below is the result of your feedback form. It was submitted by
bruce49@wavecable.com on January 30th, 2009 at 11:48PM (PST).

URL: http://
message: I am writing to state my opinion concerning the proposed realignment project for Richardson Grove on Highway 101 in Southern Humboldt County. I am very much against it for many reasons. Let's start with the estimated cost of the project. The last I heard it was in the neighborhood of $6 million dollars. Are we the taxpayers of California supposed to be okay with subsidizing the cattle industry, not to mention all of the other private industry that would benefit from the proposed project, especially in these times when our state budget is in such a terrible fix? I say emphatically NO! Why should we have to shoulder the cost? Then there are the other problems, including the damage to the local businesses, the delays to those of us who live and work in the area, the uncertainty of what a project of this sort does to the condition of the few old growth redwoods that remain along the corridor. I add my voice to the disapproval of this project and for one would be willing!

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to support any legal action that may be necessary to stop it from going forward. I am sending this message via email on this day of Jan. 30, 2009, the last day for public comment. I do hope that you receive it with acknowledgment that it is within the time frame allotted. Thank you for this opportunity to speak my mind on this matter. Sincerely,
Bruce A. Edwards
email: bruce49@wavecable.com

-------- Env Report --------

1. *See General Response #1* regarding information on project purpose and need.
2. *See General Response #11* regarding information on how STAA restriction affects small business.
3. *See General Response #3* regarding measures to minimize impacts to the trees.

RIVERWOOD INN
P.O. Box 121
Phillipsville, CA. 95559
(707) 943-1766/943-3333
loreen@asis.com/www.riverwoodinn.info

January 27, 2009

Att: Kim Floyd
California Department of Transportation

RE: Richardson Grove

As an owner of a tourist related business, I feel that this project is absolutely wrong for our area. Since the Richardson Grove road project was proposed, the dynamics of our area have changed. It seems that there will not be a Home Depot anytime soon in Eureka, as a matter of fact, they are closing stores nationwide. I need the tourists to keep me afloat. Big trucks have nothing to do with tourists. Also, the roadwork will be a detriment to having a good flow of traffic into our area during the summer months when it is most needed. I have continually owned and operated my business since 1995 and have built it up to where I am finally making some money. I don't want to go backwards and that is exactly what will happen if we are subjected to this project. The redwoods can't be replaces. Period. I know the plan, I saw it and even though no old growth will be cut, the trees are very fragile in their age and can definitely be affected by this construction.

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Richardson Grove is the gateway to our area. I camped there in September of last year and even at the far site where I was located the highway traffic, especially the truck noise was very audible. Retaining walls, stumps and road widening does not represent the majesty of the Giant Redwoods that make our area so famous.

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I know that the bulb market, goat cheese and Rob Arkley are pushing for this project, but it is not needed. It would seem to me that the best way to approach this would be to lower the speed limit and at least try that before ripping into hillsides, backing up traffic and generally pandering to only a few "businesses" that may benefit. There have been numerous ads from Humboldt for Sunshine, which is Arkey backed. Is CalTrans now a lapdog to him and his agenda or can you possibly try to understand why so many of the

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"small" business here would prefer to keep our area free of the congestion and traffic that is already imposed to the south of us?

This is just a bad idea during these economic times. Why ruin business for many for the profit of only a few? We need tourists, not WalMart trucks.

Sincerely,

Loreen Eliason, owner

1. *See General Response #11* regarding how STAA restriction affects small business.
2. Motorists traveling through the construction area would experience delays. These delays are anticipated to average five to ten minutes with a maximum delay expected to be fifteen minutes. These delay times are typical for construction along two lane State highways.
3. *See General Response #3* regarding minimization measures to protect trees.
4. The project would not result in long-term increase on noise at Richardson Grove as the project would not substantially increase traffic volumes, including truck traffic. Nor does the project appreciably change the travel way to be closer to use areas within the park.
5. The proposed retaining wall is located outside the park in a more developed setting. The design of the wall was modified based on comments received during circulation of the DEIR/EA. The design modifications include changing the location to the east side of the highway and changing the wall type to below the road so it is not visible to motorists except for the barrier rail at the edge of the pavement. The wall is also 100 feet shorter and requires much less tree removal. The project does not appreciably widen the roadway within the park. The most widening is outside the park to provide four foot shoulders. Within the park, two foot shoulders are proposed where there are no old growth trees currently abutting the roadway.
6. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
7. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
8. *See General Response #1* regarding the purpose and need for the project.
9. *See General Response #14* regarding information about increased truck traffic.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:52 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:52 PM -----

"Nymiah Eliyahu" <nymiah@humboldt1.com>
03/11/2009 12:23 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Re: Richardson Grove project

Dear Kim Floyd,

Regarding the Richardson Grove project, please consider taking a more balanced approach. As Alan Olmstead suggested, put in the stop lights, slow the speed to 25 mph, allow the big trucks to pass safely, save $6 million of taxpayer's money, and save these remarkable trees which do not belong to us but to the future generations.

Sincerely,
Nymiah Eliyahu

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1. *See General Response #10* regarding information on signalization alternatives considered.
2. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
3. *See General Response #2* regarding project impacts on park character.

Cynthia Elkins
PO Box 220
Whitethorn, CA 95589

March 11, 2009

Kim Floyd
Project Manager
Calif. Department of Transportation
PO Box 3700
Eureka, CA 95502
kim_floyd@dot.ca.gov

Deborah Harmon
Senior Environmental Planner
Calif. Department of Transportation
1656 Union Street
Eureka, CA 95501
deborah_harmon@dot.ca.gov

Re: Richardson Grove Operational Improvement Project – Draft Environmental Impact Report/ Environmental Assessment and Programmatic Section 4(f) Evaluation

Dear Ms. Floyd and Ms. Harmon,

Please consider the following comments on the proposed Richardson Grove Operational Improvement Project. I have reviewed the draft EIR/EA/4(f) evaluation and believe fundamental and fatal flaws exist. Context and feasible alternatives are missing, and a real analysis would reveal that this project is unnecessary and unwarranted. These and other issues are discussed below.

The purpose and need is narrowly defined, violating CEQA and NEPA and skewing the environmental analysis

As a threshold concern, I believe the purpose and need of the project is erroneous and ill defined, creating a fundamental problem that pervades the entire environmental analysis. The purpose and need statement of any environmental analysis is its most basic and primary component, forming both the foundation and framework for virtually everything else that follows. "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 CFR § 1502.13 (emphasis added). According to the U.S. Department of Transportation, this statement "serves as the cornerstone for the alternatives analysis … Care should be taken that the purpose and need

statement is not so narrowly drafted that it unreasonably points to a single solution." FHWA 2003. http://www.environment.fhwa.dot.gov/guidebook/Gjoint.asp.

This guidance echoes federal requirements and rulings of the courts. For example, the Code of Federal Regulations requires that "Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made." 40 CFR § 1502.2 (emphasis added). Courts have found that:

> One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing "reasonable alternatives" out of consideration (and even out of existence) … If the agency constricts the definition of the project's purpose and thereby excludes what truly are reasonable alternatives, the EIS cannot fulfill its role." *Simmons v. U.S. Army Corps of Engineers*, 120 F.3d 664 (7th Cir. 1997); (see also, *Alaska Wilderness Recreation and Tourism Association v. Morrison,* 67 F.3d723 (9th Cir. 1995). (emphasis added).

Unfortunately, this is exactly the case here. Caltrans asserts that the "purpose of the proposed project is to adjust the roadway alignment so that two STAA trucks passing in opposite directions could be accommodated." This defined purpose is so narrowly cast that it necessarily limits the resulting alternatives and analysis, thereby affecting the entirety of the EIR/EA. 1

While this may seem like a mere issue of semantics, the consequences are actually profound and cannot be overstated. For example, given the background and setting described and documents referenced by Caltrans, the underlying purpose and need described is not to accommodate STAA trucks on this particular section of this particular highway, but rather to improve the movement of goods into and out of the North Coast. 40 CFR § 1502.13. Improving the movement of goods could be accomplished through other means than the proposed action, but because Caltrans has crafted such a restrictive purpose and need, they have incorrectly identified the preferred alternative as the only viable solution. In other words, viable alternatives to improve the movement of goods into and out of Humboldt County exist, and these could very well cause less environment impacts – and could avoid impacts to Richardson Grove State Park altogether. However, Caltrans never considers such alternatives or gives them a "hard look" – as is required and deserved. 2 3

Caltrans provides a textbook example of a problematic purpose and need statement, crafting one that does not identify the causal need for the project but instead points to a single solution. Caltrans' stated purpose and need is overtly restrictive, and serves only to justify decisions it has already made. This creates a fundamental and fatal flaw, skewing the entire environmental analysis and violating one of the most basic aspects of NEPA.

The analysis of project alternatives is incomplete and inadequate

While the purpose and need statement form the foundation and framework for both CEQA and NEPA analyses, the alternatives analysis establishes their hearts. The alternatives section is "the

core of an EIR," and should "offer substantial environmental advantages over the project proposal." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564, 566). The lead agency must analyze a reasonable range of alternatives within a "rule of reason." Caltrans fails to meet this standard in several ways.

First, the draft EIR/EA/4(f) fails to analyze a range of alternatives that are prudent, reasonable and feasible. When looking at the root purpose and need of the project– i.e. to improve the movement of goods – a range of potential solutions are available that Caltrans does not discuss or consider. And indeed, Caltrans is already proposing and pursuing three such alternatives – any and all of which would accommodate STAA trucks into and out of the North Coast.

Specifically, right now Caltrans is seeking to widen/realign Highway 299, Highway 199, and a different section of Highway 101 (north of Arcata). While I neither endorse nor sanctify any of these actions, it must be acknowledged that each and every one of them – singularly or together – would allow STAA trucks into and out of the North Coast.

Caltrans uses the same justification in each of the four distinct proposals, saying the projects are needed to accommodate STAA trucks. For example, in this draft EIR/EA/4(f), Caltrans states:

> Northwestern California is one of the few remaining areas of the State that STAA trucks are not permitted. As these STAA vehicles have become the "national standard," areas that do not have access for these trucks are at an economic disadvantage because truck cargos must be unloaded and transferred to shorter trucks coming into and out of the county, which results in making goods movement more expensive and less timely. In addition, many local businesses must maintain higher inventories due to erratic deliveries and damage during transfers. Local companies with major freight needs have relocated out of the area or gone out of business in part due to transportation problems.

However, in a glaring omission, the draft EIR/EIS/4(f) completely ignores the fact that any of the other proposals exist. It is as if Caltrans has somehow forgotten or simply failed to disclose to the public that STAA traffic would have access to the North Coast if any one or more of the four projects is completed. And by doing so, Caltrans fails to answer absolutely critical questions.

For example, is it necessary to complete all of the proposed projects, or even more than one? If the proposal for Highway 299 is approved and STAA trucks gain access on it, do STAA trucks still need access through Richardson Grove? After all, compared to Richardson Grove, Highway 299 is closer to the companies that Caltrans says need STAA access – and Highway 299 provides a faster, more direct route to Interstate 5, which is a more logical route to distribute goods. If both the Highway 299 and Richardson Grove projects are completed, how many of the "disadvantaged" companies would use Highway 101 instead taking Highway 299 directly to or from I-5? Any? A few? More than the number of businesses that would likely be adversely affected by the proposed project through Richardson Grove? Could impacts to irreplaceable

cultural resources, an ancient redwood grove and a state park be avoided if one or more of these other projects are approved? What are the cumulative effects of all four STAA proposals?

Both CEQA and NEPA intend for important questions like these to be analyzed and considered. But here, the other projects are never mentioned in the alternatives analysis or anywhere in the EIR/EA, for that matter. Caltrans acts as if each project exists in isolation or a vacuum. By doing so, Caltrans fails to give the context or facts needed to evaluate the proposal – and also fails to identify or assess reasonable alternatives to it. I believe the other three proposals are feasible and prudent alternatives to the proposed project and should be considered and evaluated as such.

4(f) determination fatally flawed

As Caltrans notes in the EIR/EA, "[t]he Secretary [of Transportation] may approve a transportation program or project . . . requiring the use of publicly owned land of a public park, only if … there are no feasible and prudent alternatives to using that land ..." However, as discussed above, there are feasible and prudent alternatives to the proposal through Richardson Grove State Park. I believe that since those alternatives exist, federal law precludes the proposed project. 49 USC §303. 4

An EIS is necessary

Caltrans first attempted to get approval for this project under a negative declaration under CEQA. Only after much public persuasion and comment did Caltrans decided to prepare an EIR instead – but for reasons that are completely unknown and unclear, Caltrans elected to prepare an EA instead of a full Environmental Impact Statement under NEPA. Caltrans is proposing a project that clearly passes the threshold to prepare an EIS, and neither the EA nor its record support a Finding of No Significant Impact. 5

Whether you are a tourist visiting for the first time or a long-term resident returning home, driving through Richardson Grove State Park marks an unmistakable and defining entryway to the North Coast. At this point, the highway takes on a rural and very special feel to it, winding its way through magnificent ancient redwood trees. Although this was once the case for much of Highway 101 between San Francisco and Crescent City, it is now exceedingly rare, special, and nearly lost. Indeed, "rural" highways are becoming increasingly scarce throughout the state and nation.

At one point in the EIR/EA, Caltrans notes that "[w]hat distinguishes this segment of Route 101 from other highways is the way in which the roadway is threaded through the redwood forest, with trees very close to the edge of the pavement. The distinctive aesthetic experience of driving along this segment of Route 101 is important to the area residents and travelers …" While Caltrans tries to downplay the aesthetic impacts of the project proposal, if approved, it would fundamentally change the overall look and feel of the area as well as the experience one has on this unique stretch of highway. 6

I believe the proposed project would cause significant impacts to parklands [4(f) resources] and to the aesthetics of this rural highway – both short-term and permanent. According to federal law, in determining significance, officials must consider: "[u]nique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas." 40 CFR §1508.27 (b) (3). Richardson Grove State Park is a national treasure. I believe proposed alterations to the park and the highway clearly pass the threshold of significance, triggering the requirement to prepare an EIS.

Caltrans also notes that an archeological site would be adversely impacted by the proposed project, perhaps even partially or completely destroyed. The site is described as "a shallow, dispersed lithic scatter that appears to date to 3,500 – 1,500 Before Present." Harm to this cultural resource – and other cultural values of Richardson Grove State Park, is another reason Caltrans must complete an EIS. 7

Further, Caltrans "determined that the project 'May Affect, and is likely to Adversely Affect' Marbled Murrelet." The marbled murrelet is continuing to decline in number and could go extinct in California during the next 50 years unless all measures are taken to protect it. The fact that the project is likely to adversely affect one of the most imperiled and iconic creatures of the North Coast persuasively argues for preparation of an EIS. 8

I are also concerned that the proposed project would damage the ancient redwoods of Richardson Grove and will eventually cause tree mortality along the highway. Although Caltrans does not propose to cut any ancient trees at this time, the construction and realignment project would break and otherwise harm the roots of the ancient redwoods, which are shallow and intertwined with other trees. Realignment is also likely to increase driving speeds along this stretch of highway and lead to more collisions with large redwoods. These impacts would be significant, and the required examination of the effects warrants preparation of an EIS.

Thank you for considering my comments. I trust that Caltrans will uphold its public trust duties and withdraw the EIR/EA/4(f) evaluation for Richardson Grove.

Sincerely,

Cynthia Elkins
PO Box 220
Whitethorn, CA 95589

1. The underlying purpose of the project is to lift the STAA restriction at this location.
2. *See General Response #1* regarding the purpose of the project.
3. Goods movement in Humboldt County has limited modal choices. The 2008 Humboldt County Regional Transportation Plan (RTP) acknowledges that truck transport is and will continue to be the primary method of goods movement. The RTP also states that Humboldt Bay's marine transport industry in linked to growth in the other primary forms of goods movement: truck and rail. There is no rail servicing the county. Thus, goods loaded on and off of commercial shipping vessels would have to be transported to and from the port by truck.
4. Caltrans has provided sufficient documentation that demonstrates that there are no prudent and feasible alternatives. Refer to Appendix B.
5. It has been determined that the project would not result in a significant impact under NEPA.
6. We disagree that the overall look and feel of the roadway and the experience of the motorist would be fundamentally changed. There is only minimal widening being proposed in the park, areas where two foot shoulders do not currently exist, and where trees abutting the pavement don't preclude widening, two foot shoulders would be added. The road won't be straightened; it will continue to be on a curvilinear alignment with old growth trees abutting the pavement.
7. The State Office of Historic Preservation concurred with Caltrans' finding that the portion of the archaeological site that would be impacted during construction of the project is not eligible for listing in the National Register. The remaining portion of the site will be protected during construction.
8. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded, and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs, is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled Murrelet based on the following factors: 1) the removal of as many as 31 second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available to nesting Marbled Murrelets within half mile of proposed vegetation-removal activities, and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) the trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current Marbled Murrelet nesting habitat; and 3) the project includes measures to avoid and minimize impacts to old growth redwood tree roots during construction. An EIS is needed if the project would result in a "jeopardy opinion" under Section 7 of the federal Endangered Species Act. The Section 7 determination made by US Fish and Wildlife Service for the Richardson Grove project was that the proposed project would not result in a jeopardy opinion which does not require preparation of an EIS under NEPA.

Comments on the DEIR
On Richardson Grove

The DEIR is insufficient in its mitigation measure for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be weakening and eventually the death of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a flush response on the part of the nutritiously shy Murrelet and Owl. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

Sincerely,
Karole Ely
1289 B St
Arcata, Ca

1. *See General Response #3 and #15* regarding impacts to the trees.
2. *See General Response #16* regarding information on the corvid proof equipment.
3. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.

Kim Floyd/D01/Caltrans/CAGov
03/05/2009 01:11 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Please leave Richardson Grove as is!

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/05/2009 01:11 PM -----

change2peace
<change2peace@gmail.com>
03/05/2009 10:23 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Please leave Richardson Grove as is!

Ms. Floyd,

I just spoke on the phone with you. Thank you for your offer to chat. I'm writing here however just to leave an official comment in favor of minimal improvement to 101 through Richardson Grove. I am particularly sensitive to noise pollution. Anything that will increase traffic will also increase noise pollution. 1

In addition to all the other good arguments being made to limit improvement to the road through Richardson Grove, I ask that the natural traffic limiting aspect of the roadway through there be left in place in order to reduce traffic noise all through the county. 2

John Emig
900 G Courtyard Circle
Arcata, CA 95521

--
change to peace

1. *See General Response #14* regarding the potential for increased traffic.
2. The capacity of the existing two lane highway would not be increased as a result of this project. The roadway through the park is only being minimally widened to add up to two foot shoulders where possible. The redwoods abutting the roadway would remain.

encimer@hotmail.com (Paul Encimer)
01/29/2009 06:45 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Your plan for Richardson Grove is an outright atrocity that is not planning for our realistic future of less trucks at lower speeds as we shift quickly toward rail - electric or otherwise. The only beneficiaries are make-work for bureaucrats and workers and profits for the politically well-connected. Your glossy book of "quack-quack" is a boon to printers and office staff and feigns serious discussion for an already decided outcome. Pull this stupidity now. Environmentally conscious people will keep challenging you until you do.
Paul Encimer, Box 162 PiercyCA 95587 1

[Paul Encimer]

Sincerely,
Paul Encimer
Box 162 Piercy, CA 95587

1. It is not anticipated that rail will be an available option in the foreseeable future for this area.

Paul Encimer
<encimer@hotmail.com>
03/12/2009 08:23 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove Proposed Expansion

To the California Department of Transportation
as assigned by the
Federal Highway Administration

Dear People:

In the face of the vanishing future for petroleum based transportation via trucks, it is imperative that you abandon the attempt to make Richardson Grove the last of the safe havens for out of scale, "STAA" trucking. This is certainly the first kind of trucking to be excluded from any rational, community-positive, post-petroleum economy. 1

This Grove expansion proposal is linked with controversial intentions to dredge a deeper bottom to Humboldt Bay. The ecological damage to the Humboldt Bay will prove to be an irreversible mistake not to be compensated for by the delusions of the Developer Mentality which envisions a World Class Port. In the face of our global environmental crisis, such "conventional" commercial purposes will become unbelievably unrealistic. This includes servicing a cattle economy sure to face serious contraction in a post-petroleum economy addressing the control catastrophic climate change. The Grove expansion proposal is unacceptable as well when tied to corporate efforts to get around the solid unionization of ports elsewhere on the coast. These and other factors will leave any Grove Expansion isolated and useless to effect its purported purpose. 2 3

The most important consideration is to oppose the ongoing effort of the NRC over at least the past 14 years to link Humboldt Bay and the highway all the way to Nevada with the shipping and transportation of spent fuel rods from abroad. You must reject the attempt to set up a "fait accompli" threatening to make such hazardous nuclear waste transport a part of the lives of Northcoastal California residents. Such a purpose is in no way to be considered appropriate under your purpose of (1) "improving the safety" of the highway and (2) "goods movement". 4

CEQA, Fish and Game. US Fish and Wildlife, National and California Parks departments and others listed (p.iii of the Draft EIR) cannot in conscience sign on to such a use. In particular, permits and approval must be withheld once alerted to such a hazardous nuclear waste transport(which is in no way "goods" to be moved).

Sincerely, Paul Encimer PO Box 162 Piercy, CA 95587

cc: Wesley Chesbro, Mike Thompson, Clif Clenden, Pat Wiggins, Barbara Boxer

1. *See General Response #11 regarding the need for STAA access.*
2. The proposed project is not linked with any Port project, except that both port development and the lifting of STAA restrictions at Richardson Grove would support goods movement in Humboldt County.
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction at Richardson Grove has adversely impacted their business. The STAA restriction affects a cross section of businesses including such diverse interests as local manufacturing firms, agricultural products (including cheese products, the creamery, ranching, lumber products, dairies), seafood exporter, clothing manufacturer, local brewery, performing arts representatives who rely on STAA trucks to transport the sets for local performances, and racing enthusiasts who use STAA trucks to transport their racing cars.
4. *See General Response #1* regarding information on project purpose and need.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:42 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Proposed Richardson Grove widening project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:41 PM -----

Bonnie Etz
<banddetz@gmail.com>
03/12/2009 12:25 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Proposed Richardson Grove widening project

I just want to add my support to those who oppose this project..To cut down even one of our precious few remaining Redwoods without good reason is unthinkable. 1

In January I drove down to Sonoma County and was reminded once again of the beauty of that Grove. In fact it is the only spot on 101 between Eureka and Sonoma where travelers can experience the Redwoods. I remember a magical night at the Hartsook Inn many years ago. More traffic and trucks are not a fair trade off. 2
Keep Richardson Grove as it is for future generations to fall in love with the forest.

Thank you.

Bonnie Etz-Mott
Trinidad, CA

1. *See General Response #2* regarding impacts on park character.
2. *See General Response #14* regarding information on increased truck traffic.

LAW OFFICE OF FREDRIC EVENSON

424 FIRST STREET
EUREKA, CALIFORNIA 95501
TELEPHONE (707) 268-8900
FAX (707) 268-8901

January 30, 2009

Via email & US Mail

Deborah Harmon
California Department of Transportation
1656 Union Street
Eureka, CA 95501

Dear Ms. Harmon,

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the Richardson Grove Operational Improvement Project. It is my understanding that this proposed project would allow longer and heavier trucks to travel Humboldt County's already treacherous roadways. I travel daily with my children on Highway 101 and I am concerned that the Richardson Grove Project DEIR ignores the issue of road safety.

There is overwhelming scientific evidence showing that overweight trucks are more difficult to control, take longer to stop, are more likely to rollover in crashes, and pose a serious safety threat to passenger vehicle occupants. Consequently, it is no surprise that large, heavy trucks are disproportionately responsible for motor vehicle deaths. Although big trucks are only 3 percent of U.S. registered vehicles, they are responsible for 13 percent of annual motor vehicle crash fatalities. When a car has a crash with a big truck, 98 percent of the people who die are in the smaller passenger vehicle. The National Highway Traffic Safety Administration reports that from 1996 to 1999, 51,214 California motorists were injured and 1,669 were killed in crashes involving large trucks. 1

The chances of a big truck crash resulting in deaths and serious injuries increase with each extra ton of weight over the 80,000 pound gross vehicle weight limit in federal law. These federal weight limits are used by many states as the upper limit on truck weight even on most of their state roads. A big truck weighing even a legal 80,000 pounds is more than twice as likely to be involved in a fatal crash than a truck weighing about 50,000 pounds. (University of Michigan Transportation Research Institute "UMTRI", 1988). This is primarily because bigger trucks require more stopping time. A truck weighing 100,000 pounds with unadjusted brakes travels 25 percent further after the driver steps on the brakes than an 80,000 pound truck. A 120,000 pound truck can travel as much as 50 percent further before stopping than an 80,000 pound truck. (UMTRI, 1983; TRB; National Academy of Sciences (NAS) 1990). Additionally, the larger the truck the greater the degree of "offtracking" increasing the risk of trailers entering oncoming traffic lanes. A survey conducted in the early 1990s by the American Association of State Highway and Transportation Officials showed that many ramps on even Interstate highways were unable to accommodate the off-tracking, swept path width of a tractor-trailer pulling even a 48-foot long semi-trailer. Many combination trucks currently pulling 53-foot long trailers cannot safely negotiate such ramps, especially elevated ramps bordered by bridge parapets or

guardrails. These trucks also intrude into the traffic lanes used by passenger cars and threaten their safety. It is for these reasons that, by an 88 percent majority, the American public is opposed to allowing bigger and heavier trucks on the highways. (Lou Harris, A Survey of the Attitudes of the American People on Highway Safety, May 1996). Seventy-eight (78) percent of Americans are willing to pay higher prices for goods shipped in trucks in exchange for tougher truck safety standards. (Caravan Poll, 1999). The DEIR should specifically address these safety issues, including the state of Highway 101 ramps north of Richardson Grove, and analyze whether they can be safely negotiated by larger STAA trucks. 2 3

The DEIR seems to confirm that increases in truck size and weight will not decrease the number of trips, result in fewer miles traveled, or improve safety by reducing the number of trucks on the Humboldt County's roads. Past increases in truck size and weight have not resulted in fewer trucks, fewer trips, or fewer miles traveled. The number of trucks on U.S. highways has consistently grown, even after increases in both the sizes and weights of large trucks. 4

The DEIR misleadingly limits the project description to the road widening work in Richardson Grove, when in actuality it's stated goal is to allow larger, heavier trucks to travel throughout Humboldt County and north to the Oregon border. Humboldt County's roads are among the windiest and foggiest in the nation. The potential impacts to passenger vehicle, biker and pedestrian safety, on Highway 101 and all other roads these larger trucks would be allowed to traverse, must be addressed in the DEIR. Only then can the public make an informed decision on the project. 5

On a related issue, it has been reported that one legal 80,000 pound GVW tractor-trailer truck does as much damage to road pavement as 9,600 cars. (Highway Research Board, NAS, 1962). Many argue that overweight trucks chronically underpay their fair share of taxes and user fees for the repair of U.S. roads and bridges. By damaging roads, large trucks further degrade highway safety. (U.S. DOT, 1997). The full economic and safety impacts from this project have not been assessed in the DEIR. 6

Thank you for considering these issues.

Cordially,

Fredric Evenson

1. According to our most recent records, only about 8% of all collisions occurring on US Route 101 between the City of Santa Rosa and Eureka are related to truck traffic.
2. It is not anticipated that any on ramps or off ramps on US Route 101 would need to be improved to accommodate STAA vehicles. STAA trucks are not to leave terminal access routes such as US Route 101 except where signed and then local streets should have signage to approved terminals. Existing STAA routes on local roads would be required to be compliant with Caltrans ramp termini intersections with local roads, otherwise the local roads could not be considered STAA routes if there is connection to the State or US highway. New STAA local routes might be proposed by local agencies in the future, but it is not known where they might be proposed or when.
3. With the construction of this project, highway conditions are not expected to be any less safe than they currently are. Because there will be revisions made to non-standard highway design features such as curve radii and shoulder widths, it is expected that the roadway on this section of Route 101 will be somewhat safer for all users as a result. The presence of slightly larger STAA trucks is not expected to make the roadway any less safe as the comparative weights of the non-STAA and STAA rigs are relatively the same, with the STAA trucks having the potential to be slightly heavier due a larger size tractor (if a sleeper is included). The load weight restrictions are the same for both STAA and non-STAA vehicles.
4. It is not anticipated that truck traffic would increase on Route 101 as a result of the proposed project. The project will not be increasing the capacity of highway as no additional travel lanes will be constructed. The potential for increased truck traffic would be due to diverted truck traffic that currently uses other north/south routes such as I-5 and Route 99. Diversions from these other routes would depend upon it being economically feasible for the trucking companies to change their existing routes based upon fuel consumption and travel times. Since all the major coastal cities from southern California to northern Washington have readily available access to the I-5 and Route 99 corridors which have straighter alignments and faster travel times, the opening of STAA access to Route 101 through Richardson Grove is not expected to generate a substantial amount of diverted truck traffic. If the project is constructed, some of the truck traffic that currently use Route 101 through Richardson Grove would likely switch form non-STAA trucks to STAA trucks which has the potential to reduce the number of truck trips.
5. The project would more aptly be described as a curve modification project rather than a widening project. The only widening is minor shoulder widening. It is unlikely that STAA vehicles would affect the safety of passenger vehicles, bicyclists, or pedestrians substantially different from other commercial vehicles.
6. Total Gross Weight cannot exceed 80,000 lbs with restrictions on individual axle loads, and this restriction applies to both STAA and CA Legal vehicles. The exception is permitted loads that will exceed the legal weight due to non-reducible loads (i.e., the load cannot be reasonably broken down any smaller). More information is available at http://www.dot.ca.gov/hq/trafficops/trucks/trucksize/weight.ht .

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 12:18 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson's Grove comment

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 12:18 PM -----

Mara Fagin
<faginm1950@gmail.com>
02/23/2009 11:06 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson's Grove comment

Dear Ms. Floyd,

I am a Fortuna resident. My 95-year-old father has frequently visited Humboldt county since the 1970's. When he lived in Southern California, he camped at Richardson's Grove many, many times with my late mother. He never failed to comment on the beauty of the stretch of road winding through the park. As he got older and could no longer take a hike into the redwood forests, driving through that stretch of 101 became his definitive Northcoast Experience. His latest visit was last November. He brought his new wife for her first visit to California. She is 90 and can no longer walk in our state and national forest parks. But she could marvel at the big trees lining the road through Richardson's Grove. We didn't have time to drive through the side roads along 101 where of course she could have seen other examples of large redwood trees. Sadly, if not for the trees on 101 she would have come and gone without seeing a truly impressive specimen of our famous trees.

I belong to the Fortuna Seniors Hiking Group. I spend many happy hours hiking among the redwoods, but someday, if I'm blessed with as long a life as my dad and his wife, my hiking days will come to an end, When that happens, it would be a blessing to be able to pass among the majestic trees in Richardson's Grove on my way to and from points south. 1

Please reconsider the widening of 101. An alternative that makes fiscal, economic, environmental and spiritual sense is to impose a lower speed limit in the grove portion, thus allowing longer trucks to snake around the existing curves. 2 3

Thank you.

Mara Fagin
Fortuna, CA

1. *See General Response #2.*
2. *See General Response #13.*
3. *See General Response #8.*

To whom it may concern:

Regarding the **Richardson Grove Project** Feb 24, 2009

It seems to me, as a frequent traveler of HWY 101 from our home in Fortuna, that the proposed removal of trees and potential damage to other priceless redwoods is unnecessary and far more detrimental than an improvement. I have never seen a truck being unloaded and another reloaded to travel north beyond the Grove in all the 32 years that I have been traveling HWY 101. For our county to lose even a small amount of the charm and inspiring beauty that the Grove and State Park area provide visitors for the sake of a few large trucks would be a tragic mistake. We are very lucky to have such an incredible gateway to our County. 1

Could the trucks in question make the short trip through the Grove if the speed limit was reduced to 20 mph? I'm sure they could and that the rest of the traffic would not mind the small inconvenience for a mile or so in such an aweinspiring place. That seems to be a much simpler and less destructive way to solve the problem. Large trucks negotiate other twists and turns on other highways that are just as tight as the ones in Richardson's Grove – they just have to slow down. The area is a State Park and a reduction of the speed limit would also lessen the danger to pedestrians and bicycles in the park. 2

If two of these large trucks can't pass each other in the Grove, then an electronic metering system could be installed that would require the driver of such a truck to get permission from a controller to make the passage through the Grove. The signal system need only apply to the over-sized trucks whose drivers would know of the requirement from signs before the entrances to the Grove area. 3

You would also, of course, save a large amount of money by not realigning the highway. Use the funds to solve the serious bottleneck in Willits that affects everyone – truckers included.

It is always suspected that many highway projects are done for the benefit of powerful industrial lobbies. I certainly hope that this is not the case here, but since the only voice in favor of this are the cattle growers, it does seem that they are getting undo attention when you are proposing to damage such irreplaceable scenic beauty. 4

Does the State Park System and the Save the Redwoods League want you to realign the highway? Does the tourist industry of Humboldt County want it? Tourism is a much more important industry to Humboldt County than cattle.

Caltrans has a good record of listening to the public and in environmental awareness. I sincerely hope that this will continue in the resolution of this matter.

Thank you for considering my views,

Paul Farnham

Paul Farnham
3576 Nelson Lane
Fortuna, CA 95540
707725 2227 pfarnham2002@yahoo.com

1. *See General Response #2*.
2. *See General Response #8.*
3. *See General Response #10.*
4. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.

Feb. 2, '09

Dear Ms. Harman,

I am writing regarding my concern over the proposed project by Caltrans through Richardson Grove.

I have enjoyed driving through the Avenue of the giants and camping at Richardson Grove my entire life. It is an irreplaceable treasure to locals as well as the world at large. This stretch of hwy 101 and old growth redwood forest provide an intimate experience and opportunity for the public to enjoy this ancient grove. It should not be damaged or altered in any way.

I can not believe that Caltrans is suggesting the removal of 39 trees, a retaining wall and the possible demise of many other trees by cutting the root systems. What proof do we have that this will not kill these trees? There is no way that these impacts (as stated by you) will not harm the natural environment or take away from the travelers experience.

The large trucks that are being "catered" to have the option of using the 101. Businesses have survived using the hwy as it is for years. Small, local businesses may even be hurt by these changes. Everything

in life does not need to be "updated" or made bigger and wider to accomodate "more stuff." Let's not fix what is not broken. Save the publics money for things that really do need repair. 6

The complications of this project bring noise, pollution, errosion and disruption for a year of construction will cause tremendous stress on the ecosyptem. 7

What about the Caltrans policy of considering bye bicyclist access? You are willing to make room for huge trucks but there is no room for pedestrians or bike riders. I have been willing to make this compromise (as an avid walker) for years because I feel it unreasonable to widen this old, charming, historic road. Why change all the good attributes and not include walkers or bicyclists? 8

Thank you for your time and consideration.

Celeste Feleiano
p.o.box 863
Glen Ellen, Ca. 95442

1. *See General Response #2*.
2. *See General Response #3.*
3. A design modification for the retaining wall was developed subsequent to the circulation of the draft document. This modification included changing the location and type of wall. The retaining wall is now proposed on the east side of Route 101 and would be constructed below the roadway. This modified design would be 100 feet shorter and would reduce the number of trees to be taken (from 30 to 5) and because the wall is below the road, only the barrier rail would be visible to motorists.
4. *See General Response #11*.
5. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
6. *See General Response #13.*
7. *See General Response #4.*
8. *See General Response #5.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 03:00 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: the groovy grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:00 PM -----

<fennell3@suddenlink.net>
03/11/2009 10:40 AM

To kim_floyd@dot.ca.gov
cc
Subject the groovy grove

1

2

Please care for it..please honor it..please save it.
Use low tech measures to improve it. Spend your money on fixing and dealing with 255 through Manila where I live and drive. Slow 255 down like 101, give us roundabouts, turnoff lanes, lights..whatever but please finally do something. It has been a forever struggle in my town to get something, anything done.
Please have a good day and consider my thoughts ...
Thank you,
Sharon Fennell
1480 Peninsula Drive
manila, Ca 95521

1. *See General Response #2*.
2. Your comments regarding State Route 255 have been passed on to staff working on the Feasibility Study for improvements on HUM-255.

March 1, 2009

To: Kim Floyd, Project Manager
Cal-Trans

Dear Ms. Floyd,

I am opposed to the widening of Highway 101 at Richardson Grove. I feel that the deleterious impacts on the few remaining Redwood Trees in our county are not worth the dubious advantages to business to warrant such a proposal. Since this project takes place in a State Park, the paramount importance must be protection of the Public Trust, our last remaining old growth redwood trees whose roots are shallow and will be damaged along with the peace and awe inspiring beauty of the past that is conveyed. 1 2

Nor do I find the argument that it will be good for business valid. Part of the charm of our part of the county (aside from the redwoods) is that many of the businesses in the area are small and locally owned. I would like it to stay this way rather than opening up the highway to great big fast moving trucks servicing fast moving big box businesses. 3

There is a simple and economical solution, lowering the speed limit through the grove. And maybe the time has come to limit how gigantic these trucks can get. Why not save what is beautiful and unique in Southern Humboldt while at the same time saving money and fuel? 4

Thank you for your consideration.

Sincerely,

Sandy Feretto

Sandy Feretto
Garberville, California
(707) 223-0990

1. *See General Response #3.*
2. *See General Response #2*
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
4. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:31 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove proposal

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:31 AM -----

"The Finamores" <finamore@humboldt1.com>
03/10/2009 08:39 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove proposal

Dear Kim,

I just read Gloria Hesseltine's commentary in the Times Standard calling for a balanced approach on the Richardson Grove section of Highway 101. I support saving the trees and coming up with an alternate way to allow the needed truck to pass. If it can be done with installing some lights and reducing speed limits, that avenue should be explored before deciding on more environmentally-harmful methods. As a resident of Humboldt County, my family and I enjoy Richardson Grove State Park camping and that is by far our favorite stretch of highway on the trip to the Bay Area. As Gloria Hesseltine pointed out, those trees and the park belong to everyone and I want my children to continue to appreciate the beauty there. 1 2

Thank you for your consideration.

Jennifer Finamore

1. *See General Response #10.*
2. *See General Response #8.*

"mary beth fitzpatrick "
<marybeth@arcatanet.com>
01/27/2009 04:51 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove Project

Dear Ms. Harmon:

I am writing with concern about the Richardson Grove project.

If what I have heard is true, I want you to know my position. Based on information that i) Caltrans plans to cut the roots of 30 of the largest redwoods in the area, some of which are 15 feet in diameter, ii) a 'take' permit will allow endangered species to be harrased and threatened, without adequate mitigation, and iii) erect a 300 foot long, 18 foot high retaining wall in that pristine area, I am asking that Caltrans NOT be allowed to begin this project without FURTHER STUDY.

Based on the information I have at the moment, I am also asking that far more serious consideration be given to the alternative by which the speed limit in the area simply be reduced to 25 mph on the one-mile section affected, saving tax payers millions of dollars and eliminating the need for construction work which could seriously impact the wildlife, habitat, and ecosystem of the area.

Thank you for your attention.

Mary Beth Fitzpatrick
Eureka, CA

1
2
3
4

1. *See General Response #3.*
2. *See General Response #16.*
3. A design modification for the retaining wall was developed subsequent to the circulation of the draft document. The modifications include changing the location and the type of the retaining wall. The wall is now proposed on the east side of Route 101 as a below the roadway wall rather than an above the road wall. Since it is constructed below the road, the wall is much less visible to motorists except for the barrier rail. The modified wall is also a 100 feet shorter and reduces the number of tree removals from 30 to 5.
4. *See General Response #8.*

foglark@att.net (David Fix)
01/30/2009 02:02 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

As a biologist and Marbled Murrelet surveyor trainer, I feel that the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project is inadequate to protect our rare and declining "foglarks." 1

Further, I feel that the need for this project at a time when California is more than $45,000,000,000 in the red can be questioned on economic grounds. 2

I also think that the widening of the Richardson Grove curves will do little more than enable the transformation of urban Humboldt County into another Santa Rosa--Northern California's leading example of unchecked and metastatic growth. 3 4

What's unrestricted and metastatic growth all about? Ask any cancer cell.

I feel, too, that the needs of bicyclists should be strongly considered in this plan. 5

I would like to see the monies earmarked for this project reallocated to family planning and contraception. There are already twenty to thirty million too many people living here. Unless we flatten California's growth curve, the future is dire, and we may as well just fold like a cheap suit. 6

David Fix

Sincerely,
David Fix
1632 Hyland Street
Bayside, California 95524

1. *See General Response #16.*
2. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
3. *See General Response #13.*
4. *See General Response #12.*
5. *See General Response #5.*
6. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.

Kim Floyd/D01/Caltrans/CAGov
01/23/2009 12:55 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Widening Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/23/2009 12:53 PM -----

Jimmy Foot
<bongoboycd@sbcglobal.net>

01/23/2009 12:51 PM
Please respond to
bongoboycd@sbcglobal.net

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Widening Project

Dear Kim,

I am writing to express my opposition to this project. This is a destructive and outdated project and is not needed in any way. The Redwood groves should be considered a sacred gift, and the ugly concrete and asphalt construction project an un-natural aberration. In these economic times, we certainly need to provide jobs and improve our infrastructure, but we also need to carefully consider what is *really* an improvement. Violating the old-growth forest to build yet another massive tribute to old technology is a waste of both the environment and precious monetary resources that should be spent for better uses. We don't need this project; it's the wrong thing to do. 1

Thank you,
Jimmy Foot
Mckinleyville, CA

1. Route 101 predates the establishment of the park and provides access to the park. Caltrans is committed to working with State Parks to come up with a plan that would result in minimizing impacts to park resources. The improvements to Route 101 through the park include realigning the curves that restrict STAA access, providing two foot shoulders in spot locations where they don't presently exist and where trees abutting the existing roadway don't preclude them, as well as providing some drainage improvements.

Jimmy Foot
<bongoboycd@sbcglobal.net>

01/28/2009 01:24 PM

Please respond to
bongoboycd@sbcglobal.net

To "Deborah Harmon"@dot.ca.gov
cc "Kim Floyd"@dot.ca.gov
bcc
Subject Richardson Grove Project

Dear Ms. Harmon,

I am writing in regards to the proposed Richardson Grove project. This project should never have gotten this far. If there is such a great need to bring the large trucks up here then a bypass should be created. 1

I do not see a demonstrable need to bring the "super" trucks here. This is a sparsely populated county and we have done quite well so far without these trucks. 2

Humboldt County is a very special place and will only remain so if access is somewhat limited and if we don't put greed and grab over the preservation of this very special place. 3

As a long time visitor to the Prairie Creek Redwoods State Park I know what a difference the creation of the bypass has made to the sustainability of the park. The cut back in traffic and the elimination of large vehicles spewing noxious emissions has greatly helped the health of the forest. Visitors no longer need to breathe the mass of unhealthy fumes and no longer have to deal with the noise and dangers posed by large vehicles. At Richardson Grove there are campgrounds close to where the trucks would be driving through.

We who live here have watched the decimation of the ancient redwoods. What few pockets remain of these great trees and great forests should be protected, not invaded. People from all over the world come to see these treasures. I know that only a couple of redwood trees are marked for being felled. However, 30 other trees are going to have their roots cut - some of these trees being 15 feet in diameter. 4

I adamantly oppose this proposed project, it should be stopped right now.

Sincerely,
Susie Foot
Mckinleyville

1. *See General Response #9.*
2. *See General Response #1 and #11.*
3. Constructing the project would fulfill one of the objectives identified in the County's Regional Transportation Plan. Trucking will remain the primary mode for goods movement for the County for the near future.
4. *See General Response #3.*

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:18 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Widening Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:17 AM -----

Jimmy Foot
<bongoboycd@sbcglobal.net>

02/22/2009 09:05 PM
Please respond to
bongoboycd@sbcglobal.net

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Widening Project

Dear Ms. Floyd,
It is with dismay that I heard about the proposed project to widen and straighten the road at Richardson Grove State Park.
My husband and I have been coming to Richardson Grove for most of our 40 years of marriage. The quaint ride through the beautiful redwoods right near the park entrance is one of the magical spots in America. As a matter of fact, we have brought many relatives and friends up there over these many years. Visitors from all over the country. And Richardson Grove, with all its charm, was one of the reasons we moved up here 8 years ago from San Francisco, relocating our business and home of 30 years.
It's the little things like that stretch of road that make up the unique tapestry that is Humboldt County: the North Coast, the giant redwoods. the rivers, the owner-operated curbside businesses, the little bit of wild that is left. Please don't take that away.
In addition, the redwood trees that have to be destroyed for this project, and the root systems of many other trees that will eventually kill them also - this would be a travesty. The redwoods, what few remain, are precious. Much more so than a straighter, wider road. For once allow nature to prevail over the desires of a few large business and trucking interests. There will never be enough roads to accommodate more and more traffic. We'd have to pave over every remaining artifact of nature to do that.
Furthermore, if a road must be widened & straightened, why not do it before Ridchardson Grove? Something like the Confusion Hill area, where the road goes across the river and comes back out farther south. I'm sure that could be done in this instance, with a lot less damage to the old growth trees and the aesthetic nature of that road.
I do hope you will give some consideration to my plea, and to the many other voices that have spoken in defense of Richardson Grove.
Thank you,
Susie Foot
Mckinleyville
Owner, Bongo Boy CD/DVD
707 839-5090
bongoboycd@sbcglobal.net

1
2
3
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5

1. There are a total of thirty trees in the park proposed for removal. Only two redwoods within the park are proposed for removal, a six-inch diameter tree and a seven-inch diameter tree. No old growth trees are proposed for removal. Construction would occur in the structural root zone (circular area with a radius three times the diameter of the trunk of the tree) of several redwood trees within the park. However, all excavation below the finish grade within the structural root zone area except for the culvert work would be done via "hand work" with shovels, pick axes, or pneumatic excavators like air spades to minimize disturbance or damage to the roots from large equipment. Since most of the proposed excavation would occur in the vicinity of the outer edges of the existing road pavement, it is estimated that the density of roots in this area is less than elsewhere in the structural root zone (e.g., areas not covered by existing pavement). In addition, it is not anticipated that most of the larger roots would have to be cut, but rather excavation with a pneumatic excavator would clear the soil away from the roots, then the roots would be laid down and fill placed over the roots.
2. *See General Response #13.*
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
4. *See General Response #14.*
5. *See General Response #9.*

P.O. Box 394
Miranda, CA 9553
jvchristianson@asis.com

Januaary 27th, 2009

Deborah Harmon
CA Dept of Transportation
1656 Union Street
Eureka, CA 95501

Dear Ms. Harmon:

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project.

I oppose any cutting of mature redwood tree roots. Both paving over mature roots and removing existing paving already covering mature roots can both negatively effect the healthy homeostasis of a mature tree's roots. 1

I understand the need to make travel through the Richardson Grove safer. I support reducing the speed limit to 25 Miles per hour for the entire stretch of Highway 101 that extends through the Richardson Grove. If drivers do not adequately comply with this speed reduction, I would support an increased police presence and electronic speed monitoring and display, as we now have on the safety corridor between Eureka and Arcata. Additionally, in these very troubling financial times, I believe there are many other much more needed projects than this one. 2 3

Respectfully yours,

Marilyn Foote

1. Redwood trees can adapt to the impacts associated with roads as noted from existing highways such as Route 101 at this location as well as along Route 254- "The Avenue of the Giants." Several measures have been incorporated into the plans that would minimize the impacts of construction as well as long term impacts on the trees. The measures include hand work in the vicinity of the trees, using permeable structural section for the roadway that will allow more water to get to the tree roots, using pneumatic excavators like an air spades to minimize cutting the roots, and incorporating roots in the fill rather than cutting them. For more information see Appendix B of the FEIR/EA.
2. *See General Response #8.*
3. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:35 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: NO CUTS to Richardson Grove Trees

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:36 AM -----

jfornes@reninet.com
03/11/2009 07:33 AM

To kim_floyd@dot.ca.gov
cc
Subject NO CUTS to Richardson Grove Trees

Dear Kim Floyd:

On behalf of my neighborhood, we urge you NOT to cut the trees at Richardson Grove.

Recognizing the need to move goods in and out of Humboldt County, we also recognize the need to keep tourists (and their dollars) flocking to our area for its unparalled beauty. 1

A compromise exists: 2

1. Do not cut trees
2. Put in stop lights 3
3. Slow the speed to 25 miles per hour

This would allow big trucks to pass safely, save millions of taxpayer dollars (better spent on filling the potholes on California roads), and save these incredible trees which belong to the California State Park System and thus to all of us in this generation and future ones.

Thank you.

Joanne Fornes
Neighborhood Coalition
Silkwood, McKinleyville

1. *See General Response #2.*
2. *See General Response #10.*
3. *See General Response #8.*

Joanne Fornes
2090 Silkwood St.
McKinleyville, CA 95519
707-840 0754 jfornes@arcatanet.com

Kim Floyd
Caltrans project manager
PO Box 3700
Eureka, CA 95502

Dear Kim Floyd:

I urge you to NOT to cut the redwood trees at Richardson Grove on Highway 101. Those of us who live in Humboldt love our "redwood curtain" and wish it to remain as such. It's a beautiful tourist attraction and we need those tourist dollars. 1

Commercial interests want to widen 101 through Richardson Grove so big trucks can get through with their commercial goods. 2

Other, much cheaper alternatives are available:

1. Put in stop lights 3
2. Slow the speed to 25 mph 4

If elderly tourists with big recreational vehicles and suvs attached can get through, so can these professional drivers.

These trees belong to the California State Park System, and thus to everyone, not just commercial interests.

In addition, our scarce highway dollars could much better be spent filling potholes on roads much more heavily traveled. 5

Thank you.
Joanne Fornes
Sincerely,
Joanne Fornes

1. *See General Response #2.*
2. *See General Response #13.*
3. *See General Response #10.*
4. *See General Response #8.*
5. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:22 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: comment on proposed Richardson Grove construction

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:23 AM -----

"Robert Fornes"
<rfornes@arcatanet.com>
03/10/2009 09:40 AM

To <kim_floyd@dot.ca.gov>
cc
Subject comment on proposed Richardson Grove construction

As a resident of Humboldt County, I am opposed to any widening of Hwy 101 through Richardson Grove State Park, as the damage to the Park far exceeds the small amount of time saved by expanding the road. 1

Using lower speed limits and possibly control lights would achieve the same purpose without the damage of road construction. 2 Humboldt County does not want to become Santa Rosa. The Redwood Curtain is there for a reason. 3

Thank you,
Robert Fornes
2090 Silkwood St.
McKinleyville, CA 95519

1. *See General Response #13.*
2. *See General Response #8.*
3. *See General Response #10.*

P.O. Box 855
Blue Lake, Ca. 95505
10th March 2009

CalTrans Project Mgr. Nancy Floyd
P.O. Box 3700
Eureka, Ca 95502

Re: Richardson Grove

Dear Miss Floyd;

My comments re above:

Please do not sever any roots of any redwood trees in the Richardson Grove! Put in a traffic light for those trucks. These trees belong to me. They are in a STATE Park. No commercial interest should have precedence. 25 mph limit needs to be imposed. SAVE us all, SIX MILLION DOLLARS! - that would take care of alot of decayed teeth, homes for the needy, a shopping spree at the MALL! Last, but not least, keep those magnificent redwoods — the original sky scrapers (they bring the needed rain to the area) which (some of) have been there before Christ's coming — for the citizens of the future.

So as Mr. Hesselmeier letter recommends: 1. Install the stop lights (we all have to put up with them — they are a fact of the driving scene) 2. Impose 25 mph speed limit — same limit for school zones (compare this grove to a school of spirituality).

There are my comments.

Sincerely,
Eleanor Frederickson

1

2

3

4

1. *See General Response #10.*
2. *See General Response #8.*
3. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.
4. *See General Response #2*.

aimee nicole friberg
<nenalandia@gmail.com>
01/27/2009 11:56 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject

Dear Deborah Harmon,

I strongly disagree with Caltrans project to widen HIghway 101 through Richardson Grove.

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

thanks for your time.

Sincerely,

Aimee Friberg

1. *See General Response #15.*
2. *See General Response #16.*
3. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.
4. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:22 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: save Richardson Grove trees

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:22 AM -----

Julie Frith
<frithmobiles@gmail.com>
03/10/2009 09:31 AM

To kim_floyd@dot.ca.gov
cc
Subject save Richardson Grove trees

Hi Kim,

I would like to project my concern to the removal of Richardson Grove redwood trees to widen the road for larger trucks. 1
Yes we need improvement, BUT please do not to disturb the forest. 2
Slowing down to 25, and adding the stop lights will be the first to try before cutting down ancient redwood trees. We have to try alternative ideas before radical earth changes. 3

Please help save the redwood trees. This is one earth worth protecting. 4

thank you,

Julie Frith
P.O.Box 6698 Eureka, CA 95502
707-443-5366

1. *See General Response #2.*
2. *See General Response #8.*
3. *See General Response #10.*
4. *See General Response #3.*

funk@snowcrest.net
(Stephen L. Funk)
01/27/2009 10:37 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

I don't want my tax dollars used to damage Richardson Grove. This will increase maintenance costs over the entire length of the highway by allowing heavier trucks. I am a licensed forester, and I would anticipate a substantial number of trees eventually dying due to loss of roots, in addition the those allowed for in the plan. 1

The state is $40 billion in the hole. Dropping this project is one small way to reduce the deficit. 2 The leisurely pace of driving is what makes 101 enjoyable. I don't want it straightened out, and I don't want to worry about more and heavier trucks. 3

Sincerely,
Stephen L. Funk
PO Box 1268
Mount Shasta, Ca. 96067

1. Total Gross Weight cannot exceed 80,000 lbs with restrictions on individual axle loads, and this restriction applies to both STAA and CA Legal vehicles. The exception is permitted loads that will exceed the legal weight due to non-reducible loads (i.e., the load cannot be reasonably broken down any smaller). More information is available at http://www.dot.ca.gov/hq/trafficops/trucks/trucksize/weight.ht .
2. *See General Response #3.*
3. *See General Response #13.*

"Paul Gallagher"
<paul@pginet.com>
01/27/2009 02:17 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove HWY Widening

History: This message has been forwarded.

Dear Deborah,

1 I am sending this letter to protest the widening of the 101 N at Richardson Grove.

2 Not every stretch of highway needs to be suitable for fast moving commercial trucks. Please propose an alternate solution of lowering the speed limit.

3 My family and I have been enjoying trips to the area for many years and do not want to see it spoiled in the name of commerce.

Thank you,

Paul Gallagher
PO BOX 3306
Fullerton, CA 92834

_____ Information from ESET NOD32 Antivirus, version of virus signature database 3804 (20090127) _____

The message was checked by ESET NOD32 Antivirus.

http://www.eset.com Brief Comments on the DEIR.DOC

See attachment next page.

Comments on the DEIR
On Richardson Grove

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 4

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 5

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees.

1. *See General Response #13.*
2. *See General Response #8.*
3. *See General Response #2.*
4. *See General Response #15.*
5. *See General Response #16.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 03:00 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Caltrans 101 Corridor Project; Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:00 PM -----

rw gardner <gardner@humboldt1.com>
03/11/2009 10:51 AM

To Kim Floyd <kim_floyd@dot.ca.gov>, jrsmith@co.humboldt.ca.us, kwear@times-standard.com
cc
Subject Fwd: Caltrans 101 Corridor Project; Richardson's Grove

Dear Ms. Floyd, Supervisor Smith, Editor Wear:

Richardson's Grove Project. Allowing the larger truck trailers at a lower speed limit would save a lot of state funds and priceless trees. It is appreciated that you have put a lot of time, effort and expense into both projects. Shipping by rail seems doubtful even for the long term, but has consideration been given lately to shipping by ship? 1 2

101 Corridor Project. Our opinion remains the same. Due to economy, there might not be a mill there in the future to accommodate with highway changes. 3

Thanks for listening.

Bob and Nancy Gardner

1. *See General Response #8.*
2. Currently, infrastructure improvements are necessary to develop short sea shipping in Humboldt Bay, and funding for these improvements have not yet been identified. And, while short sea shipping may be an option in the future, it will not be practical for all shipping needs such as time sensitive goods or animals. In addition, Humboldt Bay has a couple of major disadvantages that must be overcome before short sea shipping would be perceived as viable. As stated in the Port of Humboldt Bay Harbor Revitalization Plan, the Bay's limited inland access by both rail and trucks is a key disadvantage since Interstate 5 is a major route for goods movement due to its access to major population centers from California to Washington. This lack of inland access combined with Humboldt County's small population and limited economic base makes Humboldt Bay less desirable than other competing ports.
3. Your comments on the Route 101 Eureka-Arcata Corridor project have been forwarded to the project development team for that project.

Tina Garsen
<tina62696@sbcglobal.net>
01/28/2009 06:47 AM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

Ms. Harmon,
Please don't cut the trees at Richardson Grove. That is one of the most beautiful spots on the highway. I won't wax poetic and go on and on about how lovely it is. But it is. Please protect our home from the encroachment of more ugliness in the name of economic necessity. 1
Respectfully,
Tina Garsen
Eureka, Ca

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 01:15 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 01:15 PM -----

Tina Garsen
<tina62696@sbcglobal.net>
01/28/2009 06:49 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Ms. Floyd,
Please protect Richardson Grove from the bulldozers. It is one of the loveliest spots on the highway. Expediency does not need to trump beauty. 1
Respectfully,
Tina Garsen
Eureka

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:32 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Draft EIP,Nix Richardson Grove hwy-widening project!

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:32 AM -----

Lydia Garvey
<wolfhowlmama@yahoo.com>
03/12/2009 03:47 PM
Please respond to wolfhowlmama@yahoo.com

To Kim_Floyd@dot.ca.gov
cc
Subject Draft EIP,Nix Richardson Grove hwy-widening project!

Boo! to the removal of 87 old-growth Redwoods that would damage surrounding ecosystems, negatively affect tourism & the beauty of the area. Do your job-Project Our Public lands, waters & wildlife! 1

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you Lydia Garvey 429 S 24th Clinton OK 73601

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
02/02/2009 09:46 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: RG EIR comments

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/02/2009 09:46 AM -----

Richard Gienger
<rgrocks@humboldt.net>
01/30/2009 05:06 PM

To Kim_Floyd@dot.ca.gov
cc
Subject RG EIR comments

Richard Gienger

Box 283, Whitethorn

rgrocks@humboldt.net

California 95589

707-923-2931

30 January 2009

Kim Floyd, Project Manager
Richardson Grove Improvement Project
Caltrans District 1
P. O. Box 3700
Eureka, CA 95502-3700

Dear Kim Floyd & Staff:

The following two letters and the maps referenced below (and any related studies by Caltrans, CGS, or others -- pointing up high priority stabilization threats/needs for highway 101 on the North Coast) are submitted as response to the draft EIR. The Richardson Grove upgrade is a waste of taxpayers' money when MUCH higher priorities exist for ensuring 101's viability as a transportation corridor in Northwest California. These geological concerns are paramount, not 'monkeying' with Richardson Grove. 1

Sincerely,

Richard Gienger
(personally and on behalf of E.P.I.C.)

Richard Gienger

Box 283, Whitethorn

rgrocks@humboldt.net

California 95589

707-923-2931

14 May 2008

Kim Floyd, Project Manager
Richardson Grove Improvement Project
Caltrans District 1
P. O. Box 3700
Eureka, CA 95502-3700

Dear Kim Floyd & Staff:

I'd like to submit the 20 February 2008 letter the follows as input for the official scoping of the Richardson Grove Project, along with this short note. There are alternatives to the proposed project and higher priority health, safety, and road stability issues that should be addressed -- and that make the project as currently proposed unfit for implementation.

The earlier letter summarizes my concerns about the safety of 101 immediately, both north and south of the Richardson Grove Project. An alternative that I think is feasible and would be some real middle ground is to place, say a special 25 mph safety zone through the project area, and any other special conditions on the currently limited North Coast stretch of Highway 101 (Oregon border to south of Confusion Hill?). This

would allow legitimate larger truck use while protecting the historical, aesthetic, and cultural values of Richardson Grove.

Sincerely,

Richard Gienger

Richard Gienger

Box 283, Whitethorn

rgrocks@humboldt.net

California 95589

707-923-2931

20 February 2008

Kim Floyd, Project Manager
Richardson Grove Improvement Project
Caltrans District 1
P. O. Box 3700
Eureka, CA 95502-3700

Dear Kim Floyd & Staff:

I'm writing to share my opinion that the Richardson Grove Project is ill advised, given the higher priority work that needs to be done to maintain Highway 101 as viable lifeline and economic connection for the North Coast to the rest of California. I'm sure there are certain spots along Highway 101 that are much more crucial to ensure stability and use.

There are two such spots adjacent to the proposed project, one to the south and

another to the north. The 1998 Garberville 7.5 minute Geomorphic Features Map found at
http://206.170.189.143/CGS/fwgp/watersheds_download.htm
shows an active debris slide that includes the roadway and precipice directly across from the old Reggae-on-the-River site. The map also shows assorted serious instabilities affecting the north end of the project and the adjacent roadway over and around the sharp bend in the South Fork Eel River that Big Foot Burl is above the center of. These instabilities include a very extensive debris slide slope (a section of which failed several years ago and significantly blocked the roadway between Twin Trees Bridge and Big Foot Burl), two active debris slides below the road, extensive disrupted ground and inner gorge.

These are much more serious individual and cumulative impacts that need to be evaluated and dealt with prior to any 'fiddling' with Richardson Grove. The Geomorphic Features Map by the California Geological Survey (CGS) shows an apparently stable roadway all the way through Richardson Grove. You must evaluate the actual threats to Highway 101 and reset your priorities.

Sincerely,

Richard Gienger

1. The areas mentioned are outside the project limits of the proposed project. While there may be historical geological issues, as so much of the area is geologically unstable, it would be cost prohibitive to do preventive projects to improve the stability for all the roadways.
2. *See General Response #8.*

Gilbride-Read
<gilbr@humboldt1.com>
01/28/2009 09:50 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject

Comments on the DEIR
On Richardson Grove

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

Thank you for your consideration,

Anita and Tim Gilbride-Read
Fieldbrook, CA 95519

1. *See General Response #15.*
2. *See General Response #16.*
3. *See General Response #8.*

"Don Gillespie"
<dgillespie 7@earthlink.net>
01/30/2009 07:28 AM
Please respond to
dgillespie7@earthlink.net

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove Project.

To: Deborah Harmon

Caltrans Representative

Dear Ms. Harmon,

I have been driving through and camping in Richardson Grove since 1957 and I have always appreciated its' beauty as a gateway to Humboldt and Del Norte Counties. It is the first exposure to the grandeur of the Redwood forests that await the motorist as they travel north into Redwood National and State Parks. Richardson Grove encourges the tourists to continue driving north to visit us here in Del Norte County. 1

I understand Caltrans desire to accomodate STAA Trucks on Highway 101, as I have been involved in the changes you propose to Hwy. 199 for the same purpose. However, at Richardson Grove it appears that we can 'have our cake and eat it too', by choosing alternative three in your DEIR. Why not just lower the speed limit to safely accomodate the STAA Trucks? If you don't want to lower and police the speed limit, why not provide a pilot car to safely conduct large trucks through the redwood grove? Both of these proposals could be achieved at a huge savings to the California State taxpayers and achieve your same ends, for far less that the $6,000,000 that you propose to spend here. 2

Caltrans must consider the cumulative effects of the fact that you are proposing to create an STAA loop from the Collier Tunnel on Hwy. 199 to Richardson Grove. This will encourage the higher use of STAA Trucks on stretches of highway that are just barely legal to accomodate them. You must consider the impact of this in you EIR. 3

Highway 101 through Richardson Grove is a beautiful and majestic, one-of-a-kind driving experience shat should remain untouched. It can be made safe as it is.

Thank you for considering my comments at such a late date. Sincerely, Don Gillespie, 2075 Moseley Rd. Crescent City, Ca. 95531

Don Gillespie
dgillespie7@earthlink.net
EarthLink Revolves Around You.

1. *See General Response #8.*
2. Without making the modifications to the alignment the issue of off-tracking of the STAA vehicles would not be solved. Having a pilot car would not resolve the issue of STAA vehicles encroaching into opposing lane of traffic which results from the geometric deficiencies in the alignment.
3. STAA trucks are not to leave terminal access routes except where signed and then local streets should have signage to approved terminals.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:11 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:11 PM -----

M J Gillock
<mjgillock@mac.com>
03/11/2009 02:53 PM

To Kim_Floyd@dot.ca.gov
cc
Subject

Please do not let them ruin Richardson Grove, we need the beauty of these trees much more than a highway ease for less than a quarter of a mile. 1

Thank you for taking this action in advance,
Marilyn Jane Gillock
PO Box 2111
Fort Bragg, CA 95436

"Nothing in life is to be feared. It is only to be understood." - Marie Curie

"Those who would give up essential Liberty, to purchase a little temporary Safety, deserve neither Liberty nor Safety." - Benjamin Franklin

"The eyes of others our prisons; their thoughts our cages." - Virginia Woolf

"How wrong it is for a woman to expect the man to build the world she wants, rather than to create it herself." - Anais Nin

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/10/2009 08:57 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/10/2009 08:57 AM -----

trinidadeatery@aol.com
03/06/2009 07:59 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Project

As a local business owner who is hugely dependent on tourism, an advertiser on Caltrans highway 101 signage, and an adopt-a-highway participant, I strongly feel that cutting trees along the 101 corridor would have a very negative impact on Humboldt County's tourism. Once you pass that way you definetly say....'I want to come back and see those trees again'...or 'Lets stop now!' 1

Why would we ever consider cutting down something that can't be replaced? That stretch of road is to Humboldt County what Lombard Street is to San Francisco. Lets preserve the beauty and uniqueness of our area.

Thank you,
Karen Gorick
Owner, Trinidad Bay Eatery & Gallery

Worried about job security? Check out the 5 safest jobs in a recession.

1. *See General Response #2.*

February 7, 2009

Kim Floyd
Project Mgr.
P.O. Box3700
Eureka, CA.
95502

Dear Sir,
This is regarding Improvement Project, Hwy 101 through Richardsons Grove.

Richardsons Grove has been my very favorite place in all of my 85 years. From the time I was a little girl until now I looked forward to trips to northern California and driving (sometimes camping) in Richardsons Grove.

When I heard of the project of taking out 87 of those magnificant trees and widening the highway, it was almost too much to bear. We always drove slowly through the Grove so as to take in HEAVEN ON EARTH and feel the wonder of it all. 1

Another thing, when I am suffering from pain and the anxieties of old age and sleep doesn't come soon enough, all I have to do is picture in my mind Richardsons Grove with the sun peeking through those beautiful trees and I am asleep in minutes. It is hypnotic.

It would break my heart to have that grove disrupted in any way. It is sacred, spiritual and drivers should slow down to take it all in.

I am passionate about this. Please, please don't change Richardsons Grove. There must be another solution. And, please don't change Avenue of the Giantseither. Where else on earth could you find more beauty?

I plan to be there every other year, as before, and I need to still be inspired by Richardsons Grove.

Thank you for your consideration,

Most Sincerely.

Ms. Carol Jean Grant

Ms. Carol Jean Grant
(Formerly from California)

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:18 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:18 AM -----

Virginia Graziani
<virginia.graziani@yahoo.com>
03/09/2009 10:54 AM

To Kim_Floyd@dot.ca.gov
cc vgraziani@aeesolar.com, senator.wiggins@senate.ca.gov, assemblymember.chestro@assembly.ca.gov, Clif Clendenen <cclendenen@co.humboldt.ca.us>
Subject

To:
Kim Floyd
Project Manager, Cal-Trans/Richardson Grove Project

RE: Comments on DEIR for Richardson Grove Project

Dear Kim Floyd:
I am a resident of Humboldt County who frequently travels the stretch of Highway 101 that includes Richardson Grove. I am also an employee of AEE Solar, Inc. in Redway, a wholesale distributor of solar energy equipment throughout the United States. I believe that full CEQA/NEPA review must be required before this project can go forward, if indeed it should be allowed to go forward at all.

1

First and most importantly, the DIER does not adequately address environmental impacts, particularly the proposed deep cutting of the roots of redwood trees and the alteration of drainage patterns that will be caused by the proposed project. We all know that a redwood grove is an interdependent "family" of trees with shallow, interlocking root systems. Damage to the root system of a few trees can result in the gradual (or sometimes rapid) deterioration to the entire grove. The proximity of the proposed project to the South Fork Eel River means that changes in drainage, as well as the introduction of silt and debris from the project may have impacts on this fragile river that require a serious, detailed analysis. Not only endangered salmonids but also many small towns downstream of the proposed project, depend on the South Fork Eel for their domestic water supply and for fire suppression.

2

3

Secondly, the DEIR does not consider the economic effect of the proposed project to local business. Richardson Grove is a major tourist attraction, and southern Humboldt County provides over 60% of the county's "bed tax," one of the few entirely local sources of county revenue. Tourism provides a significant amount of employment as well. The difficult, noisy, messy construction process (estimated to take at least one year) as well as the permanent disfiguring of the Grove and the increased speed of traffic which discourages drivers from stopping will do irreparable harm to a number of small businesses and roadside attractions that employ rural residents. One of the most affected businesses will be Singing Trees, a drug and alcohol rehab

4

5

6

and recovery center that serves many local people struggling to better their lives, as well as providing employment and revenue to the southern Humboldt community. 7

Transportation is certainly a major barrier to economic development in Humboldt County, but the Richardson Grove project will NOT make any significant contribution to the solution. My company, AEE Solar, Inc., moved its principal distribution facility to Sacramento a few years ago (our sales and support offices are still in Redway, where we employ about 40 people, a huge number in this area). The problem that needed to be solved was distance from a major hub, like Sacramento, where two interstates cross, and which is also near major airports. No matter how much money is thrown at Highway 101, whether bypassing Willits, widening more two-lane stretches to four lanes, or straightening Richardson Grove, Humboldt County will NEVER become a transportation center.

Finally, during severe economic recession, when the most value needs to be squeezed from every dollar of public funds, it just doesn't make economic sense to spend so much money on a project that will, it is estimated, only reduce travel time on this route to a minute or two. This is especially true when the more important bottlenecks on Highway 101 between the Bay Area and Oregon are the miles of 101 through Willits (where a bypass has planned for years, but has yet to see daylight) and Eureka (where a bypass is considered impossible). Surely CalTrans is on a tight budget and could do more with the funds currently earmarked for this project. 8 9

The solution to allowing STAA trucks to travel safely through the Grove is elementary: SLOW DOWN. A well-enforced speed limit of 25-30 miles per hour will provide all the safety needed. The portion of the road with dangerous curves is only a few miles, and unlike the miles these trucks must travel through Willits and Eureka, it lacks those time-consuming stop lights and pesky pedestrian crossings. As for the angle of the curves, it has been observed that any truck that can safely negotiate the nearly 90-degree turn where 101 changes from Broadway to Fifth Street in downtown Eureka, amid heavy traffic, can certainly make any turn in Richardson Grove at an appropriate speed. 10

Please either abandon this project as the bad, wasteful and destructive, idea that it truly is, or at least do a full CEQA/NEPA review with public hearings in southern Humboldt as well as Eureka so that an honest and open appraisal of the impacts of the project can be brought to light.

Thank you for your consideration,

Virginia Graziani
PO Box 2213/249 Sunset Avenue
Redway, CA 95560

cc: Senator Pat Wiggins
Assemblymember Wes Chesbro
Supervisor Clif Clendenen

1. *See General Response #3.*
2. There should be minimal alteration of the drainage patterns. The project area is relatively flat and the 0.3 acre of increased pavement would not substantially alter the runoff amounts over the existing situation.
3. With the implementation of storm water best management practices and erosion control measures there should be little potential for silt and debris to enter the South Fork of the Eel River. The largest potential will be where the cut banks would be constructed. Water quality measures are identified in Section 2.2.1 in the document.
4. Local area business owners will be invited to a meeting prior to construction to discuss traffic management during construction and the communication plan that will be in place to inform the public of construction issues.
5. *See General Response #7.*
6. *See General Response #13.*
7. Access to all businesses and residences including Singing Trees will be maintained. The biggest temporary impacts to Singing Trees would be during the construction of the retaining wall. Delays due to the signal are estimated to be approximately five to ten minutes with a maximum delay of fifteen minutes. In addition to delays in accessing the facility when the signal is in operation, the employees and residents of the Singing Trees facility would be affected by noise during construction. It is estimated that there would be a minimum of night work construction for this project. Most construction activities in the vicinity of Singing Trees would not occur over long periods of time (typically a few days per activity) with the exception of building the retaining wall. The wall construction would involve drilling and not pile driving.
8. The intent of the project is not to reduce travel time but to remove the last remaining STAA restriction on Route 101 from the San Francisco area to Humboldt County.
9. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
10. *See General Response #8.*

Eric Gregory
<eg29@humboldt.edu>
01/27/2009 11:05 PM

To Deborah_Harmon@dot.ca.gov, Kim_Floyd@dot.ca.gov
cc
bcc
Subject Conform to the voices in opposition, leave Richardson Grove alone!

Salutations,

Thank you very much for your hard work in trying to keep the state's infrastructure in functional order. Not always an easy job. I do however, have to stridently and most fumorously disagree with DoT's plans for the Richardson Grove. For one, I do not believe that there has been established a need to bring this large diesel traffic into my area, Humboldt County. The only reason for it would be if there were already big box stores in this area and I assure you there is plenty of opposition to that here. 1

Another reason is that I hope to take my kids to these spots someday; I love that drive, the closeness of the trees, it almost makes you feel like the world is not totally screwed up. 2

I don't believe you have adequately addressed the negative impacts to endangered species due to habitat destruction. I don't believe you have even come close to justifying the loss of some of our last remaining old beings: the redwoods, many older than Jesus (he must be turning over in his grave right now...). 3

In short, I wish to notify you that I will join my voice and vote in opposition to the destruction of something I hold so dear by an organization that is supposed to be working for me for the future. I guarentee you I will not be the only one.

Eric Gregory
3020 LK Wood #C
Arcata, CA 95221
707-826-1525

1. *See General Response #1.*
2. *See General Response #2.*
3. *See General Response #16.*

cgribi@yahoo.com (Caleb Gribi)
01/28/2009 10:57 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. I am concerned about what this might do to our community as well as the ecological community of the area which is to be impacted. I do not believe there is enough information in this report to justify your proposed actions. Even though the number of trees to be cut is minimal, the damage to be done is major. The old growth redwoods are mighty and majestic trees that do not deserve to have thier roots cut so that we may allow for the passage of larger trucks. Things are just fine as they are now....please do not allow the road to be widened and our communities to be jeapordized. 1 2

Sincerely

Caleb Gribi

Sincerely,
Caleb Gribi
PO Box 15
Phillipsville, Ca 95559

1. *See General Response #3.*
2. *See General Response #13.*

ninacolor@humboldt1.com
01/29/2009 07:26 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove Trees

January 28, 2009

Comments on the DEIR
On Richardson Grove

The DEIR is insufficient in its mitigation measures for the proposed project.

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 1

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 2

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 3

Again I ask you to please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees and our heritage.

Thank you, Nina Groth Humboldt County Resident

1. *See General Response #8.*
2. *See General Response #15.*
3. *See General Response #16.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:51 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Public Trust and Forest Protection vs Human Convenience: CAL TRANS FOOLISHNESS in RICHARDSON GROVE

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:51 PM -----

Cathy Guillette
<cjs10@humboldt.edu>
03/11/2009 01:06 PM

To Kim_Floyd@dot.ca.gov, senator.wiggins@senate.ca.gov, assemblymember.chesbro@assembly.ca.gov
cc
Subject Public Trust and Forest Protection vs Human Convenience: CAL TRANS FOOLISHNESS in RICHARDSON GROVE

To whom it may concern:

This letter is to object to the proposed highway widening by CalTrans in Richardson Grove, Humboldt County, smack in the middle of the park system.

Considering that only 3% of the original old growth virgin forest of the Pacific Northwest remains standing today, it is clearly a priority to not disturb these remnant forest ecosystems in any way. 1

Perhaps a way to make the grove traffic safer (And create revenue from speedsters at the same time!) would be to install a camera/ticketing device as used in the Bay area and Europe, whereby those who exceed the speed limit get photographed and billed. In a wonderful world, part of the ticket money would go to the actual upkeep and preservation/expansion goals of the park system. 2

What is not appropriate in the State Park is to allow human convenience and hurry and greed to dictate yet another decimation of our depleted bio-heritage. This stretch of forest is also in the riparian zone, and cutting the big leaf maples to allow hot sun to radiate on the tarmac--even if you only gouge out the roots of the 1,000+ year old redwoods and leave them standing-- sounds like a stupid idea in these times of global warming trends. 3

So please, let's just use smaller trucks, go slower, or use an alternate route. Leave standing the old growth forest we have promised to protect and preserve.

Thanks, Cathryn Guillette

Richardson_Grove_slow_down_sign.pdf

1. Careful planning in consultation with a biologist and an arborist to minimize impacts to the redwood ecosystem has gone on for this project. Special measures have been incorporated into the specifications for construction to minimize impacts to the roots of redwoods. See Appendix B of the DEIR/EA for more information.
2. Regardless of the speed traveled, the current road geometrics result in STAA trucks off-tracking over the center line encroaching into the opposing lane. Thus, only realigning the existing curves or major widening would accommodate STAA trucks on the existing highway without off-tracking. The redwood trees abutting the roadway are currently being struck by vehicles causing damage to the trees.
3. Removing the two big leaf maples should not substantially open the canopy. There are numerous trees in the immediate surroundings that will remain. Refer to the simulations in Appendix K.

Kim Floyd/D01/Caltrans/CAGov
01/28/2009 03:19 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove comments

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/28/2009 03:19 PM -----

Amy Gustin
<amyacorneater @yahoo.com
>
01/28/2009 12:42 PM
Please respond to
amyacorneater@yahoo.com

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove comments

Hello, I don't like the realignment project. I don't want any trees cut. Tan oaks are critical for wildlife food. How can you say that cutting the roots of redwoods won't have a negative impact! A 17 foot high retaining wall will be incredibly ugly and dangerous. I am completely pissed off to think that vital programs are being cut from the budget, yet this unnecessary project is being rammed through. It is very suspicious. Don't do it! Amy Gustin
P.O. Box 2301
Redway, CA 95560

1
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3

1. *See General Response #3.*
2. Subsequent to the draft environmental document being circulated to the public, a design modification for the retaining wall was developed. The modification includes changing the location and type of wall, from the west side of the roadway to the east and from an above the road wall to a below the road wall. Since the wall is constructed below the road it would not be visible to motorists except for the barrier rail. This modified wall is shorter and would also decrease the number of trees to be removed from 30 to 5.
3. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.

thaggstrom@sbcglobal.net
(Tyler C. Haggstrom)
01/29/2009 10:02 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

We have enough roads, why kill these majestic living beings to put in another highway. Trains and cargo ships are a much more effective way of transporting goods and has less impact on our environment. Cutting down trees and planting new ones does not off set our carbon footprint, it creates a forest with a lack of biodiversity and an ecosystem that is more artificial than natural. I am a young Industrial Design student and strive for a "greener" tomorrow in everything I do from concept to creation. I love the outdoors and want my children to experience the shear untouched beauty of what our Earth is capable of creating. Sure transportation is important but when will it ever be enough?

Sincerely,
Tyler C. Haggstrom
8337 Bleriot Ave. Los Angeles, CA 90045

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3

1. *See General Response #2.*
2. The railroad and shipping are not currently available. Both would require major infrastructure improvements. Movement of goods into and out of Humboldt County is expected to be accomplished via trucks for the foreseeable future.
3. The planting palette of the revegetation plan has been carefully considered to fit in. In addition, removing invasive species in the project area should enhance the natural ecosystem.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:53 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Leave Richardson Grove alone

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:53 PM -----

<jslundstrom@sbcglobal.net>
03/11/2009 12:14 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Leave Richardson Grove alone

Kim Floyd,

Please, please allow Richardson Grove's highway to stay small and scenic just the way it is. Local people like it that way. Tourists like it that way. Of course, I'm old enough to know that the Richardson Grove area has changed over the last 50 years and I am sorry that it has, but widening the highway as planned by CalTrans would obliterate the whole place. A "Slow Down" sign would be completely sufficient to accomplish the same thing. And, besides, our local businesses don't need imported goods destined for big box stores, who then send their profits to some distant corporate office. This type of importing amounts to draining the local area of cash and character. If the highway is widened to accommodate the influx of generic products then I can foresee a very sad dilution of the unique scenic, beautiful, local character of our beloved North Coast communities.

Thank you.

Sara Hallin-Lundstrom

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1. *See General Response #2.*
2. *See General Response #13.*
3. *See General Response #8.*
4. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove

Ann Hammond
<annfhammond@earthlink.net>

01/28/2009 08:49 AM

Please respond to
Ann Hammond
<annfhammond@earthlink.net>

To deborah_harmon@dot.ca.gov
cc
bcc
Subject comment Richardson Grove

Dear Ms. Harmon
as a resident of Southern Humboldt, I am appalled by the proposed construction/realignment of Highway 101 through Richardson Grove. 1
I believe that there is NO NEED whatsoever to adjust the road, simply lowering the speed limit, and possibly ENFORCING it would suffice, at a minimal cost.
Further, in what is clearly an era of diminishing oil reserves, building roads for bigger trucks is absurd. CalTrans should be at the forefront of moving 2
toward a more sustainable future, not cutting down redwoods to serve corporations. The most sustainable future for cargo in Humboldt County and beyond is in short range shipping, not in ramming bigger trucks, faster, 3
through one of the most unique ecosystems in the world.
Regards,
Ann Hammond
277 Sprowel Creek Rd
Garberville, CA 95542

1. *See General Response #8.*
2. *See General Response #11.*
3. Short sea shipping is not currently available. Infrastructure improvements would be necessary for short sea shipping in Humboldt County. While it may be an option in the future, it will not be practical for all shipping needs such as time sensitive goods or animals.

"J. Hannum"
<jhannum@wildblue.net>
01/29/2009 09:51 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Comment on DEIR on Richardson Grove

Comments on the DEIR

On Richardson Grove

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened 2

species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl.

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

1. *See General Response #15.*
2. *See General Response #16.*
3. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:47 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: richardsons grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:47 PM -----

Farley Harding
<farley@flowerfriends.org>
03/11/2009 06:19 PM

To Kim_Floyd@dot.ca.gov
cc
Subject richardsons grove

I dont have time left to mail my comments, I will email.I oppose the widening on the grounds that it is costly and unnecessary for our community.I believe it will take away from the beauty of this special area in many ways.We dont need more growth.We are fine as we are.Bigger is rarely better in my view. 1
If you need to contact me my number is 707.923.1167 I am at PO box 2452 redway 95560. 2

thankyou, Farley

1. *See General Response #11.*
2. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:33 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove (UNCLASSIFIED)

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:33 AM -----

"Harms, Blaire M MAJ MIL USA USARPAC" <blaire.harms@us.army.mil>
03/12/2009 04:07 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Dear Ms. Floyd

I find it hard to believe (and incredibly short sighted) to consider destroying one of the most beautiful stretches of highway in the United States. I sincerely hope that you reconsider - this is a small stretch of highway and the larger loss may speed up traffic during high density months (May-Aug) but I don't think that justifies losing such a wonderful area. 1

I grew up on Northern California and whenever the Army gives me time to come home I ALWAYS drive thru Richardson Grove. My now 14 year old son STILL talks about that drive and stopping to walk thru the red woods.

It is awe inspiring and the ambiance and mystery would be utterly destroyed with concrete barriers and wider roads. That is part of the majesty of the drive - take I-5 if you want a colorless, drab, concrete speedway north and south! Even people who don't have time to stop at the park can taste a piece of history and admire the absolute wonder associated with looking up and up and up at unimpeded red wood forests. 2

Please take the long view and be different from all the rest of the short sighted planners who don't take posterity into account.

VR
Blaire Harms

Blaire M. Harms
Major, US Army
Exercise Planner
US Army Pacific
Ft Shafter, HI 96868
Comm: 808-438-5808
DSN: 438-5808
Cell: 808-223-3868

"I am the living whispered warning in the Roman General's ear: 'Glory is fleeting.'"
The Cruise

1. The intent of the project is not to increase the speed of traffic through the park but rather to improve the roadway geometrics so that the STAA restriction can be lifted. The proposed project actually introduces curves into the alignment resulting in the curves being initiated earlier so that vehicles have begun going into the curves prior to reaching the trees causing the geometric deficiency. The posted speed limit will not be increased as a result of the proposed improvements.
2. No concrete barriers are proposed within the park. The only widening being proposed within the park is to add two foot shoulders in spot locations where there is no shoulder and there are no trees immediately abutting the roadway that would preclude adding shoulders.

December 24, 2008

Ms. Kim Floyd
Caltrans Project Manager
P. O. Box 3700
Eureka, CA 95502

Dear Ms. Floyd,

I am adamantly opposed to the trees along 101 in Richardson Grove being removed. One of the blessings of living in Humboldt County is the beauty we live amongst. To take these trees down to accommodate a few businesses is grossly unfair to those of us that treasure those trees. Every time I drive through Richardson Grove I appreciate that I have to slow down and take in the beauty of that area. Our world can't constantly tear nature apart just to make things temporarily more convenient. Please do not go forward with this plan. 1

Thank you for listening to one who is on the side of the preserving nature.

Kind Regards,

Dianne Harris

Dianne Harris
2910 Springer Drive
McKinleyville, CA 95519

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
01/20/2009 08:33 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove State Park Project

more comment
----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/20/2009 08:33 AM -----

Adele Hassis
<dellie@humboldt1.com>
01/19/2009 06:01 PM

To kim.floyd@dot.ca.gov, senator.wiggins@sen.ca.gov, assemblymember.berg@assembly.ca.gov
cc
Subject Richardson Grove State Park Project

Please ask Caltrans to minimize plans to alter Hwy 101 thru Richardson Grove State Park. We do not need larger and larger trucks, using more fuel and one driver taking the jobs of three people. 1

This is a protected zone. and we should be protecting these historical treasures for future generations. California cannot afford this project financially or environmentally. 2

There are viable alternatives. Lets use good judgment and use them.

Thank you for your consideration and help. We, the people need it.

Adele Hassis,

Eureka, CA

1. It has been estimated that utilizing STAA vehicles could reduce the number of trips which would help reduce fuel use. The STAA trucks are the industry standard and are the size of vehicle commonly in use throughout the nation. The non-STAA sized trucks are becoming increasingly harder to find as trucking companies replace their fleet with the STAA-sized vehicles. Thus, the non-STAA vehicles tend to be older vehicles as the newer vehicles are the industry standard- sized trucks. Smaller businesses which don't have their own fleet but rely on trucking companies for importing and exporting their products are finding it more difficult to reliably access these non-standard sized vehicles.

March 9, 04

Dear Kim

The most beautiful drive into our town can't be stream lined like so many freeways - 1

Please do what you can To Keep it the same - Simple and gentle - let Richardson Grove alone -

Thank you so much

Diana Hawes (WARNSICK)
PO 1246
Redway, Ca
95560

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/10/2009 10:02 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/10/2009 10:02 AM -----

"Kay" <dogstar@intergate.com>
03/09/2009 05:16 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

Please don't do this to such a beautiful site, nowhere in the world can you **slow down** and see nature as it used to be. Why do we need bigger trucks, from what I understand smaller trucks can get through safety. So is it all about profits for the big corporations? At What Cost To The Rest Of Us And Our Children? [1] [2]

A concerned citizen that passes through Richardson Grove on a regular basis.

Kay Heath

1. *See General Response #11.*
2. *See General Response #1.*

Edward Hensley
<cleanbathrooms 2@yahoo.co
m>

01/27/2009 10:01 AM

Please respond to
cleanbathrooms2@yahoo.com

To deborah_harmon@dot.ca.gov

cc

bcc

Subject Richardson's Grove

Deborah
I am a resident of So. Humboldt county and I want you to know that without a doubt, I oppose the proposed plan by Cal. trans to ruin the park and the entrance to our county. It is a very short distance through the park. Slow the traffic. Breathe, relax, it's OK. Lets keep diversity. There are plenty of places to go unobstructed at high rates of speed. Lets not make Richardson Grove one of them. 1 2
Sincerely
Ed Hensley

1. *See General Response #8.*
2. *See General Response #13.*

December 30, 2005

Caltrans Project Manager
Kim Floyd
PO Box 3700
Eureka, CA 95502

Mrs. Christine Henson
1408 Chester Ave
Arcata, CA 95521

Dear Mr. Floyd:

I have read the 2 part series in the newspaper over 3 times and I can't see there is a problem.

I have lived here since 1950 and have traveled down to the Bay area many times and as a family we have camped at the park many times.

Each time I am in awe at the sight of this strech of highway and often wondered why people can't take the time to drive slowly to enjoy these magnificent trees. - It would be such a shame to alter this short stretch

I believe that bringing the speed limit to 25 mph and somehow when 2 of the big trucks meet a sign saying yield to either south or north traffic? [1] [2]

Sincerely
Christine Henson

1. *See General Response #8.*
2. With little to no shoulder present on the roadway through the park and the highway design geometrics resulting in STAA vehicles off-tracking over the center line and encroaching into the opposing lane, just yielding won't solve the problem.

<tahoetipton13@yahoo.com>
01/30/2009 03:39 PM
Please respond to
tahoetipton13@yahoo.com

Calli Hesseltine

To deborah_harmon@dot.ca.gov

cc

bcc

Subject Richardson Grove

Dear Ms. Harmon,

I am ten years old and a student at Arcata Elementary School, and I would like Caltrans not to cut the roots of the gigantic redwoods. Why doesn't Caltrans just lower the speed limit to 25 miles per hour? Just a month ago my family and I went on a trip and we opened up the sky roof and looked out and everyone was pointing and "oohing" and "aahhing" at the big trees. Please choose "no-build". Thank you. 1 2

Calli

1. *See General Response #3.*
2. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 01:56 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Comments on DEIR for Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 01:56 PM -----

Diane Higgins
<4joy@suddenlink.net>
01/30/2009 01:50 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Comments on DEIR for Richardson Grove Project

Ms Harmon,

Attached to this message, you will find my comments on the Draft Environmental Impact Report/ Environmental Assessment and Programmatic Section 4 (f) Evaluation for the proposed Richardson Grove Operational Improvement Project.

Diane Higgins

RG_DEIR_comments_higgins.doc

Diane Higgins
4649 Aster Ave
McKinleyville, CA 95519

Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501
Via E-mail to *Kim_Floyd@dot.ca.gov*

January 30, 2009

Ms Harmon:

Regarding the Richardson Grove Operational Improvement Project Draft Environmental Impact Report/ Environmental Assessment and Programmatic Section 4 (f) Evaluation:

I am concerned that the Draft EIR for the proposed Richardson Grove Operational Improvement project is deficient in several respects.

The analysis of Project's potential to induce growth is inadequate and appears to be biased. The DEIR states that

> "Opening US Route101 in southern Humboldt County to STAA trucks could have a positive impact on the attractiveness of Humboldt County, and to a lesser extent, Del Norte County to potential investors."

However, there is no analysis of the type of growth that would ensue. Would the likely outcome of this investment be increased growth in Humboldt County? Would these investors build new shopping malls, new housing tacks, new industry? The DEIR fails to address this question. 1

The DEIR relies upon economic evaluations and predictions from an undefined sub-set of the business community

> "More specifically, representatives of the business community in Humboldt County have indicated that the lack of STAA truck access is a disadvantage to doing business."

"Representatives of the business community" is a vague entity. What percentage of Humboldt County businesses do these representative represent? Was this information gathered using statistically valid survey methods? What businesses, specifically, are disadvantaged by the lack of STAA trucks? What businesses will be harmed by the Project through increased traffic and alterations to the physical characteristics of Richardson Grove? 2

Diane Higgins 1/30/09

The DEIR bases its assumptions about economic impacts and growth on the Gallo, 2008 report: *Realigning Highway 101 at Richardson Grove: The Economic Impact on Humboldt and Del Norte Counties*. The report is not included in the DEIR appendices, nor does the DEIR state where to access this report. It does not appear to be available on the Internet. The public should be able to readily access and review this study, and to see comments by peer reviewers. Was the study peer reviewed? 3

The Project would open the Highway 101 corridor to increased traffic, not only to Humboldt County, but to Del Norte County and points north. However, the DEIR considers only the potential for increased truck traffic to Humboldt County, and does not consider increased truck traffic through the county. It is very likely that the number of trucks driving through Humboldt County would increase once the "bottleneck" at Richardson Grove is eliminated. This would bring increased air pollution, noise and congestion to the portions of Hwy 101 in Humboldt County, including the City of Eureka, where the highway is the main north-south thoroughfare. By ignoring the potential impacts of increased through-traffic, the DEIR analysis has taken a piecemeal approach. The cumulative increase in traffic, noise and pollution brought by all the new traffic should have been evaluated. The DEIR is deficient in this regard. 4

State Highway Code 887.8(b) states that:

> "Where the traffic safety or capacity of the highway would be increased, the department shall pay for the construction and maintenance of non-motorized transportation facilities approximately paralleling the highway."

The proposed project does not include provisions for bicycle or pedestrian facilities. The DEIR does not address this issue. 5

The DEIR does not consider the viable alternative of transporting goods by short sea shipping. This alternative would eliminate the need for the Project and save the public money, while reducing fuel consumption, pollution, noise and congestion. Humboldt Bay is ready receive ships now. (See article in the Eureka Times Standard http://www.times-standard.com/localnews/ci_11078314). 6

The DEIR was informed by surveys (cited above) about potential impacts to the economy and growth. Did these surveys include questions about using short sea shipping? Lack of consideration of this alternative is a serious omission.

Diane Higgins
4649 Aster Avenue
McKinleyville, CA 95519

1. *See General Response #12.*
2. The businesses most affected from the lack of STAA vehicles appear to be small businesses that rely on trucking companies to transport their imported and exported products. It is not expected that the project would result in increased traffic. The physical alterations in the park should not result in long term harm to any businesses; however, traffic delays during construction may have some short term adverse effects to businesses in the proximity to the construction area.
3. The Gallo Report was peer reviewed and is available upon request.
4. *See General Response #14.*
5. *See General Response #5.*
6. Currently infrastructure improvements are necessary for short sea shipping in Humboldt County. While it may be an option in the future, it will not be practical for all shipping needs such as time sensitive goods or animals.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 03:15 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: trees not roads

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:14 PM -----

Colleen Hindson <colleen_hindson@yahoo.com>
03/11/2009 09:06 AM
Please respond to colleen_hindson@yahoo.com

To kim_floyd@dot.ca.gov
cc
Subject trees not roads

Please, please, please, don't let them destroy these ancient trees for the sake of some road we don't really need. Don't let that happen. Please. 1

Colleen Hindson

1. *See General Response #1.*

Tom Hinz
<tlhinz@gmail.com>
01/27/2009 08:14 PM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove Project

I am writing in regards to the proposed Richardson Grove project. This project should never have gotten this far. If there is such a great need to bring the large trucks up here then a bypass should be created. 1

I do not see a demonstrable need to bring the "super" trucks here. This is a sparsely populated county and we have done quite well so far without these trucks. 2

Humboldt County is a very special place and will only remain so if access is somewhat limited and if we don't put greed and grab over the preservation of this very special place. 3

I have lived in Humboldt County for over thirty years and have raised my three sons here. This place is special to me and my family. We don't want it to look and be like "anywhere USA". 4

I adamantly oppose this proposed project, it should be stopped right now.

Sincerely,
Tom Hinz
5928 Stover Road
Blue Lake, CA 95525

1. *See General Response #9.*
2. *See General Response #11.*
3. *See General Response #12.*
4. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:20 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:20 AM -----

Tom Hinz
<tlhinz@gmail.com>
02/21/2009 08:28 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Project

I am expressing my opinion that widening and straightening the road would do irreparable harm not only to the few trees which are slated to be cut down, but to larger, old-growth trees whose root-systems would be cut into. As far as safety is concerned to make this stretch of road safer: All that's needed is a reduction in speed-limit, to 30 or to 25 mph. 1 2

Best regards,

--
Tom Hinz
Office: 707-668-4083, Cell # 707-498-0134
We don't know what ingredient in a healthy diet is responsible for which condition. We do know that people who consume five servings or more of fruits and vegetables have less disease. Stay healthy the Juice Plus+ way! See my website www.tomhinz.com

1. *See General Response #13.*
2. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:32 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:32 AM -----

Tom Hinz
<tlhinz@gmail.com>
03/11/2009 08:22 AM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove Project

Hi Kim,

I am asking CalTrans for a balanced approach: put in the stop lights, slow the speed to 25 mph allow the big trucks to pass safely, save $6 million of taxpayer's money, and save these remarkable trees which do not belong to us but to the future generations. 1 2

--
Tom Hinz
Office: 707-668-4083, Cell # 707-498-0134
We don't know what ingredient in a healthy diet is responsible for which condition. We do know that people who consume five servings or more of fruits and vegetables have less disease. Stay healthy the Juice Plus+ way! See my website www.tomhinz.com

1. *See General Response #10.*
2. Without making the modifications to the alignment the issue of off-tracking of the STAA vehicles would not be solved. Having the traffic stop at a signal before proceeding, even at a reduced speed, would not resolve the issue of STAA vehicles off-tracking and encroaching into opposing lane of traffic when there are little to no shoulders to use.

Kim
Floyd/D01/Caltrans/CAGov
01/26/2009 01:06 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Caltrain Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/26/2009 01:06 PM -----

al hobo
<boardhobo@yahoo.com>
01/26/2009 12:08 PM
Please respond to
boardhobo@yahoo.com

To kim_floyd@dot.ca.gov
cc
Subject Caltrain Project

Hello kim floyd,

I saw a flyer that caltrain is planning on expanding transportation means through old growth redwoods. Building another train or highway further endangers animals and involves destroying ancient trees. There are only 3% of the original old growth, so why can't we give the cutting of healthy forest a rest? 1

Please do not build another train or highway. Those wonderful trees mean more than money.

thanks,
alex

1. Caltrans is proposing to realign curves and provide shoulders on an existing highway. The proposed project would not remove any old growth trees. The largest trees proposed to be removed are twenty four inches in diameter.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:34 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:35 AM -----

"Nicole Holland" <nicoleholland@suddenlink.net>
03/11/2009 05:32 AM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove

1
2
3

I want to see a balanced approach: put in the stop lights, slow the speed to 25 mph, allow the big trucks to pass safely, save $6 million of taxpayer's money, and save these remarkable trees which do not belong to us but to the future generations.
Thanks,
Nicole Holland
1260 Grant Ave
Arcata, CA 95521

1. *See General Response #10.*
2. *See General Response #8.*
3. Without making the modifications to the alignment the issue of off-tracking of the STAA vehicles would not be solved. Having the traffic stop at a signal before proceeding, even at a reduced speed, would not resolve the issue of STAA vehicles off-tracking and encroaching into opposing lane of traffic when there are little to no shoulders to use.

music@lutherie.net (Paul Hostetter)
01/27/2009 06:25 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove

Dear Ms. Harmon,

Please accept that this report is inadequate and insufficient. This construction project would cause harm to this atmosphere and to the health of this prized redwood grove. 1

Ancient trees are more important to the people of California than some cheesy commercial scheme. There is no public money any more, but if there was, this is no way to spend it. 2

Sincerely

[YOUR NAME HERE]

Sincerely,
Paul Hostetter
2550 Smith Grade
Bonny Doon, CA 95060

1. The proposed project is not expected to increase traffic so it shouldn't result in long term adverse effects to the atmosphere.
2. *See General Response #3.*

DEAR KIM FLOYD : PROJECT MANAGER

Mr. Roger Howard
P.O. Box 1906
Redway, CA 95560

CONCERNING THE RICHARDSON GROVE PLAN:

LOCAL AND THROUGH TRAFFIC ON 101 AT THE RICHARDSON GROVE IF THE PRESENT "OLD ROAD" IS LEFT INTACT AND WE CONSIDER A POSSIBLE 2 BRIDGE BYPASS, THE SAME ALMOST AS THE NEW CONFUSION HILL BYPASS, 1

THE MOST MINIMAL IMPACT ON THE GROVE AND CAMPGROUND WOULD BE A BRIDGE PAST TOM DIMMICKS RANCH AT MATT'S PLACE ACROSS THE RIVER TO THE EAST CAMPGROUND SITE WHICH ISN'T THAT VALUABLE ANYWAY.

THE HIGHWAY WOULD BE ACROSS THE RIVER FROM SINGING TREES WITH LITTLE IMPACT ON ANY REDWOODS IT COULD THEN CROSS THE EEL RIVER S. FORK AGAIN JUST BEYOND THE BIG SLIDE AREA JUST NORTH OF THE "LEGEND OF BIGFOOT.

IN THIS PLAN WE WOULD RETAIN THE ROAD NOW; BUMPY AND SLIDING AS IT IS, AND BE ABLE TO HAVE A SEPARATE 4 LANE HIGHWAY ON 2 BRIDGES IN THE NEAR FUTURE.

IS IT POSSIBLE THAT THERE MAY BE NEW FEDERAL FUNDING AVAILABLE UNDER PRES. OBAMA'S VISION ON INFRASTRUCTURAL DEVELOPMENT FOR THIS VITALLY IMPORTANT PROJECT WHICH WOULD HOPEFULLY IN THE SPIRIT OF COMPROMISE BE THE MOST EXPEDIENT AND LEAST DISTURBING PLAN 2

WE COULD AVOID YEARS OF CONSTRUCTION DELAYS AND ONE WAY CONTROLLED TRAFFIC WHICH WOULD BE A GREAT BLESSING FOR US LOCALS, TOURISTS AND TRUCKERS ALIKE

Roger Howard

1. *See General Response #9.*
2. The bypass alternative that was evaluated in the past had an estimated cost of $600 million. There has been no indication that this amount of funding would be available for this project under the American Recovery and Reinvestment Act.

Kim
Floyd/D01/Caltrans/CAGov
03/13/2009 10:24 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:24 AM -----

GregnTeri
<gregnteri@suddenlink.net>
03/12/2009 10:11 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson's Grove

Dear Kim Floyd,

I am writing in support of our Redwood Curtain and am grateful that there are still a few places as beautiful as Richardson's Grove left in Humboldt County. I believe that the cumulative effect of continued highway "improvement" is endangering our quality of life and the scenic beauty of our area. Richardson's Grove really does act as a "Welcome to Humboldt County" gateway, and seems more effective in promoting tourism than a 100-ft. neon billboard sign would be. I fear that this proposed project will negatively affect tourism, which makes up a significant part of our local economy, and feel that our tax dollars would be spent more wisely by simply "slowing down" and enjoying the view.

1

2

Teri Huber-Bundros

1. *See General Response #2.*
2. *See General Response #4.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:54 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:54 PM -----

Ann-Marie Huettner
<elduckadoo@yahoo.com>
03/11/2009 11:26 AM

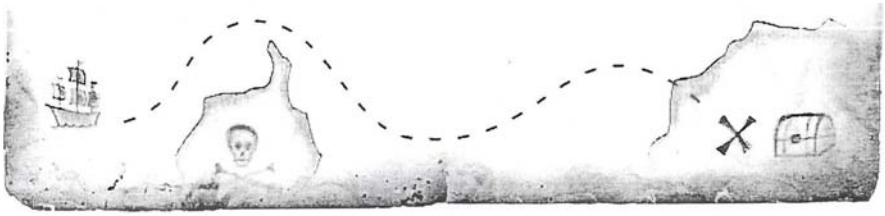
To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

1
2

I am in favor at this point and time for putting in stop lights and slow the speed to 25mph. I believe this option should at least be tried to see what the results of this attempt will show.

Sincerely,
Ann-Marie Huettner
Resides in Eureka, Ca.

email: elduckadoo@yahoo.com



1. *See General Response #10.*
2. *See General Response #8.*

Deborah Harmon
Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, Ca. 95501

January 22, 2009

Dear Ms. Harmon,

One of the main purposes stated for the proposed project at Richardson Grove, stated on page i of the Summary at the beginning of the DEIR is to "improve the safety" of Route 101. Again on page 1, Chapter 1, Proposed Project, there is reference to help vehicles "travel safely through Richardson Grove", and on page 8 it is stated again that "realignment improvements would also improve safety for other large vehicles".

To state a purpose, already popular with the public, such as safety, is a good idea, at least public-relations-wise, however to be inconsistent in the DEIR, about that same purpose, is not so good. I am referring to the disconcerting discrepancies on pages i, 1, and 8, that state that "improved safety" is promised as part of the purpose and design of the project.

Yet on page 9 of the same document, it is established by the DEIR itself that the two major causes of collision in the proposed project area are: (1) "fixed objects" (giant Redwood trees), and (2) "driver distraction" (people gawking at "fixed objects/trees"). The DEIR then goes on to report that these two major causes of collision, "fixed objects" and "driver distraction", the primary causes of collision, will *not* be addressed by this project. In other words, the project that promises improved safety will not be able to address the two top causes of collision, because giant trees will *not* be moved by the project, nor will the motorists be stopped from looking. Hence, collision rates, which are directly attributed to these two top causes, will not be affected by the project. The two top safety concerns will not be addressed. So, we are left with a project that promises, three times in the first few pages, to improve safety, and then turns right around in the next few pages and admits there is nothing that can be done by the project to address the two top safety issues.

1

Thus begins the confusion that only continues to deepen with further inspection of almost every category of the DEIR.

I am concerned with many of the weaknesses of this flawed document, which not only starts, but finishes with contradiction, discrepancy, and inconsistency. I am hoping that this is incidental and not deliberate. At very best, the DEIR is a shallow treatment of a very important area and does not even begin to give Richardson's Grove the respect it deserves.

I am deeply concerned by the lack of substantiation behind the conclusion (Sec.2.1.2 Growth) that the project is not growth inducing. Common sense tells us that removing the natural constraint at Richardson Grove will most definitely increase the volume of big trucks and encourage more development in the county at a pace not commensurate with county planning and infrastructure needs. We have seen it happen in many other counties, and the D.E.I.R. itself says the lifting of the restraints will boost the economy, but, of course, on the same page, in almost the same breath, it also claims no impact. How can one have growth and no-growth at the same time? Contradictory claims are made here in this section of the D.E.I.R. that can only be resolved with a closer look at Dr. Gallo's report, which is not included in the DEIR.

2

3

4

So, without being able to see the specific studies of the Gallo report, only the generalities and assumptions of Sec.2.1.2., and because of time constraints, I will restrict my specific comments to the Chapter that concerns me the most, Chapter 2 on Biological Concerns.

This section is loaded with conclusions that are unsubstantiated with any real science or serious recent on-site studies of species listed. It relies primarily on an incomplete biodiversity data base, and gives a shallow, precursory treatment, unworthy of the species that are state and federally listed in this area. To complete my dissatisfaction, the area of the DEIR intended to address Cumulative Impacts, (perhaps the most important section of all) on all of these species is strangely almost non-existent. I see no real analysis of the impacts from the entire identified assessment area, which is at least three counties wide, from Del Norte in the north to Mendocino in the south. In order to determine the true cumulative impact of construction on the listed species, all of the CalTrans road projects need to be looked at in that entire assessment

area, not only those that are current but also those that are planned for the reasonably foreseeable future. I do not find that serious treatment in this document. Confusion Hill is listed, but not in depth, and no mention is made of the many other projects on other roadways in the three counties, nor what the cumulative impacts of all this work is on the critical habit of listed species. 5

With its preference for the Negative Dec, CalTrans has been reluctant from the beginning to give a proper look at the possible effect its proposed project might have on these public lands, and it is evident that this unwillingness has continued through the entire preparation of this document. The initial attempt by CalTrans was to get by on a Negative Dec, and now it appears that just enough work was done to "get by" in this DEIR, but certainly not enough to give the serious thought to the consequences of disruption of the State Park. This document is insufficient, and a very disappointing performance on the part of CalTrans. 6

Please include this letter, and my detailed comments that follow, to the record of public response to the DEIR on Richardson Grove proposed project. As a concerned citizen, I request that you adopt the no-build option and lower the speed limit to 25 miles per hour to allow the trucks a safer passage through the Grove.

Sincerely,

Glenda Hesseltine
915 Madrone
Eureka, Ca. 95503
707 268-3936

Questions and Comments
On
The D.E.I.R for Richardson Grove

Chapter 2.3 Biological Environment

Sec. 2.3.1. NATURAL COMMUNITIES (pg. 79 DEIR)

Question: Is it a "natural community" when trucks, businessmen's profit margins, and stock-hauling have *more* power and right to be there, in this State Park, than the trees, plants, and animals that give us so much comfort, joy, inspiration, and peace in these troubled times? 7

Questions: By what criteria can CalTrans justify disturbance of a "natural community" in a Park that belongs to *all* the people of the entire State of California, simply on the request if an undefined portion of the northern California business community? Is this not a State Park, held for the public trust, not just the private interests of a few? 8

Questions: As such, is it to be carved up for "improved" transportation of goods for the personal benefit of a certain segment of the northern California business population? With gas and diesel prices accelerating, there will be big changes in the years to come in the way transportation of goods is handled. We may be destroying 1000 year old trees for trucks that won't even be around in ten or twenty years. **Do we risk a 1000 year old treasure for a soon-to-be-outdated trucking system? How do you justify this as good, solid, long term planning?** 9

Questions: How does disturbance of this public trust benefit Southern California residents, who have equal rights to the State Park? What justifies sacrificing the sanctity of a public trust land, intended to be held for posterity, and home of world-renowned and treasured redwoods, for higher profit margins of northern California businessmen? How do higher profit margins 10

for northern California businesses benefit Southern California residents and justify risking trees in a State Park?

<u>Question:</u> How is this then a "natural community" rather than an improved commerce lane? 11

<u>Questions:</u> What is top priority in protecting this "natural community"? Faster and bigger trucks? How does that priority, "business first", preserve the "natural community" listed in paragraph 2.3.1., page 79 of the D.E.I.R? Since when do private business interests dictate policy in a State Park? Please do answer how private business gets the privilege, regarding cutting trees, disturbing wildlife, moving earth, damaging root systems, and degrading streambed, simply to improve their own profit margins and economic well-being. This project is obviously flawed from the outset with an inappropriate attention to **wrong priorities for a <u>public</u> trust held land. Private interests** should **not prevail here, if this is indeed a "natural community".** 12

Since the CalTrans project is visiting some "adverse impacts" (pg.83 of the DEIR) on public-owned land, then what are the obvious advantages to the residents of the <u>whole</u> state, particularly those south of Humboldt County, that counterbalance the disruption of the "natural community" of the park. **When bigger trucks are top priority in changes being made, it must be assumed that something other than the natural community is more important.** 13

<u>Questions:</u> How can you justify that importance to *all* the people of the State of California? How do <u>all</u> Californians benefit from the disruption of their Park? There is insufficient justification for risking the redwoods in this way for a vague promise that northern California business will thrive from more and bigger trucks coming through. Some **small businesses will not thrive, and no one in the rest of the state below Humboldt County will benefit at all** from this proposed disruption. 14

This DEIR is deficient in attending to the question of "private business vs. public trust" as registered in public comment at

both the September 2007 Benbow meeting, and at the December 15, 2008 meeting at Riverlodge in Fortuna. These questions were posed informally, verbally, and in written form, formally, but still remain unaddressed and unanswered here.

Question: Why then is there no attention to this subject in this DEIR? If there is disturbance of a "natural community" as deeply as indicated in this document, for the benefit of a *portion* of the people, then there had better be a clear reason why the disturbance benefits *all* the people of the State. The DEIR is woefully inadequate in addressing this question of concern of appropriateness of the project designed for private gain via changes to a public trust land. 15

Question: Where is the discussion in the DEIR of how to have a "natural community" stay natural when the top priority is commerce? This "business enhancement" priority of the CalTrans project is in direct violation of the actual purpose of the Park, which is to preserve "natural community" at Richardson Grove. No personal business interest should be able to move that resolve. 16

Sec.2.3.1. Affected Environment (pg. 79 DEIR)

There are obvious discrepancies in this section in comparison to other sections of the DEIR, as follows:

On page ii of the Summary at the front of the DEIR, it is said that "**several** Douglas fir trees" are proposed to be removed.

On page 80 it says the "**30% of the trees** to be removed consist of Douglas fir".

On page 81 the quantity is actually shown to be 27 Douglas fir.

On page 19 of Chapter 4 Project Impacts, it says an "**abundance** of Douglas fir" will be removed.

Questions: Which is it? Several? Twenty-seven? Or an **abundance** of Douglas fir? 17

This is very sloppy work, leading to a doubt in the reader's mind as to the accuracy and care in the count of *all* the trees to be removed, in general, and including the treasured redwoods. If there is uncertainly regarding the Douglas Firs, perhaps there is uncertainly regarding the redwoods also.

Question: Will this sloppiness in description of the firs extend to the treatment of the redwoods? If we don't know for sure if there will be "**several**", "**27**", or "an **abundance**" of firs cut, how do we know that there will be only 2 smaller redwoods cut? Apparently there is confusion by staff on how much will actually be cut in the project, or else the **DEIR is in conflict with itself** on this topic. 18

Questions: Why are there discrepancies of this nature in the DEIR? Will they be corrected? 19

These types of discrepancies, though small, point to something much bigger. They indicate **careless work** and, indeed, undermine confidence in the document and, ultimately, in the ill-conceived project.

Question: If the DEIR is this careless, will the proposed project also be this careless? If there is not correct attention in the DEIR, in the planning stages and assessments, how will there be correct attention on site, during construction? 20

Sec. 2.3.1. Environmental Consequences (pg. 80 DEIR)
Table 8 Trees That Might Be Removed Within the Project Area

1. "as construction of the retaining wall occurs, it may be possible to "**preserve** additional trees." (Pg. 81 DEIR)

Question: How many trees will be preserved if no wall is built? 21
This statement in the DEIR misleads reader to think CalTrans project is interested in preserving trees, when actually best preservation is no-build. Cutting the retaining wall is *not* the best

preservation of trees even if some are "saved" above the wall. This is misleading language.

<u>Question:</u> How do you plan to describe the proposed project without misleading the public to think you are "preserving" trees? 22

2. "In addition to the tree removal itself, construction activities could result in other impacts to trees, both long term and short….including placement of impervious material, placement of fill over the roots, changing drainage patterns, and compaction. Short term impacts from construction can affect tree roots from such activities ***as soil disturbance, excavation, compaction, cutting roots; and exposure to fuel and oils from leaking equipment." (pg. 83, DEIR).***

<u>Question:</u> Who, and how many, will monitor all these impacts and proposed mitigations? There will need to be more than one person for the size and scope of the project, with activities spread over more than one mile. A **<u>team of qualified experts</u>** will have to be on site at all times to monitor this many potential adverse affects and make sure all promised mitigations will be done in this highly sensitive area on this very controversial project. These are serious impacts, the mitigation of which is doubtful in the mind of many of the citizens. 23

<u>Questions:</u> Who will guarantee that there will be careful monitoring? What biological experts do the monitors report into and what is the system designed and set in place for that procedure? Contractors cannot serve as their own monitors. 24

<u>Questions:</u> What are the consequences and what is the procedure for failure to monitor closely? The DEIR itself is shallow, and carelessly done with many discrepancies. **Who will insure that the monitoring will not also be shallow and careless? Who will insure that the monitoring of these potential adverse impacts will be constant and impeccable? How many are currently planned to be on this team. Who are they? What are their qualifications? How many hours will they be on site? Do the monitoring hours correspond with the** 25

construction activity schedule? Will this monitoring be given the same careless treatment that sections of the DEIR are given? We cannot afford mistakes in trees that will not grow back to this size for another 1000 years.

Questions: What is the plan of action if the monitor finds a violation? Will there be fines? Action? More mitigation of the violation? Simply installing a monitor, even a good one, or even a team of monitors, is not, in itself, a *mitigation*. In order to constitute a true mitigation measure, there must be further provisions and plans for actual action and consequences, and instructions for what the monitor is required to *do*, if the monitor does indeed witnesses violation. 26

Questions: What will be the enforcement by the monitor should there be violations?
Will the monitor simply write up a report of a violation, or will he intervene? What will be the consequence to the violation? Restoration? In-kind mitigation? How do you put severed roots back? (This is assuming that you have a large enough monitor task force to be everywhere during construction.) 27

3. Root Disturbance. (Pg. 83, DEIR)

"Of most concern is construction activity that occurs within the structural root zone of the trees for both long term and short term impacts.....There would be construction activities that occur within the structural root zone of approximately 30 redwood trees ranging in diameter from 18 inches to 15 feet. This zone is where most of the nutrient and water absorption occurs. The ***possibility of injury to a tree resulting from construction activities generally increases as the distance to the trunk decreases. In addition, construction activities occurring from the surface to three feet below ground level have the most potential to result in impacts to trees*** (Department of Parks and Recreation, 2005). Table 9 and Appendix L includes plans showing where construction occurs within the structural root zone of the trees."

<u>Question:</u> What will Caltrans do to guarantee the life and health of the tree will not be ultimately compromised by cutting, even carefully, into the root system of one of these national treasures? As a shallow rooted tree, with no taproot, the redwood depends on a shallow, far-reaching network, extending out sometimes as much as 250 feet in circumference and interlocking with the root systems of neighboring trees, to insure stability against the forces of nature such as wind and storms. Cutting into these systems may result, over time, in the weakening of the tree and ultimately, the loss of the tree. These trees are irreplaceable. If one goes down, you don't replace it within the year. 28

<u>Question</u>: How do you plan to avoid weakening this important root system? The roots must not be cut. What alternative can you offer? 29

<u>Questions:</u> What <u>field studies</u> have you conducted to determine the effect of cutting into the shallow-rooted system of trees as heavy and large as redwoods? How much disturbance before the tree goes into shock, or is weakened enough to topple? What statistical evidence justifies that cutting will not be risking the tree? 30

<u>Questions:</u> With a root system radius ranging from 125 to 250 feet, does CalTrans respect the possible maximum 250 root radius of each redwood tree in the project? Or are they considering the minimum quote of 125? 31

4. Impervious materials over roots. (Pg. 83, DEIR.)

"an additional 0.14 acres of roadbed material would be placed within the structural root zone area of trees within the project limits. This represents a nearly five percent increase in the total amount of hardened surface (roadbed) within the structural root zone area of trees within the project limits."

Question: Where are the *true* mitigation measures for this impact?

32

There is no mention of mitigation of this aspect in Chapter 5 Mitigation and Minimization Measures. There is only a small reference on pg. 86 that describes a substance known as CTPB to be used as pavement rather than Hot Mix Asphalt paving. Hot or cold paving over the roots is not a good idea for the long term benefit of these trees. Once it hardens, it still is paving, which changes the run-off, the absorption, etc. It is not in the best interests of the Grove to add even an inch more paving to the root systems there. This cannot be considered good stewardship of these trees.

Question: How come the DEIR admits (pg. 83) that "of most concern" is the impact to the root systems by construction activity, then describes an extra 5% increase of roadbed material or .14 of an acre, within a one mile stretch, and yet no mention of mitigation for this direct impact of extra acreage?

33

This is an inadequate treatment of the possible impacts to the root systems. It needs to be looked at as an impact, even if it is only .14 of an acre to see if it will jeopardize even one of the giants. It cannot be left to chance in a grove of 1000 year old, 15 foot in diameter, world-renown treasures. These treasures are in our safe-keeping for generations to come, and cannot be treated casually or with neglect. To fail to adequately discuss true mitigation for the extra impervious materials or the disturbance within the structural root zone, is to possibly risk the trees.

Question: What is the cumulative effect of gradually adding more and more roadbed material over the roots, over the years? How much tampering and damage can a redwood sustain before it succumbs? What is that point that is "too much"??? Where is this cumulative effect addressed in the DEIR?

34

Once again, the document shows insufficient justification for the disturbance and insufficient measures to offset any possible disturbance.

5. Fill over root flare of stem. (Pg. 83, DEIR.)

"some trees would be located within a fill slope and have fill placed over the roots. The biggest concern is the **fill on the flare of the stem**".

35

Questions: **How is this "biggest concern" addressed in the Mitigations and Minimizations section of the DEIR?** I do not see any mention of what will be done to address this "biggest concern". With fill depths ranging to nearly four feet, and averaging one to two feet, I am concerned about the "fill over the root flare of the stem". **What does this actually mean, "root flare of the stem"? Where does the DEIR address this concern specifically in terms of adequate mitigation?** Is the "brow log" considered the mitigation for the "biggest concern" of "fill on the flare of the stem"? It is unclear from the present language in the DEIR as to what the *actual* mitigation for this "biggest concern" about "fill over the flare of the root stem" is. **If the brow log is the "protection" for the trunk, then what is the protection for the "flare of the root stem"? Are they two different things, or one in the same?** There needs to be more detail and description here as to the nature and treatment of the "flare of the root stem". If the public is to read this document and determine adequacy, then this document needs to be more considerate and "public reader friendly" by defining obscure or vague terms.

Sec.2.3.1. Avoidance, Minimization, and/or Mitigation Measures (pg 85, DEIR)

1. M-2: "To offset the impacts to trees where construction occurs within the structural root zone, mitigation will be provided to increase the amount of invasive plant removal. A contract with the California Conservation Corps will be established to provide 300 hours a year for four years (three days each year for four years.)"

Question: How does slightly increasing the removal of "invasive plant material (3 days once a year for 4 years is not much), **in other words some minor "weeding", help mitigate/minimize the impact of soil compaction and cutting of**

roots, and other construction activity close to the roots of the redwoods? This out-kind mitigation is <u>not</u> an adequate measure to "offset the impact to the trees where construction occurs within the structural root zone".(pg. 85, DEIR) Removing invasive plant species, i.e., weeds, for 3 days a year for 4 years is hardly a credible plan for protection of the root systems during construction activities, particularly of the redwoods involved. 36

<u>Question:</u> **Please explain how this minor, "weeding", out-of-kind mitigation plan balances against the much more serious negative impact of root disturbance of the shallow-rooted redwood and the possible disease and death of the tree?** This is insufficient and inappropriate mitigation. 37

<u>Question:</u> **What is your *<u>real</u>* plan for protection of the root systems, (and in turn the entire tree) from impacts of invasive construction activity.....activity, in fact, in which some of the roots will be cut (pg. 86 DEIR), ostensibly jeopardizing the life of tree itself?** We cannot gamble with these trees and substitute the "removal of invasive plants" for the true protection of the root systems that is needed if the trees are to thrive for generations. 38

2. "Avoidance and minimization measures will be implemented for work in the park" (pg. 86, DEIR.)

First it is stated that "all excavation below finish grade within a setback equal to three times the diameter of any redwood trees shall be done by **hand**", giving, at first, the impression that great care will be taken.

A paragraph later it states that the work will be done "with **shovels, pick axes**, or other **non-mechanized methods**" indicating a little less care, in that **great damage can be done with a pick axe or a shovel** and a careless boot.

A third paragraph states that "the contractor will be required to use an **air spade** while excavating soil".

<u>Questions:</u> Is an "air spade" mechanical? If so, how will that be used and still abide by the proposed mitigation of "non-mechanical" and "excavation by hand"? Will the "excavation work done below the finish grade within a setback equal to 3 times the diameter of any redwood tree" <u>truly</u> be "done by hand", conjuring the picture of a worker on hands & knees carefully excavating around shallow roots, or is this just lip-service, and it will be boot and shovel, <u>not</u> so carefully applied, with potential for greater damage? 39

There seem to be discrepancies in this section as to whether it will be by hand spade, by shovel, or by air-spade. Best way to protect the roots is to leave them alone. Insufficient justification that you will be protecting the roots by "hand-work" compared to superior protection of a "No-build" option. Leaving the roots completely alone is the best and only true protection of this public trust forest.

<u>Question:</u> How many monitors will be assigned here? One monitor for the removal of 89 trees does not seem adequate. 40

<u>Question:</u> Will the trees be worked on one at a time so the monitor can be present and closely supervise the delicate work needed in the structural root zone? Will these trees be given the respect they deserve? Contractors are not usually arborists. 41

3. Brow logs to protect redwood trunks from fill. (Pg. 83, 87, DEIR)

"In locations where fill would be placed next to the trunk of a redwood tree greater than three feet in diameter, a brow log shall be used to keep the soil from the tree trunk and to increase air circulation.

<u>Questions</u>: What is to keep the brow log "in place" over the years? Weather, animals, people….all kinds of possibilities exist for the accidental or deliberate removal of this "protection" which has been artificially placed. Removal of the brow log, years later, when no monitoring exists, could result in damage, and maybe 42

even death, to the tree. **What guarantees permanency of a "brow log" for the next 1000 years of a redwoods life? Will we have monitors around forever? Do we risk our redwoods this way?**

Best protection of the tree is to **allow <u>no extra fill over the roots</u> or <u>near the trunk</u>** at all with a no-build option.

4. Additional minimization measures utilized throughout the project limits include: (pg. 87, DEIR)

"Equipment staging areas/storage areas will be on the paved roadway or on existing unvegetated gravel/paved pullouts so there will be no staging in sensitive natural communities." Pg. 87 DEIR

<u>Questions:</u> How many monitors will be assigned to watch the staging areas? How many employees will the contractor have moving how many different vehicles and pieces of machinery? Certainly one monitor cannot keep track of the many and various pulling in and out of multiple pieces of machinery in various locations. **What is the specific plan here?** The DEIR shows insufficient detail as to the handling of the staging areas. 43

5. "To avoid impacts to nesting migratory birds, vegetation removal will occur between September 30 and March 1."

<u>Question</u>: What about the Spotted Owl nesting period which is from Feb. 1st to July 21st. Vegetation removal between Sept 30 and March 1 would possibly adversely affect the nesting pattern of the Spotted Owl by overlapping his period which extends from Feb through March, the time of vegetation removal. 44
<u>Question:</u> Is this an authentic oversight on part of the DEIR preparation or simply another example of more carelessness?

This reader's summary of this section 2.3.1. <u>Avoidance, Minimization, and/or Mitigation Measures</u>: None of the proposed implementations will be effective without a detailed monitoring plan describing numbers of monitors, hours of supervision, actions

the monitors are expected and required to take upon discovery of violation, consequences upon the contractor and employees if found in violation, and restoration practices of areas found in violation. Much more work is needed for a credible monitoring plan.

Question: What is CalTrans intention and time table for designing the proper monitoring plan to oversee all Avoidance, Minimization, and/or Mitigation Measures in this section of the DEIR? There is insufficient information in this portion of the DEIR. 45

Sec. 2.3.2. WETLANDS AND OTHER WATERS
Environmental Consequences

"sediment discharge due to culvert improvements are unavoidable" (pg. 90 DEIR).

Culvert "improvements" as listed by CalTrans, i.e. installation of a liner and lengthening of culvert **do not** constitute "improvement" of water quality. At best, such action may prevent further degradation, but the quality of water would be much improved if the disturbance never happened in the first place. This is misleading as a mitigation attempt. There is no improvement here, only scant containment of their own unnecessary degrading of the water flow quality. This appears to be a deliberate attempt to camouflage construction disturbance of streams under the banner of "improvement" of water quality by simply putting in liners to handle the increased disturbance, and thereby gain public approval of the disturbance of the stream.

Question: How can Caltrans be more responsible in choosing language in this section of the DEIR to avoid the false impression that water quality will be "improved" with liners and extensions? It is obvious that if it were not for the construction, there would be no degradation in the first place…no need for liners and extensions…..this is not "improving" the waters of the US. Rather, it is a misleading and inadequate attempt to 46

conceal the disturbance created by the construction in the area. Best preservation of water quality in the area is not liners and extensions…it is to take the no-build option and leave the area undisturbed.

<u>Question:</u> Why is there no mention in the DEIR that the best way to "improve" water quality is to not mess it up in the first place? Why is there no mention that the "no-build" option is a superior choice for preserving water quality over a culvert liner or extension? That option needs to at least be acknowledged in this section of the DEIR as one of the viable choices for consideration. 47

<u>Question:</u> What are the specific details of the monitoring plan for the close scrutiny of all the Avoidance, Minimization, and/or Mitigation Measures of the DEIR regarding WETLANDS AND OTHER WATERS, <u>Environmental Consequences</u>? (pg. 89, DEIR) There is insufficient information in this portion of the DEIR. 48

"The contractor will be required to develop and implement a Water Pollution Control Plan or Stormwater Pollution Prevention Plan identifying site-specific best management practices and emergency spill controls" (pg 93, DEIR).

<u>Question:</u> What are some of the specifics of such a plan and who sets the standards, the contractor or the environmental experts? There is insufficient information in this portion of the DEIR and no guarantee what standards will be set and how they will be met. 49

Sec. 2.3.3. PLANT AND ANIMAL SPECIES

NOISE DISTURBANCE OF ANIMAL SPECIES:
The most glaring implausible and incongruous plan in this section is the unimpressive promise of "13 new garbage can lids" (pg.103) in exchange for the project's adverse impact of the critical habitat

of the federally and state listed endangered and threatened species, the Marbled Murrelet. This "garbage-can lid proposal" belongs in the garbage can. It is not a serious, nor adequate, proposal to mitigate possible adverse affects on this species in this proposed project. New garbage can lids cannot protect Murrelet eggs from predator ravens and crows, *if* eggs can't be laid in the first place due to increased construction noise and activity which possibly disrupts not only nest-building but egg-laying.

Question: What good will the new predator-proof garbage can lids do to reduce egg theft, if, due to construction disturbance, there are no nests being built and no eggs being laid? Danger to the species cannot be blamed on the raven taking the eggs, when it is the construction activity will first prevent the nests from being built or the eggs from being laid and hatched. 50

According to page four of the U.S. Fish and Wildlife Draft Guidance document pertaining to Estimation of the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets, tools, machines, and engines can have a cumulative effect when used **"in concert"** that places them in the Very High (91 to 100 dB) category.

Question: What actual studies have been done to accurately determine the "in concert" effect of the sound from more than one piece of machinery operating at one time? 51

Page 2 of the same document, the Draft Guidance, says that "essential behaviors, if disrupted, may also indicate harassment" and goes on to say on that same page that flush response and harassed behavior is most likely when **total sound is very high (i.e. exceeds 82-90 dB).**

Question: What studies have been done to determine the flush response of the Spotted Owl and the Murrelet from the total sound of more than one piece of equipment operating at one time, i.e. trucks backing up with warning bells, jackhammers, concrete saws. We need to know the possible cumulative effect of the total noise produced daily on the Murrelet and Spotted Owl. Their presence, until you do the study, must be presumed. 52

In the same document, US Fish & Wildlife Draft Guidance, pg. 2, it also states that "visual proximity of human activities" during noise disturbance is an added factor in harassment.

53

<u>Question:</u> Until you know for sure how many Spotted Owls and Murrelets are in the vicinity via an on-site study, how can you know what the effect of the visual proximity of the noise disturbance is?

On page 3 of the **US Fish & Wildlife Draft Guidance**, the category for High noise disturbance (81-90 dB) includes "medium and large-sized construction equipment" of the type to be used on the proposed project, and the category of Very High includes jackhammers, which are also to be used. Page 3 also states that the **"many tools and equipment demonstrate a range of sound production substantially wider than the categories provided here."**

54

<u>Question:</u> Since there is a distinct possibility that the equipment will exceed the categories, what provisions has CalTrans made for this possible variance beyond categorical averages, in estimating the noise disturbance potential?

On page 103 of the Environmental Concerns section, the DEIR finds that "due to the sensitivity of the species, it was determined that the project **MAY AFFECT AND IS LIKELY TO ADVERSELY AFFECT** the Marbled Murrelet."

Noise disturbance on wildlife is an inexact science at best, and takes specific site survey and careful study to determine the risk in each specific area. The noise and construction activities could interfere with nesting. It cannot be assumed that there will be no adverse impact from the jackhammers, concrete saws, night lighting, noise of trucks, back-up safety bells, etc. on the nesting habits of any of the species that might be in the habitat during construction time.

Thirteen new garbage can lids, to protect Murrelet eggs from predators such as ravens and crows will be useless if the Murrelets never get to build their nests and lay their eggs in the first place, due to surplus human activity in this critical habitat area.

Traffic slows considerable through this area at night, resulting in quieter levels, and to think that the noise level of night-time use of jackhammers, cement trucks, concrete saws, back-up bells, and other construction noises is comparable to the night time noise level of reduced traffic flow and reduce human activity in the campground is implausible..

Question: What statistics, from what study, at the site, back up this conclusion that noise and lights will not be a significant increase in disturbance by this proposed project in this particular sensitive area? 55

On page 6 of the Draft Guidance, it is stated "the analyst should bear in mind not only the spatial extent of the disturbance, but also the timing and duration of the disturbance"

Question: What studies and precautions has CalTrans taken in regards to the "spatial extent", "timing and duration of the disturbance"? 56

According to the Baseline Noise Level Study of Forest Management Activities on the Mt. Hood National Forest, terrain affects sound intensity.

Question: What studies has CalTrans done to determine terrain configuration effects on noise levels during construction? 57

According to page 2 of Basic Acoustics for Noise Prediction and Evaluation, prepared by Robin Leighty, US Army Corp of Engineers Wildlife Biologist, "noise which is relatively constant, such as vehicle traffic on a roadway, is best described as an average, whereas intermittent or periodic noises (construction equipment) are best characterized using a "peak" measure. It is the **impulse noises** which may have the **greatest potential for disturbance of wildlife.** It is also the type of noise to which they would **be less likely to become acclimated."**

Question: Has CalTrans studied the potential impact of "impulse noise" as described in the US Army Corp of Engineers document, Basic Acoustics for Noise Prediction and Evaluation? 58

Question: What types of measuring devices has CalTrans used at Richardson Grove to determine the traffic noise level? Was it Mobile or Stationary Measuring Techniques? 59
Question: Who is going to be monitoring the sound levels daily? How many monitors for noise disruption is CalTrans planning to employ?

To be working with heavy equipment at night, in addition to the already accumulated daytime noise from the traffic and campground use, is to further stress an already stressed species, such as the Murrelet, Spotted Owl, Pallid Bat, and Bald Eagle. Instead of the environment quieting down as is natural at night, with the proposed project, there will be construction activity and artificial night lighting, thereby furnishing the Murrelet (and others) with round-the-clock disruption and confusion. Thirteen raven-proof garbage can lids are no match for this impact.

Nesting trees, which are larger than the ones designated to actually be cut, may also be in jeopardy in the project, in that their roots may be compromised enough to eventually cause destruction of the important nesting trees. Once gone, it takes years to replace a mature tree.

Question: If roots are cut, how can the project guarantee that future nesting trees will not be removed? What will be the impact of the possible loss of nesting trees through root damage? 60

On page 103 the DEIR says "noise, lights, and activity disturbance generated by the construction on this project may disturb breeding and migration patterns in the project area".

Question: What can the project offer besides 13 garbage can lids to avoid this noise/light disruption of breeding and migration patterns? 61

Question: Will the night lighting affect the hunting of any possible Spotted Owls? Directing light down on the ground may 62

discourage movement of rodents and other prey that the owls are hunting and thereby discourage them from their natural habitat.

Question: What type of study was done at the site to determine that traffic and campground noise was comparable to jackhammers, cement saws, cement mixers, back-up bells, etc. How was it determined by the DEIR that the noise of all the various construction activities would be no louder than the traffic and campground? Who did the on site study and when? 63

Question: Are the opinions put forth in the DEIR resting on any actual recent study in the field, or are they all drawn from the CNDDB which is itself incomplete? A controversial project such as this, involving potential impact in an environmentally sensitive area on public trust lands belonging to the whole state, cannot expect to rest on an incomplete biodiversity data base when setting standards for mitigation. There must be fresh, pertinent, site appropriate study conducted in a timely fashion….in other words, live data from the area. 64

Question: Will a real study be done before construction starts? More data is needed in the case of each endangered or threatened species to determine the nature and degree of the impact of the project. 65

For the Bald Eagle, state listed as threatened, according to the DEIR, there is "suitable habitat present within the project limits" (pg. 101, DEIR) yet a statement that all of this loud construction and disruption of the proposed project "will not adversely affect Bald Eagles or their habitat."

Question: Where are the recent studies that back up the contention that jackhammer and cement mixers are no more noisy than average campground activity? 66

The public should not have to prove the obvious….that **jackhammer** and other construction noise and activity is **not good** for Pallid Bats, Bald Eagles, Murrelets, Spotted Owls, and other species breeding, nesting and hunting in the area. Rather, the project proponents should have to conclusively prove that it is harmless. Because noise disruption is an inexact science, we do

not have this proof of harmlessness without a field study. Project proponents must prove beyond a shadow of a doubt that the increased noise and activity will not adversely affect any of these state or federally listed species.

Western Pond Turtle will also most likely be disturbed, according to DEIR report on page 98.
"Female pond turtles could build nests in this area."
Questions: How was it determined that the impact to the turtle would be "minor and temporary" (pg.98)? Was there a study of this species and the possible effects of soil movement, truck activity, stream defilement on the nesting activities? Or was it just an opinion? Insufficient data presented in DEIR to back up this opinion. 67

Pacific Fisher, already a shy species, will be deterred by the increased lighting, noise and activity.
Questions: What study backs the assertion that "the proposed project will not adversely affect the Pacific Fisher" on page 102? Where is the data supporting that conclusion? 68

On page 103 of the DEIR it is stated that a "2 year study will be conducted in association with the State Parks to document presence of any Marbled Murrelet in the project area."

Question: Since the study has not been conducted yet, how can it be determined how many Murrelet are in the area, what the project impact is on the bird, and what mitigations are needed? 69

Questions: What is the timing of the start of project in comparison to the timing of this proposed study? If the proposed construction start date precedes the study date, how can you justify starting without the necessary study to determine presence and mitigation levels? 70

<u>Question:</u> Is CalTrans, or any of the contractors for Caltrans, currently, or planning in the near future, to apply for an incidental "take" permit? 71

<u>Question:</u> If Caltrans, or any of its contractors, is, indeed, applying for a take permit, how do you explain and justify your statements, repeatedly found in the DEIR, that there will be no significant adverse impacts to species? If that is true, then why is a "take" permit, (defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect") needed, if, indeed, as promised, there will be no adverse impacts? 72

In addition to the admission that the project "May Affect, and is likely to Adversely Affect" the Marbled Murrelet, the DEIR also states on page 104 that it "May Affect and is likely to Adversely Affect" the Northern Spotted Owl.

<u>Question:</u> With two admissions of likely adverse affect to threatened species (pg104 and pg 103 DEIR), and the application of a "take" permit in process, how can you justify the project as not harmful? 73

2.4 CUMULATIVE IMPACTS

Of the entire DEIR, this is the area of most concern, and yet Chapter 2, BIOLOGICAL CONCERNS, devotes a mere 2 and one-half pages, one which is simply a partial list of other CalTrans projects within a five mile radius.

The Cumulative Impacts assessment in this DEIR is woefully deficient.

<u>Questions:</u> Why is CalTrans ignoring the cumulative effect of all projects in its assessment area which spans 3 counties? 74

The fatal flaw of this document is what appears to be its **piece-mealing approach to the cumulative effects analysis.**

Confusion Hill is listed on the chart on page 108, but not the project on Hwy. 36.

If you are looking at more than just the STAA's project, which it appears you are, with the inclusion of Confusion Hill, then you must look at all the road projects within your assessment area for the cumulative effects on the critical habitat for the species such as the Murrelet and the Spotted Owl, and address those cumulative effects of all the projects CalTrans is currently engaged in, and also those in the reasonable foreseeable future. There is no such attention to cumulative effects in this DEIR, rendering it useless for determining proper mitigation for these (at this point unknown) effects.

Final Question: Where is the disclosure of all the CalTrans road projects in the entire 3 county assessment area, both now, currently in progress, and those planned for the foreseeable future? Omission of a proper analysis of the true Cumulative Effects is an inadequate treatment of the Cumulative Effects for the proposed project. 75

Final Comment: Just the presence of the many flaws, discrepancies, and insufficiencies in Chapter Two alone, make reliance on the findings of the DEIR difficult. If the DEIR is this sloppy, what will the project itself be in terms of care and quality? **Why is CalTrans unwilling to consider the public's request of Alternative 3, which is simply to reduce the speed limit through the Grove to 25 miles per hour?** Everyone, truckers, tourists, local residents, and native species would benefit from the lowered speed limit. It's economical, easy, practical, and least damaging to the environment and the quality of life for residents of Humboldt County. It is the best solution for protection of a State Park, national treasure, and world renowned redwoods. 76

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1. The primary purpose of the project is to provide STAA access. With the proposed roadway modifications it is expected that some safety benefits would also be achieved.
2. *See General Response #12* regarding growth inducing effects.
3. *See General Response #14* regarding impacts to truck volumes.
4. The benefits of STAA access are experienced by existing businesses and residents. In terms of attracting new development, other factors rather than STAA access are more influential in the decision to locate in Humboldt County.
5. Section 2.4 on cumulative impacts has been revised.
6. Caltrans has been working closely with State Parks throughout the project development process in order to minimize the impacts of the project to both the resources and the operations of the park.
7. Despite the presence of the highway and the developed portions of the park including residences, parking lots, roads, and campgrounds there is a natural community that coexists alongside these uses.
8. The primary disturbance to the natural community as a result of this project is during construction which would be temporary. US Route 101 provides the north-south access to Humboldt County and predates the establishment of the park and, in fact, provides the only access to the park. Park uses were developed around the existence of the highway.
9. Other modes of goods movement such as railroad and shipping are not currently available in Humboldt County. Humboldt County is not self sustaining and requires imports and exports t maintain the current quality of life. Trucks will be used for goods movement for the foreseeable future. Both the Caltrans certified arborist and Dennis Yniguez, an independent arborist contracted by Save the Redwoods League, have concluded that the project would not result in substantial effects to the trees including their root health with the protection measures in place.
10. The project would not substantially affect the operations or resources of the park.
11. See Response #7 above.
12. The mission statement for Caltrans is to improve mobility which includes goods movement. One of the values of Caltrans is stewardship of resources. With the protection measures in place during construction, the implementation of the mitigation measures as outlined in the FEIR/FONSI, impacts resulting from the project are minimized and the highway and the natural community will continue to coexist.
13. As the proposed project is to remove STAA restrictions on an existing highway, it stands to reason that the changes being proposed to the roadway accommodate trucks. That does not mean that the modifications proposed do not take adjacent resources into consideration when planning and designing for the project.
14. In making the roadway improvements at Richardson Grove, Caltrans is complying with federal regulations. Constructing the project would also fulfill one of the objectives identified in the County's Regional Transportation Plan to benefit goods movement. Benefits would be experienced by not only the residents and businesses of Humboldt County, but also by those who are currently forced to travel lengthy detours due to the STAA restrictions at Richardson Grove. The size restriction affects not only businesses. It has been reported that performing groups have been affected since the sets in their productions are transported in STAA vehicles. continued

14. Motorsport enthusiasts have reported that they utilize STAA vehicles to transport their racing cars. It has also been reported that since STAA access into Humboldt County is available from the north, the exemption for household goods moving vans through this area has been rescinded. With the STAA restriction in place, these motorists, among others, are forced to use a lengthy detour which at least doubles the mileage required to access Humboldt County.
15. The document does state why the project was proposed in Section 1 of the document.
16. The top priority at Caltrans is not commerce, however, removing the STAA restriction at Richardson Grove is the primary purpose of this proposed project. The park and highway coexist and share some common goals as Route 101 provides the only access t the park for both visitors and staff. Over the years, the park has developed in association with the highway's presence. Throughout the planning process for this project, Caltrans has partnered with State Parks in developing this project to ensure that State Park's concerns were taken into consideration.
17. All of these statements are correct; they are just different characterizations of the facts so the reader can better put the facts into context. (It should be noted that the last statement actually refers to Appendix I and the statement actually reads, "Over half of these *trees to be removed* are tan oaks, followed in abundance by Douglas firs…" Thus, in this statement, the word 'abundance' refers to the fact that the number of Douglas fir trees proposed to be removed is second only to the number of tan oaks proposed to be removed.) It should be noted that a design modification for the retaining wall was developed subsequent to the draft document being circulated. The modification included the wall type and location, modifying the wall to a below the road wall on the east from the original above the road wall on the west. This modification makes the wall less visible to motorists except for the barrier rail. See the simulations in Appendix K. The redesigned wall is 100 feet shorter and reduces the number of tree to be removed from approximately thirty to five.
18. As stated above, the statements are all factual and do not contradict themselves. In addition, the project plans provided in Appendix L of the FEIR graphically portray each of the trees proposed to be removed.
19. Attempting to provide the reader a context for the facts by characterizing the facts in different ways is perceived as being helpful not careless.
20. None of the planning or design efforts for this project have been careless. Careful consideration has been utilized in all aspects of the project.
21. The selected alternative contains the design modification for the retaining wall. The modified design requires five trees to be removed.
22. Information on the trees to be removed are shown in Table 8 and Appendix L.
23. As stated in the document, there will be monitors on site during construction to ensure protection measures are adhered to. There will be archaeological monitor, Native American monitor, and an arborist present to monitor ground disturbing activities within the park. In addition, there will also be a Caltrans environmental construction liaison to oversee construction activities as deemed appropriate. The Caltrans Resident Engineer would also be on site ensuring compliance with the plans and specifications.
24. The monitors will report to the Caltrans Resident Engineer who oversees the contractor and is ultimately responsible for ensuring that construction occurs according to the plans and specifications developed for the project.

25. It staff fail to comply with plans, specifications, permit conditions, or special provisions, Caltrans has the ability to replace personnel. If permit conditions are violated, regulatory agencies can demand a fine or stop the activity resulting in the violation. The monitors are not known at this time as the project has not yet been put out to bid. The monitors will be present any time ground disturbing work is occurring within the park.
26. The monitors will report to the Resident Engineer overseeing the contractor to have the work halted. Regulatory agencies can impose fines if permit conditions are violated, or they can just issue warnings of the violation. Caltrans can withhold payment to the contractor, replace staff, implement corrective actions, or direct the work of the contractor to ensure compliance with contract provisions.
27. The monitors will report to the Resident Engineer who has the final authority over all activities occurring during construction. It is likely that the monitors will be required to keep some sort of daily journal reporting on the day's activities. The special provisions outlining the duties for the monitors is currently under preparation. Since hand work is required in the structural root zone of old growth redwoods in the park, the potential for unintentional severing of roots is low. It is likely that pneumatic excavators will be used for excavating in these areas which uses compressed air so there is little damage to the roots.
28. *See General Response #3* regarding information on the minimization measures incorporated to protect the trees.
29. Wherever possible the roots will be incorporated into the structural section, not cut. In addition, the use of pneumatic excavators will be used which use compressed air to remove the soil from around the roots.
30. No field studies have been conducted. Both the Caltrans certified arborist and Dennis Yniguez, an independent consulting arborist contracted by Save the Redwoods League, have reviewed the project plans. Mr. Yniguez notes, "the existing root systems of old growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." He concludes, "My professional opinion is that the highway alterations, as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of old growth redwoods adjacent to the highway construction."
31. While the root system extends quite a distance from the tree trunk, the critical area of most concern is the structural root zone, which is defined as three times the diameter of the trunk. Work that would occur within the structural root zone of redwoods thirty inches in diameter or greater would be done by handwork except for the culvert improvement work.
32. Caltrans acknowledges that increasing the impervious surface is an adverse effect but it is not a significant adverse effect. It has been determined that the project would increase the impervious surface in the structural root zone of the trees by five percent.
33. The project does include mitigation for the increase in impervious surface. A restroom and foundation that is no longer in use in the park will be removed. This would remove approximately 900 square feet of impervious surface in the immediate area of the roadway improvements.

34. See Response #30 above.
35. The root flare is the increase taper of the trunk as it enters the ground. The brow log keeps the root flare above the ground which is a component for optimum health of the tree. 25 percent of the trees affected by fill would have depths of two inches or less. 54 percent of the trees affected by fill would have depths up to six inches. And nearly 75 percent of the trees affected by fill would have depths up to twelve inches.
36. The out of kind mitigation of removing invasive plants is an enhancement measure. Other minimization measures such as not using heavy equipment within the structural root zone, irrigating during construction, using brow logs, using a thinner structural section so excavation is minimized, and incorporating the roots into the structural section rather than cutting the roots are also measures incorporated into the project to minimize the impacts of construction on the trees.
37. It has been determined by certified arborists that the adverse effects to the trees from construction are not significant.
38. See Response #36 above for measures being incorporated into the plans to minimize impacts. It is not the intent that excavation would occur by digging with bare hands, but rather that excavation would not occur by the more normal method of using heavy equipment such as back hoes, excavators, and similar equipment.
39. The wording has been revised in the final to reflect that the pneumatic excavator is a piece of mechanical equipment. There will be some flexibility as to how the excavation would occur. What is restricted is using heavy equipment to excavate within the structural root zone of redwoods thirty inches or greater in the park. The roots of trees abutting the roadway will never be left "completely alone." Routine road maintenance of Route 101 would occur with or without implementation of this project.
40. See Response #23 above.
41. It is likely that more than one tree at a time would have work occurring around it. A certified arborist will be one of the monitors utilized for this project.
42. Vandalism cannot be prevented. However, it is not likely that many people would be traversing the area where the brow logs would be placed since there are no trails immediately adjacent to the highway and only minimal shoulders. The brow logs would be incorporated into the fill and would be difficult to move. The intent of the brow log is to decay over time.
43. See Response #23 above.
44. Yes the vegetation removal could occur during the early part of the nesting season of the Northern spotted owls. However, none of the trees to be removed are trees appropriate for nesting for the Northern spotted owl as determined by the US Fish and Wildlife Service. Therefore, the vegetation removal was determined not to be a substantial adverse effect to the owl. The US Fish and Wildlife Service determined that construction activities would not likely result in mortality of the Northern spotted owl, their young, or the eggs.
45. The archaeological monitor, Native American monitor, and arborist would be onsite when ground disturbing construction activities are occurring. The minimization measures would be incorporated into the contract plans and specifications.

46. The culverts are deteriorated. If left unimproved, they could rust through and water could undermine the culvert leading to the culvert failing and resulting in sediment entering the river and necessitating a road closure until the culvert is repaired. The improvements will ensure that culverts are functioning properly ensuring that erosion doesn't develop which could add sediment loads to the river. A design modification has been developed which eliminates the use of liners and replaces the culverts instead, except for the culvert at PM 1.18 which would just have an inlet improvement.
47. See Response #46 above.
48. Monitors will be onsite when ground disturbing activities are occurring.
49. The monitors will be ensuring proper compliance with the plans and specifications of the contract. The commitments contained in the environmental document and the permit conditions will be incorporated into the plans and specifications.
50. *See General Response #16*.
51. The operation of several pieces of equipment at one time is a common occurrence when constructing public work projects and was taken into account when US Fish and Wildlife Service issued their Biological Opinion.
52. See Response #51 above.
53. When consulting with the US Fish and Wildlife Service, (FWS) for this project, presence of Marbled murrelet and Northern spotted owl in the vicinity of the project area was assumed. The Biological Opinion issued by FWS took this factor of harassment into account.
54. The Biological Opinion issued by FWS took this into account.
55. The Biological Opinion issued by FWS took night work into account when they made their determination that construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled murrelet or Northern spotted owls in and near the project area.
56. One of the minimization measures is no construction activity at sunrise and sunset during the Marbled murrelet breeding season.
57. Modeling was used to estimate what the noise levels would be during construction. The modeling takes into account terrain.
58. For highway transportation projects with the Federal Highways Administration (FHWA) involvement, the Federal-Aid Highway Act of 1970 and the associated implementing regulations (23 CFR 772) govern the analysis of traffic noise impacts. This method evaluates all of the frequencies of a sound in accordance with a weighting that reflects the fact that human hearing is less sensitive at low frequencies and extreme high frequencies than in mid-range frequencies. It also averages the "pulses" with the continuous noise.
59. The existing noise environment were estimated through modeling utilizing FHWA TNA (version 2.5) as well as field noise measurement. The field measurement was obtained by using a sound meter set up within the campground at Madrone loop site #70. It is not anticipated that daily sound levels during construction will be measured. continued

59. If night work occurs during construction, it would be limited to a total of twenty days. The most likely elements of construction that might be done as night work in the park would include removing the existing open grade (cold planing), paving with the new open grade overlay, placing shoulder backing, applying dense grade AC for supervelevation and leveling, and replacing culverts. Because working at night is not as productive, and therefore is more expensive, it is anticipated that night work would only be considered if the contractor gets behind schedule. The maximum number of days of night work would include the following: five days for cold planing, two days for paving, two days for shoulder backing, seven days for superelevation corrections, and four days for culvert improvements.
60. As stated previously, certified arborists have determined that the project would not substantially affect the trees. It is not expected that any nest trees would be lost as a result of this project.
61. To minimize adverse impacts to migrating Marbled murrelet during the breeding season (between March 24 and September 15) there will be no construction activity in the morning for a three-hour period starting one hour before sunrise until two hours after sunrise, then in the evening no construction activity in the three-hour period starting two hours before sunset until one hour after sunset.
62. Night lighting could affect Northern spotted owls. Directing the lights downward is an attempt to limit the impacts of the lights.
63. The FEIR acknowledges that construction-related noise would temporarily impact noise levels in the vicinity of the construction activities.
64. The determinations in the environmental document did not just rely on the CNDDB. As stated previously, presence of listed birds in the project area was assumed.
65. No additional biological studies are anticipated, other than the Marbled murrelet survey. Section 7 consultation for the Federal Endangered Species Act concluded with the issuance of the Biological Opinion by the US Fish and Wildlife Service.
66. See Response #63 above.
67. The determination of the level of effect on the Western pond turtle was made by the project biologist.
68. As you stated, the Pacific fisher is a shy species. The human activity level of the highway, campground, and other park amenities would likely discourage the presence of the fisher.
69. The two year survey is a conservation measure identified in the Biological Opinion. This information will be used to assist in the recovery of the species. The information is not being used to assess level of impact to the species as a result of the project.
70. The survey would begin in 2011. Again, the results of the survey are not intended to determine level of impact to the species as a result of the project.
71. No. As there was no projected ‘take’ of a listed species, no incidental take permit is required.

72. See Response #71 above.
73. Caltrans has determined that no significant adverse effect would result from the project with the minimization measures in place.
74. The cumulative effects section has been revised.
75. See the revised cumulative effects section.
76. Reducing the speed limit will not correct the geometric deficiencies which result in off-tracking of STAA vehicles.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:27 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:28 AM -----

Linda Ivey
<lindativey@gmail.com>
03/10/2009 03:51 PM

To kim_floyd@dot.ca.gov, richardson@yournec.org
cc
Subject Richardson Grove

It is my family's hope that the Richardson Grove project does not go though. We have lived in the Garberville area all our lives and originally decided to stay here for the beauty of the area. I remember as a child, access to the park and buildings was directly off the road section that is slated for change. Removing this access was to the betterment of the traffic and did not negatively impact the trees. The plan in question now destroys many trees as well as their root systems and does not favorably impact our tourist industry here. Again we are AGAINST this plan. 1 2

Thank you for your time.

1. *See General Response #3.*
2. *See General Response #7.*

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:23 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:22 AM -----

"Bill Jackson" <bill@hypnosisplus.us>
02/21/2009 02:21 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject

To the attention of Kim Floyd:

My name is Bill Jackson. I am 70 years old this month.
I first migrated to Humboldt County in 1968. I owned, and now own, land in Northern Mendocino, and Humboldt County. I am a business owner in the town of Redway.
My demographic information will follow my message.

I am totally against cutting even a fern in Richardson Grove. The spectacular drive through there must not be changed. I am open to alternative ideas. Is there another route? 1

I invite your reply.

Sincerely, Bill Jackson, CHT.
216 McKenzie Drive
P.O. Box 2550
Redway, CA95560
e-mail = bill@hypnosisplus.us
phones: (707) 223-1730 -- cell
(707) 923-4225 -- home

1. *See General Response #9.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:20 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: richardson grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:20 AM -----

"Marcia Jensen" <barmarjen@humboldt1.com>
03/10/2009 09:17 AM

To <kim_floyd@dot.ca.gov>
cc
Subject richardson grove

Dear Ms. Floyd,

I am really disappointed about what is being planned for Richarson Grove. This is a state park, one of the most beautiful sights as you are driving Hwy 101 especially after being in truck and car choked bay area. Getting to the grove is like entering a cathedral. You could impose speed limits of 20 miles per hour through there. It isn't as if it is that far. The idea of Cal-trans cutting the trees and or the roots is deplorable. AND putting up a retaining wall, you've got to be kidding! 80 trees, you've got to be kidding! I for one would not be opposed at all going 20 miles an hour through the grove. The slower the better to view what a gorgeous place it is. You could even put stop lights, I'd gladly wait. Why spend all that money? If you are going to spend 6 million, why not spend millions more and bypass the area?

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Respectfully,
Marcia Jensen Eureka

1. *See General Response #8.*
2. *See General Response #3.*
3. The retaining wall was proposed in order to minimize impacts, including the number of trees to be removed. A design modification was developed subsequent to the circulation of the draft document. The modification changed the location and type of the wall from the west side of the highway to the east side and from an above the road wall to a below the road wall. Since the wall is constructed below the road, it is not visible to motorists except for the barrier rail. In addition, the modified design is shorter and reduces the tree removals from 30 to 5.
4. *See General Response #10.*
5. *See General Response #9.*

Kim Floyd/D01/Caltrans/CAGov
03/10/2009 08:58 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/10/2009 08:58 AM -----

Randy Jones <rjonestrucking@sbcglobal.net>
03/06/2009 12:42 PM
Please respond to rjonestrucking@sbcglobal.net

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

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I really think this project needs more thought. Any kind of activity that will disturbe the roots of the Old Growth Redwoods will adversly affect the life of the tree. It seems to me the the only people that will benefit will be Costco, Walgreens big box stores. Environmental Impact reports that have been done dont take into effect removal of trees, which will have to be done to widen the road.
I just don't see any big benefits for this area except for big stores which I could care less about.

Randy Jones

Randy Jones ☹
Randy Jones Trucking
Phone 707-840-9400
Fax 707-840-0940
Cell 707-834-0781
rjonestrucking@sbcglobal.net

1. *See General Response #3.*
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
3. *See General Response #2.*

"STEPHEN JONES"
<erstevie@msn.com>
01/29/2009 08:15 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove

1

Don't touch Richardson grove!!

Sincerely,

Stephen Jones

1. *See General Response #1.*

Jeanette Jungers
771 Azalea Lane,
Eureka, CA 95503
707-443-3420
12-15-08

Dear Caltrans planner,

I am writing this letter today to address two separate projects that are proposed for the Humboldt County area. One is the Richardson Grove re-alignment, and the other is the Route 101 Eureka – Arcata Corridor Improvement Project. Both of these projects need to be modified in order to protect our valuable environmental resources. I do not believe either of these projects need implementation. With California in serious debt why spend millions of dollars on projects that are unnecessary. 1

In the case of the Richardson Grove re-alignment, the reason stated is "to allow larger trucks access, and to allow traffic to move faster" In this economy we should be doing what we can to build our local economy, instead of trying to bring in more goods from out of the area. We should as a society put our emphasis on buying local. As far as the issue of speed goes, people should relax and enjoy the beautiful view. So be it if they take five minutes longer to reach their destination. The Avenue of the Giants is a special place and if the shoulder's is ground down to widen it by a few inches I believe that the Ancient Redwoods lining this avenue will over time suffer damage. The parks belong to the residents of the state and should have the highest level of environmental protection. 2 3 4

As for the 101 corridor there are a number of problems, while the eucalyptus trees lining the corridor are not native, they have been the entryway to Eureka for anyone coming from the north for the past 100 years, they act as a windbreak and with global warming we should be planting trees, not cutting them down. There are also a number of businesses that will be affected by this project and people will have to travel out of their way and then backtrack to get to the business in question. The safety corridor is working fine and I feel that my tax dollars can be better spent on other roadway projects in Humboldt County.

Yours Sincerely

Jeanette Jungers

1. *See General Response #13.*
2. STAA vehicles would be used to import products used by local businesses in producing their goods as well as importing goods ready for sale and exporting local products to external markets.
3. The proposed project is on Route 101 not Route 254, which is also known as the Avenue of the Giants.
4. *See General Response #3.*

redwoodmary@gmail.com
(Mary Rose Kaczorowski)
01/29/2009 12:22 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

RE: Draft EIR for the proposed Richardson Grove Operational Improvement Project.

I am extremely concerned that this EIR report is incomplete. Also Richardson Grove was put into the Public Trust almost a Century ago to PROTECT IT and not to BE changed or improved for trucks or people or commerce.

Caltrans proposes to adjust the roadway alignment of Route 101 through Richardson Grove State Park. This project will allow access by industry standard-sized trucks conforming to the Surface Transportation Assistance Act (STAA), which are currently prohibited north of Leggett.

The people of the State of California must be allowed to keep this Grove from further infringement and alteration under the public trust doctrine. The state must consider the potential adverse impacts of any proposed activity over which it has administrative authority.The public interest in environmental protection favors resolution of these issues before the damage occurs or before the case is rendered moot by destruction of the environmental values petitioner is seeking to protect. 1

The "Official Response" must provide non-conclusory responses based upon scientific data and historical and cultural data and the explanatory information must discloses the agency's mode of analysis.

I also question the necessity of the project, and I cannot find information that explains how this project allows the restrictions for the longer trucks to be lifted by Caltrans. 2

Highway 101 already provides motorists, bicyclists, and pedestrians with access to old growth redwood forest, and provides a gateway into the North Coast that defines the character of the region.

This construction project would cause harm to this NATIONAL TREASURE. 3

The atmosphere and the health of this prized redwood grove is at stake.

Cummulative impacts of products and contaminants from car driving and additional larger trucks will increase stormwater pollution and increase high concentrations of chemical dust such as oil,body underseal, lubricating oils; grease, copper from car brake linings;zinc from tires and other toxic by-products of vehicle transport driving. This project as well will contribute to the increasing of the impacts of the "Greenhouse Effect" and climate change by increasing truck traffic and allowing larger size trucks to pass through.Runoff from impervious surfaces and storm sewers is the most widespread source of pollution into the nation's waterways (USEPA 1995).While all pollutants can become toxic at high enough levels, a number of compounds can be toxic at relatively low levels.The US EPA has identified and designated these compounds as "priority pollutants." Some of these "priority 4 5

28 pollutants" include: (1) metals, such as cadmium, copper, chromium, lead, mercury, nickel, and zinc
that arise from industrial operations, mining, transportation, and agriculture use.While our understanding of the individual, cumulative, and synergistic effects of all contaminants on the coastal ecosystem are incomplete, pollution discharges may cause organisms to be more susceptible to disease or impair reproductive success (USEPA 2005). Although the effects
of NPS pollution are usually lower in severity than are those of point source pollution, they may be more widespread and damaging to fish and their habitats in the long term. NPS pollution may
affect sensitive life stages and processes, is often difficult to detect, and its impacts may go unnoticed for a long time. When population impacts are finally detected, they may not be tied to
any one event or source, and they may be difficult to correct, clean up, or mitigate.

Increasing human populations and transporatation trucking development within and near Richardson Grove will generally lead to an increase in impervious surfaces, including but not limited to roads, 6
and unpaved parking or paved parking areas.Runoff is generally difficult to control because of the intermittent nature of rainfall
and runoff, the large variety of pollutant source types, and the variable nature of source loadings(Safavi 1996).

Paved and dirt roads introduce an impervious or semipervious surface into the landscape, which intercepts rain and increases runoff,
carrying soil, sand, and other sediments (Ziegler et al. 2001) and oil-based materials more quicklyinto aquatic habitats. Roads constructed near streams, wetlands, and other sensitive areas may
cause sedimentation in these habitats and further diminish flood plain storage capacity.

Both sides of Richardson Grove Borders the River!

These contaminant effects are particularly pronounced in smaller water bodies adjacent to construction and to roadways. Stormwater runoff from roads can contain oil, grease, and other 7
hydrocarbons from asphalt, wearing of tires, deposition from automobile exhaust, and oiling of roadsides and unpaved roads with crankcase oil (USEPA 2005).

The cutting of the roots of 30 redwood trees, some of which are 15 feet in diameter,will have significant impact. The impacts cannot be adequately predicted or mitigated since permanent alterations allowing larger vehicles will certainly require more and more root cuttings over time and over the years. 8

There is no information in the document showing how cutting roots of the old trees would not adversely affect, or even kill, these ancient trees. These issues are not adequately addressed in the document. 9

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (14 CCR ßß 895.1, ß 15355). Under this definition, any individual project may have impacts which, when considered in isolation, are not significant, but when the various projects and "related past projects" are considered together, the total cumulative impact may well be significant and unintended consequences cannot be adequately 10
ascertained.

Any industrial development in this sensitive grove is cause for alarm. Noise,

air pollution, increase of traffic, increase of vehicle size and motor oil runoff, brakeshoe, soil compaction, and many other effects from large industrial construction equipment will disrupt the serene environment, drive away wildlife, and discourage the public's use of the state park. An entire year of this could cause extreme impacts on the local forest ecosystem, and deteriorate the quality of the environment. 11

It is my understanding that Caltrans has a policy that whenever a highway improvement project is planned, bicycle access is considered and prioritized. This stretch of Highway 101 provides inadequate access for bicyclists. The narrow shoulders already ensure conflicts between bikes and vehicles. The narrow shoulders provide no room for bicyclists to ride along side vehicles already. This proposed project does not seem to comply with Caltrans' own policy. 12

Few businesses will benefit from this publicly funded project while local businesses dependent on tourism may suffer. 13

Local businesses are directly impacted by this project and not adequately acknowledged in the document, they will suffer harm, especially during the construction phase and after due to the change of character of this resource due to increase in trucking. 14

In a time of economic crisis, I fear that these shops and services may not survive the impacts.

Sincerely
Mary Rose Kaczorowski
California Resident,
California Women's Agenda (CAWA) Environmental Task Force Co-Chair (CAWA is a state action alliance of over 600 organizations in California)

Sincerely,
Mary Rose Kaczorowski
PO Box 14146
Berkeley CA 94712

1. Caltrans has considered the potential adverse impacts of the proposed project. Measures to avoid and minimize impacts have been incorporated into the project; refer to Appendix D in the document.
2. *See General Response #1.*
3. *See General Response #2.*
4. STAA vehicles are not expected to appreciably increase storm water pollution over that of other trucks.
5. *See General Response #14.*
6. The project proposes improvements to an existing highway. Development within the State Park would be under the jurisdiction of the California Department of Parks and Recreation.
7. Caltrans concurs that storm water runoff from roads can contain contaminants.
8. Caltrans has worked with a certified arborist and biologist regarding the development of the project. The requirement for hand work in the park and the use of an pneumatic excavator such as an air spade is not expected to result in significant impacts to old growth redwood trees. The current concept plan for this segment of Route 101 is the highway facility remaining a two lane conventional highway. With the proposed project lifting the STAA restrictions, it is not anticipated that further alterations to the highway facility other than routine maintenance would be proposed. Typically, maintenance activities require minimal to no ground disturbance, thus additional root cutting is not projected for this segment of highway.
9. *See General Response #3.*
10. Refer to Section 2.4 of the DEIR/EA for a discussion of cumulative impacts.
11. *See General Response #4.*
12. *See General Response #5.*
13. *See General Response #6.*
14. *See General Response #7.*

March 8, 2009

Kim Floyd
Project Manager
P.O. Box 3700
Eureka CA 95502

RE: Richardson Grove Project

Please accept my comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project.

I do not believe the project is necessary - and I am extremely familiar with the State Route 101, having driven the road very regularly since 1985 - in good weather and bad.

1

Richardson grove must continue to be protected. I do not believe that interests of the 'few' should take precedence over protecting the ancient grove -- once it is destroyed, it cannot be restored.

a study was completed several months ago, which demonstrated that any savings to the public ~~in~~ with regard to products in stores, etc, would be either very minimal or not existent; several items were actually cheaper in Del Norte County than in the same 'mega store' in a larger city.

my concerns also surround

the safety of 'guests' visiting Richardson grove -- larger trucks going faster (which if you've had the displeasure of having a truck follow close behind you, pushing you to go faster, while you are following the posted speed limit), is not only scary but obviously unsafe.

and when there are large events, such as the Redwood Motorcycle Run, and Regatta on the River, taking place in the area, there is a greater likelihood of a truck vs. pedestrian/bicyclist accident.

I truly do not understand how the 'greed' of a few

(4)

longer should can take precedence over a State treasure and the safety of people enjoying that treasure. 4

Thank you for allowing me to submit comments regarding this issue.

Sincerely
Peggy Kaestle
150 Rossini Lane
Smith River CA 95567

P.S. In this time of severe budget deficits, how is it that we have money for such a project and expecting 'State Parks' to pay for pedestrian and bicycle 'routes' is ridiculous, (5) especially since 'State Parks' is typically underfunded. P. Kaestle

1. *See General Response #1.*
2. *See General Response #2.*
3. *See General Response #13.*
4. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. .
5. Shoulders are being widened to four feet outside the park to better accommodate bicyclists and pedestrians. Within the park, widening on existing roadway to create wider shoulders is not possible without removal of several old growth redwoods. The project proposes to add two foot shoulders within the park where no shoulders currently exist and where the trees do not preclude widening. Any separate bike or pedestrian path beyond the highway would need to be constructed on parkland; and therefore, would have to be done by or in association with State Parks since they are the agency owning the land.

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:18 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove and HWY 101-Public Comment

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:18 PM -----

kelly karaba
<kellykaraba@hotmail.com>
01/29/2009 09:32 PM

To <kim_floyd@dot.ca.gov>, <kak61@humbodlt.edu>
cc
Subject Richardson Grove and HWY 101-Public Comment

January 29, 2009

Dear Kim Floyd,

I am a resident of Humboldt County and am deeply concerned with the proposal to widen Hwy 101 through Richardson Grove State Park. As a State Park employee, I lived in the grove not 50 feet from Hwy 101. I know firsthand of the traffic that flows through and between these large trees. Every night I was hummed to sleep to the sound of large semi-trucks down shifting through the tight turns. These semis were just as large as any other I have seen on Interstate 5. Even though yellow signs, flashing lights, and the trunks of enormous redwood trees warned drivers to slow down, vehicles whirred through at an accelerated and dangerous pace. In my opinion, their speed through the Grove was still way too fast for safety, relying on the steering wheel alone and just barley swerving through.
I led the young people of our world through the Grove on Jr. Ranger programs, connecting them to the mysteries of nature and teaching them to be stewards of the land. The children loved to hear the soft squeaks of the bats that roosted in the dark hollow masses of the trees and would patiently wait for lulls in the Hwy traffic to hear them. I know the ecology of this ancient redwood grove. Redwoods, having shallow root systems collect surface water and intermingle their roots with surrounding trees for strength and balance. The trees in the Grove are over two thousand years old, being just saplings when Jesus Christ took his first steps. Most of the visitors to Richardson Grove did not plan on stopping there, rather, they saw the trees upon slowing down and decided it was a good place to rest from the Hwy. Most of these visitors had never seen anything like these trees and stood neck bent in awe. The Grove causes people to slow down, get out of their vehicles and look up, contemplating our place in the universe among these giants. They are a source of inspiration and bring people closer to health.
Humans are the only creatures that have the capacity to resonate with all other creatures and objects found in nature. We can speak with all that exists in the universe. We can give out energy and also receive energy in return. However, this ability is a two-edge sword. When people act out only on their own greed they emit an energy that serves to destroy the harmony within nature. The defiling of our earth is the result of an unrelenting hunger for convenience and the fulfillment of greed, initiated by the industrial revolution. This has led to lifestyles of mass consumption that seriously threaten the global environment.
The local economy of Humboldt County is strong, and has the potential to be even tighter and self-sustainable. It has its own source of meat, dairy, fruits, vegetables, and artisan goods. The opening of 101 threatens not only our local economy, but our serenity, allowing more people, more trash, and more development to slowly decompose all things that truly

matter in life. Roads, trucks, consumer goods and humans are temporary. The people have spoken, we must protect and respect redwood trees; a road and a fluctuating truck market have no authority to be anywhere near them. With less than 3% of Old-growth redwoods left, we must tip toe around them, respect them, and value them.

Your proposal indicates that no old-growth will be cut, but cutting other trees, disturbing the ground and laying more pavement damages their roots, leading to their demise. I am deeply concerned and appalled that you haven't done a full Environmental Impact Statement. Your proposal is a full impact and needs very thoughtful consideration and a wider range of alternatives. I would suggest that 101 leave the grove completely and re-route across the Eel river. Let the quiet return to this sacred shade. Let the children hear the bats and others to hear the symphony of trees that touch the heavens. A cheaper and safer solution is to lower the speed limit in the grove, and increase the emphasis on signage to slow the traffic way down. Your slogan says "Slow for the Cone Zone" while there needs to be a sign that says; "Slow Down for the Trees Please". 2 3 4

As for the business and corporations that think that they are the most important thing in this world, they can and should lobby to change the STAA standards from larger diesel trucks, to medium and fuel-efficient ones. This would save them more in the long run than any four–lane expressway could. We need to put our foot down somewhere and just say, "Sorry that is costing you money, but we can't get any closer to these trees, they mean more to us than money. We can't develop so close to them, you have to figure something else out, we're sorry we just can 't do that, they are too valuable". 5

I know that state standards for vehicle sizes have been set and that smaller trucks will begin to phase out. This is yet another way we are handicapping ourselves, by turning the useful into completely the useless. I know that the North Coast has always faced economic concerns and relied heavily on outside commerce. I know that safety is a main concern. I know that California is broke. I know that merchants have the money to pay for transportation but California doesn't. I know that if the merchants switched from diesel trucks to energy efficient vehicles that they would save thousands if not millions of dollars and also bring less carbon emissions to our already stressed plant and animal life.

The solution is simple, let the trees grow and invest in solutions to get drivers to SLOW..... DOWN..... or re-route the Hwy around the Grove and bring the traffic out of this sacred grove altogether. Bring back the peace, and serenity that Richardson Grove once had when it wasn't held to the fate of a temporary but booming human condition to develop, progress, and grow. Keep the curtain drawn on the North Coast, we have local grass fed cows, we have the agricultural land and resources to survive successfully on a local economy. Widening 101 will not solve any problems but it will open the gates, creating new problems, bringing more stuff, garbage, people and pollution to the last place on earth where the tallest trees on earth remind us to slow down and look up. Slow Down and Keep Humboldt Humble. 6

Sincerely,
Kelly Karaba

1. *See General Response #12.*
2. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.3.2 of the DEIR/EA.
3. *See General Response #9.*
4. *See General Response #8.*
5. *See General Response #1.*
6. *See General Response #13.*

Laura Katz
<laurakatz5@gmail.com>
01/28/2009 09:48 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Comments on the DEIR

Comments on the DEIR
On Richardson Grove

This is such a no brainer...save the budget by allocating just enough to put up the 25 MPH signs and install the garbage cans. [1]
We don't need to destabilize these magnificent trees that will run the risk of toppling during high winds after we cut their root systems, possibly killing people during the event. [2]

I drive this stretch of highway often and it is my favorite place to slow down, roll all my windows down regardless of the temperature, and breathe in the magnificent redwoods. My life can slow down for a few miles while I enjoy the treasure this area provides.

Perhaps the budget for this project will be lost...so what! We're in a financial crisis at the county, state and federal level. I'm sure there are a lot of more valuable projects within Humboldt County that these funds could be earmarked for, even if it means going back to square one to apply for the funds. We need to change our mind-set and prioritize where our spent dollars will bring the most value. This project is not one of them. [3]

Sincerely,

Laura Katz
Former Eureka resident

1. *See General Response #8.*
2. *See General Response #3.*
3. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:17 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:17 AM -----

vkelly1000@hughes.net
02/23/2009 08:29 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Kim,

I felt I had to write to plead for NO widening, straightening or re-building of the stretch of highway through Richardson Grove. Sometimes no progress is the way to go. Leave ancient nature alone. 1

Sincerely,
Virginia Kelly
20160 State Highway 36
Carlotta, CA 95528
707-777-3348

1. *See General Response #13.*

January 26, 2009

Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501

Re: Richardson Grove DEIR Comments

Ms. Harmon:

Attached are my comments on the Richardson Grove DEIR. I hope to see answers to the questions incorporated into the final EIR. Thank you.

Very truly yours,

Barbara Kennedy

Barbara Kennedy, 202 Lum Street, P.O. Box 29, Weott, CA 9557
707-946-2248

Chapter One

Section 1.1

Page One

In the first sentence, why is the word "improve" used; is not this word subjective and would not a more accurate and objective word be "change"? 1

In the first paragraph, last sentence is there not an error of fact since industry standard trucks are permitted by exemption, i.e. cattle haulers and moving trucks? 2

In the second paragraph, second sentence is there not an error of fact since the posted speed limit has been reduced to 35 mph? 3

In the second paragraph, last sentence is there not an error of fact as there is a 13 mile gap in the freeway (from Leggett to Piercy)? 4

In the third paragraph, sixth sentence, where is the objective support for the statement that "improvement in goods movement will help area businesses stay competitive in the marketplace"? 5

Page Two

In the first paragraph, how can the $5.65 million cost of the project be justified in light of the billions of dollar deficit facing the state? 6

Section 1.2

In the third paragraph, first sentence should it not be indicated that since Richardson Grove is a State Park, the roadway predates current design standards and was not created to be an access road for trucks? 7

In the fourth paragraph, first sentence, since STAA access is restricted throughout much of District 1 (by your own admission), what justifies changes to 101 through Richardson Grove? 8

Page Three

In the first paragraph, last sentence what is the vehicle speed for the "best-case scenario"? 9

In the last paragraph, specifically what local businesses have relocated or gone out of business solely due to transportation problems and what statistical support is there for the "10 to 15%" greater charge for goods due solely for transportation costs? 10

Page Eight

In the second paragraph, what is the actual amount of lost sales, how many businesses participated in the survey and what entities comprise the "Humboldt County Workforce Investment Board"? 11

Page Nine

In the first paragraph, last sentence, what "similar facility" is being used for comparison purposes since this is a one-of-a-kind grove of old growth trees? 12

In the second paragraph, second sentence, what "similar roadway" is being used for comparison? 13

In the third paragraph, last sentence since the major factors creating a distracted driver cannot be "improved" by this project (by your own admission), why even undertake the project? 14

Page Ten

In the first paragraph, since trucks only account for 16% of the collisions, most occurring in clear weather during daylight with dry pavement (by your own admission) how does this possibly justify the project as the logical conclusion is that speed, rather than off-tracking was the causative factor? 15

In the third paragraph, why not monitor the effectiveness of the speed reduction to 35 mph before this project is ever undertaken? 16

Why not reduce the speed limit to 25 mph? 17

What about better enforcement by the CHP which has an office nearby (in Redway)? 18

Why no improvements for the safety of bicyclists and pedestrians? 19

Why only the focus on bigger trucks for a select few businesses at a cost of $6 million to taxpayers? 20

Page Eleven

In the last paragraph, last sentence, how do the STAA exemptions help protect the safety of the traveling public (by your own admission) and if so, what is the point of the project if STAA trucks can travel safely through the Grove? 21

Page Thirteen

In the first paragraph, last sentence, why were port development and railroad access dropped as alternatives for goods movement? 22

Section 1.3

Subsection 1.3.1

Page Eighteen

In the first paragraph, where is the study showing that in the course of grinding off the open graded asphalt and replacing it, the underlying root structure and water absorption ability of the old growth trees would not be adversely affected since these are shallow rooted trees? 23

In the third paragraph, where is the study showing that disturbing the environment by removal of excess materials and cutting into slopes would not adversely affect the underlying root structure and water absorption ability of the old growth trees? 24

In the fourth paragraph where is the mitigation for the 300 foot, long, 18 foot high retaining wall opposite Singing Trees that would create a negative visual impact for this business? 25

Where is the mitigation for the disruption to be caused to this business by the construction? 26

Page Nineteen

In the last paragraph, last two sentences, it is stated that with the no-build alternative, the roadway improvements would not occur WHICH COULD HELP LOWER THE COLLISION RATE ON THIS SEGMENT OF ROUTE 101 (your own words). Does this not negate that stated reason for the project? 27

Subsection 1.3.2

Page Twenty-One

In the section on Signalization Alternatives why is there no explanation of why queuing and wait times do not cause problems when traffic waits at the signals in Willits? 28

Why was there no consideration that to ease congestion that signals be placed at the south end at the Humboldt County line, before the bridge where the highway is still four lanes wide and at the north end, the signals be placed as you leave Benbow, just before the highway bridge there, before the highway narrows to two lanes as this would eliminate traffic queues in front of the tourist businesses at either the north or south ends of the park? 29

Chapter Two

Page Twenty-Seven

First paragraph, First sentence, what is the factual basis for the statement that the "project would not substantially alter the existing drainage patterns nor substantially increase the amount of runoff"? What studies have been done to support this statement? 30

Second paragraph, second sentence, what studies have been done and what is the factual basis for the statement that "nor would the project expose people to any permanent substantial noise increase or excessive groundborne vibration"? 31

Sixth paragraph, what is the factual basis for the statement that the "project will not result in substantial adverse effects on people"? Has a surveyor interviews been done with Park campers or the occupants of Singing Trees Recovery Center? 32

Section 2.1
Subsection 2.1.1
Sub-subsection 2.1.1.1.

Last paragraph, fifth sentence, this is a factual error in that the nearest community is actually Piercy. Why is there no analysis of the consequences to this community including a current description of Piercy and a historical review? Why is there no analysis of the effect of the project on emergency service providers (i.e. the Piercy Volunteer Fire Department)? 33

Page Thirty

Sub-subsection 2.1.1.4

First paragraph, fifth sentence, where is the study by a redwood root specialist that assesses the impacts to the root system of the old-growth trees due to the proposed construction activities? 34

If there is subsequent die-off due to root cutting, grinding of asphalt, placing fill where none existed before and increased traffic of heavier trucks, what mitigation is possible given these are protected, 1000 year old trees? 35

Section 2.1.2

Page Thirty-Five

First paragraph, third sentence, what validity can be attributed to the conclusions drawn from a "voluntary anonymous survey"? Such a survey could not possibly be considered in any way objective and how does CALTRANS justify the cost of such an unscientific and specious document? 36

Where is the cumulative impact assessment of the various projects (such as on Routes 197 and 199 in Del Norte County) CALTRANS has undertaken on Highway 101 to provide STAA access? Why are these projects being piece-mealed and not treated as one project for the purpose of a cumulative impact analysis? 37

Page Thirty-Six

Second paragraph, second sentence, with the cost of diesel fuel recently peaking at over $5.00 per gallon, what is the factual basis for the assertion that continuing the reliance on STAA diesel trucks will substantially reduce shipping costs? 38

Why is this project being undertaken at taxpayer expense to benefit a small segment of the business community? 39

Chapter 4

Page One Hundred- Fifteen

In the first paragraph, first sentence, is it not inaccurate to state that there was "early and continuing coordination with the general public" since the general public did not become aware of the project until the Benbow meeting was announced in September, 2007? 40

Why were members of the general public not permitted to attend the TAG group meetings? 41

Why were individuals Lee Mora of the Humboldt Auction Yard and Vince Thomas of Sun Valley Group allowed to attend these meetings but not other members of the public? 42

Why is there a decidedly pro-business bias to this project to benefit select businesses at taxpayer expense? 43

Why was notification of the "general public" made through announcements in the local media, which by definition, being local, have limited readership? 44

Since Richardson Grove is a State Park, which is owned by the "general public" of the entire State of California and is visited by residents of the entire State, was wasn't notice made in the media in the population hubs of Sacramento, San Francisco and Los Angeles? 45

Why does the format of these meetings consists of large engineering drawings and posters being placed around a room with CALTRANS representatives available to answer questions from individuals with no presentation by CALTRANS or general question and answer session offered? 46

Does this not result in members of the "general public" being essentially isolated and not able to hear questions and concerns expressed by other members of the "general public"? 47

Additional Comments

In a separate email, we are forwarding a "Report from Big Lagoon" authored by Sue Nolan.

Where in the DEIR are adequate safeguards to the actual execution of the project by CALTRANS contractors? 48

What is to prevent that in the execution by CALTRANS contractors, irreparable damage will not result from the actual implementation of the project? 49

How much of the project's footprint will extend beyond the designated roadbed? 50

Will employee vehicles, equipment or materials be stored adjacent to work areas – affecting the park? 51

The staging areas proposed in the DEIR are inconveniently distant and since some large heavy machinery will be involved in excavating and grading where will this equipment turn around? 52

Will the equipment be driven all the way to a suitable paved or at least graded turnaround spot, or will it turn on location by backing into the Grove? Just how much will the park beyond the roadbed be affected? 53

1. The word “improve” is accurate as the geometrics of the roadway are being improved so that the end result is closer to meeting design standards.
2. The document has been revised to reflect the exemption granted to livestock carriers. It has been reported that moving vans are no longer being exempted from the STAA restriction and that the California Highway Patrol has been issuing tickets. The reason being given is that Humboldt County is accessible by STAA from the north via Route 101, and since there is a route available, the special circumstances that allowed the exemption no longer exist.
3. The reduced speed limit was not in effect at the time the draft document was prepared. The final document has been revised to reflect the change in speed limit.
4. The final document has been revised.
5. This statement was derived from the County’s Regional Transportation Plan and statements made by County staff as well as local business owners.
6. Funding for transportation projects is not funded from California’s General Fund, and the funding is specifically allocated for transportation projects. Improvements at Richardson Grove to accommodate goods movement has been identified as an objective in the County’s Regional Transportation Plan.
7. Most State and US highways in California were originally constructed decades ago and thus the alignments of these highways would not meet today’s design standards. In addition, they were constructed prior to the enactment of the federal Surface Transportation Assistance Act of 1982. US Route 101 is not unique is this respect. US Route 101 is designated as a Terminal Access Route for STAA vehicles.
8. What differentiates US Route 101 from the other State highways within District 1 is that Route 101 is designated as a Terminal Access Route for STAA and the other State highways are not. Refer to Figure 3 in the document which illustrates this.
9. The model program evaluates the feasibility of a particular alignment for STAA irrespective of speed. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. The curve radii used in the modeling had a design speed of 30 mph.
10. The Cambridge Systematics study did not include the raw data that this conclusion is based upon.
11. The Humboldt County Workforce Investment Board (WIB) is composed of 34 members representing business, community-based organizations, elected officials, education, labor organizations, and local government. For more information on the organization and its member list, refer to http://www.humboldtwib.com/about.php. WIB has not released the raw data to Caltrans.
12. In comparing statewide collision averages for highways, highways are grouped into 67 categories using such characteristics as the number of lanes, the average traffic volumes, whether the adjacent land use is rural, suburban or urban, the classification of the highway (whether it is a conventional highway, freeway or expressway), the speed, and the terrain (whether the terrain is flat, rolling, or mountainous). The evaluation is not a strict comparison of the collision rates of one highway to another, but a comparison of one highway to the group of highways with similar characteristics, which together, compose the statewide average.
13. See Response #12 above.
14. The purpose of the project is not to improve safety per se. The improvements in safety would occur as a side benefit to making the highway accessible for STAA vehicles. The purpose of the project is to provide STAA access on US Route 101 at Richardson Grove. By making this

improvement at Richardson Grove, Caltrans is implementing one of the objectives identified in the County's Regional Transportation Plan.

15. See Response #14 above.
16. The purpose of the project is to provide STAA access at this location. Reducing the speed to 35 mph does not accomplish the purpose of the project.
17. *See General Response #8*.
18. Better enforcement does not correct the deficiencies in the roadway alignment that lead to off-tracking.
19. Improving the curve radii and widening shoulders in the park would slightly improve the facility for bicyclists and pedestrians. North of the park, the shoulders will be widened to four feet to better accommodate non-motorized travelers. Within the park it is not possible to widen shoulders to four feet on the present alignment without substantial tree removal. To construct a bike-pedestrian path separate from the existing highway in the park would have to be done on land under the jurisdiction of State Parks, or would involve a longer and very steep detour of US Route 101, which would likely make its construction not feasible. State Parks, as the agency controlling the management and approval of the type and location of any new facility within its jurisdiction, is the most appropriate lead agency for planning such a facility.
20. Accommodating STAA vehicles at this location is identified in the current and past County Regional Transportation Plans. Providing for STAA access would affect more than just a select few businesses. The STAA restriction affects a cross section of businesses including such diverse interests as local manufacturing firms, dairy owners, clothing manufacturers, ranching businesses, lumber product representatives, a creamery, and performing arts representatives who rely on the STAA vehicles to transport the sets for local performances.
21. The text in the final has been revised.
22. No specific alternatives were identified. The study referred to in the document to develop options for accommodating goods movement was never fully initiated. A Request for Proposal to potential consultants to identify alternatives and prepare the study was developed, but the effort was dropped when the Richardson Grove Operational Improvement project was initiated.
23. Typically there are no roots in the existing pavement and base material of the structural section of highway. Any roots would typically be below the structural section of the roadway since one of the purposes of the structural section is to provide a stable base for the asphalted section of roadway; the structural section is compacted to prevent rutting from traffic loads. The standard practice for the existing roadway would have been to remove any roots before placing the base material.
24. There are no old growth redwoods on this slope. The slope across from Singing Trees that has the proposed cut is primarily vegetated with tan oaks, with a couple of Douglas fir trees. Refer to the Layout map, Appendix L.
25. Subsequent to the circulation of the DEIR/EA, a design modification for the retaining wall was developed subsequent to the circulation of the draft environmental document. The modification included changing the location and type of wall, from the west side of the highway to the east side and changing the type of wall from an above the road wall to a below the road wall. Since the wall is constructed below the road, it is much less visible to motorists except for the barrier rail. The modified design of the wall would require much less tree removal (5 trees as compared to approximately 30 trees of the original wall proposal). The modified wall would not be visible from most of the structures which compose the Singing Trees facility.

26. Standard practice is not to mitigate for construction impacts to businesses.
27. The intent of the sentence is to state that the improvements which could help lower the collision rate would not occur with the No Build alternative, not that the No Build Alternative would lower the collision rate.
28. Queuing at traffic signals in Willits does cause problems in Willits, especially when traffic volumes are particularly high such as before and after holidays. There is currently a proposal for a bypass of Willits that would resolve many of the issues of queuing in Willits.
29. There are standards for where the signals are placed in relation to the location where the proposed roadwork is to occur. One factor that determines the standard is the longer the distance that is under traffic control, the longer the wait times would be.
30. The basis for stating that the project would not substantially alter existing drainage patterns is that current drainage patterns are being maintained except for the two locations where the project would correct erosion in areas where runoff is going over an unprotected slope rather than directed to a drainage. The additional improvements to drainage consist of culvert work, primarily replacing culverts at the same location. An evaluation is done that looks at such factors as the potential for erosion, the amount of ground disturbance that is proposed, the steepness of terrain, the precipitation rates, and other factors. The project does not add a substantial amount of impervious surface and the roadway is on generally flat terrain, thus, the runoff rates are not expected to change substantially over the existing rates.
31. A noise study was conducted for the project. There would not be a permanent noise increase as a result of the project as the project does not result in moving the traffic lanes substantially closer to sensitive receptors (residences, schools, campsites) nor would the project substantially increase traffic volumes. Adding STAA vehicles to the existing highway would not result in substantially increasing the groundbourne vibration.
32. The project would not result in substantial impacts to the community character, cohesion, or quality of life; nor does the project result in relocations of either residences or businesses, including populations protected under environmental justice. Per the CEQA guidelines, Section 15382, construction phase impacts on traffic, transit, noise, air quality, and the visual environment would generally not be considered significant since construction-related changes are by their nature temporary. A significant impact would only occur if temporary effects substantially affected accessibility to an area for a long period of time, caused the loss or relocation of substantial numbers of businesses or residences, or posed severe health or safety threats. This is not the case with the proposed project. Since the roadway alignment shifts do not move the roadway appreciably nearer to any trails or campsites, the traffic noise experienced in these areas would not be any greater as a result of the project.
33. The text has been revised to indicate that the project area includes the community of Piercy. The document acknowledges that the project may affect emergency service providers, see Section 2.1.4. Impacts to emergency responders resulting from this project are similar to that experienced in any construction project on a two lane State highway. For traffic control under the direction of flaggers, any emergency responders will be given priority access through the construction. In addition, the contractor is required to submit to Caltrans a document called a Traffic Handling Contingency Plan addressing such items as emergency opening of a lane closure and other traffic handling issues during construction. A meeting prior to construction will be held with law enforcement and emergency responders to discuss how this process will work.
34. Both the Caltrans arborist and Dennis Yniguez, an independent arborist contracted by Save the Redwoods League, have determined that with the special conditions in place as described in

the document, there would be no significant detrimental effect on root health or the availability of water to the roots of old growth redwoods adjacent to the highway construction. Mr. Yniguez also noted that "the existing root systems of old-growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height."

35. If there is evidence of die-off in the grove, Caltrans would work with State Parks to discover the cause and implement measures to rectify the problem.
36. The study was initiated, conducted, and funded by the County.
37. A study was performed to evaluate the traffic impacts of implementing the Del Norte County STAA access projects in conjunction with Richardson Grove. It was determined that the level of service on US Route 101 would not decrease as a result of implementing the STAA improvement projects.
38. The price of fuel is relative. Regardless of the size of the vehicle, the fuel price is the same. The reduction in shipping costs is realized by not having to transfer loads from non-STAA vehicles to STAA vehicles. By not having to off-load goods, time delays and labor costs are reduced.
39. *See General Response #6*.
40. The project was initiated in July 2007. The first public meeting was held two months later in September 2007 and was the first of four public meetings held for the project.
41. Members of the general public were represented in the Technical Advisory Group (TAG).
42. Typically when Caltrans formulates a technical advisory group, representatives from established environmental organizations are asked to participate, rather than sending out a general request for participation. This is partly to keep the size of the meeting participants to a manageable and effective number, but also it is important that members be committed to attending meetings consistently so that progress occurs more smoothly. Official members of the TAG representing the general public included elected officials as well as representatives from Save the Redwoods League and the Sierra Club. In addition, the mailing list for sending minutes of the meetings and other material included representatives from the Northcoast Environmental Center and the Environmental Protection Information Center (EPIC).
43. Not sure what is meant by your question. The County, elected officials, and several business owners have been very active in urging Caltrans to pursue the project. From before inception of the project, Caltrans involved representatives from the environmental community, law enforcement, and State Parks in TAG which culminated in the identification of the current operational improvement project. The project affects goods movement in the County and goods movement inherently affects businesses. As stated above, opening up STAA access at this location is identified as an objective in the County's Regional Transportation Plan. By virtue of being included in the Regional Transportation Plan, such a project is, by definition, a priority of the County.
44. The standard practice is to put public notices in a newspaper of general circulation that services the project area. Information about the project has appeared numerous times in the Ukiah Daily Journal, North Coast Journal, and the Redwood Times in addition to the Times-Standard newspaper. In addition, there have been several radio shows on KMUD regarding the project. Information about the project has also been reported numerous times on KIEM and KTVU television stations. There are also numerous environmental groups on the internet which contain information about the project. Caltrans has received thousands of postcards from throughout California as well as out of state regarding the project. This is an indication that interested stakeholders are aware of the project.
45. See Response #44 above.

46. Caltrans has found the one on one interaction with the public to be an effective way to communicate with the public. People who just want their question answered don't have to wait for a long period of time. Maps and other exhibits can be examined closely and technical questions can be addressed more effectively. Half of the meetings did include a question and answer portion of the meeting in addition to the one on one contact.
47. Again, two of the four public meetings included a question and answer segment. The one on one interaction format does not prevent members of the public from staying an extended time at one exhibit or station to hear what others have questions about and what the responses are to those questions.
48. The special conditions that will be incorporated into the construction contract are included throughout the document. Each section in Chapter 2 includes a segment, "Avoidance, Minimization, and/or Mitigation Measures." Appendix B and Appendix D also identify the special conditions that have been incorporated into the project.
49. The special conditions are a part of the contract. There would be penalties to the contractor if the specifications in the contract are not carried out. In addition, there will be monitors employed to ensure the contractor is complying with the special conditions. State Park representatives will also be monitoring the project.
50. Refer to the Layout Map in Appendix L.
51. Vehicles will only be stored in paved shoulder and turnout areas outside the park. Long term equipment and material storage sites will not be located within the park. Equipment and material for immediate use would not be stockpiled off the paved area without concurrence from the biological monitor. Within the park, equipment would only be off-pavement in those areas which will be ultimately disturbed such as areas that would be under a fill, with the exception that the unpaved turnout at PM 1.79 +/- to the west of the roadway would likely be used. While these areas are in use, it would detract from the existing aesthetics of the area, but this would be temporary.
52. Equipment will turn around where it is legal to do so. The staging areas are located a distance from the park to minimize the impacts to the park.
53. Equipment will be limited to the work areas. The area affected beyond the roadbed varies depending upon the type of work proposed at each specific location.

moongodescynthia @sbcglobal.net (cynthia kent)

01/31/2009 02:42 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)

cc

bcc

Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon, I am wrighting this on behalf of the proprosed cutting of OLD growth in richardson grove on hwy 101 , I have enjojed these woderful beacons of bueatty and streanght since i was young some 50 years now my childrens children alas enjoy and am in wonder of them , I ask you to weigh out the long term , verses trucks being able to log the tree,s behind the curtain , IF you take the curtain away what do you have short term satisfactin I am asking you please to not let this happen to our old growth majestic forest thank you cynthia and will kent and all our family,, 1

Sincerely,
cynthia kent
26901 albion ridge rd.. po 730 95410

1. *See General Response #2.*

Jan. 26, 2009

re: Richardson Grove State Park

I am strongly against the plan to widen U.S. Hwy. 101 through Richardson Grove State Park. History goes back to 1933 when a giant Redwood fell after living approximately 1,204 years. This is a state park which belongs to the public. It already has a road cutting through the heart. Now big business from north and south greedily feel they need to make room for bigger trucks which would tear away and rape this beautiful park. 1 2

Already the public is having enough trouble sharing the road with big rigs. The crime here is big business, behind the public's back, managed to obtain state and local transportation laws be changed allowing big rigs to travel at 65 mph instead of 55 mph which was established years ago. A safer speed limit preventing altercations with motorists. It is shameful and sad to hear big business in Humboldt County wish to sacrifice Richardson Grove for their greedy gain. Bigger is NOT better. 3

Sincerely Lina Kent - McKinleyville

1. *See General Response #13.*
2. *See General Response #1.*
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.

Kim Floyd/D01/Caltrans/CAGov
02/02/2009 10:29 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/02/2009 10:29 AM -----

Lynn Kerman
<kinsaraluna @hotmail.com>
02/02/2009 10:27 AM

To <kim_floyd@dot.ca.gov>
cc
Subject

Greetings,

I am writing to urge you to not go ahead with the Caltrans plans to widen the 101 highway around Richardson Grove. I have lived in this area for many years now and do not want to see the disruption of the ecosystem plus the added traffic that will ensue if this happens. 1
Please listen to the voice of the people and let us come up with alternate plans for economic growth. 2

Thank you for your attention on this matter,

Lynn Kerman
Eureka, CA

Hotmail® goes where you go. On a PC, on the Web, on your phone. See how.

1. *See General Response #13.*
2. *See General Response #14.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:05 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove- PLEASE DON'T

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:05 PM -----

Deborah Ketelsen
<dkimages@gmail.com>
01/30/2009 09:13 AM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove- PLEASE DON'T

I am writing this letter to strongly express my opposition for the proposed Richardson Grove Improvement project.
I have lived in Humboldt County for 30 years and I am very aware of our economic "crisis" in this area. I realize trucking is the primary means of transportation for both export and import for Humboldt, aside from shipping.

Having driven 101 thousands of times, I am aware of the quantity of trucks that utilize the 101 corridor. It seems to me the number of trucks that I encounter on the commute to and from the city has declined. Is widening this small section of road going to make that big of a difference to the consumer? Aside from perhaps making the cost of goods a little less? To me it will. Call me crazy, but every time I drive through that magnificent section of road, I slow down, open all my windows day or night, and take many deep breathes. I always marvel at the magnificent redwoods, the organic smell that fills the air, and the rays of light that shine through the trees. This section serves as a gateway to the Redwood Curtain as you travel North, it lets me know I am almost home, and why I live in Humboldt County. When traveling South, I think take it all in, stay calm and relax as I travel to the city.

1

2

I just don't feel as a taxpayer that I want to devote any money to this project. The new bridge project at Confusion Hill I can understand, but right now or anytime, spending the money on this project doesn't seem justified. Not in today's economy or ever. Cut trees, add more concrete and barriers, doesn't feel right. More trucks will just increase the greenhouse gas effect into our North Coast environment. I'm sure you have heard how Redwood trees are dying at an unprecedented rate in the Pacific Northwest. Plus it is more awful diesel that I have to ingest when I get stuck behind these monstrosities. I would imagine these beefy new trucks are expensive to purchase, run and operate.

3

4

The thought of this project saddens me to no end. Please reconsider.

Thank You,
Deborah Ketelsen

Moved here in 1979.

1. *See General Response #13.*
2. *See General Response #11.*
3. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
4. *See General Response #14.*

jhkibbler@gmail.com (John H. Kibbler)
01/28/2009 02:11 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

I believe that the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project inadequately addresses the impact of the proposed project.

Our California Redwoods are an irreplaceable natural and historic resource. They cannot be replaced and no amount of remediation will provide an adequate substitute. 1

I do not believe that Caltrans has adequately shown the need for the proposed work or that the benefits outweigh the costs. 2

Sincerely,
John H. Kibbler
John H. Kibbler
111 North Vermont Avenue
Glendora CA 91741

1. *See General Response #3.*
2. *See General Response #1.*

Kim Floyd/D01/Caltrans/CAGov
01/29/2009 02:17 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: richardson grove proposal

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/29/2009 02:17 PM -----

sue kimpel
<suekimpel@hotmail.com>
01/28/2009 09:11 AM

To <kim_floyd@dot.ca.gov>
cc
Subject richardson grove proposal

To whom it may concern,

My name is susan kimpel and I live in eureka and have lived in Humbolt county for ten years.It has come to my attention that there is a proposal to widen the road going through Richardson grove. I am opposed to this plan as there are alot of ancient trees that would be affected. these trees are an important part of what makes Humbolt county great and no amount of "progress" is worth potentially harming them.I think this place is a unique place and it is important that we not be lulled into sacrificing it's integrity for rote economic development.

1

2

thank you for your time, sincerely susan kimpel

1. *See General Response #3.*
2. *See General Response #2.*

aliana knapp -prasek
<alianaleekp @hotmail.com>
01/30/2009 01:59 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove & 101

I can still remember the first time I drove through Richardson Grove on my way up to my boyfriend's home in Redway. Riding in the passenger seat from San Francisco my eyes were taking in all the beauty I saw as we drove through Mendocino County. But, then we crossed the Humboldt County Line. We came upon Richardson Grove. My heart started to flutter, my eyes widened, and my jaw dropped open. I could not believe how big the trees were starting to get. The car twisted and turned coming ever so close to these magnificant giants. My whole body was pressed against the window so that I could look up at the redwoods. I was in love. I could feel the spirituality from inside the car and I knew I was in a magical place. It was at that moment that I knew that I was home. My eyes started to shed tears of joy.

My love for the environment really hit home when I was a personal shopper for a very wealthy group of women in North Carolina. I had gotten my degree in Fashion Merchandising and thought that this was the direction I wanted to go in. It was at this point in my life that I was doing nothing to contribute back to society or the environment. So I applied for a Sustainability Internship at Golden Gate National Recreation Area through the Student Conservation Association. I got the internship where I was able to inspire and educate park employees and other interns to do everything they could to help the environment. I especially tried to make them aware that they did not need so much "stuff" because eventually all that "stuff" would only end up in places that did more harm for our environment than good. I recommended the website StoryofStuff.com because it gave a quick 20 minute educational source on consumerism and its flaws.

When I decided to move to Southern Humboldt County, I knew things would cost more. Plus, it couldn't be that much more than the cost of living in San Francisco. To me, it was worth it. Here I had the opportunity to take walks in the redwoods, or have picnics by the river. I would live in a place that did not have fast food joints on every corner or tons of corporate shopping malls. I could truly support the local industry and live a simpler life.

I heard earlier this week that there is a proposal to widen the road in Richardson Grove so bigger trucks carrying more "stuff" can come through. Are you serious? Just yesterday I was driving through the Grove and was behind a big semi truck with a trailer. We passed another big semi coming from the opposite direction. The two trucks did fine together on the road and they both seemed pretty big to me. Why do we need to go in and put up retaining walls and repave the road to allow bigger trucks in? After reading the proposal they say it will save millions. I beg to differ. We may save millions in "stuff" and allow more corporate shopping centers in, but, we are losing the beauty of our lands. 1 2

Mother Nature has no voice. Mother Nature is constantly being taken over. Mother Nature gets destroyed and polluted. But Mother Nature does have people who care and love her and will fight for her. Trees will have to be removed to widen the road. I say we have removed enough trees. We can NOT AFFORD to lose anymore trees up here in Humboldt County. 3

If fire engines or emergency vehicles could not get through, that is one thing. But bigger

trucks to carry more "stuff," well, that is a no brainer.

Mother Nature is Ancient. Let's protect her so that future generations will feel as blessed as we do.

Pura Vida,
Aliana Knapp-Prasek

"The more I see the less I know for sure." ~John Lennon

1. CA Legal trucks are currently allowed through the park. The geometric deficiencies result in STAA trucks to off-track over the centerline and therefore such vehicles are restricted from this segment of Route 101.
2. *See General Response #11.*
3. No old growth trees are proposed for removal. The majority of trees proposed to be removed are twelve inches in diameter or less and half of the trees are tan oaks.

aprilandkevin @aol.com
01/27/2009 03:54 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson's Grove

I was a 13 year resident of Humboldt County until just recently when a family emergency made it necessary to move out of state.

1

I understand that Cal Trans plans on widening the Hwy 101 through Richardson's grove near Garberville CA. Please reconsider, and lower the speed limit instead of cutting tree roots and taking two trees down.

2

This is a special area and I do not think it should be marred in the way Cal Trans is planning to change it.

Thank you,
April Knife
Tolleson, AZ

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!

1. *See General Response #13.*
2. *See General Response #8.*

PAT KNITTEL
<patknittel@yahoo.com>
01/28/2009 10:04 PM
Please respond to
patknittel@yahoo.com

To deborah_harmon@dot.ca.gov
cc
bcc
Subject RICHARDSON GROVE PROJECT

Dear Ms. Harmon,

Please accept my opposition to the proposed project for modification of Highway 101 at Richardson's Grove.

It would be a crime to pull the existing Redwoods from this place.

I grew up on the North Coast and have been a resident of Northern California for 39 years. I would be devastated to see this incredible place changed. It is a destination for so many people and is an example of the unique beauty of Northern California. 1

Sincerely,

Patricia Knittel
707-508-5175

1. *See General Response #2.*

Diane Korsower
<dkorsower@yahoo.com>
01/28/2009 10:14 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Comment on the Richardson Grove Proposal

Dear Ms. Harmon,
I am a long-time resident of Humboldt County, hence a similarly long-time user of Highway 101 through Richardson Grove, as well as a local shopper. I do not believe that the current proposal to widen the highway at this point is sound economically nor environmentally. Given the state's current financial crisis, spending state dollars on this project is unjustifiable: it is not critically needed (not necessary at all, I believe); scarce public monies should go towards education, prison reform, healthcare, environmental protections and other life-and-death areas. The simpler allernative, alternative 3, would both save $5-6 million for better uses and prevent irreparable harm to the Grove environment. Now is not the time for this project, and this proposal is not the correct long-term answer.
Please, Ms. Harmon, do the right thing. The common sensible thing. The big trucks can slow down for a short stretch--it'll do them, and us, and the planet, some good. It's a simple, elegant and economical solution.
Sincerely,
Diane Korsower M.D.

1
2
3
4

1. *See General Response #13.*
2. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
3. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.
4. *See General Response #8.*

Subject: Comments re: Richardson Grove project

Kim,
As a 30 year resident of Humboldt County, I would like to comment on the proposed project for Richardson Grove. 1
I think a retaining wall would severely detract from the beauty of the Richardson Grove State Park drive through experience. I am concerned that the cutting of roots to tree species without tap roots would compromise their stamina and natural state. I'm opposed to removing any old growth trees. 2
I favor the slowing of traffic through that area as that is clearly what is needed anyway. So many of us slow down and maneuver it safely and have for many years. 3
Please let us find a different solution. Thank you.

Marylynn Kosulandich
Trinidad Resident

1. The retaining wall proposed as part of this project is not located within Richardson Grove State Park, but outside the park boundaries in an area where there are residences and several structures associated with a business. In addition, a design modification for the wall was developed subsequent to the draft document being circulated to the public. The modified wall would be located below the road so it would not be visible to motorists except for the barrier rail. In addition, it reduced the number of tree removals from 30 to 5.
2. *See General Response #3.*
3. *See General Response #8.*

Guy Kuttner
<kuttner@humboldt1.com>
01/28/2009 08:54 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

Dear Deborah,

As a resident of Humboldt County for 30 years, and especially as an immigrant from Los Angeles where I was raised, I implore Caltrans to preserve Richardson Grove as it stands. I witnessed the evolution of the San Fernando Valley and environs from small farms and orchards to asphalt, glass and metal. The degradation of air quality, bird diversity, curved and living landscape, mental and physical health of humans and quality of life was astounding. Those of us who thrive on rural and healthy environments had to leave.

The Redwood Curtain must be treasured and protected for its own sake, and because it protects Humboldt County from over development and destruction. 1

Most of us who live north of Richardson Grove do not mind slowing down when traveling through the State Park. We do not need bigger trucks bringing in more goods. We live quite comfortably without more stuff because we are fed by the beauty of Nature that still surrounds us. We are, in fact, part of that beauty. We need those trees who feed us spiritually and emotionally and therefore physically. 2 3

Humans are the adaptable ones. We can slow down, consume less and remain in touch with Nature by preserving it. 4

Please leave Richardson Grove alone. Please protect it from development and destruction.

Sincerely, Cindy Kuttner

1740 Buttermilk Lane,
Arcata, CA 95521

707 822-7831

1. *See General Response #12.*
2. STAA vehicles would be used to import products used by local businesses in producing their goods as well as importing goods ready for sale and exporting local products to external markets.
3. *See General Response #2.*
4. *See General Response #8.*

Sophie Lagacé
1533 S Street, Eureka, CA 95501
Phone: (707) 442-0760 – E-mail: <mechante.anemone@gmail.net>

January 27, 2009

California Department of Transportation
1656 Union Street
Eureka, CA 95501

Attention: Deborah Harmon, Senior Environmental Planner

Object: Richardson Grove Operational Improvement Project Draft Environmental Impact Report/ Environmental Assessment

Ms. Harmon,

I have read the Richardson Grove Operational Improvement Project Draft Environmental Impact Report/ Environmental Assessment (draft EIR/EA) and I would like to offer some comments. I am an environmental engineer with over a decade of experience in conducting environmental impact assessments under the National Environmental Policy Act (NEPA), the California Environmental Quality Act (CEQA) and similar regulations, and I live in Humboldt County.

I believe that some aspects of the project have been insufficiently studied to meet the requirements of NEPA and CEQA. Aspects I am concerned with are the traffic and safety impacts, effects of decompaction and recompaction on the root mass of old-growth trees, and the range of alternatives proposed.

Traffic. Although the draft EIR/EA evaluates the existing traffic component of the environmental setting, it provides no analysis of the effects on traffic and road safety that can be expected to occur due to the increased capacity and the new presence of larger freight vehicles, the Surface Transportation Assistance Act of 1982 (STAA)-compliant trucks that are the reason for this project. The document offers no projection of the expected volume and composition of traffic, or the resulting effect on accident rates. 1

I note that there is mention that:

> Caltrans is also considering reducing the existing posted speed limit of 40 mph through Richardson Grove to 35 mph as an independent action from the proposed operational improvement project.

However, there is no discussion of the effects on traffic and safety of the project with and without this measure. 2

Traffic and safety considerations are particularly important to discuss because there is a perception in the general public that the Richardson Grove Operational Improvement Project is proposed in response to safety concerns and will help improve conditions, even though the draft EIR/EA clearly states that no such improvement is expected to result. It does not say, however, whether conditions are expected to worsen.

Old-Growth Trees. Construction activities will result in excavation, decompaction, backfill, and recompaction of soils in and near the root zone of old-growth trees, particularly Coast redwoods, which is harmful to the trees. The draft EIR/EA analyses the projected effect by stating that:

Sophie Lagacé
1533 S Street, Eureka, CA 95501
Phone: (707) 442-0760 – E-mail: <mechante.anemone@gmail.net>

Many of the large redwoods within and adjacent to the project area are likely affected by compaction resulting from the existing Route 101 roadway and park facilities (campsites, trails, roads, park structures). The proposed project is not anticipated to substantially increase the magnitude of compaction that presently exists.

However, no effort is made to support this conclusion with data. I would like to see a discussion of the results of comparable construction work conducted in old-growth areas in the past, such as the along other segments of U.S. 101, the Newton B. Drury Parkway, U.S. 199, etc. Were the old-growth redwoods unharmed by such work? If there were instances of trees being damaged, how frequent were they? 3 4

Alternatives Range. While it appears that several design options and alignments were evaluated as part of the proposed project, the draft EIR/EA provides very little information on or analysis of realistic alternatives bracketing the proposed project. I do not believe it has met the requirements of CEQA and NEPA in this regard. 5

I hope the final EIR/EA will be revised to provide more information on these topics; as it stands, I believe the document does not provide sufficient information to support a determination of no significant impacts, with or without mitigations.

Sincerely,

Sophie Lagacé

1. *See General Response #14.*
2. The action to reduce the posted speed limit was an independent action separate from the proposed improvements to allow STAA access. Effects on traffic and safety as a result of reducing the speed limit would be expected to be minimal due to the fact that the speed reduction was minor (five miles per hour) and the stretch of highway affected by the reduced speed limit was about a mile in length. While reducing the speed may result in some motorists being more cautious and aware of the conditions, it is not expected to result in a substantial increase in safety.
3. *See General Response #3.*
4. Highway construction adjacent to old growth redwoods on Routes 36, 254, 197, and 199 were done without the special minimization measures to be used at Richardson Grove such as use of pneumatic excavators such as air spades for excavation work and hand work rather than large equipment being used within the structural root zone of the old growth trees, and irrigation during construction. It is likely that the construction activities resulted in adverse effects to the trees. The trees have adapted to the presence of the highway like at Richardson Grove.
5. Several alternatives were considered including a bypass and signalization options. Alternatives that would result in greater impacts than the preferred alternative to the park or old growth redwoods were withdrawn from further consideration. The problems with implementing signalization variations are identified in Section 1.4.2 of the document.

Kim Floyd/D01/Caltrans/CAGov
02/02/2009 09:45 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Proposition to widen 101

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/02/2009 09:45 AM -----

Rachel Lagomarsino
<ralagomarsino @hotmail.com
>
01/30/2009 09:25 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Proposition to widen 101

1
2
3

Please reconsider the proposal to widen highway 101 through Richardson Grove State Park. It seems to be be bad for pedestrians, bicyclists, the environment, and some local businesses. Please don't destroy something beautiful. Please look at this as a moment to recognize that somethings are greater than our most immediate needs. What we need now is to be more innovative, more creative, rather than looking for easy solutions.
"While Eating a Pear by Billy Collins
After we have finished here,
the world will continue its quiet turning,
and the years will still transpire,
but now without their numbers, and the days and months will pass
without the names of Norse and Roman gods.
Time will go by the way it did
before history, pure and unnoticed,
a mystery that arose between the sun and the moon
before there was a word for dawn or noon or midnight,
before there was a name for the earth's
unaccountable things
when fruit hung anonymously
from scattered groves of trees,
light on one smooth green side,
shadow on the other."
Thank you for taking a moment to read this short message.
Best,
Rachel

1. The curve modifications and wider shoulders would be expected to slightly improve the situation for pedestrians and bicyclists over the existing condition.
2. *See General Response #2.*
3. *See General Response #7.*

Kim Floyd/D01/Caltrans/CAGov
01/26/2009 09:33 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Caltrans Richardson Grove DEIR Public Comment Period

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/26/2009 09:33 AM -----

Alezz Laielen
<believedifferent @aol.com>
01/23/2009 03:15 PM

To Kim Floyd <kim_floyd@dot.ca.gov>
cc
Subject Re: Caltrans Richardson Grove DEIR Public Comment Period

Just in case my letter doesn't arrive in time, this is what I wrote to my local newspaper:

Having been born in Eureka I very much oppose the widening of one mile of Hwy 101 through beautiful Richardson's Grove State Park, that will involve the removal of 80 or more trees, cost us taxpayers millions and create a huge traffic jam for months and am sending Kim Floyd, Project Manager, P.O. Box 3700, Eureka, CA 95502 a letter by January 30th to say so as well as State Representatives. 1 2 3

I have read that certain businesses are concerned smaller trucks that carry their products will not be in operation in the future due to pollution restrictions and that large trucks, that are already traveling through that stretch but aren't suppose to, go over the midline. The thing is, if everyone were to travel slowly and carefully for that mile, it would not a problem. Signs could be installed to warn motorists and truckers alike, not unlike "watch for children", "watch for deer", "watch for falling rock", etc. Richardson's Grove is a beautiful stretch of road and slowing to drive by giant redwoods for one mile, like stopping to smell the roses, should be welcomed, especially during these stressful times when taxpayer's money needs to be saved or spent in more important, environmentally positive ways. As I understand it, there are other portions of Hwy 101 that are even more narrow than the Richardson's portion and the force behind the widening is said to be a very wealthy man who lives in Eureka that wants to bring in a lot of big box stores over the objections of local businesses and residents. 4 5

Alezz Laielen

San Rafael, CA

(415) 454-0321

On Jan 16, 2009, at 3:36 PM, Kim Floyd wrote:

>
> Just wanted to remind everyone that the public comment deadline is
> January

1. *See General Response #13.*
2. After the draft environmental document was circulated a design modification for the retaining wall was developed that reduced the number of tree removals from thirty trees to five. The preferred alternative proposes to remove a total of 54 trees; the majority of these trees to be removed would be twelve inches in diameter or less and nearly half of the trees to be removed are tan oaks. The largest tree to be removed by the project is a 24 inch in diameter tan oak.
3. Delays during construction are expected to average five to ten minutes with a maximum delay of fifteen minutes.
4. *See General Response #8.*
5. In terms of notifying motorists of the conditions there are already signs for both northbound and southbound traffic warning of the curves. The curve warning sign for southbound traffic includes a flashing beacon with a recommended speed limit just before entering the park. For northbound traffic there are flashing beacons in the commercial area just south of the park and an additional curve warning sign just before entering the park. Caltrans has also committed to installing additional signs alerting motorists to the presence of bicyclists. While measures such as installing warning signs may help slow down traffic or at least alert motorists to the presence of pedestrians and bicyclists in the area, signs or even signals would not correct the geometric deficiencies that result in the STAA restriction for this portion of US Route 101.
6. The STAA restriction at Richardson Grove is more a result of curves occurring between trees located just off the traveled way than a narrow road in of itself. The STAA vehicles cannot traverse the curves without crossing the centerline or using the shoulder. Where the trees are abutting the paved surface and there is no shoulder to utilize, off-tracking over the center line occurs.

Alezz Laielen
<believedifferent @aol.com>
01/30/2009 02:29 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson's Grove

Dear Ms. Harmon,

I now live in San Rafael but was born in Eureka and still have family that live in that beautiful area. I very much oppose the widening of one mile of Hwy 101 through Richardson's Grove State Park, that will involve the removal of 80 or more trees, cost millions of dollars and create a huge traffic jam for months as well as an eye sore forever! I sent an e-mail to Kim Floyd, Project Manager, and am now e-mailing you. 1 2

I have read that certain businesses are concerned that the smaller trucks that carry their products will not be in operation in the future due to pollution restrictions and that large trucks, that are already traveling through that stretch but aren't suppose to, go over the midline. The thing is, if everyone were to travel slowly and carefully for that mile, it would not a problem. Signs could be installed to warn motorists and truckers alike, not unlike "watch for children", "watch for deer", "watch for falling rock", etc. Richardson's Grove is a beautiful stretch of road and slowing to drive by giant redwoods for one mile, like stopping to smell the roses, should be welcomed, especially during these stressful times when taxpayer's money needs to be saved or spent in more important ways. As I understand it, there are other portions of Hwy 101 that are even more narrow than the Richardson's portion and the force behind the widening is said to be a very wealthy man who lives in Eureka that wants to bring in a lot of big box stores that local businesses and residents oppose. If this is true, I'm hoping that some investigative reporter will bring it to the light like the recent covert activities of the Boy Scouts of America, as reported in the S.F. Chronicle, that have been clear cutting on their property for profit. 3 4

We can not afford to allow private interests to use millions of taxpayer's dollars for their personal gain. 5

Apparently there are other issues having to do with the EIR and this all needs to be taken into consideration.

Sincerely,

Alezz Laielen, San Rafael, CA. (415) 454-0321=

1. *See General Response #2.*
2. Construction delays are expected to be typical for two lane State highways with average delays of five to ten minutes and maximum delays of fifteen minutes.
3. *See General Response #3.*
4. *See General Response #12.*
5. Providing for STAA access on US Route 101 at Richardson Grove is identified as a goal in the current and past Regional Transportation Plan for Humboldt County. Construction of the project would fulfill this identified transportation need.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 03:01 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:00 PM -----

"Andy Lane" <andylane3@suddenlink.net>
03/11/2009 10:49 AM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove

Dear Kim Floyd,

I have been following through the newspaper, some of the discussion about the need for and method of reworking the road through Richardson Grove. I am of mixed mind about what is best to do.

On the one hand, I agree that it would be a benefit to our local business community to have the option of the larger shipping trucks be able to travel through the Grove.

But on the other hand, I am concerned about the potential damage to both the old-growth trees and the majesty of the Grove. Even though there are no plans to remove any old-growth, there is a danger that the cutting of the roots of some of those trees could contribute to those trees dying, either through nutrient lack or because of less wind-resistant stability. Also, there is presently a great majesty to the Grove – every time I've driven through there, I have felt as if I were driving through a sanctuary and that it was special to have some time there – even though I was just driving through on my way to somewhere else. Some of that special time would be lost, if the flow of traffic were even faster through the Grove. 1 2

I hope that Caltrans is aware of these concerns, and is not just focused on getting the wider road in.

Thank you, Andy Lane

Andy Lane
690 Hunts Drive
McKinleyville, CA 95519
707/839-2263
andylane3@suddenlink.net

1. *See General Response #3.*
2. *See General Response #2.*

<lunarphase@asis.com>
01/30/2009 02:13 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove Project NO ACTION Alternative

Re: Draft Environmental Impact Report
for the proposed Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

I do not support the proposed realignment project on Highway 101 through the Richardson Grove. I strongly believe that the no action alternative is the correct choice for many reasons including saving taxpayer dollars. The Richardson Grove stretch of 101 is rare as it remains very much what the old Hwy. 101 was in character before being made into a major highway. It is an important gateway to the Redwood Forests and to Humboldt County. Richardson Grove is where the traveler first comes into contact with the magnificent Ancient Redwood forest and the first opportunity to stop and visit, hike, picnic, bike and swim. The State Park is protected for all of our use and enjoyment as well as for the forest, wildlife and watersheds. It should not be disturbed. 1

The construction project will certainly result in adverse environmental impacts in the short term. The wildlife, including migratory and nesting birds, will certainly be disrupted. The EIR states that wildlife surveys will only be conducted if it proves infeasible to do the construction between September 30th and March 1st. The EIR states that there are no migration corridors for other known wildlife in the park within the project area. How can you evaluate the impact on migratory birds and other wildlife when you have ***no wildlife survey information*** as part of your evaluation of the environmental effects of this project? 2

The long term impacts such the issue of the cutting of roots and compaction in the root zone of 30 redwoods some a large as 15' in diameter and other trees have not be given adequate consideration. The mitigations for avoiding damage to the roots of the Ancient Redwoods are inadequate. The roots of these trees , as we've seen in the parks when a giant redwood falls over, are shallow and therefore extremely vulnerable when roots are damaged or compacted. There were once 2 million acres of Ancient Redwood forest now only a fragment remains, most of which are in our State Parks. We can not take actions which may harm any more old-growth redwoods. 3

The EIR has failed to adequately consider the cumulative impacts of the project in regard to the environment and to the long term impact on the quality of life in Humboldt County. Larger trucks mean that small businesses will have to compete with the inevitable big box stores that will follow. In the short term the small businesses that serve the tourists that use the Park will suffer during the construction phase. The Signing Trees is a very important recovery center for the area and will be significantly disrupted during construction and in the long run by the presence of an 18' high and 300' long retaining wall. Leave the hillside alone in it's natural state. As the site exists now is part of the atmosphere at the Signing Trees that allows so many to find their way to recovery. 4 5 6

I have lived and worked here for 32 years and do not want Humboldt County to take on the characteristics of urban sprawl so common elsewhere. The North Coast is a special place for the protection of biodiversity and open space and must remain that way especially in the face of challenges like global climate change. and environmental crises like accelerated rates of species extinction.

To ensure safety and avoid these impacts Caltrans should adopt the no action alternative and decrease the speed limit. After all isn't that the original purpose for creating this refuge as a State Park right on the old Hwy. 101 ? It was created for people to slow down, maybe even stop and visit this world renowned Ancient Redwood forest. 7

Please choose the no action alternative.

Sincerely,

Cecelia Lanman
PO Box 1985
Redway, Ca. 95560

<lunarphase@asis.com>
01/30/2009 02:44 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject ITP/Richardson Grove

Dear Ms. Harmon,

Please add this question to my remarks I sent to you at 2:13pm Jan. 30,2009. I was unable to find any reference to whether or not Caltrans will be obtaining an incidental take permit from either the DF&G or USFWS. In what way will Caltrans ensure protection of endangered or threatened species listed under the California and Federal Endangered Species Act? 8 9

Thank you.
Sincerely,

Cecelia Lanman
PO Box 1985
Redway, CA
95560

1. The proposed improvements would occur on the existing highway which passes through and provides access to Richardson Grove State Park. No old growth trees would be removed as a result of this project. The majority of the thirty trees proposed to be removed in the park are four to twelve inches in diameter and nearly half are tan oaks. The largest tree proposed to be removed from the park is a 24 inch in diameter tan oak. Only two redwoods are proposed for removal in the park and they are six inches and seven inches in diameter. The current ambience of the grove in the park for the motorist would not be altered substantially as a result of this project as the roadway would remain a two lane curvilinear highway with minimal to no shoulders and large redwood trees abutting the edges of pavement.
2. Wildlife is assumed to be present adjacent to the highway. The survey mentioned in the document is to identify nesting birds that might be affected with vegetation removal. The intent is to perform vegetation removal during the non-breeding season, October through February. If vegetation removal cannot be done during the non-breeding season, then a preconstruction survey would be performed to ensure that birds are not nesting in any areas where vegetation removal would occur. If nesting birds are found in the survey, the vegetation clearing in a 100 foot buffer area would be postponed until nesting is complete.
3. *See General Response #3.*
4. *See General Response 12.*
5. *See General Response #7.*
6. Subsequent to the circulation of the draft document to the public, Caltrans developed a design modification for the retaining wall option. This modification would be located below the northbound lane and thus would not be visible to motorists except for a barrier rail. The modified design for the wall is 100 feet

6. *(continued)* shorter than the original wall design and requires only five trees to be removed as compared to the thirty trees to be removed with the original design. The shorter wall would also result in a shorter construction duration. The majority of the wall would be north of the Singing Trees Recovery Center although the southern terminus of the wall would be at the dining hall.
7. The posted speed limit through Richardson Grove was reduced to 35 mph in fall, 2008. Decreasing the speed limit does not correct the existing deficiencies in the roadway geometrics that result in the STAA restriction. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed.
8. The US Fish and Wildlife Service determined that no take of Northern Spotted Owl or Marbled Murrelet is expected as a result of the project, thus an Incidental Take Permit is not appropriate.
9. The US Fish and Wildlife Service determined that the project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded. The Service also determined that while construction activities may disturb any nesting Marbled Murrelet or Northern Spotted Owl present adjacent to the highway, the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled Murrelet or Northern Spotted Owl in and near the project area.
   Providing the corvid-proof trash receptacles is a conservation measure recommended by the US Fish and Wildlife Service during the consultation efforts for this project and Caltrans incorporated this measure into the project. Conservation measures in the context of the federal Endangered Species Act represent actions that are intended to further the recovery of and/or minimize or compensate for the project effects on the listed species. Surveying potential breeding habitat to identify potential nesting areas is identified as a recovery action in the Marbled Murrelet Recovery Plan (US FWS, 1997). The two year survey for Marbled Murrelets that Caltrans has committed to do at Richardson Grove State Park would aid in the recovery of the species by providing information to the US Fish and Wildlife Service about the population in inland nesting areas.

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 01:43 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson's Grove Widening Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 01:44 PM -----

Kelly Larson
<solarkelly@asis.com>
01/27/2009 06:10 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson's Grove Widening Project

Dear Kim,

I request that the December Eureka meeting be rescheduled and take place in a southern Humboldt location. I have been studying the Richardson's Grove Widening Project and have some concerns. I was out of town during the first meeting, and couldn't get to the last meeting in Eureka because of the inclement weather. Because the weather was so bad it kept many concerned folks away. If this is still a viable project, it would be prudent for Caltrans reschedule the December Eureka meeting and have that meeting in southern Humboldt. That way, all concerned would have input to this project. 1

Thank you,
Kelly Larson
Box 104
Piercy, CA 95587
707-237-3000

1. There have been four public meetings on this project since 2007, one of which was held in southern Humboldt. The majority of meetings were held further north because of the lack of a large enough meeting space that was also handicap accessible available in the Garberville area. The comment period for the DEIR/EA was from December 5, 2008 to March 12, 2009. Information about the project is also available online at the Caltrans District 1 website.

Dear Kim,

I oppose the widening of Hwy 101 through Richardson's Grove.

I live just south of the grove and drive through daily. I appreciate having these giants on my path. I love to look up and consider how brief my life is in comparison to theirs, and so inconsequential. It may take me an extra minute to go the couple of miles through at a reasonable speed, and it pains me to think about how we may come to regret this project.

Every time I hear a widening advocate speak about the project they point out how few small trees will be cut. They never mention the root impact that is clearly acknowledged in the EIR. All that Caltrans equipment has to be parked somewhere and will be smashing the tree's roots! We all know that redwoods have shallow root systems and that they can exist only in a grove. What happens when so many suffer root impact in so small a space? The best is not good, the worst, the loss of the grove. This grove is uniquely accessible and serves as an important welcome to those who come to our region. We loose that, and we have lost much. 1 2

This project ignores the needs for pedestrian and bicycle traffic. This is intolerable. It is my understanding that Caltrans is required to accommodate pedestrian and bicycle traffic in all of their projects. Why has this important safety issue been disregarded in this one? 3

This project has come amidst a change in the speed limit, assumedly for safety. I have noticed that the new speed limit is much more reasonable speed to navigate through that section. It seems strange to reduce the speed limit just before improving the road. I would like to see if the safety issues resolve with the lower speed limit. 4

Ultimately, the widening project is likely to lead to an increase in speed limit. They say that won't happen, but it just makes sense that speed limit increases will follow roadbed improvement. The consequence of that will be higher collisions and less earnings for the local businesses that make their money from the tourists. Not a good outcome. 5

Larger trucks being allowed through the grove favors large retail, not local small business. In fact, making it less expensive for the big box stores to get goods into the area is likely to have a very negative impact on local businesses. Ten years from now it is likely that transportation costs will be very high. It is unlikely that trucking will have the equal role it has now. The country is bound to come up with different solutions to the transportation issues. This plan is based on cheap oil and goods being shipped over long distances. Will we look back and realize that not only was our grove significantly impacted, but our local businesses were hindered by the ease given the big box stores, and all for a short-term solution to a former problem? 6 7

1. The project is more accurately a curve correction project as opposed to being a widening project. The majority of widening is proposed outside the park to provide four foot shoulders to better accommodate non-motorized users. Within the park, shoulders up to two feet in width are proposed where trees aren't abutting the highway. Construction equipment will be parked in paved areas with the exception of potentially using the unpaved turnout at PM 1.79.
2. *See General Response #3.*
3. *See General Response #5.*
4. The project purpose is to provide for STAA access, it is not a safety project per se. While the highway alterations may slightly improve safety, the proposed improvements are not expected to result in substantial increase in safety. Reducing the speed limit would not correct the existing deficiencies in the roadway geometrics resulting in the STAA restriction. The degree of off-tracking for a given truck is determined by the truck size and type and the curve dimensions of the road, not the truck speed. While lowering the speed can lead to motorists being more careful, lowering the speed, in of itself, will not eliminate off-tracking.
5. *See General Response #13.*
6. *See General Response #6.*
7. It is likely that trucking will remain the primary component for goods movement in and out of Eureka for the foreseeable future. Both the railroad and the port at Humboldt Bay necessitate major infrastructure improvements before the railroad or short sea shipping would be viable. Funds to complete these infrastructure improvements would be millions of dollars and no sources for this funding have been identified.
8. *See General Response #7.*
9. The need for STAA access at Richardson Grove is identified in the current and past Regional Transportation Plans for Humboldt County. Construction of the project would fulfill one of the stated objectives in the 2008 Humboldt County Regional Transportation Plan. Several local businesses have stated that removing the STAA restriction would support their business.
10. The project would be funded as on operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

1-29-09

Dear Ms Floyd,

The approval of the Grove Improvement Project is one that only serves those who have the potential to profit from the widening of 101, while having negative consequences for all of the other interests involved.

This taxpayer subsidized road project is wasteful when we consider all the other needs that our state is facing. In order to reduce traffic accidents simply lower the speed limits to 25 mph. This is a cost effective solution. We will probably need the funds for our fire fighting season in this apparent drought year.

The interests of the long term health of our forests is also negatively impacted. The reality is, is that we need to do all that we can to invest in protecting and preserving our forests which are already diseased. I invite you to read the article in this weeks Redwood Record on page two. The heading of the article reads as follows: Old growth trees in west dying at twice the usual rate. Is this the time to place the short term profits of the few over the long term health of the many? Do we really need more traffic that further stresses our environment? Is it really wise to pretend that the current challenges Global warming presents should be ignored?

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I would hope that this publicly funded agency acts in accordance with the public good rather than awarding the special interests of investors. I would hope that Richardson Grove remains the beautiful, majestic entrance to our county that it is today.

I would also hope that if this project is given a green light that it will be challenged in court. I also pledge that I will contribute everything I can to help fund that challenge.

Sincerely,

Karen Ledue

1. The purpose for the Richardson Grove Operational Improvement Project is to remove the STAA restriction. Providing for STAA access at this location is in the County of Humboldt's Regional Transportation Plan, so implementing the project would fulfill one of the identified objectives of the County's Plan.
2. *See General Response #8.*
3. Funding for transportation projects does not come from California's General Fund, and the funding is specifically allocated for transportation projects.
4. *See General Response #3.*
5. *See General Response #14.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:36 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:36 PM -----

<waterman9915@att.net>
03/12/2009 10:06 AM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

I logged on to the CalTrans website to find out about the Richardson Grove widening project. I downloaded and read the main study and pertinent appendices. I read the notice that said the public comment period was extended to March 12, but there was no way provided for the public to comment. I am sending you this message in hope that it will be included in the public record.

This proposal would use tax dollars in a time of economic difficulty to widen a state highway through a state park for the benefit of the cattle industry, a few trucking firms, and presumably large chain retail organizations. I object. State parks were created to preserve special areas for ALL Californians. Pieces of our State Parks should not be permanently destroyed and the future experiences of state park visitors incrementally degraded to accomodate a few politically well-connected people and firms.

1

California legal trucks use the road every day. They cause enough maintenance problems. Bigger, heavier and faster is not necessarily better, but the presence of bigger, heavier and faster trucks will absolutely cause more maintenance problems and create more demands on CalTrans budgets. If people wish to use larger trucks, they should be required to purchase over-width or over-weight permits and to comply with all parts of those permits.

2

I have commuted on 101 north of Legget for more than 20 years. Over that time, I have spent about as much time waiting for the road to be opened after a California legal truck, driven by inexperienced operators, went off the road or overturned as I have waiting for the Confusion Hill landslide to be cleared. Almost none of those mishaps occurred in the Richardson Grove area. The Richardson Grove project is not a "stand alone" project. After that is completed, each of the sharp curves north of Legget will "need" to be widened in sequence and each "individual project" will be "critical" for some reason. I request that the entire project be made public and recieve public and environmental review.

3

Those of us who live north of Legget do so by choice. We live here for many non-economic reasons and almost all of us have accepted an increased cost of living as part of the price to be paid for living in a lovely environment. This project is really one small step in building a 4-lane super-highway from Marin County to the Oregon border. This project will have an incremental negative impact, both economic and non-economic, on the daily lives of every person who lives north of Legget. The end result of this project will be to turn the area from Rio Dell to Orick into another Santa Rosa.

4

Use the money to fix bridges or repair other sections of 101.

Richard LaVen
PO Box 756

Fortuna CA 95540

1. All trucks are restricted to the same 80,000 lbs weight limit regardless of whether they are CA Legal or STAA trucks. Caltrans does not expect truck traffic to increase with the proposed project. *See General Response #14.*
2. The primary purpose of the project is to lift the restriction on STAA vehicles. The current roadway geometrics are such that STAA vehicles off-track over the center line into the opposing lane. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. The proposed project would correct the known geometric condition and lift the restriction for STAA trucks with no special permits being required.
3. Presently the only STAA restriction north of San Francisco on US Route 101 is this segment at Richardson Grove State Park.
4. Due to the substantial environmental impacts and high costs of a four lane alignment for this section of Route 101, the Route Concept Report acknowledges that the highway would remain a two lane conventional highway on its current alignment for the foreseeable future.

noahlevy@asis.com (Noah Levy)
01/30/2009 04:38 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments on Richardson Grove

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project.

I am a resident of Twin Trees Rd (south of Benbow), and my house is located less than 2 miles north of the project area (just off the south end of Benbow Drive).

I am extremely concerned about this project, and am opposed to it altogether based on what I know about it and have been able to learn from this draft EIR and other documents and statements I have seen. I believe that your analysis of the impacts understates or does not address the value (on environmental grounds, as well as tourist/recreation and aesthetic grounds) of keeping the road through the Grove substantially as it is. I walk through the State Park often, and sometimes walk or bike along the highway. I have regretted the lack of safe bike and pedestrian access through that section. But I do not believe your improvement plan even addresses that. 1 2

Others have pointed out that the EIR does not adequately adress the impacts on the root systems of the ancient trees there, and the entire ecosystem, of the sort of road upgrades and widening your plan envisions. I do not have time in this brief comment to cite the data I have seen suggesting these impacts may be far more significant than you assume; I trust that data will be submitted. But I urge you to propose, as an alternative to most of not all of the plan, that a strictly-enforced lower speed limit be imposed on this brief section of highway. Lowering the speed limit would allow most if not all vehicles to pass through safely, would reduce or eliminate the need for any widening of road, AND would protect or enhance the experience of being in this magnificent park for its many visitors. 3 4 5

In addition, it would save the state millions in unnecessary expenditures on this project. Use those highway dollars where they are ACTUALLY needed -- not here, where the "problem" has been overblown by a narrow group of business interests at the expense of the local community, and a much cheaper alternative exists! 6

Sincerely,

Noah Levy
254 Twin Trees Rd.
PO Box 607
Garberville, CA 95542

1. The aesthetics of the proposed roadway through the park would not substantially change. Within the park, the highway would remain a two lane curvilinear roadway with minimal to no shoulders with large trees abutting the edge of the pavement. The existing canopy over the road would not be substantially changed as no old growth trees would be removed.
2. *See General Response #5* regarding information on bike path.
3. *See General Response #3* regarding information on minimization measures incorporated into the project to protect the trees.
4. *See General Response #8* regarding how reducing speed limit does not meet project purpose and need.
5. *See General Response #13* regarding information on the shoulder widening.
6. *See General Response #1* regarding information on project purpose and need.

Dear Ms. Harmon,

PLEASE DO NOT WIDEN RICHARDSON GROVE! 1

Instead, how about installing traffic lights for when the big trucks need to go through. That would be a less expensive option than widening the precious Grove. 2

Also, we don't want vehicles barrelling through there anyway. 3 And what else would the big trucks be carrying - Nuclear waste? 4 This is a real concern.

I beg of you to consider other options than just widening the road.

Thanks for your consideration,

Sincerely, Leslie Lind

2932 Chemise Mt. Rd.
Whitethorn, CA. 95589

1. *See General Response #13* regarding information on the shoulder widening.
2. *See General Response* #10 regarding information on signalization alternatives considered.
3. The speed limit was reduced from 40 mph to 35 mph in Fall 2008. The alignment modifications include putting in more curves. Thus, it is not expected that speeds will increase as a result of the project.
4. *See General Response #12* regarding the small businesses affected by the lack of STAA access.

Dec 6, 2008

In re: Richardson Grove
Hwy 101, Widening

My husband + I would like to add our names to the list to not take out trees at Richardson Grove.

I think that is the prettiest, most peaceful place on earth.

My husband feels that area is the crown jewel of California.

We are gradually losing, more + more, of our "natural wonders."

Why don't the big rigs drive slower or go elsewhere with their long loads? Why cater to them?

Thank you,
Mr. + Mrs. John Lindell, Eureka, Ca.

1

2

3

1. *See General Response #2* regarding information on how the project affects the park.
2. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.

Kim
Floyd/D01/Caltrans/CAGov
03/18/2009 10:35 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:35 AM -----

Cynthia Lindgren
<cynbell2@gmail.com>
03/11/2009 07:14 AM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Kim,

My husband owns Lindgren Lumber, just off 101 at the 299 interchange. For the past 12 years he has been shipping lathe to his partner in Boonville. Three to 5 days a week (with only a slight downturn during these bad economic times) a 42 foot truck travels down south with a full load of finished lathe, then picks up a full back load of wood for his trip back home. There has never been a problem and the only time complaints involve the traffic in Willits. 1

PLEASE DO NOT CUT THROUGH RICHARDSON GROVE.

Spending huge amounts of taxpayer dollars for something so unnessary is ridiculous. I appreciate all the good work of Caltrans but this is very ill-conceived.

Not only is it destructive to the unique entranceway to the area (let's not forget that tourism is a large financial draw) but an extremely expensive solution for something so simple. 2

Slow down the traffic in that area (I'm sure most people wouldn't mind having to slow down in one of the most beautiful spots in Califonria) or put in some in some lights that would allow the few (and I mean very few) over 42 foot trucks pass through. Cattle, lumber and goods have been going through there for decades. I know that some of the large trucking companies are expanding their truck lengths to make more money, let's not ruin a local gem just to appease the few. There should be a way to work around this. 3 4

Thank you.

Cindy Lindgren
Lindgren Lumber
P.O. Box 276
Trinidad, California 95570

1. *See General Response #1* regarding information about project purpose and need.
2. *See General Response #2* regarding information on how the project affects the park.
3. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
4. *See General Response #10* regarding information on signalization alternatives considered.

dlipman@mcn.org (Don Lipmanson)
01/28/2009 10:13 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Richardson Grove comments

Dear Ms. Harmon,

Concerning the Draft EIR for the proposed Richardson Grove Operational Improvement Project, I write as a former Mendocino County planning commissioner who has voted to approve various CalTrans projects in the past and as someone who frequently drives on the affected portion of Hwy. 101.

Here, however, I must question the need for this project. It beggars the imagination for the draft EIR to claim that cutting the roots of old redwood trees and compacting soil around the remaining roots would have no significant environmental impact, especially since the microrhizal fungi that are critical to redwood growth and survival live primarily in that root habitat. 1

Given how little old growth redwood remains in this world, to say nothing of the global warming implications of more trucking through this section of highway, I urge your agency to pay more serious attention to the damaging impacts of this project in the final EIR.

Sincerely

[YOUR NAME HERE]

Sincerely,
Don Lipmanson
518 S. School Street, Ste. 200
Ukiah, CA 95482

1. *See General Response #3* regarding information on minimization measures incorporated into the project to protect the trees.

h842nots1s@yahoo.com
(Gerhard Lippert)
01/30/2009 07:33 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Please take some time to review my input on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. My concerns lie with the impact this project will have on the ecosystem of one of the last, few old growth redwood forests in Northern California. I know your agency is concerned with these issues but I am concerned that this report is inadequate ways. For years various agencies have struggled with balancing commercial interests & protecting the environment in these sensitive areas. Every time the government agency involved allowed either logging interests or other commercial interests to do what they wanted in those areas. Ultimately through judicial review these land use permits were blocked as their impact was too severe. I believe this project is also going to have a dramatic impact on the area & should be reconsidered. Are there other alternatives available? I question the necessity of the project, and cannot find info rmation within the report that explains how this project allows the restrictions for the longer trucks to be lifted by Caltrans.

1

2

3

Sincerely,
Gerhard Lippert

Sincerely,
Gerhard Lippert
14926 Marlin Place
Van Nuys, CA 91405

1. *See General Response #3* regarding information on minimization measures incorporated into the project to protect the trees.
2. *See General Response #10* regarding information on alternatives considered for this project.
3. *See General Response #1* regarding information on project purpose and need. Section 1.4 in the final document describes the modifications proposed in the project and the layout maps in Appendix L show where the alignment changes are.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:24 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:25 AM -----

Sandi Little
<slittle@humboldt.k12.ca.us>
03/10/2009 11:36 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson's Grove

I oppose the widening of the highway through Richardson's Grove for many reasons. I grew up here in Humboldt County. Richardson's Grove has always been a special place to me. Motorists have to slow down and appreciate the beauty of our trees, which is one of the main things people appreciate about Humboldt County. A huge retaining wall as well as cutting down trees and cutting the roots of old growth is not what anyone planned for this Grove when it was dedicated to our WWI veterens. 1 2

Also, I am concerned about our local truckers. The majority of accidents on that section of road is not caused by trucks, but by cars going to fast. Also, the local truckers will not be able to financially compete with out of county trucking companies who will be able to transport at a lower cost due to the size of their company. This means MORE LOCAL JOBS LOST at a time when we are already hurting. 3

PLEASE consider alternatives to this. Our county is rural, most of us like it that way. I do not want bigger trucks coming in, not only because of our local truckers, but also I do not want to make it easier for Big Box Corporations to invade our northcoast area. 4 5

Thanks you for your attention to this matter

Sincerely,

Sandra L Little

Eureka CA

1. The location of the proposed retaining wall is outside the park adjacent to residential and commercial land uses. A design modification for the retaining wall was developed after the circulation of the draft document. The modification includes moving the wall to the east side of the highway and constructing it below the road so the wall would not be visible to motorists except for the barrier rail. This modification would also reduce the number of tree removals from 30 to 5.
2. *See General Response #3* regarding information of minimization measures incorporated into the project to protect the trees.
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
4. *See General Response #10* regarding information on alternatives considered for this project.
5. *See General Response #12* regarding information on how the project affects big box development.

January 28, 2009

To: Deborah Harmon
CalTrans
Eureka Office

The proposed road widening "improvement project" at Richardson's Grove is deceptive. Removing only 2 small redwoods in the widening process will of course allow the Big Trucks easier access. In reading the DEIR, it is mentioned that the root systems of the **15 foot diameter giant trees** will definitely be disturbed. In some cases the roots will be severed, and in other cases, up to 4 feet of fill packed over the system and close to the trunks. Redwoods are shallow rooted and have no tap root. This is a death knell for those 15 trees. 1

Once the trees are gone, it will only take about 1000 years to replace them. We will probably forget that there were once Big Trees, rather than Big Trucks, that lined the roadway at Richardson Grove. 2

Acceptance of this project will induce, Big Box stores to establish in our towns increasing the volume and speed of the bigger trucks into Humboldt County, and taking business away from our local stores that struggle to exist. 3

To what purpose?? Why risk 1000-year old trees? Well, apparently there is not enough on the shelves to buy at Target and K-Mart, so we need a Home Depot too. And, maybe we need more houses and people, and air pollution, and traffic. This is not what Humboldt County wants! We are unique and special, and we need to preserve our land, our forests and waterway, and **our** lifestyle for future generations.

We are asking CalTrans to stop this insanity. Why not use Alternate #3 which will save us worn out taxpayers $5 million dollars in construction costs by lowering the speed limit to 25 mph and allowing truck and trees to co-exist? 4

Sincerely,

Suzanne Simpson Litzky & Lewis Litzky
POB 309 Arcata, CA 95518

1452 "I" St. Arcata, CA 95521

1. *See General Response #3* regarding information on minimization measures incorporated into the project to protect the trees.
2. *See General Response #12* regarding information on how project affects big box development.
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
4. *See General Response #8* regarding how reducing speed limit does not meet project purpose and need.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:22 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:22 AM -----

Elizabeth Lovejoy
<llovejoy@pacific.net>
02/21/2009 12:58 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Ms. Floyd,

I am in support of keeping the Grove as is, and re-routing traffic, or making the road in that section a very slow, 15 to 25 mph area so as to take a moment to remember the past and let what is still ancient growth pristine redwood be as it naturally is. 1

There is no reason why we need to eliminate something of majestic awe in order to pander to commercial wills... it is more important to save our heritage, and slow our movement than it is to ruin a godsend forever and perhaps ruin our ecology in the process. 2

Please do your part in finding some solution to the traffic problems with Highway 101 that does not interfere with preserving Richardson Grove for our grandchildren's grandchildren's grandchildren... they will thank you as well for your visionary wisdom. 3

Sincerely,
Elizabeth Lovejoy

1. *See General Response #9* regarding information on bypass alternative.
2. *See General Response #8* regarding how reducing speed limit does not meet project purpose and need.
3. *See General Response #2* regarding information on impacts to the park.

5 March 2009

Dear CalTrans
Humbolt County,California

People travel to Humboldt County from all over the state and the world to visit our Redwood Forests and our unique rain forest ecosystems. Let it be.Let Richardson Grove be.

I have traveled on the highway for 50 years and many times have been on the bus with visitors from San Francisco, southern California, the east coast, Canada, Japan, Europe and watched their exxitement and wonder as we slow down for this special place.

The exxperience of traveling through Richardson Grove is a spiritual pause. The indigenous people of our area believe these trees are star people who chose to remain here on earth to guide and support us.

Being a person who has lived in several countries, traveled a bit and studued the ways of nature as well as people--I am very much oppsed to Caltrans widening this road, now or ever. 1

Many treasured, sacred sights on earth do not have freeway access, let it me,broaden your inner horizens and not the road, think of our grandchildren and our selves as part of the natural world...

Claire Lyon
P.O. Box 6284
Eureka, Ca 95502

1. The widening being proposed for this project is to provide shoulders where it is feasible to do so..Outside the park, four foot shoulders will be provided to better accommodate non-motorized travelers. Within the park, up to two foot shoulders will be provided where it is not precluded by old growth trees abutting the highway.

2-2-'09

Kim Floyd, + Area Project Mgr.

Subject: · Richardson's Grove
· Eureka to Arcata

I believe Jim either talked to you and Debra H. (maybe left phone messages about these two projects)

ie: Richardson Grove

· Transplant the Road Trees — talked to retired HSU Professor Jerry Partain and CA State Univ @ Davis (late '80s) and both felt it can be done.

1

· Plus, reduce the speed to 25 mph yesterday.

2

· And, not another Cushing CR.? where a centerline barrier will be needed in the future because of

3

prevailing speed and increase in accidents on an non-engineered alignment — what Reg. Engr. ~~would~~ would sign-off on? (non-engineered) design standards.

4

Eureka — ~~Arcata~~

- take one eucalyptus tree, take them all. A recognized hazard.

- if not, at least prune the remaining "E" trees. 27' above the pavement. Don't forget MAINT. DEPT. as one did on the median barrier south of town.

In closing. The President & the Governor has expressed the relaxation of the ENVIRONMENT laws

In order to speed up the process to construction, thus creating jobs.

I'm hoping that the Engineer Spec's and Special Provisions still read "or as directed by the Engineer. The environmental spec should read the same.

Sincerely,

(707) 447-3649
3888 Penn. Ave.
Eureka, CA 95501
(102 yrs of Dairymen/farmers in the family)

P.S.

Kim, you or Debra should submit a merit award. A merit award to eliminate Regionalization. Should receive the max. amount allowed for an award of this nature. Can help to prepare same.

5

1. Only two redwoods are to be removed from within the park and they are six and seven inches in diameter. Transplanting established redwood trees is difficult even for trees of this size and would require specialized equipment to get a large enough root ball which would result in a substantial hole. Transplanting these trees would also require stabilization stakes or cables for a period of time and deep watering for a year. The disturbance required to get a substantial enough root ball would likely result in adverse effects to adjacent old growth redwood root systems as redwood root systems often overlap.
2. See General Response #8 regarding how reducing speed limit does not meet project purpose and need.
3. Due to the constraints in the roadway widths resulting from trees abutting the highway on either side, a centerline barrier is not feasible. The posted speed limit for this segment of highway was reduced from 40 mph to 35 mph in Fall, 2008 so it is not anticipated that prevailing speeds would increase in this segment of highway.
4. Several mandatory and advisory design exceptions have been processed for this project.
5. Several special provisions have been incorporated into the specifications for construction of this project. Some activities will be performed at the direction of the Resident Engineer.

Kim Floyd/D01/Caltrans/CAGov
12/15/2008 08:59 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: 12-14-08 Final Governor Arnold Schwarzenegger Regarding Caltrans 101 Richardson Grove State Park Project etc OPEN FOR REVIEW

—— Forwarded by Kim Floyd/D01/Caltrans/CAGov on 12/15/2008 08:58 AM ——

"Trisha Lee"
<trishale@sonic.net>
12/14/2008 10:38 PM

To "CalTrans Kim Floyd" <kim_floyd@dot.ca.gov>
cc "Trisha Lee" <trishale@sonic.net>
Subject 12-14-08 Final Governor Arnold Schwarzenegger Regarding Caltrans 101 Richardson Grove State Park Project etc OPEN FOR REVIEW

Hello...this is the letter I just sent the governor, and representatives, and I thought I could use it as another submission of ideas to minimize cost and impact of both Caltrans Projects: Richardson Grove and Route 101 Eureka to Arcata Corridor. 1

One way at a time passage through Richardson Grove State Park, plus lowering the speed limit down to 25 mph would have the least impact on the protected grove and lowest cost to the California Tax Payers. 2

In the 101 Corridor from Eureka to Arcata, slowing traffic to 45 mph, with flashing lights for crossing traffic crossing over on the 101 Corridor with triple fines to generate money for the Highway Patrol and Fire Departments would be the most practical idea, in my opinion.

Combined, these two choices with the least environmental impact, will actually save the State of California taxpayers about $75 million dollars while also preserving our treasured historical landscapes.

December 14, 2008

Governor Arnold Schwarzenegger
State Capitol Building
Sacramento, CA 95814
916-445-2841
www.gov.ca.gov/

Dear Governor Arnold Schwarzenegger,

Please ask Caltrans to abandon plans to alter Highway 101 through Richardson Grove State Park. We do not need larger and larger trucks using too much fuel and one driver taking the jobs of 3 to plow through our supposedly protected Richardson Grove State Park. 3

Any alteration or tree cutting along that stretch of Highway 101, just 7 miles south of Richardson Grove State Park, and just north of Willets and Laytonville, WILL effect the root systems of the 1000 year old growth redwood trees along the road. It will also negatively impact the habitat and river below. And even any culverts for lights, need to not be dug under the road, as that can cause the road to cave. Figure out something else, just like we figured out how to put people on the moon. It can be done in a way to preserve this environmentally sensitive area and allow traffic to pass too. 4

This grove was bought by the state of California to PRESERVE, not to plunder every time California decides it needs bigger and bigger trucks. We already have been paying higher gas prices and food prices, so we are used to that and we like to buy locally when we can.

A one way light with an automatic switch, can allow traffic to pass from one direction, and then from the other direction with only a short 5 or 10 minute delay. In addition, dropping the speed limit down to 25 mph (=35) will also decrease chances of any accidents through there. If a further study is done, I will bet most accidents are caused by drug and alcohol impaired drivers or drivers that are speeding over the required speed limit, and not by the trees. 5

With California in a huge budget deficit, here is one project I would ask that you cancel, please. My Great-grandfather Henry M. Devoy and Great-grandmother Ella Devoy were the owners of Richardson Grove, after the Native Americans and after the owner who gained custody after the Native American Indians were killed in a genocide type of plunder by the early settlers.

Save the Redwoods League persuaded the government to buy this and other forested land to preserve, as they could see way back in the early 1910's that this area would be entirely plundered if nothing was saved for future generations to appreciate. Fortunately, my Great-grandparents Henry M Devoy and Ella Devoy agreed to sell this grove to the state in 1922, to PRESERVE it for future generations.

Several years ago, a logger told me that he had taken out many many healthy old growth out of Richardson Grove, so the Forestry Service has been logging the parts of Richardson Grove State Park that is not visible to people for years, and I am furious about this. Please stop further plundering and erosion by NOT allowing this project to continue if it involves cutting ANY trees or altering the road in any way. This is a precious and most historical landscape, and if you could just take the time to experience being in one of these groves you would surely agree.

In addition, I see that you are involved with the new wave of energy development (from the Times-Standard article of November 19, 2008). Hopefully, that will mean smaller and more fuel efficient trucks. Running two or three trucks instead of one will give two or three people respectable jobs. We have cut too many corners, and this is one corner we who care about saving this amazing historic passageway just as nature intended it to be. We do not want it cut up to accommodate these impractical, gas guzzling, humongous trucks. They scare me just looking at them. Enough already, Governor Schwarzenegger. Please stop this insanity. 6

California can not afford this project, nor the 101 Corridor Project from Eureka to Arcata either. Scrap them both and use that money in more practical ways, LIKE EDUCATION AND SERVICES FOR THE LESS ADVANTAGED THAT WERE CUT FROM THE BUDGET. EDUCATION IS MORE IMPORTANT THAN BIG TRUCKS, so let us send a better message to our children and future generations; one of caring about the earth and caring about our children enough to afford them a better education. 7

Just slow everything down through both these areas, and triple the fines. In Richardson Grove the one way traffic idea will work just fine. In fact, little stands with information about our state parks can be strategically placed where people are stopping for 5 minutes, so people can pick up a brochure that educates people on the State Parks and asks for a donation to support them through Save the Redwood's League or the State Parks directly. Traffic can be lowered to 25 and then people will really feel the amazing entrance to Humboldt County with a greater impact.

Please, I ask for your compassion for these 1,000 year old trees. Cutting the trees nearby WILL effect the root systems and further harm the ecosystems and topography of the area.

Here is your chance to be walking the talk, by curtailing both of these Caltrans Projects that only want to cut trees and support huge STAA sized trucks. Those trucks are not environmentally friendly. They are the opposite. Please listen to my tears of sadness pleading with you Governor Schwarzenegger, to please stop these two projects.

These two Caltrans projects (Highway 101 @ Richardson Grove State Park) and (Highway 101 Corridor from Eureka to Arcata involving cutting of 90 year old eucalyptus trees that adorn the highway and serve as a windblock) are not practical, and they are not good for decreasing the effects of global warming. The least invasive solution is best solution in both these projects.

Thank you kindly for considering this very important issue to protect our historical treasures for future generations. California can not afford these Caltrans projects, in more ways than financially.

With Heartfelt Sincerely,

Patricia Lee Shade Lotus
2425 C Street
Eureka, CA 95501
(707) 476-0173
trishale@sonic.net

DEADLINE FOR COMMENT
ON THE RICHARDSON GROVE STATE PARK CALTRANS PROJECT IS JANUARY 23, 2009

Deadline has been extended to January 30, 2009

You too can go to www.gov.ca.gov/issues: and enter your point of view
Governor Arnold Schwarzenegger, State Capitol Building, Sacramento, CA 95814
or call 916-445-2841

Also please call, e-mail, or snail mail a copy of your comments and suggestions to:

Caltrans Richardson Grove State Park Project Plan
or
Caltrans 101 Corridor (Eka to Arcata) Project Plan

Project Manager Kimberly Floyd
kim floyd@dot.ca.gov
707-441-5733 or 707-445-6445
TTY=1-800-735-2929
Toll Free Voice line=1-800-735-2922
P.O. Box 3700 Eureka, CA 95502-3700

I also contacted:

State Senator Patricia Wiggins
State Capitol Building Rm 4081
Sacramento CA 95814
Phone: 707-445-6508
Fax: 707-445-6511

1. *See General Response #10* regarding information on signalization alternatives considered for the project.
2. *See General Response #8* regarding how reducing speed limit does not meet project purpose and need.
3. *See General Response #1* regarding information on project purpose and need.
4. *See General Response #3* regarding information on minimization measures incorporated into the project to protect the trees.
5. *See General Response #10* regarding information on signalization alternatives.
6. While smaller vehicles might provide more jobs, increasing the number of vehicles would increase the amount of fuel needed to transport the goods adding to emissions and global warming.
7. Transportation projects are not funded from the General Fund, thus the funding for this project is not competing with education priorities.

"Trisha Lee"
<trishale@sonic.net>
01/13/2009 12:35 AM

To "CalTrans Deborah Harmon" <deborah_harmon@dot.ca.gov>, "CalTrans Kim Floyd" <kim_floyd@dot.ca.gov>
cc "HeidiWalters NorthCoastJournal" <heidiwalters@northcoastjournal.com>, <senator@feinstein.senate.gov>, "Janie Sharon Laidlaw"
bcc
Subject 12-31-08 Letter to Caltrans RE Richardson Grove State Park NOT SENT

Dear Caltrans Representatives and Governor Schwarzenegger,

Below are the latest ideas I have come up with since the December 15 Caltrans Final Hearing. The hard copy of the EIR was not available until December 8, so that was exactly one week to read and process an entire 181 page EIR, plus drafts, before the Final Hearing by Caltrans on the 15th. **This was not right.**

1

Of the 15 or so agencies I have called, most had not had time to read the EIR yet, as of December 19. It was wrong to only have only a week until the final hearing, and to push three things in December; 101 Corridor, Richardson Grove, and then the EIR for the Marina Center came out on December 14.

Everyone thinks this is a done deal, but STATE PARKS BELONG TO THE PEOPLE OF CALIFORNIA, AND WE MUST HAVE A VOTE FROM THE PEOPLE OF CALIFORNIA ON THESE ISSUES, AND NOT BE DRIVEN WITH NO TIME TO PROCESS, BY SPECIAL INTERESTS.

Most Sincerely,
Trisha Lotus
trishale@sonic.net
707-476-0173

Here are some ideas that will save this glorious and supposed to be protected Richardson Grove State Park (FROM FURTHER LOGGING) and the 101 Corridor eucalyptus trees between Eureka and Arcata. These ideas consider the state of our economy, and they consider the safety of Richardson Grove and the 101 Corridor, in order to allow STAA trucks through. Let me know what you think:

In the 101 Caltrans Richardson Grove State Park Realignment Project

2

--1--Slow speed to 25-30 mph effective immediately for that 1 mile stretch

3

--2--Triple fines, (speeding, intoxicated, sleeping, stupid) designating this a permanent construction zone.

Money generated goes to local Emergency Services and Volunteer Fire Department that serves Piercy to Garberville, who lack funding in that area. A gentleman from this department, Jeff, who spoke out at the Caltrans final hearing on December 15, said emergency services are going to increase if this road is made wider. No one quoted him. They serve Piercy to Garberville. I did not get his last name. They work very hard as it is.

4

--3--Cameras to photograph speeders, and triple fines apply.

5

--4--Tax Write Off to companies who must off load into smaller and (will be) more fuel efficient trucks, giving more people jobs, and letting drivers rest up in long hauls so as not to fall asleep at the wheel.

-5-Install a Signal that is set to operate from 7 p.m. to 7 a.m. (or all the time except 7a.m. to 9 a.m. and 5 p.m. to 7 p.m. when commuter traffic is coming through) to allow STAA trucks to pass single file going one direction and then single file the other direction with an automatic light. Some smart engineer can do this. 6

Caltrans has this in the Environmental Impact Report, but insists that it will not work, no way no how. I beg to differ. This can work, or make it full time with something that lets both sides go in busy traffic times.

-6-Install little reflector ridges or lights at the edge of the pavement to jolt people awake. 7

-7 Have Betty Chinn serve coffee and snacks to the people stopping for 5 minutes...LOL 8

-8-reinforce pavement without any tree cutting.

-9-bike path inside the park along the road, not disturbing any nesting, and can be ramp above the canopy so as to not disturb the environment. 9

-your ideas 10

I stress the need for a tax write off for businesses who pay for off-loading, effective immediately. On a positive note, this will also give more people jobs. Of course there needs to be standards and oversight so there is no cheating.

Not Building (NO BUILD) is the best option because of our economy being so depressed due to you know what.

Not building, and waiting just a bit longer to be implementing Barack Obama's idea of keeping the jobs here for new low emission cars, and Governor Schwarzenegger's example of running his Hummer on Vegetable Oil, to create large, but passable trucks with two people working instead of one across the country. Take all the STAA Trucking jobs and eliminating the Diesel if possible to convert. As they become antiquated, replace them all with large normal trucks and pay full benefits, even if pay is a little lower (with government incentives to train and have medical benefits for two to every one worker. 11

Someone said there is money available (right now) to business who can create jobs. This is a step in the right direction. Use this idea, and lets focus on inventing and implementing the new fuel to get off foreign oil. All the troops coming home will need jobs, so pay a little less to employees until the economy picks up, but hire a soldier coming home or a logger or fisherman who has lost their job and gone through retraining to be a trucker.

We already have STAA trucks coming through, so let's just slow it down to 25 mph, offer coffee and donuts with a truck drive through or facilities to rest up, with quick grab Espresso and regular Humboldt Coffee, cocoa, sodas, and energy snacks, before going slowly through the one mile of Richardson Grove State Park old growth grove. 12

For now going slow, and soon low emission fuel will lessen the environmental impact to further damage Richardson Grove State Park and the Eel River, on the Wild River Specification. Fish and Game or U.S.Fish and Wildlife confirmed my sadness is that the Eel River has degraded to low quality and this must be fixed or a lot of people will die.

No extra road work except to strengthen, put in a single file at night stop go lights that are tripped, and slow to 25 mph, with helping the State Park put the bike path through the inside of the grove through there...see where this is an issue in EIR Page _ _ _.

Create water capturing devices everywhere in the Pacific Northwest to capture and send water south and use for own use with filtering devises, and then stop the water systems from Eel River, with tax incentives to implement these water capturing devices already invented.

Let the Eel River become restored again. It would be the absolute worst time to do more road work and cutting to create run off to add to the Confusion Hill Caltrans Project having a devastating impact on the forests, creating quite enough already. This is not even touching on the fuel emissions of more STAA Trucks on Diesel effect on the species and endangered species that are in this area. The noise alone, for digging and cutting would significantly harm any species and the human species who will all loose their businesses in the neighboring areas due to blocking the entrances and taking the quiet out of the forest; the reason people com up here. 13 14

Let the Native American Indians buried there, who were killed by settlers, leave their ancient grounds alone; leave their burial grounds alone too. Let my ancestors, who were good stewards of Richardson Grove rest in peace; and not have to keep rolling over in their graves each time their precious groves get cut into again and again. There is more to this story to be revealed. 15

Last but not least, there is no money, and cutting into this protected grove will not improve your bottom line if there is a

freeze on credit and people can't buy your goods.

My vision and hope is that we will be completely off foreign oil within 10 years. We must look to the future where new fuel efficient trucks will be invented. It may be hydrogen, Wesson oil, corn, solar, electric, methane, or something that will be invented soon.

All these big STAA trucks they say are so fuel efficient are in fact using Diesel; the most toxic and environmentally destructive of all the fuels. These STAA trucks are also taking the place of two or three people's jobs. The new fuel may not convert to these large STAA trucks, and trucks 1/2 the size with zero emissions will be the new wave, and instead of one person, two or three people can have respectable jobs driving goods, with no need to off-load. Until then, tax break for off loading.

The draft **DEIR** (Draft Environmental Impact Report) for Richardson Grove State Park Realignment Project is available online at the following link:
http://www.dot.ca.gov/dist1/d1projects/richardson_grove/reports.htm

Do you like any of these ideas or have some other ideas to address the Environmental Impact Report, please submit comments BEFORE January 30, 2009 to:

Caltrans: deborah_harmon@dot.ca.gov
Deborah Harmon
1656 Union Street
Eureka, CA 95501
707-445-6431 or 707-445-6600

Caltrans: Kim Floyd at Caltrans: Kim_floyd@dot.ca.gov 707-441-5739

Governor Arnold Schwarzenegger
RE: CALTRANS 101 RICHARDSON GROVE STATE PARK REALIGNMENT
www.gov.ca.gov/issues cut and paste into here
State Capitol Building RM 4061
Sacramento, CA 95814
916-445-2841

Our Great-grandparents Ella and Henry M. Devny, and our grandparents sold Richardson Grove to the State of California in 1922 to protect. Much credit should be given to Save the Redwood's League who thought ahead to convince Governor Richardson to protect what would become Richardson Grove in 1922.

Most Sincerely,

Trisha Lee Lotus
2425 C Street
Eureka, CA 95501
trishale@sonic.net
707-476-0173

To be continued...

1. The comment period for the DEIR extended from December 5, 2008 through March 12, 2009. Letters sent in during the comment period are given the same weight as testimony heard at the public hearing.
2. See General Response #8 how reducing speed limit does not meet project purpose and need.
3. It is inappropriate to designate something a construction zone that is not. To make this stretch of highway a "triple fine zone" would require legislation.
4. An increased fine zone would require legislation.
5. Providing tax write offs is outside the authority of Caltrans.
6. *See General Response #10* regarding information on signalization alternatives evaluated for the project.
7. Generally, rumble strips are placed on or just outside the white fog stripe to alert motorists that they are leaving the established lane. In the case of Richardson Grove, some of the trees are abutting the fog stripe so that by the time the tires are on the rumble strip, the car could have already made contact with the tree with their side mirrors or other portions of the vehicle.
8. This would be a service outside the authority of Caltrans to provide.
9. Reinforcing the pavement would not resolve the issue of off-tracking of STAA vehicles.
10. As the larger trees are hundreds of feet tall, it would be impracticable to have a bicycle path located above the canopy.
11. Low emission cars and using alternate fuels does not alleviate the need for STAA access.
12. STAA vehicles cannot legally traverse the grove at present unless they meet certain criteria, such as being a livestock carrier. The legislation providing this exemption expires in January 2012.
13. The project is not expected to result in a lot of runoff. The project area is relatively flat and the duff of the redwood forest works very well for erosion control. Water quality will be protected by implementing the elements identified in the Stormwater Pollution Prevention Plan which will be developed prior to ground disturbing construction activities begin. While the project may result in more STAA vehicles traversing the grove, the overall number of trucks is not expected to substantially change as a result of the project.
14. Access to local businesses will be maintained throughout construction.
15. There are no known Native American burial sites that would be impacted by the project.

"Trisha Lee"
<trishale@sonic.net>
01/28/2009 11:24 AM

To "CalTrans Deborah Harmon" <deborah_harmon@dot.ca.gov>, "CalTrans Kim Floyd" <kim_floyd@dot.ca.gov>, "Gail Moss Wes Chesbros"
cc
bcc
Subject 1-28-09 FINAL Summary entire DEIR Caltrans 101 Richardson Grove Realignment Sending Plus Making Hard Copy to Deliver

Dear Deborah Harmon, Kim Floyd, and Wes Chesbro,

These are my comments adressing the Caltrans Environmental Impact Report for Richardson Grove. I would appreciate it if you would please acknowledge receipt.

Thank you,

Trisha Lotus
2425 C Street
Eureka CA 95501
trishale@sonic.net

To:
Deborah Harmon

Senior Environmental Planner
CA Department of Transportation (Caltrans)
1656 Union Street
Eureka, Ca. 95501
707-445-6600
deborah_harmon@dot.ca.gov

cc:

Assembly Member Wes Chesbro

Website: http://www.assembly.ca.gov/Chesbro
Email: Assemblymember.Wesley.Chesbro

District Office:
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Overview

Is it not true that these oversized STAA Trucks being designed to be larger and larger all the time, actually take jobs from two to three people, and give these jobs to one person? So who are we creating jobs for? 1

Are we not currently intent on getting off Diesel and foreign oil by researching new fuels for low emission trucks to be designed very quickly here, thus making these STAA trucks already obsolete? 2

Didn't President Barack Obama say we need to create jobs? Yes, I am writing the President too, as anyone who is for stopping global warming would not do this Caltrans 101 Richardson Grove Project, as is it not true many of these STAA trucks are already antiquated trucks and is this not coupled with antiquated business practices, and a few business people thinking only of themselves? 3

Is it not true, that this highway widening project will likely cause traffic to go faster, and thus it could seriously impact those local businesses along highway 101 near the proposed Richardson Grove construction site area? Has Caltrans thought about in those businesses in that area with the traffic increasing? Has Caltrans thought about the extra damage this event will do to harm protected species and their environments. 4

Do you see that Eureka lumber supply businesses will be underpriced with a big company like Home Depot who can afford to undercharge, thus forcing the other local lumber supply companies out of business, that is if they are not already shrinking or closed in the worst economy ever due to George W Bush Administration, etc? 5

Isn't off loading a respectful job? Don't fork lifts make the transfers easier if needed to transfer to a regular sized trucks? Nobody gets their backs hurt anymore and systems can be created for transfer of whole beds already separated to the size of the truck to be transferred to. Math, is all it is. Math and design. 6

Does Caltrans care what happens to all those workers, and the truck drivers who get replaced with STAA Trucks too? Does Caltrans care about all those truckers who lost their jobs because of these terminator trucks that I am afraid to drive near one on the regular freeway,. like in the bay area or the whole two lane road from the Redwoods south to Willits or below...Willits. Those are all regular sized roads and the trucks take up a whole lane and then some, have you noticed that? 7

Don't you have to agree, that these big trucks took away so many jobs??? Does Caltrans actually believe that any of these businesses pushing for this project will actually push the savings off to the consumer? 8

If anyone was to read this Draft Environmental Impact Report, would they not clearly see there has been no two year study of the Endangered Marbled Murrelets, and yet the project is proposed to go ahead even if the study is not done, correct Deborah Harmon? PAGE #103 9

Is Caltrans really caring about our environment with this project, or are they part of a streamlining with big campaign money pushing the Governor to the point of being a hypocrite as he and Ackley and others (a select few) pushing this through in a sneaky way? Can you deny this statement? 10

Until the press got a hold of it, is this not true that the management of Caltrans would have pushed through this Richardson Grove disaster, not caring at all what effect this construction noise, the cutting into the root systems, the damage to endangered species, and further damage to the Eel River? Is it not true that Governor Schwarzenegger is pushing to "relax environmental standards and requirements" in order to push his agenda through (haven't figured out if he has investments here or Ackley invested a lot in the Governor of California. Perhaps you can enlighten me: will you please? 11

Where in your studies trying to prove STAA is the only way, have you included all the businesses who use regular sized trucks? Is it not true that the businesses already pass those costs off onto the consumer, correct? 12

Oh, excuse me, Sun Valley stated they did not pass the cost off. No, instead they hired illegal workers nearly 300...and of course they didn't know, they did not pay overtime and now law suits are forcing them to pay up, many workers are sick from poison in growing processes at Sun Valley and thus more law suits. These are the kind of companies Caltrans is in bed with.

Shall we see through to the truth here? This is not the fault of the citizens of California who own these parks, it is Sun Valley Flower's own fault and bad business practices coming back ten fold, and who wants their old toxic flowers anyway? Certainly not me.

Is it not true that your studies are all unfounded, from endangered species, to efforts of more and faster Diesel STAA trucks allowed through the park, to the noise levels of construction like jack hammers, cement cutters, back up bells, all day and all night long, holding 13

up traffic for hours and the local businesses not having access so they will likely all fold? Do you see all the lies in this DEIR for Richardson Grove concerning nearly every topic???

14

Don't you think any college educated person can see all the places that Caltrans has tried to convince the public that there will be no environmental impact, when in truth it will be a devastating impact on Protected Habitat, Protected Species, Protected Wild Scenic River below from run off, and this has the potential of killing several 1000 year Old Growth Redwood trees due to cutting into their root systems, and this will be opening the area up to more negative environmental impact from increased fuel emissions?

Quite frankly, many would agree this wanton disregard for endangered species, their habitat, scenic rivers, and digging into the root systems of Old Growth Redwoods are intentional, thus is this not criminal intention to harm our environment and protected species?

Let me run this by my sister who works at New York Law School, and I will get back to you on that one, ok? To knowingly misrepresent an environmental impact report to disregard Environmental Protected Species Act, is not something to be proud of at all (see page 99 for Federal Endangered Species Act (FESA): 16 United States Code, Section 1531, et seq. See also 50 CFR Part 402).

15

Then to have Governor Schwarzenegger talking of wanting to "relax environmental requirements" in order to push these two highway projects through is really beginning to sound even more questionable, does it not Deborah Harmon and Caltrans? Is this not corruption by management of Caltrans, the Arkless, the Governor, Pat Wiggins, and the whole lot of you in that this is trying to be streamlined rather than doing all the necessary requirements? Can you argue with me here? I think not.

16

The statements Caltrans makes all through this DEIR, such as "the Northern Spotted Owl has not been spotted, therefore this project will not harm local species" and at the same time not waiting for the proper field studies. Or how about this one, "we read a chart from 1999? (didn't see date of chart), and it said there was a Northern Spotted Owls nest 1/3 mile away, therefore we will not be harming any endangered species.

No recent "in the field" studies have been done, and old charts do not prove those owls or the Marbled Murrelets have not had babies nesting or growing in the close proximity. Is that not correct, Deborah Harmon? Or are there recent studies and they show such a huge impact that you are hiding them? What is the truth here?

Or how about every protected species from Northern Spotted Owl to Marbled Murrlete, to Coho are all 1/4 mile to 1/2 mile away and will not be effected, you say? Then the person reads the entire Environmental Impact Report for Richardson Grove and sees the charts, the studies, and the determinations on Endangered Species and their habitat and the river, all pretend this will not be devastating to an already endangered area???

Don't you agree, that I am hitting the truth right on the nose here, Deborah and your other supervisors who are creating this irrelevant 181+page and another 40+ page document full of lies and miss-leading statements to try and fool the citizens of California in what you know to be a project that will harm our environment substantially, is that not also true?

17

Or saying there will not be extra run off into the Eel River due to construction, or actually you say there will be but you will stop it all from going into the already seriously endangered Eel River. Do you actually believe that there will be no harm done to the Eel River by this Richardson Grove project of yours?

18

Another very important, and of the utmost importance, is the most incorrect of all, in the Richardson Grove DEIR when you are saying this project will not endanger Old Growth Redwoods, as you know that digging in the root systems of old growth redwoods and cutting trees inter-twinned with the roots of old growth redwoods will in truth have a devastating effect them, and sadly could be the death of several of these 1000 year old preserved Old Growth Trees, that have never been logged, will it not?

If you kill these trees, you will be prosecuted to the full extent of the law, Deborah Harmon and others attempting to deceive the citizens of California who own these State Parks. Actually you know that will be in complete violation of the Federal Endangered Species Act (FESA) on page 499, don't you? This is why you want Arnold to "relax" environmental requirements, is it not?

You know exactly how much damage this can cause, and going into further detail below, the "fix it" with something to hold the roots together and fill them will really be so devastating I am cringing and my stomach is turning just thinking of it. You know all this already, don't you Deborah Harmon, don't you Caltrans managers, and authors of the DIER?

Is it not true Deborah Harmon, that this whole entire Draft Environmental Impact Report is unfounded and unscientific, and actually (to me) it willfully disregards protected species, and in a court of law could be deemed as harassment toward protected environments and species; would you not agree?

Is it not a lie %%%% not a like, when you state that the sound levels (PAGE # oh no page...you hide your bloody inaccurate Project Noise Levels chart in the back of the Draft Environmental Impact Report in Appendix E, with no page numbers, and you have the audacity to say all those construction trucks and equipment are the same as the regular traffic, and you know this is also a lie, don't you? 19

Instinctively I know this is wrong, and just Googling Road Construction Noise compared to regular traffic, will easily prove that your charts are entirely incorrect just to try and lie to the public again saying that road work will not endanger species, when in truth you know it will so you intentionally miss-represented construction equipment sounds in the chart, were you not?

So was this another "mistake" or am I building a real serious case against you for actually intentionally trying to deceive the citizens of California? Who is involved besides the Arkleys, Sun Valley Floral, Cattle business, Recycle, Patricia Wiggins, and the Governor? Governor Schwarzenegger promised not to take campaign contributions: didn't he? Why is he trying to push these projects? Let me see...maybe it was due to campaign money and promises because of that money, or is it some other corrupt reason??? 20

Anyone able to check on these things? Lunch a couple/few years ago with the Arkleys at the lumber jack restaurant near Cafe Marina. It is all is making sense now, isn't it? Maybe there is more; maybe it also has to do with the railroad (Corridor), or Arnold has a summer cabin in Trinidad perhaps or a high-rise in the projected Marina Center Condos, perhaps? There is more to this story? Won't it be fun to uncover it all?

Government tax break for the extra expense of off-loading is warranted, but then businesses can't also pass the cost off to the consumer. That is just like the bail out, that once again hurts the consumer, who many are already losing their jobs in this horrible economy; the worst in my lifetime. Oh, and it was you Republicans who voted for Bush/Cheney crooks and it is actually your own darn fault the economy is in the crapper, isn't it? And are you wanting to damage a precious piece of our protected environment just to get your contract, Caltrans?

WHY DOESN'T CALTRANS DO SOMETHING REALLY NECESSARY, LIKE FIX THE LEVIES IN THE DELTA, OR FIX THE REAL HIGHWAY AND INFRASTRUCTURE PROBLEMS AND LEAVE THE STATE PARKS AND EUCALYPTUS TREES ALONE. BY THE WAY, WHAT HAPPENED WITH THE CALTRANS PROJECT IN REDDING, HUGE PROBLEMS THERE, RIGHT? AND NOW YOU WANT TO RUIN OUR PIECE OF THE WOODS TOO? Have you not done enough damage?

These questions are directed to management of Caltrans and not the workers, I want to make that completely clear. The workers, just like the soldiers, are just doing their jobs.

Is it not true that it is a much better idea is to invent low emission regular sized large trucks and so it will be back to two trucks in every STAA thus creating jobs rather than taking jobs away? Do you not get it that we will soon be using the new fuel like vegetable oil or and not oil or gas? Don't you agree that regular sized trucks with zero or very low clean fuel (to be announced) will offer two to three jobs to every STAA Diesel truck? 21

Have you worked into your studies the fact that many of these STAA Trucks are already aging thus spewing more Diesel into the air to further damage the protected Richardson Grove State Park? 22

Are there not more important projects that Caltrans can work on, rather than cutting through a 1000 year old canopy of a State Protected park, damaging the root systems of old growth trees, interfering with protected species with cutting trees and noise levels that are way above normal, and causing more run off into an already low quality Eel River? 23

Is it not correct to say that Caltrans does not have justification to cutting here and there into a State Park owed by the citizens of California and not special interests?

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Moving on to address specifics of the Draft Environmental Impact Report for Richardson Grove State Park

Caltrans 101 Richardson Grove State Park Realignment Project
Environmental Impact Report that was ready on December 8, 2008
Final Hearing Portuna River Lodge only one week later on December 15, 2008

Final Date to Submit Comments and Questions is January 30, 2008

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CHAPTER 1
Section 1.1
Page 1

In the third paragraph, sixth sentence, Caltrans states "this improvement in goods movement will help area business stay competitive in the marketplace."
Why does Caltrans state that to widen Richardson Grove it will improve the market place, when in truth it will be the opposite? Have you asked the local lumber supply places what effect opening a Home Depot will have on their businesses? 24

Isn't is also true that the very businesses and members of congress who have been pushing this agenda, met together way before the public sector was allowed to participate? Do you not find that to be deceptive?

Just like Wal-Mart, don't you see that Home Depot will under sell other businesses, and then when Piarson's, Myrtletown Lumber, and other lumber supply places will very likely close, and then Home Depot will gain a monopoly and raise costs? This would be a disaster for our long-standing local businesses, would you not agree?

Section 1.2
Page 2
In the third paragraph where Caltrans states "the dimensions of the curves (curve radii) are not consistent within the project limits and the tight curves do not meet current design standards. The DEIR also goes on to say, other features of the roadway which do not meet current design standards include: shoulder width, distance to a fixed object, stopping sight distance, and tilting of roadway, etc..."

Is it not a fact that Richardson Grove is a State Park and the roadway was built *after the Park was established to be protected by the State* ? Richardson Grove Park was established in 1922, and the road was built a few years later, is that not correct? 25

Section 1.2
Page 3
In the statement made by Caltrans in the last sentence of the first paragraph "With this best case scenario, the model still shows STAA vehicles crossing the centerline at .26 feet on existing alignment".

First of all, is it not true that Caltrans first says STAA trucks are not permitted, and now Caltrans is saying they know exactly how much bigger these trucks are than a highway built in the early 1900's, and how much they pass over onto the line of other cars on regular highways, and yet, they are let through with exceptions, is that not true? 26

How fast are these STAA trucks going through this State Park that is causing them to be crossing over the line into the traffic lane of oncoming traffic, on a highway that is supposed to be restricted from these trucks?

Is it not true that Humboldt County depends on tourist trade, as fishing, lumber, and now all commerce is down due to George W. Bush failed administration causing the United States economy to fail? Can't you see that cutting into the entrance to Humboldt County with all reasons unfounded, would be a huge mistake for the survival of Humboldt County as a tourist area, wrong for the protected species and the wrong thing to do for protection of Eel River?

Don't you see that it is of the utmost important to preserve our historical entrance to Humboldt County, in order to recognize the Historical effects this will have on our Tourist Trade?

If this project is allowed to proceed, can't you see that the trucks and cars will fly by and not stop at the nice little shops near Richardson Grove? Has Caltrans thought of their welfare? Or are they not the "right" businesses to care about? 27

Can't you see how devastating this project will be on this 1000 year old canopy, that is just as it has been for over a thousand years, aside from the initial road being constructed around 1925? 28
~~~~~~

Do you realize the devastating environmental effects this project would create by having more trucks and cars going at a faster speed to increase the carbons onto this protected forest? This is not good for us and it is not good for California. Then who is this plan good for besides Caltrans and a few businesses?

Section 1.2
Page 3
Goods movement is actually not going to increase the economic benefit of the County, as Caltrans states in the second paragraph, last sentence, is it? This project is not going to create more jobs for California, is it? This project will only create a few jobs for Caltrans while the project is going on, and it will actually cut jobs in the long run won't it? 29

How will it be for off loaders and regular sized truck drivers loosing their jobs? Does Caltrans or the select businesses pushing this project care about all these people who will loose their jobs if this project is allowed? How about all the jobs that will be lost when Home Depot is pushed through, which in essence is happening right now because everyone is too busy on two other projects; but then you knew exactly what you were doing, didn't you all?

Creating larger trucks will take the jobs of two to three people. Don't you agree that this Richardson Grove Caltrans plan is actually more of a detriment to the economy by taking jobs away from a community already lacking in jobs or being laid off from the very companies trying to push these plans through in a shady way. Does Caltrans want to destroy a protected State Park entrance; a 1000 year old treasure that can never be duplicated to take jobs away from Humboldt County?

Third paragraph on page 3 in the first sentence states "trucks are at an economic disadvantage because cargos must be unloaded and transferred to shorter trucks come to and out of the county. Caltrans states that local businesses and residents pay about 10 to 15 percent more for goods due to poor truck access, increasing the decline of local businesses."

OK OBAMA...WRITE OFF HERE TO PROTECT OUR ENVIRONMENT. BAIL THEM OUT AND MAYBE THEY WILL PASS THE SAVINGS ON TO THE CONSUMER???...let me see...I THINK NOT!!!!

Do you see the irony here? Bigger trucks take the jobs of people, and off-loading and driving smaller trucks creates jobs for people. Do we not need jobs for our people or not? We can do without flowers to survive, and we do not have much sustainable lumber left, so the lumber businesses are already hurting and laying off people. With the economy hurting, don't you see that this money would be better spent on fixing the levies or education or anything that is important? 30

Still 3rd paragraph
Caltrans states already in this paragraph that the increase is already passed onto the consumer, so despite passing higher prices off to us, they are saying off loading is causing closures of businesses. This is simply not true then is it? How can it be if the cost has been passed onto the consumer? 31

In the last sentence on page 3,
Caltrans states that "several businesses, including lumber, floral, food, and other manufacturing, as well as the local newspaper, have noted higher costs and have them considering relocating out of the County. " Boy, that really makes me sad...NOT!

Here we go with the businesses that think we can't do without them. First of all Times-Standard already sold to a New York company. Sun Valley Floral has so many lawsuits against them for pesticides poisoning their employees, they got busted because they hired illegal workers rather than hiring locally (thus taking jobs away from Humboldt County and giving them to illegal Mexican workers who are now getting medical services at our clinics and overloading them and the hospital; way to go Sun Valley. Also Sun Valley Floral also have more law suits against them for not paying employees for overtime. Also Arcata Recycling company is the clincher. A recycling company that does not care if the roots of old growth are harmed, or protected species eliminated, or the Eel River further imparted. Why do I even bother?

Oh and pushing those Mercury light bulbs and then charging to recycle them. I just want to throw up all over this document. Arnolds idea of global warming changes is using Mercury light bulbs that everyone just tosses into the garbage. Then more mercury in our streams and rivers, more fish dead, rivers dead. Wake up people. What are you trying to pull over on the people of California?

Maybe Sun Valley should relocate near Mexico and hire all illegal workers and not pay any work comp, as your poison pesticides do not help the soil, and your hiring and employee work ethics are not good for Humboldt County. May I be the first to wave good by. Please help our economy and leave Humboldt County. Would you agree that law suits are putting

Sun Valley Tulips poisoned flower company out of business, and not off loading? And would these businesses fair well down in Santa Rosa where the cost to run a business is three times as much? By all means please do leave. The homeless can run a recycling center, and we don't need a company who has shady business practices. We should cut into a grove for that?

Section 1.2
Page 8
In the second paragraph Caltrans states "there are other local income losses due to the STAA restriction, primarily lost exports. Estimates of lost sales provided by local businesses participating in a survey sponsored by the Humboldt County Workforce Investment Board in 2008 indicated there are four general categories. (1) limitations on truck size (2) higher truck transportation costs (3)shipping delays (4) having to keep higher inventory to mitigate shipping delays."

Don't you think we need an actual accounting of the amount of lost sales? How many business participated in the survey and what businesses comprise the "Humboldt County Workforce Investment Board"? Do they represent just a few select businesses or what? Truck size is taking jobs away not creating jobs, and add that to outsourcing, and all the jobs are given away for the bottom line. 32

Wasn't a great deal of the higher truck transportation cost because of gas prices that was causing Diesel to be $5.50 a gallon until just a few months ago, and this has nothing to do with off loading either, do you know what I mean?

I did not see factored in that shipping delays could have been because Confusion Hill closes 101 off, and Highway 299 also closes due to slides in the winter. Is that not correct Deborah Harmon? Also, isn't it true that when everything comes from China, there will be shipping delays. As far as exports, isn't it true that when the weather is bad, the roads and slides increase. Do you not see that more cutting to the canopy, will in fact create more landslides? How does Caltrans think the reason businesses have a slowed business it is to do with landslides, the economy, and many other factors influence exports besides off-loading. 33

Lastly, in this economy, isn't it true that having to keep higher inventory is a given when no credit is being extended? Does anyone else take any responsibility here on our economy? Do you think we are idiots, to think this is all due to off-loading? 34

In the last paragraph of page 8, Caltrans states that "realignment "improvements" would improve safety for other large vehicles such as motor-homes, buses, and vehicles pulling a trailer."

Do you agree that the Caltrans **"No Build"** idea of a stoplight allowing traffic to pass from one direction and then the other direction in a single file, is actually a viable idea that could save the taxpayers 8-10 Million dollars? 35

Just slowing the traffic to 25 mph during the day will solve most of the problems. Is Richardson Grove "a protected State Park" less important to Caltrans, than say Willits where traffic goes slow with many stoplights all along that stretch? 36

Why does Caltrans not bypass Willets? Is it the same reason they don't bypass Richardson Grove? Is it because there are mountains and many protected forests there also? 37

Don't you think that perhaps only allowing STAA Trucks to pass single file and at 25 mph, between 7 p.m. and 7 a.m. is actually a very practical idea? The exempted trucks can travel at night and the "normal sized" trucks can travel night and day at 25 mph through the grove; enforced and triple fined signs prior to entering grove twice. 38

Do you see that just by slowing the traffic to 25 mph (enforced by retired police and newly graduating police, cameras, and possibly a strategically placed police car to be moved every few days) will allow for slow, safe and careful passing? 39

On the subject of Willets and causing STAA Trucks to travel at 20 mph with stopping at several stoplights, why does Caltrans not bypass Willets? Is it the same reason Caltrans can not bypass Richardson Grove?

Also on another subject, what is the overall impact going on to the environment when one combines the Confusion Hill Bypass, 299 Caltrans Projects, and the Caltrans mess in Redding I have been reading about on Google? 40

Do you agree, that nearly every paragraph in the entire EIR is full of inaccuracies? Is that not correct Deborah Harmon and the other creators and supporters of the Draft Environmental Impact Report for Richardson Grove?

Section 1.2
Page 9
The first paragraph is stating by Caltrans "about 35 collisions, which included 17 injury collisions, and 18 of property damage. Of these 35 collision incidents, 11 involved multi-vehicles, with no fatalities."

How many deer crossed the road of a speeding driver? How many drivers were tested for drugs and alcohol? How many drivers were speeding and drinking? Are you saying that the collision history indicates the actual collision rate to be 3.47 collisions per million vehicle miles? What does this really mean? Where are you getting these numbers and calculations from? How can you possibly calculate that in Richardson Grove it is twice the expected collision rate for similar roadways? 41

The last sentence in that first paragraph states by Caltrans: "A comparison of actual collision rate to the expected statewide rate for a similar facility is summarized in Table 2."

Please explain to me what similar facility is being used to compare? Do you mean Highway 299? Is it not true that this is a unique grove of 1000-4000 or more year Old Growth Redwood Trees, has been the entrance to Humboldt County since 1925 when the road went in? CALTRANS NEEDS TO ACCEPT THIS IS A HISTORICAL SITE. ANOTHER HISTORICAL FACT IS WHAT WAS FOUND IN A VERY SMALL GEOLOGY SURVEY. THAT NATIVE AMERICAN TOOLS DATING BACK 3,500 YEARS. 42

THAT HAS NOT BEEN NOTICED ALTHOUGH IT WAS MENTIONED ON PAGE 54 IN THE CALTRANS DRAFT ENVIRONMENTAL IMPACT REPORT FOR RICHARDSON GROVE STATE PARK REALIGNMENT. 43

Isn't it true that it would be quite difficult to compare this protected old growth forest where the original road goes through the State Park? I was just googling, and it clearly states that these forests are the last remaining old growth forests in the world, and does this not seem the most Historical Reason to bring the Tourist Trade here to Humboldt County? Are you taking into consideration that Tourists come to Humboldt County because of the forests? Have you worked that factor in before trying to tear apart this Historical Entrance to Humboldt County? 44

REMAINING BEING THE KEY WORD HERE. Do you see what I am asking you here? How can you come to such conclusions, when one can simply Google for the truth of anything? How can you deny the entire DEIR is based on inaccurate information, and I would venture to say testers on disregard for the law. I will have to check with sis on that one too, but perhaps by some small chance do you already know the answer?

Is what I read in a blog true, that Caltrans/Arkleys/SunValley/Pat Wiggins/Cattle, Arcata Recycle, Times-Standard and other small businesses were gathering in closed meetings long before the general public knew? 45

When did you all start meeting? Did you generally start to meet in groups of small business interests nearly a year before the general public is told of a tiny meeting in the Richardson Grove Area at an RV Park in Benbow that I read about in past newspaper articles I pulled up? Let me guess. Was that meeting that the public was finally invited to in the dead of winter too?

WHY DID YOU HAVE THE FINAL HEARING FOR THE RICHARDSON GROVE PROJECT ONLY ONE WEEK AFTER THE DRAFT ENVIRONMENTAL REPORT CAME OUT? WAS THIS DONE ON PURPOSE TO TRICK THE CITIZENS OF CALIFORNIA WHO OWN ALL STATE PARKS? 46

Is this project, the 101 Corridor between Eureka and Arcata, and the Marina Center and Home Depot part of this three-fold highway plan? Were these three plans pushed through in December to purposefully deceive the citizens of Humboldt County and the citizens of California who own all of these State Parks? 47

Will you tell the truth now? Your studies are really not representing all the truckers and people working as off-loaders who will loose their jobs if this ill created project is allowed, are you?

Does Caltrans care about all those people who will loose their jobs? How many jobs will be created by doing this cutting into a 1000 year old canopy? Are you being vague because you know that so many jobs will be lost if this Richardson

Grove is allowed to be cut into and mess with. This project, if allowed to proceed is allowed to proceed to open the door to big box companies.

The number of jobs to be lost will make your head spin. Do you know what would happen if Parsons, Myrtletown Lumber, Schmidbauer Lumber, and other lumber supply places like Ace Hardware were to all close? How about the pain stores and everything Home Depot can sell and under charge. Then when the other businesses close 48

How about all the lost trucking jobs due to more STAA Trucks? Have you done a study to see how many trucking jobs and off-loading jobs will be lost? Didn't President Barack Obama say there was money available for people who can create jobs??? Here you go... Two truckers and an off loader and eliminate STAA Trucks as soon as new fuel big but not over-kill terminator trucks are manufactured with zero emissions. The STAA Trucks are already obsolete. There will be inventions that have not even been conceived happen in our lifetime, can you see where I am coming from? 49

So just ask yourself, Is cutting into a 1000 year old canopy and very likely harming the root systems of 1000 year Old Growth trees, very likely substantially harming the endangered environment and species of the Northern Spotted Owl, the Marbled Murrelets, Coho, and definitely likely to further harm the already endangered Eel River? Do you realize that the Eel River is hooked up to the Sonoma County Water Systems?

Please tell me you know that if the Eel River dies (it is so bad now) and if the Eel River dies then Sonoma County dies or they will have to pull on another water source??? Better get your water capturing devices in place, if this project goes through, or they will come after the Mad River, our source of water. This is all true, isn't it Deborah Harmon? 50

Are you going to try to tell the citizens of Humboldt County that this was not all planned exactly for three Environmental Impact Reports to come out at Christmas, and two to do with my families history? You did not bank on that one, did you?

Perhaps you did not bank on the fact that some of us care more about saving our forests and wildlands and exposing the truth than you expected, did you?

Did Caltrans consider how they were treating people who care about our environment, but people who are elderly or have disabilities, so it may take longer to reply to such lengthily documents? Did Caltrans take that into consideration? How could Caltrans consider people with disabilities when pushing three DEIR's in December of 2008, (excuse me two by Caltrans and one by Arideys in December. 51

DID YOU TRY TO TRICK THE CITIZENS OF HUMBOLDT COUNTY BY HAVING THIS CALTRANS ENVIRONMENTAL IMPACT REPORT TO COME OUT IN HARD COPY ON DECEMBER 8TH AND THE FINAL HEARING ONLY ONE WEEK LATER ON DECEMBER 15?

Why did you also have the Final Meeting just a lot of diagrams, but another unfocused meeting for Caltrans 101 Corridor on December 3? Why did you hold both meetings in December and the Final on the busiest shopping day before Christmas, December 15? Were you intentionally trying to sneak these projects by?

Do you think you might have under estimated the numbers of people in Humboldt County that care about preserving the environment, and who do not like big business pushing everyone else around. Or is this precisely why you did these three projects (two Caltrans and one Marina Center) all together in December 2008, with final comments and questions due on January 30, 2009???

Despite trying to trick the citizens of Humboldt County and California, did you even consider that some people have disabilities so unable to process so quickly? Even the people who I called that were on the Save the Redwoods League potential partner's list; none could possible have time to read the Environmental Impact Report in a week. Did you do this intentionally so to make it difficult for people with disabilities and even highly educated people were busy shopping and making plans to visit mom or grandma? Why did you do this and make it so hard on people? Is it because you did not want public input? Are you trying to push your plan by tricking the citizens of Humboldt County and California?

In fact, you do not care if anyone reads this Richardson Grove DEIR, because you are purposefully trying to pass this through without the public to examine it, and without the proper studies done to the environment, is that not true Deborah Harmon? 52

Also, do you agree there was deception in the media using a local newspaper and Channel 3 where Caltrans only

represented the businessas and organization that wanted this project to go on to better a few businesses like (Sun Valley poison flowers, Cattle for slaughter who already have a pass, Times-Standard and some others. This is only a fraction of citizens and does not represent the entire population of California, does it?

Are you doing all of this on purpose to harm our people who are struggling to survive and did you purposefully release three Environmental Impact Reports in December of 2009, when the Chrisimas season is their only time of rest for many?

Was that your intension to be actually trying to burden our local people, some dealing with disabilities, by pushing them to the brink, and are you purposefully trying to neglect environmental studies that need to be done?

Why did Caltrans not mention that deer also frequently cross that road from north of Ukiah, and may accidents are caused by deer crossing? Why are deer not mentioned here as a cause of accidents? 53

I nearly hit a deer coming home from down south, at night in a rainstorm on this Highway 101 route above Ukiah.

It was only because I was driving 25 mph, due to the stormy winter weather conditions, that I was able to stop and not hit the young deer frozen by my lights in the center of the road. Driving slowly, I was able to stop and allow the deer to cross, as no one was behind me. Going slow, I was able to avoid three obviously intoxicated drivers. Two cars were upside down, the roads get black ice and such is life in the stormy northwest in the winter. This was all north of Ukiah and way south of Richardson Grove and Confusion Hill I was trying to pass before the road was dealing with yet another landslides that are a problem due to previous Caltrans' mistakes in road building that cause run offs and

In the third paragraph on page 9, in the last sentence Caltrans states: "These scenic distractions factors (the forest) and these fixed objects (the trees), contribute to a condition of a distracted driver in an environment with little to no clear recovery area. They go on to say, These factors, non standard alignment, objects on or near the shoulder, and scenic value of the setting cannot be improved within the scope of the proposed project." Since the major factors creating a distracted driver cannot be improved by this project, and so what? So why go ahead? 54

Section 1.2
Page 10
In paragraph two on page 10, Caltrans is discussing a speed survey that determined people speed past the stated speed limit. Knowing this fact, doesn't it makes perfect sense to lower the speed to 25 mph so to allow for the 5 mile over that people who push the envelope always travel?

Is it not true that in paragraph three on page 10, Caltrans says themselves, that lowering the speed, if implemented, would help improve safety and operations of this segment of highway for both motorists as well a providing some improvement for bicyclists?

So therefore, doesn't it make sense to lower the speed even more to 25 mph and provide enforcement by the CHP, and this would take care of this problem without any road construction? 55

Where does Caltrans address improvements for the safety of bicyclists and pedestrians? Is there a plan for a bike path inside the state park? I will answer that, NO! So once again do you see how this plan is only focusing on bigger trucks and the bottom line of a few businesses? 56

Section 1.2
Page 11
Is Caltrans trying to lead people to believe the entire route 101 is a 4 lane highway except in the Richardson Grove State Park, as Caltrans states in the first paragraph? 57

Actually from around Willets or maybe the next town north, isn't it true that there are many sections where the road is a two lane road?

Can you argue with what I know for a fact (because I drive 101 frequently to Sonoma and Marin Counties), that for a good deal of my trips back and forth that slowing to 25 mph going through many little towns along the way, and with many stoplights in Willets slowing traffic to 20 mph or to a snails pace is a fact, and so slowing the speed way down in Richardson Grove would not be different than in the other little towns?

In the last sentence of the last paragraph on page 11, Caltrans states "STAA restrictions resulted in interest groups lobbying for Assembly Bill 2425 (1998) provided exemptions to the STAA restriction for licensed carriers of livestock that also meet certain length and other criteria. Other bills Senate Bill 775 (October 2007) extended this exemption until January 2012."

" Moving vans or household goods carriers are also exempted from the STAA restrictions per the California Vehicle Code Section 35401.5 (f). These exemptions allow these STAA vehicles to be used without roadway improvements to help protect the safety of the traveling public."

To this statement, forward thinking people are asking, "how do the STAA exemptions help protect the safety of the traveling public?" I am referring to what Caltrans says themselves. What is the point of the project if STAA trucks can travel safely through Richardson Grove State Park? 58

Section 1.2
Page 12
"Caltrans did a study along with others like the CHP, State Parks, etc. to create A Report to Improve Safety and Accommodate Commerce on Route 101. The study found that collisions involving trucks are especially prone to lengthy cleanup which causes significant delay to traffic, the potential exists for hazardous materials to contaminate the Eel River or other environmentally sensitive areas. In addition, these events strain available emergency response resources."

If trucks were not so large and they were required to go very slowly through Richardson Grove State Park, wouldn't there be little chance of accidents or "environmental damage" due to spills when the driver falls asleep? Also if truly caring about the Eel River, then why not stop draining it dry with the water systems?

Do you realize that any cutting into that 1000 year old canopy WILL CAUSE DRAINAGE AND RUN-OFF PROBLEMS THAT WILL ALSO FURTHER HARM THE EEL RIVER?

Page 13
First paragraph of page 13, Caltrans goes on to say "that because they came up with a computer image, The Technical Advisory Group was dropped, so no other efforts were made to consider alternatives for goods movement." **This brings up the question as to why not use shipping, and is railroad access an alternative for goods movement?** 59

There may be other alternatives that can be developed as well, but the study was dropped because Caltrans had a computer generated plan? How is this good planning, to only include Caltrans plans and drop the community forum to brainstorm for other alternatives? 60

Section 1.3
Subsection 1.3.1
Page 18
This first paragraph brings up a very good idea of "replacing the existing culverts with cast-in-place plastic pipe liner that is flexible and made of thermosetting resin." **Why haven't these culverts been fixed already if they are causing run off?If the old culverts are faulty, as that is what I read in another section (page 80) then it is important to correct any current run off problems that may exist with the least amount of impact.**

On page 80, it says "permits for the culvert improvement work would be required from the U.S. Army Corps of Engineers, California Dept of Fish and Game, and Regional Water Quality Control Board. An on-site meeting was held on June 30, 2008 with staff from California Dept of Fish and Game, Regional Water Quality Control Board, and Army Corps of Engineers to discuss the project. (page 81)" 61

What was their determination? Please show me what transpired. Is there a documented study anywhere? So did they do a study, or just drive there and chat?

More good points to consider on page 18 are that there is no guarantee that in the course of grinding off the open graded asphalt and replacing it that the underlying root structure and water absorption ability of the old growth trees would not be adversely effected, is there? Since these are sensitive and shallow rooted trees, isn't there a very good chance the Old Growth Redwood trees will actually be harmed if this project is allowed to go through? 62

Does Caltrans have any guarantee that disturbing the environment by removal of excess materials and cutting into slopes would not adversely affect the underlying root structure and water absorption ability of the old growth trees? Aren't these

irreplaceable natural and historical treasures that have been entrusted to the State of California to preserve?

In the forth paragraph on page 18
"the 300 foot long, 18 foot high retaining wal opposite Singing Trees is to be built to help prevent run off."
I know Caltrans knows there will be run off as a result of any cutting into the canopy, and this will be their Band-Aid for doing something that should not be done in the first place?

63

Has Caltrans considered what an eyesore that retaining wall will be for this business (Singing Trees)? Has Caltrans considered what a disruption all this construction will cause to that and the other local businesses?

" The truth is, that this disruption caused by the construction cannot be mitigated",
Then I ask, why you want to push this through, and why use so much deception all through this DEIR? Could it be you know the ramifications, and are trying to hide them from the general public?

Section 1.3
Subsection 1.3.1
Page 19
In the last paragraph, Caltrans states that "non-STAA trucks are often unable to stay within their lane"

Please tell me how long trucks (including STAA trucks with exemptions) along this highway? I will help you, this highway has been open nearly 90 years, and you are now saying that non-STAA trucks don't stay in their lane? How fast are they going? Did you know that those big STAA Trucks go into my lane on normal freeways? How about that for a fact? Here is an answer...SLOW DOWN!

Finally Caltrans states that "with the no-build alternative, the roadway improvements would not occur WHICH COULD HELP LOWER THE COLLISION RATE ON THIS SEGMENT OF ROUTE 101 (in the works of Caltrans in the DEIR). In other words, not "improving" the roadway would actually "improve" it! This negates any reason to pursue the project."

64

Section 1.3
Subsection 1.3.2
Page 21
Signalization Alternatives

Caltrans says "there would be a problem with signals and wait times in Richardson Grove if a single file signal was implemented." Please explain how we get back and forth to the bay area with so many stops and goes, and very slow traffic through many areas, and many lights through Willets with no problems? Does the traffic travel slower through those little towns south of Richardson Grove? Yes of course it does.

65

Page 21 ...middle of page
"A signal system would allow one way operation of this segment of Route 101 to eliminate the problems associated with trucks and RV's being unable to navigate the segment and stay within their own lane. However, there are issues associated with attempting a one way traffic signal at this location that make these alternatives infeasible. The issue with cycle length would not be severe if the signal was only in operation at night since traffic should be less than that during the day."

"Location -- The stop bars for the signal system would need to be located approximately one mile apart. The stop bar locations are based on the first available area for the signal equipment with the necessary sight distance for operation. Standard methods for traffic detection do not function over this distance. Therefore, the signal system would consist of two seperate signal installations consisting of a cabinet, loops, poles, and associated hardware connected through an interconnect cable."

"The typical location of such a conduit would be under the existing roadway." Who needs typical? Can't you think of another plan than under the highway if it you have "redwood tree root concerns all of a sudden?"

Can't your engineers figure that one out? "This trenching for the conduit would add significant costs as well as potential redwood tree root concerns." Oh, so now you have redwood tree root concerns" when here you have a simple solution that will actually work. Oh, and the significant costs??? hehahahaha And now you are concerned with costs?

What are you talking about significant costs??? Is it more than 6 million dollars to put in a signal light? There is a house at Singing Trees. Maybe you can hook up to their electricity and pay their bill, or some underground generator type thing. Don't you have any engineers working for you, Caltrans? 66

This is not rocket science. If you can figure out to make huge gashes into canopy when really you wanted to take out the old growth redwoods, and you know this will not solve the problem then you can figure how to hook up a signal and have it in a hidden metal box so animals would not chew the cable?

However I find it quite interesting that you are all of a sudden so concerned about root systems, when a simple solution is to use signals at night and STAA only go at night, and 25 mph all the time; enforced by triple fine.

Put a sign before the grove on both sides, triple fine and lights on, and get the local police (sheriff) to enforce strictly and they get the money for local police, and volunteer fire, and rescue. Put down the donut and get busy writing tickets to all speeders over 25mph. 33mph is $90, 40 mph=$100, 45 mph=$120, 50 mph=$150, or something like that. Hit the pocket book. 67

How on earth will these trucks possibly deal with rush hour in Eureka, and heaven forbid the 14 lights through the little town of Eureka...how on earth will STAA drivers cope with such a thing? Heaven forbid, they will have to slow to 25 and not run over people, children, animals, or bikes jumping out in every direction and into the traffic. 68

It is such a distraction with all that commotion and all the stores along the way; how does the driver possibly manage to concentrate to get through town without killing something or some drunk staggering across the street and into the STAA truck? I wonder, especially with all the distractions of fixed objects, and moving objects.

Then, why does Caltrans say signaling simply will not work without giving it a chance? Will it not at the same time be saving the taxpayers 6 Million Dollars (minus cost for a signal light). Are signal lights running in the Millions these days, cost wise? How many million dollars will it cost for a traffic light allowing single file at night?

Don't you agree, it will be saving this sensitive and protected environment? Or is it that Caltrans is really not wanting to consider such a small undertaking, because quite simply it might work? Or is it also that Caltrans really wants the 6 Million dollar project that will soon turn into a 10 Million dollar project?

Isn't is true that this signaling could be figured out so as to not cause back up or covering entrances to businesses by placing the signals in the right places? Isn't it true your engineers could figure a way not to hurt the root systems while putting in two stop lights before Richardson Grove and after Richardson Grove ... so no root systems would be effected?

I found it interesting the way you carefully described how you would dig into the root systems of the old growth at their base and dig out all the soil and cut roots of other trees, and put in a board, and fill you will not call toxic unless you take it off site?

Also, is it not another great idea that driveway lines could be drawn to allow entrance to any business there be left open to exit and enter freely, just as we are supposed to leave a crossing street or business driveway open when waiting for any traffic light. Can this be studied as a very possible potential? 69

Would you agree that the no-build practical course of action, that will include these signals to allow one way traffic to pass, and then trip the switch for the other way traffic to proceed, is a viable option? Do you know that everyone I have mentioned this idea to said that sounds like the perfect solution? What do you think of adapting Caltrans own NO BUILD option? It could be used only from 7 p.m. to 7 a.m., when the STAA trucks do most of their commuting. 70

Why is Caltrans saying this "no build" and "signaling" is not an option, when the one way signaling and stop signs placed

at entrances to businesses will prevent blocking of entrances? Perhaps if this were done correctly signaling could be utilized all day. Considering the environmental impact and the state of the economy, don't you agree that this "no build" with signaling is absolutely the best solution of all to allow STAA Trucks to come through until they are obsolete in 5-7 years and replaced with normal sized low emission trucks? 71

Page 21, in the third paragraph down.
Another argument Caltrans is using against signalization, states "the signal system would consist of two separate signal installations consisting of a cabinet, loops, poles, and associated hardware connected through an interconnect cable. The typical location of such a conduit would be under the existing roadway. **this trenching would add significant costs as well as potential redwood tree root concerns," and this is in the words of Caltrans.**

Why does Caltrans seem to have the utmost concern for the root systems for the old growth redwood tree roots under the road, but they have no problem digging into the root systems of many Old Growth as part of this project?

Is Caltrans saying the root damage needing to be done for signaling is more or less significant than the root damage to be done when cutting into this entire canopy being dug up for their 6 Million dollar plan? So roots are damaged by going under the road, and not more so by cutting directly into them? Please explain the reasoning here. In this day and age, is there not a way to prevent any damage to roots by hooking up the signaling another way? 72

Why is Caltrans trying to dissuade everyone from proceeding with this most practical and cost effective alternative, that will also have the least invasion damage done to root systems of the old growth?

Won't the "no build" and signaling option save the taxpayers 6 Million Dollars, while also keeping a State Park that is supposed to be protected safe from harms way? Isn't it true that it would be of catastrophic damage in harming old growth roots with all the compacting, logging, and digging into and filling in the actual root zone of the old growth (they say with picks and shovels) this plan has in the works?

Is Caltrans actually encouraging death to these ancient trees to eventually totally widen the road with no obstacles or things to distract people? With distract I mean glorious old growth redwood trees and a lovely HISTORICAL entrance to Humboldt County. Could it be that Caltrans means intentional harm toward the environment, knowing they will be damaging the root systems and environment? Isn't knowing this and still trying to push it more malicious than not knowing and making a mistake?

Do you see that the "NO BUILD OPTION" will protect the endangered species and other species nesting and living peacefully? And most important to survival to humans and wildlife, do you understand that the "no build" will be protecting our designated Wild and Scenic Eel River from further demise due to run off from cutting into the canopy?

Any cut into the sloping areas, WILL CAUSE RUN OFF INTO THE NEARLY DEAD EEL RIVER. EEL RIVER IS BEING SUCKED DRY BY THE WATER SYSTEMS TO SONOMA COUNTY, IT IS LOW DUE TO GLOBAL WARMING (TOO MUCH DIESEL IN THE AIR), AND IT IS LOW FROM PAST ROAD WORK AND CONFUSION HILL AND OTHER SLIDES (ALSO FROM POOR PLANNING BY ROAD COMMISSIONS OF PAST. Does Caltrans want to further damage the Eel River and environment by trying to trick the general public into thinking their preventative measures will prevent damage? 73

Isn't it true that there will be fuel leaking, trampling, cutting and rain draining more stuff into the Eel River? You have not proven to me at all that this road work will be anything less than the biggest mistake in all of your current road plans. If you kill the Eel River by changing the slopes causing more run off in the storms we will have, and by allowing it to continue to be hooked up to the water systems to Sonoma county, you will not have a river. Do you see this could cut off water supply to Sonoma County and then they would come after our water source, the Mad River?

In a college class I took called Conservation of Forests and Wildlands, my professor stressed this fact: We must protect our rivers and bring them back up to good quality. If we have no clean and free flowing rivers then we will have no life.

My suggestion is to get going on Water Capturing Devices with filtering systems to get people water and DO NOT proceed with this road work involving cutting trees and changing the run off. NO BUILD is the only solution. Nothing in the DEIR proves it is good for protection of the old growth root systems to do this project. Everything points to the opposite.

1.4 PERMITS AND APPROVALS NEEDED
Page 25
See chart that is explaining the permits, reviews, and approvals required for project construction.
Where is the Biological Assessment that is in review stated in DIER by US Fish and Wildlife? 74

Where is the Section 404 Permit for filling or dredging waters of the United States that Caltrans said was submitted after the final environmental document? Does it take into consideration the run off that will happen due to any construction allowed? 75

Where is the 2 year study of the Marbled Murrelete that is required to be done by US Fish and Wildlife? When is this study scheduled to be done. 76

I was told by Deborah Harmon that this two year study for the Marbled Murrelet has not even begun and that the work is planned to proceed before any study is complete. Here is Deborah Harmon's e-mail to me:

----- Original Message -----
From: "Deborah Harmon" <deborah_harmon@dot.ca.gov>
To: <trishalc@sonic.net>
Sent: Tuesday, January 20, 2009 9:58 AM
Subject: Richardson Grove-Marbled Murrelet

>
> Trisha,
> Per your request I am following up my phone call with the information
> regarding the marbled murrelet survey at Richardson Grove.
>
> The protocol for surveys as dictated by the US Fish and Wildlife Service
> requires a consecutive two year survey during the nesting period of the
> murrelet. The biologist for the project is checking into all the
> requirements outlined in the protocol to see if the surveys can begin this
> year (2009). If we can begin the survey this year, we will follow-up with
> the second year of surveys in 2010. If it is not possible to meet all the
> requirements in time to begin the survey this year, the survey will be
> initiated next year and continue through the following year.
>
> Deborah Harmon

I asked Deborah Harmon when the work is projected to begin on this project and she said 2010. I said you will considering starting the work before the study is done and Deborah Harmon of Caltrans said "yes." 77

Where is the 1602 Agreement for Streambed Alteration Consistency Determination for Marbled Murrelet under Section 2080.1 or the Fish and Game Code?

Where is the application for the 401 Certification for National Pollution Discharge Elimination Systems? It says anticipated after final environmental document, and where is it? 78

How can you possibly state in reference to Section 106 Consultation for Historic Resources Review and Comment on 404 Permit, that Concurrence on No Adverse Effect Determination with Standard Conditions in Appendix F? THESE ARE HISTORIC RESOURCES, SO WHERE IS THE STUDY TO PROVE THAT THERE WILL BE NO ADVERSE EFFECTS ON THIS HISTORICAL ENTRANCE INTO HUMBOLDT COUNTY? 79

Where is the Consultation for impacts to public parklands from California Department of Parks and Recreation? It says Consultation ongoing. It says approval obtained prior to final environmental document, so where is it? 80

Then we know the Eel River is designated a Wild and Scenic River and you say there is Consultation ongoing. Where is this documentation of approval that you say was obtained prior to final environmental document? 81

Isn't it true that these studies are not complete? 82

CHAPTER 2 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES
Page 26

Wildlife and Fish Migration:
How can Caltrans say the project would not substantially interfere with the movement of fish or wildlife species, when studies have not been done, and common sense says the opposite? 83

Habitat Conservation Plan:
How can Caltrans state that the project would not conflict with the provisions of any adopted Habitat Conservation Plan, when no studies have been done? 84

Cultural Resources:
How can Caltrans possibly state that this project would not change the significance of any historical resources, when any disturbance will significantly change the HISTORICAL RESOURCE, WHICH IS THE ENTRANCE TO HUMBOLDT COUNTY THAT HAS BEEN THIS WAY SINCE THE BEGINNING OF TIME, EXCEPT FOR THE ROAD BUILT IN 1925 OR THERE-A-BOUTS? 85

Geology:
How can Caltrans state that this project will not result in substantial soil erosion, that will harm the Eel River? 86

Page 27

Water Quality:
How can Caltrans say that this project will not substantially alter the existing drainage patterns nor substantially increase the amount of runoff? 87

Effects on People:
How can Caltrans say that this project will not result in substantial adverse effects on people?

Isn't it true that as a result of this proposed project to "open up the grove" that traffic will speed by local businesses and they will close as a result? 88

Isn't it true that jobs will be lost due to less truckers needed and less off-loaders will be needed?

Don't even get me started on Home Depot. Home Depot (one of the main reasons for these projects) will under-cut and eventually close all of the other lumber supply places (Pierson's, Ace Hardware, Myllotown Lumber, etc) and then when Home Depot will be the only place with jobs they will jack prices up? Who knows if Home Depot will hire only 30 hour people with no benefits like Wal-mart, so further taxing the Medi-cal systems?

Our local economy can not afford any big box companies, and just like we voted to keep Wal-mart out, we need to vote what happens to our State Parks and to keep Home Depot out of Eureka.

Page 28
2.1.1.2 Consistency with Regional and Local Plans and Programs
"This plan is called Action Plan for Goods Movement. The DEIR goes on to state that between the community of Leggett and the Oregon border, Route 101 has been identified as "eligible" for scenic highway status on the California Scenic Highway System. The proposed project would not affect this status."

How can Caltrans make this statement, when the most beautiful and HISTORICAL entrance to Humboldt County being cut into with tree stumps, retaining walls, and later loss of Old Growth due to disturbing the root systems, and watching the Eel River get lower in quality due to additional run off WILL BE AFFECTED? 89

2.1.1.3 Wild and Scenic Rivers
Page 28
Environmental Consequences
Caltrans states that "the proposed project is not anticipated to have an adverse effect on the free-flowing characteristics of the river, and measures to protect water quality have been incorporated into the project."

See page 57/58. **The Eel River already is suffering, and ANY run off (which by inference that measures to protect water quality have been incorporated, says run off is expected. How can Caltrans assure that their "measures to protect" will not fail as they have in the past, thus further damaging the Eel River to an even lower water quality status?**

The only thing that makes sense is the statement by Caltrans in the DEIR:
"THE NO BUILD ALTERNATIVE WOULD NOT CHANGE THE STATUS QUO AND WOULD NOT HAVE IMPACTS ON THE FACTORS THAT MAKE THE EEL RIVER WILD AND SCENIC"

...so wouldn't you say this is one more reason to choose the "no build" solution?

So if consultation is ongoing with the River's responsible federal managing agency, the National Park Service, then where is it confirmed that this project is in "COMPLIANCE WITH THE CALIFORNIA WILD AND SCENIC RIVERS ACT"? Does Caltrans have this permit from California State Parks and Recreation? If so, where is it? 90

2.1.1.4 Parks and Recreational Facilities
Environmental Consequences
Page 30

See top of page 30:
"Several trees abutting the existing highway (**old growth protected forest**). The majority being redwoods, **would also be affected by construction activities. In some cases, the curve improvements would be moving the roadbed slightly closer to the trees, and in other instances, the roadbed would be realized further away from the trees. Construction activities in close proximately to these trees could result in impacts to the root systems of these trees.**"

Trees that may be impacted by construction activities have been identified in Table 9...page 84

I will list some of the old growth redwood trees in which the root systems WILL BE AFFECTED:
redwood 18 inches
redwood 48 inches
redwood 84 inches
redwood 48 inches
redwood 78 inches
redwood 115 inches
redwood 18 inches
redwood 94 inches
redwood 43 inches
redwood 84 inches
redwood 84 inches
redwood 78 inches
redwood 156 inches
redwood 82 inches
redwood 144 inches
redwood 84 inches

redwood 96 inches
redwood 60 inches
redwood 36 inches
redwood 60 inches
redwood 182 inches
redwood 86 inches
redwood 90 inches
redwood 42 inches
redwood 19 inches
redwood 120 inches
redwood 108 inches
redwood 30 inches
redwood 34 inches
redwood 48 inches
*** In Caltrans own words:
The No Build Alternative would not result in vegetation removal or impacts on the cultural resource site. The culverts would likely have to be improved in the near future as an independent project as they deteriorate further. Why have you not fixed the culverts?

Is this not further proof that the "no build" choice is the only best choice to protect this historical State Park?

2.1.2 GROWTH
Affected Environment
Page 32
"Historically, lumber and wood products industry along with sport and commercial fishing dominated the county's resource-based economy. More recently, Humboldt County has been making the transition from a resource extraction-based economy to a more diversified economy shifting towards education, manufacturing, and tourism."

"Over the past twenty years there have been substantial job losses in the timber industry and commercial fishing due to a variety of factors"

... (OVER LOGGING, OVER FISHING, OVER LOGGING DEPLETING OUR RIVERS AND STREAMS, ALLOWING SONOMA COUNTY TO HOOK UP TO EEL RIVER, ETC)....mainly a few select business people pushing their agenda. **Is that not the case here too?**

"Timber production, which has been an important part of Humboldt County's economy in the past, remains strong???, although it is not as dominant as it has been in the past.

Pacific lumber over-logged, ruining our rivers and streams and fish have little habitat, and then laid off how many (100-200?). Pulp mill closed, laying off how many (??)?. California Redwood Company just laid 75 without severance, and more are to go. A manufacturing company just closed, and they laid off how many? LUMBER IS DEAD...GONE...

This is just lumber, and just the tip of the iceberg.

These statistics were wrong then, and they are totally off base for today's economy. There has been so many losses of jobs in the last few months in Humboldt County and all over the United States, that we are in a state of depression, so these numbers of employment are not at all accurate.

So, this leaves tourists. Why do tourists come here??? They like HISTORICAL PLACES LIKE THE ENTRANCE TO HUMBOLDT COUNTY. Tourists come here for the old growth redwoods, rivers, ocean, and mountains. Is this not one more valid reason, this cutting into Richardson Grove is not only harmful to the environment, it is harmful to our attracting tourists? If tourists don't see the beauty of Richardson Grove, they may not venture to the other State Parks nearby.

At the bottom of page 32, Caltrans says themselves that "Declines were experienced in the Transportation and Utilities sector already." Don't you agree, that when you add the current declines and you have a state of emergency?

Page 33

Caltrans states that "between 2002 and 2008, it is estimated that employment in industry decreased by 200 jobs in the County. Do you agree, that recently we have lost at least another 300-500 jobs with Mervyns and now the other department store is closing, many (?) were laid off from Pacific Lumber Company, nearly 100 so far are laid off from California Redwoods Company, all the illegal workers, sick workers, and pissed off workers from Sun Valley, and every day another business is closing. How many lost their jobs with the pulp mill closing?

These numbers Caltrans provides in this report are not accurate, and we are not in need of this project at all. Tax payers can not afford these Caltrans projects. They will only take more trucking jobs away from people, and we don't need more losses of jobs due to a big box company like Home Depot nor will people be able to get loans for Marina Center condos, nor will people be able to afford high rents when they don't have a job. Is Rob Arkley going to build low income housing in the Marina Center Project...on top of contaminated soil and Native American Indian artifacts???

It is not true, that Humboldt County's labor force has been growing at a faster rate than the County population, so this is also not accurate, is it? 91

Environmental Consequences

Page 33

"Opening US Route 101 in southern Humboldt County to STAA trucks could have a positive impact on the attractiveness of Humboldt County, and to a lesser extent, Del Norte County to potential investors."

It is not true that opening US Route 101 will actually have a negative impact on the attractiveness of Humboldt county, as more big trucks take up my lane and theirs, they put off more toxic fuel and will further harm our environment? Isn't that the real truth, Deborah Harmon? Also, Isn't it true that more people will loose jobs as these STAA Trucks take jobs away. 92

Then won't more people will loose their jobs if Home Depot comes here and under cuts, thus closes all the other companies that are currently struggling? Have you considered the effects of toxic fuel emissions on our city of Eureka with MORE AND BIGGER STAA TRUCKS BARRELING DOWN 5TH AND 6TH STREET? HOW ATTRACTIVE IS THAT?

I can see it now, with more and more STAA trucks going through congested Eureka? Have you thought of how Eureka can handle more traffic in the 20 lights. Will that be difficult for STAA Trucks. Oh, but you have to cut through a 4,000 year old canopy and damage the roots of these ancient old growth trees so more trucks can pollute Eureka. Am I getting the message loud and clear yet? Shall we also bypass Eureka? Oh yes, I can see how attractive that all will be with lost jobs and humongous trucks polluting Eureka. Lovely. I think you need to move to 4th or 5th street to see how that will effect our local businesses here in Eureka. This will not be attractive nor a way to clean energy.

Also, do you actually think that increasing truck size would remove a constraint on business attraction in Humboldt County? We are remote, and if people want city, then move to the city and pay the high cost of real estate, but don't try and bring the city to Eureka. It is just a small rural area. Why do you think people retire here? It is not for a good job, I can tell you that. It is for the quiet and not so much traffic, and the beauty of nature that the citizens have fought hard to maintain. Fought hard against a few select "developers' business to improve THEIR bottom line. 93

People, do you think these few select businesses will pass a dime of their savings off to the consumer? If you do, then you are sorely mistaken.

OK...here is the bottom line...PER CALTRANS:

"More specifically, **representatives of the business community in Humboldt County have indicated that the lack of STAA truck access is a disadvantage to doing business.**"

Will you please list these companies and please tell me if all companies in Humboldt County are being represented? It is true that only a select group of business say that off loading is cutting into their profit, but they charge the consumer more so they get their money back that way. If businesses are off-loading the cost of off-loading to consumers? Do you hear the consumer whining? Well, we may whine, but we must just pay the price. 94

Who makes up the Humboldt County Office of Economic Development? Have they considered the loss of trucking jobs these STAA trucks create? Is this a few businesses gathering, or is it represented by all facets of our community?

JEEZE, IS THERE EVEN ONE ENTIRE PAGE OF THIS RICHARDSON GROVE DRAFT ENVIRONMENTAL REPORT THAT REPORTS THE TRUTH???

Please give me the names of these businesses and proof that it is off-loading and not the terrible state of economy causing losses in demand. Can you do that so I can have an idea of where you are getting these figures, because of course they were not accurate and of course the are not currently accurate, as the economy worsens with each passing day.

Page 36...I found a true statement!!!
However, economic activity and subsequent growth in Humboldt County faces a challenge in the form of distance to markets, with or without the proposed project. Growth within the county has fallen well within planned estimates, particularly within the immediate project area. The inaccessibility of these areas to longer trucks is not the most important constraint on businesses development in this portion of Northern California, and so forth...

2.1.5 TRAFFIC AND TRANSPORTATION/PEDESTRIAN AND BICYCLE FACILITIES
Page 40
"The Department is committed to carrying out the 1990 Americans with Disabilities Act by building transportation facilities that provide equal access for all persons. The same degree of convenience, accessibility, and safety available to the general public will be provided to person's with disabilities."

THERE IS NO BIKE PATH OR WALKING PATH IN THIS DRAFT ENVIRONMENTAL IMPACT REPORT, IS THERE? BUT I AM NOT SURE WERE TO ADDRESS THAT.

95

I THOUGHT SOMEONE HAD A PLAN FOR A RAISED BIKE PATH IN RICHARDSON GROVE, BUT IT IS NOT MENTIONED IN THIS DEIR PLAN FOR RICHARDSON GROVE STATE PARK 101 PLAN IS IT? Also when I called State Parks and Recreation the representative said there is no plan for the State Parks to build a bike path through Richardson Grove. So where are bikes and pedestrians supposed to get through safely if Caltrans does not partner with State Parks and Recreation to build a raised path and bike path through the grove so as not to disturb the environment?

As far as caring about people with disabilities, you do not actually care do you? Otherwise, why did you railroad two projects (101 Corridor and Richardson Grove) at the same time in December? Do you think a person who is suffering with the agonizing pain of disabling effects could possibly read an entire DEIR between December 8 and December 15, 2008?

So please do not insult my intelligence by stating that you give a damn for any person with any disability, as it is simply another lie, isn't it? I will save this one for later, as you have violated my rights. These projects have caused me so much emotional distress and physical distress, that I may need to get surgery as a result of your pushing these projects on us during December and not allowing time to get help in addressing these issues. I will not go into further detail here, but believe me it is all documented.

Ok, because of the extreme pain I am in I must move forward, but there is so much to address on pages 40 to 57, but I must leave that for now.

Page 54
One thing I want to address though is, did Caltrans actually inform and consult the Native American Heritage Commission with the knowledge that there has been historical findings of Native American culture already with a small investigation. Did Caltrans actually follow through to see if the Native American's who's ancestors were murdered have information in the Sacred Land File within the proposed project limits?

96

Will you please give me names and phone numbers of the ancestors of the Native Americans who used to inhabit and protect these lands, as I have not located the tribes that have been contacted and I have called several? Are you sure there is NO OPPOSITION by Native American people who are decedents of their ancestors who's possible remains could be here, and the known findings of other 3,500 year old tools that have been found here on the site of this proposed project?

From what source was this information determined from? Do they know you found historical items with just a few digs dating back 3,500 years??? So these trees are older than I thought. The Native American sure did a better job of protection, didn't they? Perhaps we should put them back in charge before the white man allows any further destruction to their historical homelands.

Caltrans states there is a site that consists of a lithic scatter and a habitation site with house pits. The Extended Phase I excavation occurred in areas of the APE where it was determined there was the highest probability of locating subsurface

"impaired water quality?"

2.2.3 Hazardous Waste/Materials
Page 62
"Lead is the primary factor considered for waste classification because of the lead normally found near roadsides from auto emissions. Soil that's left in place isn't classified as "waste" material; however, if it is dug up and moved outside of the "area of contamination", then it must be dealt with as a hazardous waste."

If the soil is left alone, the so called "toxic" soil will not have to be stirred up or deposited somewhere else, is that not correct?

Isn't it true that digging up what Caltrans describes as "toxic" soil, it could get taken to the river in run off?

97

Has Caltrans considered the chances of these chances of it being put onto the roots of the ancient old growth redwoods...maybe 4,000 years old and not 1,000?

Does anyone really know how old this ancient HISTORICAL FOREST IS?

Did I read that digging up this fuel toxic soil could cause workers to be sick?

Is it true what I read, that only disturbing this "roadside that is toxic from gas/Diesel, is only a problem when disturbed?

So isn't this more reason not to disturb this soil?

Does this not further prove we need zero emission trucks and not these huge STAA Diesel guzzling trucks spilling more gas into the environment?

And considering the road construction uses a lot of machinery that spills and leaks oil and gas, would not the actual road work further damage the environment and the soil?

98

On page 65, after telling us all about how toxic the soil is, you then state that
"Based on the 90 percent upper confidence limits results of less than 5.0 mg/l, soil waste generated from the Richardson Grove project site would not be classified as hazardous waste and would not require disposal as a RCRA hazardous waste. Then at the bottom of page 65, you state:

However, it is Caltrans policy to use the more conservative definition of the 95% upper confidence limits for defining waste if the material is to be disposed off site as opposed to being reused onsite or disposed of within the Caltrans right of way. Thus, if the excess material generated by the project would be given to the Contractor for disposal, Caltrans would consider the material hazardous waste and mandate that it be taken to a Class I landfill."

So are you saying that if the material is used or disposed of onsite, it would not be considered hazardous waste???

99

What are you saying here? Caltrans, are you essentially saying that you will do what you damn well please with the excess toxic soil with lead in it, so then a big storm or earthquake, would cause run off with more lead in our waterways...I am getting physically ill by every passing investigation of this document.

2.2.4 Air Quality
Page 67-71
Please explain to me how these "dust palliative compounds" to control the particulate matter that will be disturbed will work?

100

Is it not true that emissions from the construction machinery doing the actual road work will be highly toxic to the air and

environment?

In the DEIR it states that "this project will not result in any meaningful changes in traffic volumes, vehicle mix, location of the existing facility or any other factor that would cause an increase in emissions impacts relative to the no-build alternative." No meaningful potential Mobile Source Air Toxics effects." 101

Isn't the opposite the actual truth? As these trucks get older, they burn more fuel and will increase toxins into the air at an increased speed, so the above statement that there will be no meaningful changes is not at all accurate. Construction will be noisy for a year or more, and more STAA trucks after will be more increased noise and toxic emissions. 102

"This project will not result in any meaningful changes in traffic volumes, vehicle mix, location of the existing facility, or any other factor that would cause an increase in emissions impacts relative to the no-build alternative." This is so far from the truth, and this has been addressed in my responsse here.

"As such, FHWA (I wish you would just spell the friggen words out as if this was not confusing enough)

Of course you know that to cut into the grove, it will substantially increase fuel emissions through Richardson Grove State Park, both for building (1-2 years of noisy road equipment), and increased truck traffic that burn Diesel. But then you do know this, don't you Deborah Harmon?

How can you possibly think anyone is going to believe that this project is not going to increase toxic fuel emissions? When you widen a road people, people drive faster, and this burns more fuel. And I am not even mechanical and I know that. Why are minimizing the impact this will have? 103

Page 71 Noise

Would you like to compare charts with the one in the back of the DEIR, Appendix E, and see studies that construction hurts the hearing of workers in a detrimental way?

Just Google, and then select these sites to see the real numbers are much higher for construction than Caltrans is trying to depict, is that not so Deborah Harmon?

Google....select this down load:
PPT] **Noise In Road Construction**

File Format: Microsoft Powerpoint - View as HTML
Noise in Road Construction. What this presentation covers. Hearing loss rates and claims facts. Noise levels of construction equipment ...
wisha-training.lnl.wa.gov/training/presentations/NoiseinRoadConst.pps - Similar pages

Or:
http://www.cdc.gov/elcosh/docs/d0100/d000054/d000054.html

2.3.4
Page 103
"Noise, lights, and activity disturbance generated by the construction of their project may disturb breeding and migration patterns in the project area. However, the disturbance will be short-term and restricted to the immediate vicinity of the roadway, which already experiences moderately high levels of disturbance. the construction activity will not substantially exceed the existing disturbance levels present with the roadway traffic and the campground activities, thus the project is not anticipated to substantially disturb migrating Marbled Murrelet. **However, due to the sensitivity of the species, it was determined that the project 'May Affect, and is likely to Adversely Affect' Marbled Murrelet."**

Noise disturbance on wildlife is an inexact science at best, and takes specific site survey and careful study to determine the risk in each specific area. The noise and construction activities **will** interfere with nesting.
There will be adverse impact from the jackhammers, concrete saws, night

lighting, noise of trucks, back-up safety bells, etc. on the nesting habits of any of the species that might be in the habitat during construction time.

Caltrans' solution to help the environment is to go ahead with this project that they know will adversely affect Marbled Murrlets and Northern Spotted Owls, but to provide thirteen new garbage can lids, to protect Murrelet eggs from predators such as ravens and crows, is that what I am understanding? Please explain what good some good garbage cans will do when there are no protected species around to be nesting, due to the noise and cutting into their environment scaring them away?

Isn't it true that simply the increased activity of construction workers, trucks parked here and there, oil spilling and cigarettes tossed into the forest, the oil spilling here and there from the equipment, trucks all over-compacting the root systems even further, more toxic emissions by starting and stopping trucks and cars of employees, along with Diesel equipment off putting toxic emissions, will also be devastation on this protected and sensitive environment?

no bird much less human should be asked to endure. Storms daring stuff not yet "cleaned up" into the river will be devastating to the Marbled Murrelet species, the Northern Spotted Owl, the Eel River and all the old growth roots?

"Traffic slows considerable through this area at night, resulting in quieter levels"...

Is Caltrans trying to lead us to believe that the noise level of day and night-time use of jackhammers, cement trucks, concrete saws, back-up bells, and other construction noises is comparable to the day and the night time noise level of even more reduced traffic flow and reduce human activity in the campground?

104

What statistics from what study back up this conclusion that noise and lights will not be a significant increase in disturbance by this proposed project in this particular sensitive area?

105

How can Caltrans say that during construction of (HEAVY NOISY EQUIPMENT CHARTED IN GOOGLE TO BE WAY HIGHER THAN THE CHART CALTRANS IS USING AS SOUND LEVELS (see appendex E way in back of DEIR without page numbers), and Caltrans is to say that this noise level that harms the workers ears will not increase more than normal traffic or normal campground noise from fishing and swimming???

Are we not talking of heavy and noisy building going on for 1-2 years, and Caltrans is saying that the noise and toxic fuel emissions will not substantially increase during construction or after construction (if they are allowed to dig into the 3,500 or more year old HISTORICAL canopy), with many more STAA trucks flying through?

We all know how noisy STAA trucks are, but do we know how toxic Diesel fuel is?

Well, this is also true with protection of State Parks and Endangered Species, therefore we must not increase STAA truck passage, we must not do all this extremely noisy and toxic

road work that will certain be the demise of some of the few protected species left in this world. Certainly we must not endanger the habitat, part of which is compacting and cutting into the root systems of the old growth redwoods that will be endangered if the canopy is cut into, as it is all intertwined in the root systems. Certainly we must not allow cutting into the canopy thus creating new run off into the already endangered designated Wild and Scenic Protected Eel River.

Can anyone deny, that to be working with heavy equipment at night, in addition to the already accumulated daytime noise from the traffic and campground use, will certainly further stress an already stressed and endangered species, such as the Marbled Murricta, Northern Spotted Owl, Pallid Bat, and the Bald Eagle?

106

Also can anyone prove to me that slides will not be created that will run into the Eel River due to this cutting of the root systems that holds the mountainside together, thus further harming a water source serving Sonoma County, and most importantly to further endanger an already endangered habitat and water source for habitat, the Eel River?

107

How about, can you prove to me that this road work in this sensitive HISTORICAL 3,500 YEAR OLD YEAR GROWTH FOREST will not further threaten the already threatened fish like Coho Salmon, Northern California Steelhead, and Coastal Chinook Salmon that are trying to survive with lower water levels? (Native American artifacts were found to prove this)

There are different contributing factors already threatening the Eel River, and some has to do with mistakes from past roadwork...(Confusion Hill Landslide due to erosion from cutting old growth off the mountainside). some has to do with sucking the Eel River dry by connecting it into the water systems that serve Sonoma County, some is due global warming and the rain levels being lower some years and other years flooding, and some has to do with old growth trees in surrounding areas that were cut to the edges of rivers, thus not leaving the now required buffer necessary for cold water fish to have cold water to survive. A lot is being done to restore habitat, but we certainly do not want to further damage it, do we?

Isn't it true, that the landslide at Confusion Hill, causing a huge bypass to be built, is already having devastating impacts on the environment? But this can not be ignored. I asked for this documentation but not surprised I don't have it. Didn't I correctly hear that there was huge mistakes other places like in Redding and some Rancheria place?

Do you want to be having more devastating detrimental effects on the environment? Let us just slow down and think a little ahead. If this roadwork kills the river, kills more protected species, and kills the old growth due to messing with their root systems, then I will sue you big time, and I can promise you that. You can not say you were not warned of the dangers. It is all here in black and white.

I know some of these things, because I read this entire 200 page Caltrans Richardson Grove Environmental Impact Report and I have studied Conservation of Forests and Wildlands in College and we are not protecting our water ways or forests by continuing with projects such as this, trying to "get past" environmental requirements. As Governor Schwarzenegger puts it, he wants to "relax" environmental requirements to push these and other highway projects through.

Why not fix the levies and places with huge problems, and not mess up our little piece of the world we find historically precious and worth preserving as long as we can, and put some lights in to allow single file traffic at 25 mph enforced all the time with triple fines. Step up police, cameras, planted police cars, whatever. This can be done without this cutting into anything in Richardson Grove or neighboring buffer areas.

Don't you realize that this will have a devastating effect on global warming to allow this type of pushy stuff going on, where the general public is not being educated to the devastation this project will have on the protected environment of Richardson Grove State Park. Pushing a project even before the REQUIRED studies are even started? What is going on here? Well, we all know, don't we?

Look at the economy. If you can't see through to saving this small area for our future generations, then can you look at the fact that the State of California is broke, thus we can not afford to waste money this way. This road

work can not go on, for all these reasons I have stated.

What message are we sending to our children if we are to cut education and push highway projects through old growth State Parks for the bottom line of a few select businesses in the area? Are we going to allow this very small percentage of our population to not be caring what endangered species or habitat we will be destroying?

Do we really know we will be destroying with this project, as it takes awhile for root system damage to take effect? First really big storm and down goes the old growth whose root systems were disturbed. And do not even try to say it would have happened anyway.

Mark my words, if those root systems are cut into, we will see some falling old growth. Who will be killed when the old growth dies and falls? Could it be your child or your loved one?
Their safety is now in your hands. Do you care about the business that is next to Richardson Grove, that could be destroyed if the highway is opened to faster traffic, not to mention an old growth crushing their establishment? How about the local businesses that will be passed by if traffic is increased, or local rescue that will be further taxed. Increased speed means more accidents and more tip overs and spills into the river. More More More

I am telling you, that if you do this and one of these trees falls in the next 10-20 years, it will be your fault. This is on record to not do this. The type of damage you will do and say you will Band-Aid fix with board and fill, will shift and earthquakes shift, and then more landslides will happen.

Just don't mess with mother nature here. I saw what happened to an old growth whose roots were not considered; it fell and crushed a whole house. I just am learning this stuff too, so don't feel bad if you did not know this before. But now we know, so I hope we make the correct decision.

2.2.5. Noise
Page 71-77
"Noise levels as measured by Caltrans are within the normal allowable range There's no increase in through-traffic lanes, or significant changes to the horizontal or vertical alignment, so it's considered exempt from needing an abatement plan."

Page 76
"Traffic noise levels are not expected to increase appreciably due to the project as the travel lanes are not moving substantially closer to any sensitive receptors."

Wouldn't noise levels be affected by an increase in traffic, not just shifting of the road towards receptors? 108

2.2.6 Energy
Page 77-78
"CEQA requires discussion of the potential energy impacts. This is with the emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy"; NEPA requires "identification of all potentially significant impacts to the environment, including energy impacts. Removing the STAA restriction would allow for new combinations of tractor trailer rigs that are not currently allowed (longer tractors and longer trailers with the short tractors)...While it is not known how many such combinations would replace the non-STAA combinations that pass through the project limits, it is not anticipated to result in a substantial change to the energy usage."

How can Caltrans say there will be no substantial change to energy usage, when more STAA Trucks passing through will increase the toxic fuel into the air? Also, as these STAA Trucks age, it is stated in this DEIR that their efficiency will dwindle, thus more toxic fuel into the protected sensitive environment, would not that make for a more honest statement? 109

Where in this document does it state precisely how many STAA Trucks will be coming through the project site as a result of the road widening? Is that another mistake not to have these details?

Exactly how many trucks are currently having to off-load to bring goods into Humboldt? This needs to be a current calculation, since all the closures and layoffs of jobs (300-500 lately due to the economies downturn). Can I get this calculation from Caltrans? 110

Will there not be even less need of this project now that so many businesses are closing and there is no demand for products due to the economy being in the gutter? 111

Don't you think one needs more current research to arrive at an intelligent conclusion as to the number of STAA and non-STAA trucks on the road currently, since the economy of the United States slipped into a depression a couple of months ago?

Page 78
"It is not anticipated that opening Route 101 at Richardson Grove to STAA trucks, by itself, will necessarily induce new business growth in the North Coast Because of this, it is not likely that there would be substantial increase in truck trips resulting from industrial or commercial growth in the near term caused solely by the route becoming accessible to STAA vehicles. Any new growth in industrial or commercial business would likely be primarily dependent upon the overall economy of the North Coast in general."

Isn't this statement another attempt to not provide the requirement that Caltrans determine impact on environment including energy effects?

112

Don't you agree that if developers such as the Arkleys were not intent on their Marina Center Home Depot plan, there would be no pressure to open the Richardson Grove State Park to STAA trucks? Isn't it also true that so many businesses pushing this widening of Richardson Grove State Park are now laying off employees in huge numbers and the lack of demand for housing and supplies will not support the Marina Center or Home Depot?

113

Isn't it a fact that if this project is allowed, it will create even more job losses due to all the local businesses that will suffer and close (that are of a similar nature to Home Depot)? Will not more trucking jobs be lost as well, as bigger trucks take the jobs of two or more people?

114

The real truth to this document is really the fact that Rob Arkley and Governor Schwarzenegger (who everyone knows are friends) are pushing to hurry this project through without the proper environmental considerations? In fact, is it not true that Caltrans is ignoring the environmental impact and the Native American Artifacts found on this project site in order to go along with this corruption?

115

Are there not more important projects that Caltrans can be working on than these two that will most likely cause the old growth trees to fall once the roots are effected in Richardson Grove State Park? Is that the reason for doing this project? In other words, does Caltrans actually want the old growth trees to fall, so they can come in and really widen this road?

116

Doesn't Caltrans say that this project will not, by itself, induce new business growth? How can Caltrans say that when the entire community knows the reason is to quickly push these projects through to prepare for Home Depot and new housing development in the Marina Center?

Page 78
"It is anticipated that the number of trips that would decrease due to increased capacity of STAA vehicles would off-set any potential increases due to diversions of trucks to Route 101 and increased industrial or commercial growth. Thus, the net gain or loss in truck trips would be insignificant as a result of the proposed project."

117

Will you please provide recent statistics to support your claims of volume increase or decrease? I see none in this document to do with truck traffic or specifics of non-STAA and off-loading to see how many business are just fine the way they are and which specific business will profit in this current skeleton market?

Is it not true that this document is not accurate at all, and it is not even more inaccurate with reference to what is left of business commerce in Humboldt? Can Caltrans predict how many more businesses will be closing due to the Administration that just left and their lack of oversight of financial institutions and their overspending on an Iraq war we should not have started in the first place?

Will you tell me how Caltrans determines truck traffic will be less if 101 should be opened to more STAA trucks permitted to come through? Is this not yet another contradiction of hundreds in this document?

How can Caltrans have a final hearing only one week after the hard copy of the Draft Environmental Impact Report was available to pick up? How can Caltrans have a final hearing when the potential partners in Save the Redwoods League website that I called had not read the Draft Environment Impact Report, much less come to any conclusion? How can Caltrans think of pushing through a project that their own constituents had not even read the DEIR?

NONE I CALLED (between Final Hearing of December 15 and December 23) HAD READ THIS DEIR DOCUMENT WHEN I CALLED MOST OF THEM AFTER THE FINAL HEARING. AND MANY WERE ALREADY AWAY ON CHRISTMAS HOLIDAY AND I WAS TOLD I SHOULD NOT EXPECT A CALL BACK UNTIL AFTER THE FIRST OF JANUARY.

WILL YOU PLEASE TELL ME WHAT YOUR INTENSIONS ARE WITH DOING SOMETHING SO SHADY AS THIS TO PUSH THROUGH A PROJECT OF SUCH SENSITIVITY, WHERE YOUR OWN REQUIRED STUDIES ARE INCOMPLETE AND THE PUBLIC IS ON HOLIDAY OR SHOPPING ON THE MOST BUSY SHOPPING DAY BEFORE CHRISTMAS WHICH IS DECEMBER 15, IN ORDER TO ALLOW FOR SHIPPING TO ARRIVE BEFORE CHRISTMAS?

Page 78
"Even the latest high-end tractor sleeper cabs speculate being able to have only a modest (10-15%) improvement to fuel economy. It is unknown how many such modern high-end rigs would be used, but it is anticipated that average fuel economy for tractor trailor rigs would not change substantially. The proposed improvements to the roadway are not expected to result in increased or decreased prevailing speeds or travel times through the project limits."

"The proposed project is not anticipated to result in substantial changes to number of truck trips, the percentage of trucks on the highway, prevailing speeds, travel times, roadway capacity, fuel economy of trucks or non-truck vehicles. Thus, it is anticipated that there would be no significant change in energy conservation as a result of the project."

Isn't it true that these STAA trucks are less and less fuel efficient with each passing year? Doesn't it make sense that if a road is widened that more traffic will come through at a faster speed? Doesn't faster speeds create more fuel emissions to be deposited onto the State Protected Richardson Grove Park?

How can Caltrans try and lie again and again about these things, when a normal person knows that widening a road will increase the speed of traffic and emissions??? Who is Caltrans consulting to come to those false statements? Perhaps no one? Older trucks and more of them will in fact increase fuel emissions, is that not true Caltrans?

If this road is allowed to be widened, is it not true that many more STAA trucks that usually use Interstate 5 to go to Oregon, will now instead come on Highway 101? Thus, how can Caltrans say truck volume, noise, air pollution, etc. will not increase as a result of this project?

118

Will Caltrans please provide statistics and evidence to prove there will not be increased truck traffic through Richardson Grove State Park as a result of this project? Common sense tells me that this is simply another lie to push this project through based on no proof or documentation to prove it.

2.3 BIOLOGICAL ENVIRONMENTS

2.3.1 NATURAL COMMUNITIES

Page 79
Affected Environment
Caltrans starts off in this section of the Draft Environmental Impact Report (DEIR) with:
"Although the California Native Plant Society Inventory does not include redwoods, IT IS A SPECIES THAT COMMANDS RESPECT IN AND OF THEMSELVES, IN ADDITION TO PROVIDING HABITAT FOR LISTED SPECIES."

119

If California Native Plant Society say our protected old growth redwoods are not on their list, it is of no consequence, because of course Old Growth redwoods are a protected tree (thus leaving them in State Park protection), is that not true, Caltrans?

120

Is it not true that species that are endangered and supposed to be protected are prevalent in this area? (U.S. Fish and Wildlife expert said "they assume they are there").

121

Would it not be best to conduct on-the-ground surveys for Marbled Murrelet, required by the government agencies entrusted to protect endangered species, before this project goes to a FINAL HEARING, AND BEFORE CALTRANS BEGINS ANY WORK?

122

Isn't it true that no studies have been done regarding the presence of The Northern Spotted Owl?
At the same time, Isn't Caltrans saying all through this section, that there are no protected endangered species within 1/4 or 1/2 mile, thus trying to lie to the public and themselves, because in truth this is the perfect habitat and both endangered species are known to be in this entire area?

Page 101, middle of page:
"This type of habitat is present in the project area, however, there is no designated critical habitat for the northern spotted owl within the project area. A search of the California Natural Diversity Database shows that the nearest known nest location is about one half mile from the project area."

Did Caltrans read something in an old document to come to this determination? It is true there is supposed to be a 2 year study on the Marbled Murrelet before this project is even to be considered, is that not correct Deborah Harmon?

Will Caltrans provide this search evidence, and the year it was done? We need recent information; not something from someone's remembrance in 1972 or 1992.

Is it not true that to say a Northern Spotted Owl nest is at least 1/2 mile away is really not any proof at all, but truly just another way for Caltrans to push through their agenda without thought to getting comprehensive recent studies in the field? Is this not blatantly going against our environmental laws to push their agenda? Is this not criminal in thought to try to push through construction while knowingly disregarding environmental requirements? 123

Page 101 bottom of page
"These species (Northern California Steelhead, Coho Salmon, and Chinook Salmon) are also present in the South Fork of the Eel River but no adverse impacts resulting from the project are anticipated to occur to the South Fork of the Eel River. It was determined that there would be "No Effect" to these species."

Isn't it really true that anytime a road is cut into, there is run off (thus retaining wall), and will Caltrans please tell me how they can possibly determine the weather or storms at the time of construction that will very likely cause huge devastation to the already suffering Eel River right below this construction site from run off due to cutting into the canopy of this roadside? 124

The Eel river used to be plentiful (deep and wide) with water snakes, all kinds of frogs and pollywogs, and now the waters are such low quality, that the endangered species of the river are the steelhead, Coho salmon, and all the other fish and creatures large and small that are dying off from low quality rivers. Isn't it true that these surviving protected and endangered species need to be protected from further decline?

The rivers need to be improved (taken off the water systems) and ANY CONSTRUCTION WILL HARM THE EEL RIVER, WON'T IT? Do you realize that if the Eel River is reduced even one degree, that the Eel River and what is left of these endangered fish will die. If the Eel River dies, then isn't it true that Sonoma County will die or come after our water source, the Mad River? 125

2.3.1
Page 80:
"Most of the ground disturbance results form excavation and fill to support the proposed realignments."

However, isn't it true that the change in drain off from any change in the topography, except improvements to current culverts, will effect the Eel River adversely? 126

Is it not also true, that any disturbance to the digging and compacting of the canopy that the root systems of the old growth redwood trees will increase their chance of being killed due to their highly sensitive and shallow root systems?

I am not at all convinced the precautionary measures (picks and shovels/ wood blocks/ fill with toxic soil, etc) Caltrans professes to promise to address, will be enough to keep the very sensitive and shallow root system of the ancient old growth redwood trees safe from damage and eventual death. 127

2.3.1
Page 81: "Construction of the retaining wall requires the greatest amount of tree removal". Without the retaining wall, the cut would have excavated up to the top of the slope and many more trees would have been removed."

Isn't it true that the retaining wall is being built, because there will be run off from this project? And as stated previously,

the Eel River is in terrible straights as it is. being sucked dry from the water systems, run off from other areas like Confusion Hill and other past mistakes of the State Road Commissions, now called Caltrans?

2.3.1
Page 83:
"In addition to the tree removal itself, construction activities could result in other impacts to trees, BOTH LONG TERM AND SHORT TERM. Long term impacts to the trees resulting from this project include placement of impervious material, placement of fill over the roots, changing drainage patterns, and compaction. Short term impacts from construction can affect tree roots from such activities as soil disturbance, excavation, compaction, cutting roots and exposure to fuel and oils from leaky equipment."

They proceed in saying:

"Of most concern is concern in construction activity that occurs within the structural root zone of the trees for both long term and short term impacts. The structural root zone is a circular area with he tree trunk at center with a radius equal to three times the diameter of the tree trunk. There will be construction activities that occur within the structural root zone of approximately 30 redwood trees ranging in diameter from 18 inches to 15 feet...the possibility of injury to a tree resulting from construction activities GENERALLY increases as the distance to the trunk decreases."

And yet, is Caltrans still trying to insist there will be no damage to the root systems of the old growth redwoods? Are they trying to convince the general public that this is no big deal, when in truth it could quite likely have devastating results?

The EIR continues, "In addition, construction activities occurring from the surface to three feet below ground level have the most potential to result in impacts to trees (Department of Parks and Recreation, 2005)."

Table 9 (on Page 84) and Appendix L (after Page 181) includes plans showing where construction occurs within the structural root zone of trees.

"The proposed realignments would require placing the roadbed nearer to some trees and locating it further from other trees and removing the existing pavement."

"The road being placed closer to the old growth trees will be in greater danger with heightened trauma, and most will likely be effected adversely by the root systems being disturbed."

This is another red flag that Caltrans seems to minimize the damage they will be doing to the roots of the old growth trees with this project. Their precautionary measures are not at all convincing to me.

Also stated here is, "The biggest concern is fill on the root flare of the stem. Within the project limits fill depths within the structural root zone range from a few inches to a nearly four feet, but most depths average between one and two and a half feet. In locations where the fill would be placed up to the trunk of the tree, it is proposed to place a brow log against the trunk. A brow log is a log that is placed parallel to the road against the trunk of the tree to be protected, and the fill is placed up against the brow log not the trunk."

This does not set well with me, because of natural run off and erosion that will take place just merely by disturbing this canopy, and it is also of great concern that this brow log will shift and the root systems will of course be even further effected. I am not convinced that this is a valid solution at all. We have too many earthquakes to shake things out of place, and isn't it true that a disturbed root system can not be repaired? 128

2.3.1
Page 84: "Construction activities would likely result in additional compaction of the soils within the structural root zone of some redwoods, while realignment could result in a decrease in compaction in other areas within the project by moving the roadway further from the trees and removing the existing roadbed."

Isn't the real truth here, that of course the compacting will increase on the root systems, with all that lumber activity, heavy trucks and huge equipment trampling there? 129

"Compaction typically alters soil structure and hydrology by increasing soil bulk density; breaking down soil aggregates; decreasing soil porosity, aeration and infiltration capacity; and by increasing soil strength, water runoff, and soil erosion. Absorption of the

major mineral nutrients is reduced by compaction of both surface soils and subsoil's. Severe compaction of the soil also affects seed germination and growth of seedlings. Many of the large redwoods within and adjacent to the project area are likely affected by compaction resulting from the existing route 101 roadway and park facilities."

So is Caltrans saying there has been camping allowed by the State Parks, so now it will be fine to cut a bunch of root systems and bring a bunch or construction vehicles and drive all over the root systems, because children have played ball and campers have camped?

Let me compare lumbering, compaction, cutting too close to the roots of old growth, noise levels, and opening this road for more huge trucks spewing Diesel everywhere, to camping and fishing in the woods. And Caltrans is saying this construction will not cause any adverse affects? This is not true at all, is it? 130

"The proposed project is NOT ANTICIPATED TO SUBSTANTIALLY INCREASE THE MAGNITUDE OF COMPACTION THAT PRESENTLY EXISTS."

"st height (the diameter of the tree measured 4.5 feet above ground level)"

A tree 48 " has roots three times that, so 144 inches or 12 feet needs to be given in distance for this tree not to be disturbed.

Another old growth tree is 78 inches, needs 234 inches space to accommodate the three times the diameter rule, or 19.5 feet of distance kept from the root systems not to be affected.

An old growth 156 inches, needs 468 inches or 39 feet of distance kept from its precious root system to be unaffected.

This project spells disaster for the old growth root systems of all the trees listed above taken from page 84 of the DEIR.

2.3.1
Page 85, top:
"Short term construction impacts can occur during the construction itself and immediately after. The disturbed areas would be vulnerable to erosion until erosion control measures are in place of vegetation provides effective ground cover to stabilize soils from erosion processes."

Big red flag here!!! I am greatly concerned of any run off into the Eel River. What proof do you have there will be no damage from future landslides and run off due to this project? 131

If the Eel River dies so do all the people surviving with it, and it is already being sucked dry with the water systems, damaged by the previous road work, damaged by logging right down to the edge leaving no buffer, damaged by Confusion Hill run off, damaged from sewage and fuel spills (like January 2006), and other contributing factors both human made and accidents. THESE AREAS WILL OF COURSE CAUSE EROSION, and does this not bother Caltrans?

WHAT STEPS ARE IN PLACE FOR EROSION CONTROL "UNTIL VEGETATION PROVIDES EFFECTIVE GROUND COVER? Is Caltrans saying you may just wait for the ground cover to grow back? This is actually a concern, isn't it Caltrans? 132

Still on page 85,
"There are no known wildlife migration corridors within the projected limits; although it is likely that wildlife cross the highway to access the South Fork of the Eel River."

I talked to both Fish and Game and U.S. Fish and Wildlife and both said there are known protected species in this area, and is this not a contradiction to say no known wildlife migration, but then say it is likely that wildlife cross the highway? 133

"The park itself fragments habitat, at least in those areas that provide visitor-serving uses such as the campground, roads, visitor center, restrooms, etc..."

How can a nearly 2,000 acre old growth forest "fragment habitat?" And what about the entire grove? Plus, there have been many old growth logged out of Richardson Grove through the years. This is just the final straw. 134

This is the only sentence on page 85 that makes any sense:
"Under the No Build Alternative, there would be no additional long term impacts to the trees abutting the highway and no impact resulting from construction."

Thus, perfect reasoning for the NO BUILD ALTERNATIVE.

2.3.1
Page 86: **Avoidance and minimization measures Caltrans says they will implement.**

See page 86. This is saying they will be cutting and excavating within the root zones, so to do it with a pick and shovel instead of what???? to minimize physical injury to the tree roots. Caltrans is saying it will damage the root systems and they are going to do it anyway.

Oh, and they will leave stumps in place. That is good for holding the earth together, but I think it is awful and will look terrible to cut any trees and have the entire landscape damaged forever; never to be the same as it has been for the previous thousands of years, aside from the original road. 135
~~~~~~

2.3.1
Page 87:
"To avoid impacts to nesting migratory birds, vegetation removal will occur between September 30 and March 1."

"If this is not feasible, a qualified biologist will conduct a preconstruction bird survey to ensure that birds are not nesting in any of the vegetation to be removed. This survey would be conducted not more than seven days prior to the vegetation removal. If birds are nesting, the site will be designated an Environmentally Sensitive Area and the next left alone until nesting is complete."

Do I think that Caltrans workers will stop to look for a birds nest?
Nesting

From Google: Spotted Owls are monogamous and form long-term pair bonds. These bonds are maintained throughout the year, and pairs defend their territories year-round. They nest in trees with broken-tops and other natural hollows, in old stick nests of other species, in artificial nest boxes, and, especially in eastern Washington, in mistletoe tangles. The female scrapes a depression in existing debris, but adds no additional material to the nest. Spotted Owls reuse the same nest site for many years. Most pairs do not nest every year. The female typically incubates 2 eggs for 28-32 days, while the male brings her food. Once the young hatch, the female broods for 8-10 days and the male bring food to both the female and the young. The young leave the nest and venture onto nearby branches at 34-36 days. At this time the female joins the male bringing food to the young, which remain with their parents for 60-90 more days.

Spotted Owl roosts from Feb to March (1-2 months before egg laying). Then March to April is egg laying. Incubation is April to May for a month. Fledging is May to June, where after incubation and hatching the mother never leaves the nest for 10 days, then just to get food. Spotted Owls are fed by parents till August or September. They nest in the vicinity or nearby as habitat is available. So from February to September the Northern Spotted Owl is involved with the entire process from musting to being entirely on their own.

Is the plan for Caltrans to start work during the roosting period of the Northern Spotted Owl if they are planning to do work September to March, then this would be cutting into the beginning process of Spotted Owl mating process.

This is of the utmost importance with protected species assumed to be in this area like Northern Spotted Owl, and the Marbled Murrelet. Why is it that Caltrans continues to say that any protected species are 1/4 mile to 1/2 mile away? WHERE IS THE PROOF???

WHERE ARE THE FIELD STUDIES? Why is the two year study for the Marbled Murrelet not going to take place before the projected start time for this project in a state protected park?

Many other species will be affected by any disturbance, on top of even camping being allowed. Maybe we should close the campgrounds for a few years to let the habitat be undisturbed.
~~~~~~

We need to improve the shade factor for fish to return, and this is an ongoing process as I was happy to learn is going on. Instead of run off from projects like this, don't we need to improve the water quality of the Eel River? Another way to do this is to quit draining the Eel River down to the Russian River, so that the fish like steelhead and Coho salmon and others in a protected natural habitat can return to spawn.

Use water capturing devises already invented will be an important addition to implement, in order to lessen the need to take all the river waters, so they can be restored before it is too late. No water, no life folks.

2.3.1
Page 87
"Equipment staging areas/storage areas will be on the paved roadway or on existing un-vegetated gravel/paved pullouts so there will be no staging in sensitive natural communities."
Isn't it true that this would be impossible not to park personal vehicles, big construction trucks, all machinery and equipment locally, thus machinery will be leaking oil or gas and further compacting the old growth roots during any proposed project?

136

2.3.2 WETLANDS AND OTHER WATERS
Environmental Consequences
Page 88 last paragraph
"The project would result in minor temporary impacts and minimal permanent impacts to Waters of the US due to the culvert improvements." **Why haven't these culverts been fixed already if in need of improvements?**

Page 90
"sediment discharge due to culvert improvements are unavoidable" This is sad.

Page 93
"The contractor will be required to develop and implement a Water Pollution Control Plan or Storm-water Pollution Prevention Plan identifying site-specific best management practices and emergency spill controls."
The fact of this process, further proves my point that this plan of operation in Richardson Grove WILL ADVERSELY AFFECT THE EEL RIVER...ONE MISTAKE AND IT IS FURTHER DAMAGED!!!

"At the end of each work shift, any vehicles stored within 150 feet of the Ordinary High Water Mark of any drainage facilities and water courses will have containment placed beneath the drip zone when left overnight. Any leaks will be immediately controlled with absorbent mats and repaired before the equipment operates again. Clean up of petro-chemical drips will occur as soon as they are observed."

137

Isn't it true, that with the "NO BUILD" idea that no petro-chemical leaks will happen and no extra run off will happen?

2.3.4 THREATENED AND ENDANGERED SPECIES
Page 100, first sentence that began on page 99
"Designated Critical Habitat for the Marbled Murrelet is also identified on the list.

Page 100 last paragraph
"On May 24, 1995 US Fish and Wildlife Service designated critical habitat for the Marbled Murrelet including 99,958 acres in southern Humboldt County administered by the California Department of Parks and Recreation including Richardson Grove State Park. Primary constituent elements of the designated critical habitat for the Marbled Murrelet consist of physical and biological features that are essential to the conservation of the species within areas occupied by the species at the time of listing that may require special management considerations and protection. These include such factors as space for individual and population growth and for normal behavior, food, water, air, light, minerals, cover or shelter, sites for breeding and rearing of offspring, and habitats that are protected from disturbance or are representative of the historic geographical and ecological distributions of a species."

2.3.4
Page 101
For the Marbled Murrelet, the US Fish and Wildlife Service has identified the following as primary constituent elements: which describes this Richardson Grove as the perfect nesting area for the Marbled Murrelet. So this is critical. This work, noise, disruption, and otherwise seemingly uncaring of this critically endangered species is not being addressed in any proper way. I see below that a survey will be conducted, but when is this survey to take place?

Page 102
The Pacific Fisher is also not tolerant of high human activity levels. The DEIR there is suitable habitat within the project limits. Caltrans is saying the normal noise from the highway would not substantially exceed with jack hammers, Auger Drill Rigs, Concrete Saws, Pneumatic Tools, Generators, cranes, dozers, chain saws, and all the other construction equipment listed in '''Appendix E Project Noise Levels (back of DEIR). The relation of the noisy equipment to normal traffic is a complete farce and an insult to intelligence of a 2nd grader, thus not at all believable. This is really inaccurate.

2.3.4
Page 102 ...third paragraph
On September 17, 2007, a site visit ..A Biological Assessment was prepared to comply with Section 7 of the federal Endangered Species Act to discuss the impacts to Marbled Murrelet, Northern Spotted Owl, and designated Critical Habitat for the Marbled Murrelet. The Biological Assessment that was prepared for this project did not include Bald Eagle, Coho, Chinook, or Steelhead species since no adverse effects to these species are anticipated to occur as a result of the project.' **This is another statement that cannot be substantiated. All the species and the habitat will be adversely effect with this project.**

"The Biological Assessment is currently under review by the US Fish and Wildlife. A Consistency Determination for impacts to Marbled Murrelets as required under Section 2080.1 of the Fish and Game Code will be submitted to California Department of Fish and Game.' **We are still waiting for this to begin, but I was told by Deborah Harmon that Caltrans plans to begin the work next year, despite this fact, and despite there are Native American Artifacts dating back 3,500 years on this potential job site.**

Page 103 mid a of page
"A TWO-YEAR SURVEY WILL BE CONDUCTED IN ASSOCIATION WITH STATE PARKS TO DOCUMENT PRESENCE OF ANY MARBLED MURRELET IN THE PROJECTED AREA"
So when is this study to take place, is my question, once again? So all of this proves my point, that a study needs to be done before anything goes any further with this plan.

Fish and Game and US Fish and Wildlife people consulted, and the DEIR, say this is the perfect habitat for Marbled Murrelet.

Is Caltrans is once again trying to say there are no protected species in the proposed project area, which is of course completely wrong? To me this seems in violation of the Federal Endangered Species Act (FESA), in that a project is being fast tracked without the proper studies, thus uncaring and harmful to the Marbled Murrelet, and Caltrans is willingly wanting to proceed despite possible damage to this species. That would be breaking the law, in my opinion. I would equate it to a hunter with a gun who doesn't care what bird he kills.

The Northern Spotted Owl
'This type of habitat is present in the project area, however, there is no designated critical habitat for the northern spotted owl within the project area. A search of the California Natural Diversity Database shows that the nearest known nest location is about one half mile from the project area.' This is not proof of anything. What year was that location documented, and how many recent studies have been done to locate nests of the Northern Spotted Owl?

"DUE TO THE SENSITIVITY OF THE SPECIES, IT HAS BEEN DETERMINED THAT THE PROPOSED PROJECT "MAY AFFECT, AND IS LIKELY TO ADVERSELY AFFECT: NORTHERN SPOTTED OWLS." See bottom of page 104, and I want to ask you if Caltrans is not clearly stating themselves that this project is going to effect the Northern Spotted Owls, and yet Caltrans says it is not going to SUBSTANTIALLY affect? That question is for you Deborah Harmon.

138

Page 103
Caltrans is saying "The habitat within the project limits is not high quality due to the presence of the highway and campgrounds. Noise, lights, and activity disturbance generated by the construction of this project may disturb breeding and migration patterns in the projected area."

After all this, Caltrans has the audacity to say: "The construction activity will **not substantially** exceed the existing disturbance levels present with the roadway traffic, thus the project is not is **not anticipated** to substantially disturb migrating Marbled Murrelet. However, due to the sensitivity of the species, it was determined that the project may Affect, and is likely to Adversely Affect" Marbled Murrelet."

Would you like to compare charts with the one in the back of the DEIR, Appendix E, and see studies that construction hurts the hearing of workers in a detrimental way? Do you see the numbers in this chart compared to anything one Googles, which proves the noises levels are substantially higher than Caltrans is representing in this document, aren't they?

Just Google, and then select these sites to see the real numbers are much higher for construction than Caltrans is letting on. Is that not true Deborah Harmon?

Google: Road Construction Noise, and select this down load:

PPT] Noise in Road Construction

File Format: Microsoft Powerpoint - View as HTML
Noise in Road Construction. What this presentation covers. Hearing loss rates and claims facts. Noise levels of construction equipment ...
wishe-training.inl.ws.gov/training/presentations/NoiseinRoadConst.pps - Similar pages Or:
http://www.cdc.gov/elcosh/docs/d0100/d000054/d000054.html

Isn't it true that the noise and construction activities **will** interfere with nesting? **Isn't it really true that t here will be substantial adverse impact from the jackhammers, concrete saws, night lighting, noise of trucks, back-up safety bells, etc. on the nesting habits of any of the species that might be in the habitat during construction time?**

What is this about 13 new garbage cans with special lids to protect Murrelet eggs from predators? How will garbage cans help if all the noise from these projects scares the birds away? All I can determine is this noise going night and day will not only make the workers deaf, you can not say this will not adversely affect all the protected species in this proposed construction site, can you Deborah Harmon?

Then this report also says "noise, lights, and activity disturbance generated by the construction on this project may disturb breeding and migration patterns in the project area." AND YET CALTRANS WILL CONTINUE DESPITE ALL OF THIS KNOWLEDGE, AND SO I ASK YOU IF THIS AN INTENTIONAL DISREGARD FOR THE LAWS PROTECTING THESE ENDANGERED SPECIES? If it is, then you should be ashamed of yourselves, and you will be breaking the law if you proceed.

Has there been even one recent study done in this proposed project?

2.3.4
Page 104 Middle of page

"Although the large trees within the project provide elements these trees would not be **substantially** impacted by this project" Is this not the craziest thing you ever heard? If you cut root systems, all the trees will be effected and habitat lost, is that not the real truth? Can you guarantee that cutting into root systems will not make these old growth trees with the first or second, or some big storm?

How can noisy construction equipment going day and night not effect all the species that are in these trees and that are supposed to be protected? Here again one must Google, since Caltrans presents a flawed noise level chart in the back section of the DEIR, with incorrect levels, and Caltrans is trying to say this noisy construction is the same as camping or normal traffic, is that not true?

2.3.4
Page 105
"Invasive plant species thrive in disturbed areas. Re-vegetation can minimize the likelihood of invasive species re-establishing. HOWEVER IT CAN ALSO PROVIDE A SEED SOURCE FOR NEW INVASIVE SPECIES." Do I believe Caltrans will send people out to weed the grove once any invasion caused more new invasive species??? When Caltrans tries to skirt the truth throughout this document, isn't that proof enough not to trust them?

2.3.4 CUMULATIVE IMPACTS
Page 107
We have addressed cumulative impacts all through this document. Cumulative impacts will be devastating, will they not? When the old growth are killed and invasive plants take over and the endangered and protected species and habitat are disturbed, we will be having cumulative effects, will we not? When there is run-off into the river, will this not be a cumulative effect? Also, what about all the Caltrans projects combined cumulative effects?

140

Can we have a Cumulative Report on the devastation of the Caltrans bypass, the 299 Caltrans projects, and I heard something happened in Redding? Isn't it true that the cumulative effect of old work done by the road commission is the reason Confusion Hill closes every year due to landslides? So are we to assume that the run off from this project will also cause landslides in the future, and so will this give Caltrans another project to fix this damage that will be cumulative?

Chapter 4 COMMENTS AND COORDINATION

Page 115
Isn't it true that the general public did not become aware of the project until the Benbow meeting was announced in September 26 2007, also in the winter months when storms prevent good turnout at public meetings? There was no environmental impact report at that time was there?

141

Isn't it true that the Times-Standard is in on this too, and they have purposefully not done a lot of writing about the Richardson Grove project except making reference as if all the public was invited to attend and know about early meetings, and purposefully only stating their position, because isn't it true that Times-Standard has been part of this "select businesses" to push this through along with cattle (already have permit to drive STAA back and forth), Sun Valley Floral (busted for hiring nearly 300 illegal workers and then pretended that they did not know, many law suits for highly toxic pesticides making many workers ill, not paying overtime...wow that is a good employer to keep around...not), and the irony of it all Arcata Recycle, and others like Roger Rodoni, and the Times Standard article here lies to say other people were there at those meetings representing the people who care about the environment, is that not true, Deborah Harmon?

142

Was the Sierra League and Save the Redwoods League really in attendance, and weren't all the people in attendance businesses here WHO WILL NOT PASS ANY SAVINGS OFF TO ANY CONSUMER? WHO WILL PROVE TO ME THE CONSUMER WILL PAY A LOWER PRICE AT ANY OF THE ESTABLISHMENTS; MAY OF WHICH ARE DEAD IN THE WATER. This is a bad idea, and it hurts TOURISM...OUR ONLY REMAINING THRIVING BUSINESS, EXCEPT FOOD. Something tells me Safeway is allowed to pass back and forth, because their shelves are always stocked. Recycle is raising prices all the time, and it is worked into the garbage bills. Bills are not going to shrink as a result of cutting into this protected grove, are they Deborah Harmon or Charlie Fielder?

Isn't it true that these meetings have not been well advertized, and only the perspective of the businesses involved have been talked about, and all other opinions have been downplayed, both in the Times-Standard Newspaper and Channel 3 News?

Isn't it also true that the Times Standard has purposefully waited until the last minute to announce these meetings, and like this article, it is when people are getting out their barbeques and getting fireworks (Wednesday, July 4, 2007), I copied below? Do you see a pattern here?

143

This is Wednesday, July 4, 2007...people are getting out barbeques and setting off fireworks and not reading the paper like they do on other days.

Richardson Grove fix still in planning phase

James Faulk/The Times-Standard
Posted: 07/04/2007 04:13:56 AM PDT

EUREKA -- A recent meeting of stakeholders revealed remarkable unity in the pursuit of a long-sought fix to the narrowest

bottleneck on the North Coast's stretch of U.S. Highway 101, two county supervisors reported Tuesday.

Chairwoman Bonnie Neely and 2nd District Supervisor Roger Rodoni both attended a meeting Thursday that gathered together stakeholders and other interested parties to continue their examination of widening the highway at Richardson Grove.

The nearly two-mile stretch of road there snakes between trees in the state park, and is therefore too narrow to allow passage of the trucking industry's standard-size trucks. Only those with a kingpin of 40 feet or less are allowed to pass by law. That limitation has pinched a broad swath of local businesses for years by increasing their shipping costs, and making it so they often have to offload their cargo outside the county and then reload onto bigger vehicles.

"People seem to realize there's a problem," said Rodoni. "I came away from the meeting hopeful that something great was going to come out of this."

Neely agreed that the meeting was imbued with positive energy, and said the best news is that in the work done so far ancient redwoods have been protected -- the largest threatened tree, she said, is an 18-inch maple.

Recently, work has proceeded on another slim stretch of road at Confusion Hill. When that bypass is completed, Richardson Grove would be the

Last impediment to making the county's transportation system fully accessible.

Cattle haulers have attracted the most attention recently in seeking relief.

A bill authored by North Coast state Sen. Patricia Wiggins, D-Santa Rosa, now seeks to extend a truck length extension for cattle haulers only, by allowing them to use trucks as long as 43 feet. The bill would also limit the length of a semitrailer to 48 feet. It passed this week out of the Assembly Transportation Committee, after passing out of the State Senate in May.

Testifying before the committee, she pointed out that most of the beef coming out of her district heads out of state on trailers with a 43-foot kingpin. It is the standard for 90 percent of the industry, she said.

"As a result, to do any interstate business in the livestock industry, you must be able to use a trailer with a 43 foot kingpin," Wiggins said.

Senate Bill 773 was recently amended to protect old growth redwood trees, but Caltrans District 1 Director Charlie Fielder has already made a goal of improving the road with the least possible impact to surrounding natural resources.

Fielder said he's encouraged by the progress his engineers have made in developing fixes to the narrow road. The work they've done so far will have to be verified, he said, but their handiwork could make the hiring of a consultant unnecessary, even though a request for proposals has already been circulated.

It's possible that road widening construction could begin in about a year, Fielder said.

"It just depends on how well the studies go," Fielder said.

Fresh from a surprisingly quick turnaround in the Confusion Hill Bypass project, Fielder said he plans to use that process as a model for expediting this work.

Attendees at the meeting Thursday included the county, Caltrans, California State Parks, the Sierra Club, Save-the-Redwoods League, cattle haulers and the California Highway Patrol, among others.

Roughly 40 people attended, Rodoni said, from about as many different groups.

James Faulk can be reached at 441-0511 or jfaulk@times-standard.com.

Isn't it true that this entire project has been carefully calculated to purposefully side-step the public and all the citizens of California who own these State Parks?

Wednesday, September 26, 2007~FIRST OPEN MEETING TO THE GENERAL PUBLIC. The meeting at Benbow RV Park was from 3 p.m. to 7 p.m., and most people don't get off work until 5 or 5:30 p.m., need to eat dinner, and that means they have missed the meeting, by the time they drove the hour to two hours to Benbow RV Park, if they can even find it, as it gets dark early at the end of September and this was the end of the month in September. So people from McKinleyville to Fortuna would probably skip a mid week meeting which they can not possible arrive to until shortly before it was over.

March 8, 2008~FIRST STORY ALERTING THE PUBLIC TO THE TRUTH WAS BY NORTH COAST JOURNAL, is that not correct? Parting the Redwood Curtain, by Christina Bauss

March 11, 2008~Times-Standard has come back with saying how Roger Rondoni was all for both Caltrans plans (101 Corridor cutting Eucalyptus trees in the way of progress) and (Richardson Grove in the way of progress) When Cattle are already exempted from the restriction of the use of STAA trucks, is that not true, Deborah Harmon?

Sunday, November 16, 2008~First front page article of the Times-Standard that really caught my attention. It was by Kathy Dillon, Half the Eucalyptus Trees along the 101 Corridor are to be cut. That was the first time I saw an article on a Sunday. As a result there was a huge turnout at the

~December 3, 2008 Final Meeting for the Caltrans 101 Corridor, and so many commented, you ran out of 150 comment cards and had to use scratch paper and many more commented directly. AND YET YOU ARE STILL DISCUSSING CUTTING SOME EUCALYPTUS TREES, AREN'T YOU CALTRANS? HOW MANY PEOPLE DID CALIFORNIA REDWOOD COMPANY LAY OFF ALREADY, AND HOW MANY MORE, AND WHEN WILL THEY CLOSE SHOP BECAUSE THERE IS NO DEMAND FOR LUMBER AND THE ECONOMY IS REAL BAD? To what lengths will you go for a failing company that has never had an accident there ever. I just do not get it.

UNLESS IT IS THE RAIL TRESTLES YOU ARE AFTER...but that is another project.

December 8, 2008~FINALLY the hard copy of the Caltrans Richardson Grove State Park Draft Environmental Impact Report was available to pick up. So from 2006 (where there were meetings that only business people were invited and no one from the environmental caring community were invited...and not till the end of 2008 was an environmental impact report made available, ONE WEEK BEFORE THE FINAL HEARING?

December 14, 2008~Times-Standard's ONLY notice of the Final Hearing for reporting on the Environmental Impact Report to be the following day. Was that another attempt at down playing so not a lot of people would be alerted???

December 15, 2008~FINAL HEARING FOR THE CALTRANS RICHARDSON GROVE TO ADDRESS THE ENVIRONMENTAL IMPACT OUT ONLY ONE WEEK BEFORE. These are 2101 page document with discrepancies on every page, and no one can read it in a week. No one had been able to, including all the so called participating partners listed in Save the Redwoods League Website. WAS THIS YET ANOTHER WAY TO TRICK THE PUBLIC AND MAKE IT TOO HARD TO HAVE AN EDUCATED OPINION ON SUCH A DOCUMENT, I ONLY HAD TIME TO READ PARTS OF IT.

JANUARY 23 WAS THE ORIGINAL DATE FOR FINAL COMMENTS AND IT WAS EXTENDED TO JANUARY 30, 2009. FIRST ALL THREE ENVIRONMENTAL IMPACT REPORTS COME OUT IN DECEMBER (CALTRANS 101 I NEVER SAW, CALTRANS RICHARDSON GROVE STATE PARK, AND THEN ON DECEMBER 14, OUT COMES MARINA CENTER CITY PROJECT. It does not take a rocket scientist to see the public has been kept from the truth as much as possible and the Times-Standard has made sure of this, Is that not absolutely the truth, Deborah Harmon?

Shall we take a tally to see who believes any of these businesses will lower any of their prices for their products to consumers if they are allowed to rip into this sensitive and supposed to be protected environment?

Did you know that NATIVE AMERICAN ARTIFACTS DATING BACK 3,500 YEARS have been found on both the RICHARDSON GROVE STATE PARK proposed work site, and on the MARINA CENTER proposed work sites?

Do you see how deceptive this and the other two Caltrans projects are being to the public who care about our environment, and if they knew it would harm the root systems and environment, they would not like it one bit.

I don't like it at all, and I would like to put a stop toward this type of government. Most of the companies pushing this are either breaking the law, laying off people, or soon to find diseases in beef that will kill their market too, and so forth. Aren't you intentionally being deceptive, Caltrans? Don't you realize that things have a way of coming around and the truth being revealed, or things happen to stop projects when they are just not right for our community?

Noticing which newspapers slant toward the project gave me even more insight to who is involved and who is not included in complete studies of the entire population; not just the failing businesses. Perhaps some are failing because of cheating, poisoning, breaking the employment laws of not paying overtime, hiring illegal workers. Lumber is dead, the market is dead, this Richardson Grove project and the 101 Corridor project are both totally overpriced and unnecessary projects, that the people of California can not afford. Just slow it down and put in a couple signal lights here and there.

Too much is unfolding and we need to stop this and drop it right now, or more will come out to totally embarrass Eureka and the Governor, due to the underlying deception in every part and every paragraph of the Draft Environmental Impact Report. Wouldn't you call this corruption, in another way of describing it when lies are stated all through the DEIR and the Governor and the Arkleys are having luncheons together at the cattleman's restaurant? Then the Governor is wanting to "relax" environmental projects and even pleading with President Barack Obama to push these highway projects through without environmental considerations???

Water capturing devices will be a good place to place your stocks and investments, and inventions. Water ways are dying folks. Any further spills into the Eel River and run off due to unfounded plans to cut into a 1000 year old Canopy will kill the Eel River.

Isn't it true that if you kill the Eel River, then you kill all the habitat everywhere there, and Sonoma County who is sucking off the Eel River, against my better judgment? They will come after the Mad River, and we will have river wars if this happens. If anyone gets near the Smith River, I will personally let a bear loose in their yard...

And if you want to cut through my heart again, just kill the Eel River, that I remember so fondly swimming all afternoon and it was very deep and very wide as a child. We even had beavers back then. Are the beavers still surviving? The fish were big and many swam around. Water snakes skirted across the top and we tried to catch them at the head for a minute, so they would not bite, then toss them far. Now the Eel River is really struggling to survive, and it is on the protected list for Wild and Scenic Rivers, did you know that?

At the meetings I attended there was no presentation by Caltrans or general question and answer session offered, that is except for the low publicized final hearing December 15, 2008. Isn't it true that regular consumers (citizens) have been purposefully left out of this process?

Aside from the final meeting, is it not true that you did not have a questions and concerns time to help educate the public on all aspects of this plan? Isn't it also true that the Final Hearing was only represented in the news as being a sure thing by the Business State holders, and any comments opposing were downplayed by the news media and Caltrans as being insignificant? In fact, Kim Floyd actually had her head down when she quietly said some others in a low voice, and body language tells a lot too, don't you think Deborah Harmon?

In order to survive, we must revive and renew our rivers, number one. We must provide more habitat and enforce the protection of our forests and wildlands. This will save human kind. We really need to get water capturing devices and solar, hydrogen, ocean currents, methane, and other ways to get off oil, sucking the rivers dry in the water systems, and electric provided by nuclear waste. Let the rivers run free and replenish, as if they die, they will be a non-replenishable resource.

Education is of the utmost importance to accomplish these goals and bring California up to standards. I say use the NO BUILD PLAN for RICHARDSON GROVE STATE PARK, and projects that effect State Protected Parks and adversely effect the environment.

What kind of a message are we sending to our children when we try and push for funding of highway projects, and cut money per student ratio to 47th in the country? We need to educate our children up to standard, so they will be our leaders of tomorrow, and our inventors to invent things to get off foreign oil and electricity produced by nuclear power plants. We need to protect this precious State Park, and not allow a few in the business community to push the rest of the citizens around to improve THEIR bottom line, not ours. I am used to paying more for everything up here. But housing is less, so it offsets the high cost of groceries and gas.

I am now Skipping Ahead to the very back of the DIER, behind the grafs to the
SUMMARY OF FINDINGS AND CONCLUSIONS

All this once again summarizes that this project will have huge impacts on the environment, including the Eel River, the protected and all species and fish, and could very likely kill old growth due to the impending impact to their sensitive roots, and from an environmental and historical view, this is just the wrong thing to do. For tourism it is the wrong thing to do too.

From the impression of tourists coming into Humboldt County, it will never look or feel the same with those stumps and retaining walls so ugly for the view of Singing Trees, and canopy all torn apart with water running off to flood the road and pour more run-off into the Eel River. How would you feel if you had a lovely view and some project cut it out?

The extra run-off from the slops cut, will cause water to pour more sediment into the Eel River, Isn't that true? **WON'T THIS ACTUALLY BE TOTALLY DEVASTATING TO OUR ALREADY SUFFERING EEL RIVER? This will be devastating to tourists entering Humboldt County, and heartbreaking to people who know this area is a precious gift from God, and to disturb it is really not caring about protecting what we were entrusted to protect.**

Please select "NO BUILD" with the safety precautions such as "25 MPH ENFORCED" "SIGNALING FOR ONE WAY PASS THROUGH NIGHT TRAFFIC" and please ask Parks and Recreation or Caltrans to fix anything running into the Eel River and continue restoration projects to rivers and forests.

In the second paragraph of the Summary at the very end of the DEIR on page 2, Caltrans states:
"Avoidance and minimization measures will be employed so the action will have no adverse impact on sensitive biological resources, natural communities of special concern, special status plant species, and special status animal species. based upon habitat present, record searches, site surveys, and information provided by the US FS, Fish and Wildlife Service, NOAA Fisheries, and the California Dept of Fish and Game." NOW THIS IS JUST NOT TRUE AT ALL, is it, as WE CAN CLEARLY READ EARLIER ON IN THIS DOCUMENT SO FULL OF HOLES, YOU WOULD HAVE THOUGHT DICK CHENEY WAS IN THE AREA SHOOTING QUAIL AGAIN. Know what I mean?

"Potential impacts to special status species have been analyzed" Please present proof of who has analyzed what? When and where were these so-called studies done? Has anyone gone in the field, or do you use your computer to figure that out like your plans for this historical scenic roadway?

This second paragraph goes on to say: "Although there is habitat for a number of special status species in the project vicinity, this work will not adversely impact those species of their habitat." Oh please, are you capable of writing the truth? What if your water source depended on it?

Then Caltrans continues. "For listed fish species, the project is not expected to result in any cumulative adverse impacts to available spawning or rearing habitat, essential fish habitat, and will not result in adverse modification of Coho salmon, Chinook salmon, or steelhead trout." Do you have proof of these statements either? Is there any proof of anything here?

It will of course affect the river, roots of trees, and habitat of this very sensitive area. Caltrans has not given any proof that they will not affect these things, and Caltrans, in fact, says "these projects will effect endangered species." How could it not?

In the last paragraph, way in the back in Summary, on page 2. It again clearly states the project site is within the breeding range of the state listed peregrine falcon as well as the federally listed northern spotted owl, and marbled murrelett. There is suitable nesting habitat for some of these birds within 1/4 mile of the project locations. Don't care about spotted owls or falcon's either, Caltrans.

Then don't you have the audacity to actually say again, "However, this project will not adversely modify any critical habitat for any of these species. Nor will it impact rearing or foraging habitat." Then in the same breath Caltrans says, "Some marginal Northern spotted owl dispersal and foraging habitat will be impacted. The federal candidate species Pacific fisher is also found near the project area. This work will not adversely impact Pacific fisher or its habitat." I AM SCREAMING NOW!

These are statements admitting Caltrans will be going onto State Protected property and knowing there will be species and waterways and fish to be effected, don't you see this Deborah? Oh but you do. In fact, you are purposefully not protecting these protected species, their environment, or the river they depend upon, are you???.

Several times Caltrans says a protected species is 1/4 mile away. If you say there is none within 1/2 mile, then how do you know? Do you have any studies to prove this? How do you know if they are in one of these trees 3 feet away or 1/2 mile away if you have no recent studies???.

All through this DEIR is states the protected habitat is either 1/4 mile away or 1/2 a mile away, depending on the requirement to begin cutting into this old growth forest, so are you purposefully telling lies all through this document, just so some questionable business men can get their bigger trucks through for their bottom line?

On the next page #3 in the summary in the back of the DEIR, in describes the noise of construction not expected to exceed ambient traffic noise...give me a break. This is absurd. Jack hammering, concrete sawing, concrete grinding, back-up warning signals on heavy equipment. This is not exceeding ambient traffic??? This would be like the street cleaner amplified for 24/7 and all the natural species will be frightened off and nest abandoned. Where do you get these figures and who devised your charts? Do you ever try to Google for the truth? It is way more accurate than anything in this document, wouldn't you have to agree if you were capable of honesty?

No shrub removal between March 1 and September 1 to avoid nests, but as stated in another section the Northern Spotted Owl nests from February 1 to July 21. Thus there is no good time to do vegetation removal, as there should be no removal and only NO BUILD as the solutions.

To stress this point again, on page 9 of the Caltrans Draft Environmental Impact Report summary, it estimates the excavate slope and construct retaining wall from February 1 through July 1 (the nesting period of the Northern Spotted Owl), thus this will disturb the nesting of the Northern Spotted Owl, so no excavating slope and no constructing retaining wall, and only a NO BUILD is acceptable or Caltrans will be purposefully harming a protected and endangered species, the Northern Spotted Owl.

February 1 through September - cut and fill other areas.
Again, February 1 through July 21 is the nesting period of the Northern Spotted Owl. Therefore, the NO BUILD is the only solution to protect our endangered species, whose habitat is continuously being preyed upon by humans.

June 1 through October 15 is Culvert work. June 1, the Northern Spotted Owl is nesting. So that would be a NO during that time also...and the only solution is NO BUILD, of course.

September through October is paving, and we know schedules always run exactly on time...NOT. However there will need no pavement, except improvements to strengthen the current road and put bumper things to prevent people from falling asleep at the wheel. That can be done without any impact for the NO BUILD solution. Therefore, the NO BUILD is the only possible scenario any deductive mind can determine, with the words right here, from the horses mouth.

2.1 SUMMARY REGULATORY REQUIREMENTS
On page 10 of this summary in the back, in the first paragraph under Regulatory Requirements states "studies have been done on-site", and I got conflicting information from speaking directly to different people." Will you please show me these studies? Please have dates on any study you show me, will you please?

Caltrans states that "on September 17, 2007 Ray Bosch and Bill McIver of USFWS visited the site. Later it was determined that formal Section 7 Consultation with USFWS (US Fish and Wildlife Service would be initiated for impacts to listed species and critical habitat.

In compliance with CEQA, a consistency determination for impacts to marbled murrelet is required under Section 2080.1 of the Fish and Game Code. Therefore consultation with California Fish and Game was initiated. On May 8, 2008 Department of Fish and Game Environmental Scientists Michael Van Hattem and Scott Bauer visit the site.

AN EIR (CEQA) AND AN ENVIRONMENTAL ASSESSMENT (NEPA) ARE BEING PREPARED FOR THE PROJECT. Is that the DEIR we are reading and reporting on here? Or will Fish and Game have their own determination? Where is this

document? Where are these determinations? I do not see any proof of any studies done, am I missing something here?

2.2 END SUMMARY PERSONNEL AND SURVEY DATES SUMMARY:
Information in this report is based on field observations by a Caltrans Associate Environmental Planners (Natural Science), consultation (talking) with the California Dept of Fish and Game DFG, USFWS US Fish and Wildlife Service, and a review of existing literature.

SEVERAL SPECIAL STATUS SPECIES WERE REPORTED TO HAVE OCCURRED NEAR THE PROJECT AREA. THE CALIFORNIA NATURAL DIVERSITY DATABASE DOES NOT PROVIDE SPECIFIC LOCATIONS BUT IT IS ASSUMED THAT IF HABITAT FOR THE SPECIES EXISTS IT WILL BE PRESENT.

NO BUILD. SLOWING DOWN TO 25 MPH, AND SIGNALING AT NIGHT ARE A BETTER SOLUTION. DO PEOPLE KNOW YOU FOUND 3,500 YEAR OLD NATIVE AMERICAN ARTIFACTS ON THE RICHARDSON GROVE SITE?

Was it not enough that earlier settlers killed nearly all the ancestors of the Native American people, must you take their burial grounds too. We must not proceed, and the Native American People need a chance to find what is left of their ancestors.

Please enlighten me as to any good reason to proceed after this researching and proving this document is full of mostly lies and deception. and the people pushing it are the only ones who may improve their bottom line, for a minute.

Trisha Lotus
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1. As both STAA and non-STAA vehicles are subject to the same weight allowance, for loads that are heavy, it is not a correct assumption that a STAA vehicle can transport the same goods as two CA Legal trucks. In addition, even for low weight goods, it is not accurate to say that a STAA vehicle can carry the same load as two CA Legal vehicles.
2. STAA vehicles are the industry standard and will likely not become obsolete in the near future.
3. Providing STAA access at Richardson Grove could actually help with global warming as it would eliminate the necessity of a lengthy detour into Humboldt County. As STAA vehicles are the industry standard, it is expected that as trucking companies replace vehicles in their fleet, they would replace with STAA vehicles.
4. No, it is not expected to result in increased speeds because: 1) the posted speed limit was reduced from 40 mph to 35 mph in Fall 2008; 2) the widening that is proposed is for providing up to two foot shoulders where there are currently no shoulders; and 3) the roadway will remain a curvilinear highway with minimal shoulders and large trees abutting the pavement. Traffic volumes are not expected to substantially change. The project's impact on listed species was considered.
5. It has been reported by small local businesses that the STAA restriction has negatively affected their cost of doing business. Larger big box stores tend to have their own fleet of non-STAA vehicles available.
6. Transferring loads result in making goods movement more expensive and less timely. In addition, many local businesses must maintain larger inventories due to erratic deliveries and damage during transfers. It has been reported that local businesses pay about ten to fifteen percent more for goods due to poor truck access, increasing the decline of locally owned businesses.
7. Truck traffic is not expected to substantially change as a result of the project. The type of vehicle may change but not the number. So the assumption that the project would result in a substantial loss of jobs is not realistic. The STAA vehicles are the same width as CA Legal.
8. No, it is not expected that the project would result in loss of jobs.
9. The two year Marbled murrelet survey is not required to occur prior to the conclusion of the NEPA/CEQA document. The survey is a conservation measure identified in the Biological Opinion. The intent is to add data about inland breeding populations to further the knowledge of Marbled murrelets and assist in the recovery of the species. The data is not needed to determine the project's impacts to the species.
10. Improving Route 101 at Richardson Grove has been a long-standing priority for the county. The Regional Transportation Plan (RTP) identifies lifting the STAA restriction at Richardson Grove for improving goods movement. Constructing the project would fulfill one of the objectives of the RTP. The RTP went through a public review process as well.
11. No, it is not true. The project was initiated in summer 2007 and the first public meeting about the project occurred in the fall, 2007. Numerous measures have been incorporated into the project and construction specifications to minimize impacts and protect the trees. The project is in compliance with NEPA and CEQA. Permits will be obtained from CA Dept. of Fish and Game, Army Corps of Engineers, and the Regional Water Quality Control Board.

12. Goods movement for Humboldt County will continue to be provided primarily by trucking. The railroad is not available in Humboldt County. The port requires major infrastructure improvements before shipping could become a major mode of transport.
13. Technical studies were performed for the project by professional staff. Consultation occurred with federal and State resource and regulatory agencies. The results of these studies and consultations are included in the EIR.
14. The US Fish and Wildlife Service (FWS) has determined that the project would not result in mortality of Marbled murrelet or Northern spotted owl. The National Park Service has determined that the project would not adversely affect the values of the Wild and Scenic River. Certified arborists have determined that the project would not substantially adversely affect old growth trees. Since there would not be an increase in traffic volumes it is not expected that there would be a substantial increase in emissions.
15. No environmental laws have been relaxed for this project.
16. Presence of Marbled murrelet and Northern spotted owl is assumed for the project area in the consultation with FWS. The conservation measures committed to were based upon the potential the project had to impact these species. FWS has determined that the project would not result in a take of any listed species.
17. The project area is relatively flat and substantial runoff is not anticipated. Stormwater Best Management Practices will be in effect during construction. Permists from CA Dept. of Fish and Game, Regional Water Quality Control Board, and the Army Corps of Engineers may require additional water quality protection measures.
18. See General Response #3 regarding information on minimization measures incorporated into the project to protect trees.
19. Table 7 in Section 2.2.5 of the document identifies noise levels from typical construction equipment.
20. As stated before, this project would fulfill one of the objectives of the RTP.
21. See Response #1 above.
22. There is not reason to believe that the STAA vehicles are older than the non-STAA vehicles in a company's fleet.
23. The project would fulfill one of the objectives of the County's RTP.
24. The data we have indicates that the project would result in local businesses being more competitive.
25. No, the park was established after the road was built. The road was constructed in 1915.
26. The information in this statement was generated by computer modeling. The degree of off-tracking for a given truck is determined by the truck size ad type and the curve dimensions of the road, not the truck speed.
27. See Response #4 above.
28. No old growth trees will be removed so the canopy won't be substantially altered.

29. It is believed that the project would result in economic benefit to the County. The project does not create jobs for Caltrans. The construction would occur by a construction company which would provide jobs within the County.
30. Transportation projects are not funded by the General Fund.
31. See Response #6 above.
32. Businesses that participated in the survey were likely those most affected by shipping costs. While the findings in Dr. Gallo's study are based on information from a limited portion of businesses present in Humboldt County, for the industry sectors it covers, the response rate was statistically valid. An actual accounting of lost sales is not warranted. The higher gas prices were not what made the transportation costs higher but rather the unique factors associated with the STAA restriction.
33. State Route 299 is also has STAA restrictions. Certainly in the past road closures at Confusion Hill could have been a factor in shipping delays, but the highway has been rerouted around the unstable area. It is not known how much of the imported goods come from China. Shipping delays impose costs on the affected businesses in various ways such as resulting production costs when labor and machinery are idling due to delays of imported goods. Delays in exporting can result in decreased consumer satisfaction because of reduced shelf life of perishable goods. The dissatisfaction can result in loss of markets. The trees that are proposed to be removed do not form a major part of the canopy as they are not the large old growth redwoods. The largest tree to be removed is a 24 inches in diameter tan oak. It is not anticipated that the local geology of the area would be appreciably affected by the removal of 54 trees.
34. It is a combination of factors resulting from the STAA restriction that results in the higher costs.
35. Utilizing a signal was considered. See General Response #10 for more information.
36. Reducing speed will not correct the geometric deficiencies resulting in off-tracking of the STAA vehicles. The signals in Willits are in an incorporated city and allow cross traffic to proceed.
37. There is currently a project to bypass Willits. It is currently planned to begin construction in 2010.
38. *See General Response #10*.
39. *See General Response #8*.
40. The Confusion Hill project did not remove any old growth redwoods. The Route 299 projects will occur over several years as funding becomes available. No old growth redwoods would be affected by these projects. No old growth redwoods would be affected by the Redding project.
41. It is not known how many deer cross the road in front of a driver. Yes the collision history states that the collision rate is 3.47 which is twice as high as the expected rate. This number means that for every million miles traveled 3.47 collisions occurred. The expected rate is the amount of collisions that are expected to occur based on the type of roadway it is.

42. In comparing statewide collision averages for highways, highways are grouped into 67 categories using such characteristics as the number of lanes, the average traffic volumes, whether the adjacent land use is rural, suburban or urban, the classification of the highway (whether it is a conventional highway, freeway or expressway), the speed, and the terrain (whether the terrain is flat, rolling, or mountainous). The evaluation is not a strict comparison of the collision rates of one highway to another, but a comparison of one highway to the group of highways with similar characteristics, which together, compose the statewide average.
43. The environmental document acknowledges that an archaeological site will be impacted. Several minimization measures have been developed to protect the site. Please refer to Section 2.17.
44. While the old growth trees located in Richardson Grove State Park are a portion of what remains of old growth trees, the park does not contain the only remaining old growth trees. The project does not remove any of the old growth trees.
45. It is presumed you are referring to the technical advisory group meetings here. For more information on this group, refer to the 'Background' section of the document.
46. The comment period for the draft environmental document was from December 5, 2008 to March 12, 2009. Comments received at the hearing are not given any more weight than written comments received during the comment period.
47. There was no attempt to deceive the public.
48. Numerous small businesses have advocated for lifting the STAA restrictions.
49. While there may be an increase in STAA vehicles as a result of the project, it is not anticipated that the number of trucks would substantially change. It is highly unlikely that vehicles with zero emissions would be available in the near future. STAA vehicles are not obsolete, they are the industry standard.
50. The project is not expected to result in substantial adverse effects to the South Fork Eel River. Water quality protection measures will be required by the agencies issuing permits for this project.
51. The comment period was extended to 97 days. A typical comment period is 45 to 60 days.
52. Caltrans policy is to notify all the media when a public hearing is to be held. Caltrans does not determine which television stations choose to report on the meeting. Public hearing notices are published in the local newspaper of general circulation nearest the project area.
53. The collision reports did not identify deer as a major factor in the reported collisions.
54. Constructing the project would fulfill one of the objectives identified in the County's Regional Transportation Plan. While the project would not eliminate the distractions caused by trees abutting the pavement, it will correct the geometric deficiencies that result in STAA vehicles off-tracking.
55. The speed limit was reduced in this area in Fall, 2008 from 40 mph to 35 mph. Reducing the speed in of itself, does not correct the geometric deficiencies that result in off-tracking. Thus, reducing the speed would not result in the STAA

58. Limited number of exemptions are issued. This does not negate the need for the project. The project is identified in the County's Regional Transportation Plan.
59. The railroad is not currently available in Humboldt County. Before shipping could become a major mode for goods movement, the Harbor District has identified a number of infrastructure improvements that are necessary. The funding for these improvements has not been identified. It is likely that trucking will remain the primary mode for goods movement for the foreseeable future.
60. Those participating in the study concurred that lifting the STAA restriction at Richardson Grove was the optimum alternative.
61. The culverts are causing run off, they transfer drainage from one side of the road to the other. Culverts have a finite life, and Caltrans routinely identifies those in need of repair or replacement. Culverts within the limits of a proposed project are routinely evaluated to see if improvements are necessary. The culverts included in this proposed project have been identified for improvements. Caltrans routinely meets with staff from regulatory agencies that will be issuing permits to see if they concur with the proposed improvements. Design modifications were implemented as a result of the coordination with these agencies. Instead of installing pipe liners, two additional culverts will be replaced. And the culvert at PM 1.18 will only have improvements at the inlet. There was no study done as a result of this coordination.
62. *See General Response #3*.
63. The document does not state that the retaining wall is to be built to help prevent runoff. The retaining wall is necessary to provide the roadway width to accommodate the wider shoulders. The retaining wall is located outside the park. A design modification was developed subsequent to the circulation of the draft document. The modification included changing the location and type of wall from the west side of the highway to the east side of the highway and from an above the road wall to a below the road wall. As the wall would be constructed below the road, it is much less visible to motorists, except for the barrier rail. See the simulations in Appendix K. The modified wall is 100 feet shorter and reduces the number of trees to be removed from 30 to 5. Construction impacts to the Singing Trees facility were considered. Other than noise, the greatest impact would likely occur when the signal is in operation. The construction impacts would be temporary.
64. The intent of the sentence is that the roadway improvements which could help lower the collision rate would not occur under the No Build Alternative.
65. The difference between signals in Willits and Richardson Grove is that the wait times at Richardson Grove would be longer. In addition, there are uncontrolled accesses (park entrance road, park maintenance road, campground access road) in the segment of route 101. The signals at Willits occur at intersections where the cross traffic is controlled by signals too. Also, at an intersection, the cross traffic is visible. Due to the curvilinear nature of the highway, motorists waiting at the signal cannot see if vehicles from the uncontrolled access roads have entered the highway.
66. *See General Response #10*.

67. To make this area a triple fine area would require legislation.
68. See Response #65 above.
69. Access to businesses will be maintained by the use of cones and flaggers if needed.
70. *See General Response #10*.
71. There will not be signals or stop signs at businesses to maintain access. Flaggers may be used if coning the access is not sufficient.
72. Caltrans has implemented several minimization measures to offset impact roots during construction.
73. It is not expected that there will be a problem with runoff or that the amount of runoff would appreciably change as a result of the project. The areas disturbed by construction will be revegetated. Duff will be collected before ground disturbance occurs and will be replaced as erosion control after construction. The planned cuts are being conducted in areas that have been cut before. The slopes are not being substantially altered.
74. The Biological Assessment is one of the technical studies that was prepared for the Section 7 consultation with the US Fish and Wildlife Service. It was submitted to that agency for review in 2008.
75. The permit applications for this project are submitted to the agencies once the final environmental document is completed.
76. See Response #9 above.
77. Application for a 1602 Streambed Alteration Agreement is submitted after the final environmental document is completed. No Consistency Determination for Marbled murrelet is required since FWS determined no take would occur.
78. The application for the 401 Certification is submitted after the final environmental document is complete.
79. A Historic Properties Survey Report was prepared for this project to evaluate the project's effects on cultural resources. The concurrence letter from the CA Office of Historic Preservation is included in Appendix F.
80. The results of Section 4(f) Evaluation consultation with State Parks is included in Appendix B including the concurrence letter from State Parks.
81. The concurrence letter from National Park Service is included in Appendix G.
82. These consultations have been concluded as evidenced by the concurrence letters from the appropriate agencies.
83. None of the culverts being worked on are fish bearing, thus the movement of fish is not being impeded. The roadway is not being substantially widened, nor is the project resulting in substantial changes to traffic volumes or speeds that would affect wildlife crossings. No median barriers are being proposed. The barrier rail at the retaining wall could affect wildlife crossing but it is a short span and there are many other opportunities on either side of the wall to cross.
84. There is not any adopted Habitat Conservation Plan within the project limits.
85. The park does not meet the criteria for being determined a historic resource.
86. The potential for soil erosion has been evaluated. Factors including the amount of soil disturbance, the soil type, the percent slope, among others are evaluated to determine the appropriate stormwater protection measures and erosion control that is appropriate. It was determined that the potential for soil erosion was not excessive.

87. The culverts are being replaced on existing alignment and grade so there would not be a change in drainage patterns.
88. The project will not result in increased speeds. *See General Response #13*.
89. No old growth trees are being removed by the project. The project would not result in substantially changing the existing water quality of the South Fork Eel River.
90. The CA Dept. of Fish and Game oversees compliance with the CA Wild and Scenic Rivers Act in the 1602 Agreement. Issuing the permit confirms compliance with the Act.
91. The data shows that this is true.
92. *See General Response #12* regarding how the project influences big box development.
93. By eliminating one of the factors resulting in higher transportation costs, the project would have a positive impact on businesses.
94. Every business in Humboldt County has not been surveyed. Several small businesses in Eureka and the surrounding area have reported that the STAA restriction has negatively affected their business. The Office Economic Development is a part of the County's Community Development Office. The Humboldt County Association of Governments composed of representatives form the County and incorporated cities prepares the Regional Transportation Plan (RTP). The RTP identifies providing STAA access at Richardson Grove as an objective. This objective has been a long standing priority for the region.
95. The project will provide four foot shoulders north of the park which would better accommodate non-motorized travelers. For more information on bike path, see *General Response #5*.
96. Yes, Caltrans coordinated with the Native American Heritage Commission regarding the Sacred Lands file. Their response is found in Volume 2. There has been opposition from some of the Native Americans. No human remains are anticipated to be affected by the project. The findings in the Historic Properties Survey Report were provided to the Native American representatives that requested it.
97. Yes, construction activities could stir up soil that has been contaminated by aerially deposited lead (ADL). ADL occurs when lead from tail pipe emissions is deposited onto the soil adjacent to the highway. Thus, the old growth trees are affected by ADL. When certain thresholds of ADL are reached, a worker safety plan must be developed.
98. While construction equipment can have leaks and spills, the staging areas for this project minimize the potential for impacts by having staging occur on paved areas or in turnouts.
99. Yes, that is correct. In the event of a major storm or earthquake that displaces soil, soil contaminated with ADL could be disturbed and end up in runoff with or without the project.
100. Dust palliatives bind the soil so dust production is reduced.
101. No, it is not accurate to say the emissions from construction equipment for this project would be highly toxic.
102. Newer vehicles tend to have less emissions than older vehicles. There is no reason to believe that STAA vehicles will be older than non-STAA vehicles. It is not expected that truck volumes would substantially change.

103. The widening that is proposed is minor shoulder widening. The posted speed limit will not increase.
104. *See General Response #16*.
105. The US Fish and Wildlife Service (FWS) concurred with the determination that construction activity would not result in a substantial adverse affect.
106. If night work occurs it would be for a limited time. The Biological Opinion prepared by the FWS took night work into account the possibility of night work when they determined that the construction activities would not have a long term effect on the breeding patterns of the listed birds.
107. It was determined that the project would have no effect on the listed salmonids.
108. A substantial increase in traffic can result in increased noise.
109. While there may be a change in the types of trucks, it is not expected that the number of trucks would substantially change. Thus, it is not expected that air quality would be substantially affected.
110. Caltrans does not have this information.
111. The poor economy would make greater pressure to provide a project that would benefit local businesses.
112. Providing STAA access at Richardson Grove has been a long standing priority for the region as witnessed that it has been included in the past two Regional Transportation Plans.
113. It is expected that lifting the STAA restriction would result in a benefit to local businesses.
114. Caltrans is not ignoring the environmental impacts of the project including the impact to cultural resources. Numerous minimization measures have been incorporated into the project.
115. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of projects priorities and funding. The Route Concept Plan for this segment of Route 101 is for it to remain a two lane conventional highway for the foreseeable future.
116. *See General Response #12*.
117. *See General Response #14.*
118. *See General Response #14.*
119. Caltrans acknowledges the importance of redwoods. Numerous minimization measures have been incorporated into the specifications to protect these trees.
120. It is not expected that listed species are prevalent in the project area due to the high amount of human activity associated with the roadway, campgrounds, and other park uses. None the less, for the purposes of the Endangered Species Act, presence of these species was assumed in the project area.
121. See Response #9 above.
122. It is true that Caltrans did not conduct a survey to determine the presence of Northern spotted owls in the project area. The document disclosed where the nearest occupied nest was known to occur. That does not preclude owls foraging or being present in the project limits.

123. As previously stated, listed birds were assumed to be present within the project limits. This is a conservative approach when surveys have not been conducted.
124. The purpose of the retaining wall is not to contain runoff. Best Management Practices for stormwater will be implemented to prevent and contain runoff. Permits from regulatory agencies will also likely contain conditions to ensure water quality is protected.
125. It was determined that there would be no effect to listed salmonids from this project.
126. The alterations to topography as a result from the cuts are not expected to substantially alter drainage and runoff.
127. Both the Caltrans certified arborist and an independent arborist contracted by Save the Redwoods League concur that the project would not result in substantial detrimental effects to the trees or their root systems.
128. The brow logs are incorporated into the fill and braced against the tree. It is unlikely that they would shift.
129. Since much of the construction activity would take place at the edges of the roadway, it is likely that the construction equipment would be working from the paved lane.
130. The document acknowledges that there would be some impacts would result from construction.
131. The areas proposed to be cut are previous cut banks that successfully revegetated and do not show signs of major instability. Subsurface geology and soil investigation was conducted as well. It is not expected that the project would result in increased landslides in this area.
132. Disturbed ground would be revegetated. In addition, erosion control will also be placed.
133. A migration corridor is different from an occasional crossing by wildlife. A migration corridor is a specific path that a species of wildlife uses year after year, usually seasonally. There is no known migration corridor within the project limits. The document discloses that wildlife may occasionally cross the highway within the project limits.
134. Most of the acreage within the State Park does not contain old growth redwood stands. The stands are considered fragmented because they have been disturbed with development.
135. The two areas of cut where the majority of tree removal would occur, are on previous cut banks that subsequently revegetated.
136. Staging area restrictions will be identified in the specifications.
137. Petrochemical leaks can occur when there are collisions. So even under the No Build Alternative there is the potential for leaks and oil spills.
138. That is correct, the project is anticipated to have the potential to adversely affect any owls and murrelets that may be in the project area but it would not result in a substantial adverse effect.
139. Weeding of the disturbed areas will be conducted for a period of years.
140. Cumulative effects were considered and determined not be significant.

141. The project was initiated in the summer of 2007 and the first public meeting occurred in September 2007 to disclose to the public that the project was initiated.. In February 2008 an additional public meeting was held. In May 2008 the scoping meeting was held and in December 2008 the public hearing was held.
142. While the Times Standard has not written many articles about the project they have run numerous editorials regarding the project. The technical advisory group did include representatives from Save the Redwoods League and Sierra Club and they did attend. No, business owners did not compose the majority of the group. For more information on the composition of the group refer the Backgound section 1.2 of the document.
143. Caltrans does not control when newspapers report the stories or what they write.
144. As noted in Response #141 above, there have been four public meetings regarding this project. At each of them exhibits and Caltrans staff were available to educate the public about the project and answer questions.
145. The window of vegetation removal from March 1 to September 1 is for compliance with the Migratory Bird Treaty Act. Since none of the trees to be removed are nest trees for listed birds, the removal of this vegetation should not substantial affect any breeding listed birds. The construction activities have been considered by the US Fish and Wildlife Service. The Service determined that the construction would not result in mortality of the species and would not result in affecting long term breeding patterns.
146. The DEIR and EA is the document you are responding to. It is uncertain which studies you are referring to.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:17 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Save Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:18 AM -----

Debbie Macdonald
<dmacdonald@affinitygroup.com>
03/09/2009 10:37 AM

To <senator.wiggins@senate.ca.gov>, <assemblymember.chesbro@assembly.ca.gov>, <Kim_Floyd@dot.ca.gov>
cc
Subject Save Richardson Grove

I am against the proposed widening of Hwy 101 and the senseless slaughter of what makes Northern California special. DO NOT CUT DOWN OLD GROWTH REDWOOD TREES!!!!! 1

There are many problems with this report, including:

Does not evaluate risk to old growth trees from deeply cutting their roots 2

Relies upon an economic analysis which is inadequate, insufficient and misleading 3

Inadequate analysis of the impacts on listed species, the redwood grove and growth induction 4

Does not evaluate all the alternatives 5

Does not address safety issues 6

Does not include plans for bike or pedestrian lane 7

Does not consider impacts from trucks traveling through Humboldt County 8

Debbie Macdonald | Production Manager

4604 Scotts Valley Dr., Suite 20 | Scotts Valley, CA 95066
877.HDNEWS1 direct | 831.438.0993 fax | dmacdonald@affinitygroup.com

thunderpress.net

No trees were killed in the sending of this message.
However, a large number of electrons were terribly inconvenienced.

1. No old growth redwoods would be removed with the proposed project.
2. *See General Response #3.*
3. The information in the Gallo Report was not used to justify the project. The need for the project is identified in the County's Regional Transportation Plan as well as in complying with the federal mandates in the Surface Transportation Assistance Act.
4. Consultation with US Fish and Wildlife Service regarding this project occurred which included preparation of a Biological Assessment identifying impacts to listed species. US Fish and Wildlife Service prepared a Biological Opinion which states they concur that the proposed project may modify, but would not adversely modify designated Critical Habitat, nor would the project result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. US Fish and Wildlife Service also concluded that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on breeding performance of Marbled Murrelets or Northern Spotted Owls in the project area. Additional information on the impacts resulting from construction excavation and fill activities within the structural root zone of old growth redwoods will be provided in the final document. A qualitative rather than quantitative analysis for growth was done. The economic costs of not constructing the proposed project would fall on businesses currently located in Humboldt County. However, a study prepared by the Humboldt County Association of Governments identified the following as being the major constraints to economic activity and subsequent growth in Humboldt County: distance from major population centers, lack of direct access to the Interstate road system, lack of a completed four lane north-south or east-west highway, limited air service, unreliable and inadequate rail service, lack of industrial land zoned in Eureka, shortage of labor in some occupations, lack of diversity of tourist attractions and visitor activities, and perception of the area by outsiders as remote. For more information refer to Section 2.1.2 of the FEIR/EA.
5. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.4.2 of the FEIR/EA.
6. With the construction of this project, highway conditions are not expected to be any less safe than they currently are. Because there will be revisions made to non-standard highway design features such as curve radii and shoulder widths, it is expected that the roadway on this section of Route 101 will be safer for all users as a result. The presence of slightly larger STAA trucks is not expected to make the roadway any less safe as the comparative weights of the non-STAA and STAA rigs are relatively the same, with the STAA trucks having the potential to be slightly heavier due to a larger size tractor (if sleeper is included).
7. *See General Response #5.*
8. *See General Response #14.*

dougall38@hotmail.com (josh macdougall)
01/28/2009 12:55 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject the grove

Dear Ms. Harmon,

I am a local Southern Humboldt County resident, and have nothing but respect for Cal Trans and the the work they do. I cannot, however, support unnecessarily cutting down any more old growth redwoods. This will once again seriously effect not only ecology, but the local economies as well. There is no true need for this proposal and I don't believe it should be considered for for approval. 1 2

Sincerely,
josh macdougall
shelter cove

1. *See General Response #2.*
2. *See General Response #1.*

Deborah Harmon/D01/Caltrans/CAGov

01/27/2009 08:48 AM

To Kim Floyd/D01/Caltrans/CAGov
cc
bcc
Subject Fw: About Richardson Grove Road Widening

----- Forwarded by Deborah Harmon/D01/Caltrans/CAGov on 01/27/2009 08:46 AM -----

<madrone@tidepool.com>
01/27/2009 08:16 AM

To <deborah_harmon@dot.ca.gov>
cc
Subject About Richardson Grove Road Widening

I am writing to you to voice my distress about the DEIR on Richardson Grove. This is a state park and thus should reflect my values too in its management of that stretch of road. The DEIR is insufficient in its mitigation measures for the proposed project.

I am concerned about and object to the cutting of roots of the old growth trees which in the long run could potentially have devastating results. 1
Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 2

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, 3
is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the

nutritiously shy Murrelet and Owl.

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 4

Thank you for representing my deep concerns.

Rose Madrone

200 Seely Crk Rd

Redway, Ca 95560

1. *See General Response #3.*
2. *See General Response #15.*
3. *See General Response #16.*
4. *See General Response #8.*

Cal Trans 1656 Union Eureka, Ca 95501

To Humboldt Cal Trans,

I have driven by the Richardson Grove corridor more times than I can count and it always humbles me. I believe that the vast number of people who come to Humboldt County expect to see great huge redwoods.

I believe that people who come here do not expect to see the same strip-highways that are everywhere in this state. Hwy 5 is a strip-highway and people do not expect to see anything, it is devoid of life, and good only for the trucking-rush of commerce. This is an unusual place and the 101 Highway is special too. Please, please leave it that way. 1

The Times Standard article of Wed. the 28th 2009 stated that there were no highway fatalities this past year in Humboldt Co. 2

We do not need extra trucks zooming on straight dead roads to supply new stores in this county. Please do not listen to the big-city minds who can only think of new growth instead of listening to the massed voices of people who prefer old growth. Please do the right thing. There are other ways to make the road safe. Put in 'speed tables' to slow traffic for those few miles and increase road markings. 3 4

Please do not cut down magnificent trees that give the gift of humility to the traveler and represent the gateway to Humboldt County. 5

Sincerely, 6

Jan Magneson

707 826-1232

Family members who travel Hwy 101

Mark Magneson

Clare Magneson

Veronica Magneson

Martin Magneson

Alden McKelvey

Joann Mckelvey

Jennifer Artis

P.S. Isn't the State out of money? If you are not why you can't resurface roads instead of cutting down trees a thousand years old? 7

You can say to your grandchildren how you saved these grand beautiful redwoods. Instead of hanging your head when you look at the devastation you created for them.

1. *See General Response #2.*
2. The number of fatalities in any given year can change. Caltrans typically looks at a three year period or longer to account for anomalies.
3. *See General Response #14.*
4. *See General Response #12.*
5. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.4.2 of the FEIR/EA.

6. *See General Response #8.*
7. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.

1718 Blakedee Ave.
Arcata, CA. 95521
3-11-09

To: Kim Floyd

Dear Mr./Ms.? Floyd,

At a time when our state and our nation are clearly in deep financial quandries, it seems to me that finding good but inexpensive solutions to our everyday problems is only common sense. Therefore, I am writing in support of Mr. Olmstead's simple proposal re: Richardson Grove. (See ed. pag pg. A 4 Times Standard 3/5/09.) ie. a traffic light with a keypad code so just those trucks that need to could activate it and enter that section without worrying about any on-coming traffic for a defined period of time. A queue-up area at either end of that stretch of road would leave an open road for other traffic while long trucks are waiting on the light. This certainly wouldn't be anymore troublesome, probably less so, than the snarl at Willits during the summer & a good cheap solution! Sincerely, Nancy Marie

1

1. *See General Response #10.*

Kim Floyd/D01/Caltrans/CAGov
01/26/2009 09:34 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Letter to help stop the widening of 101

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/26/2009 09:34 AM -----

Dana Martin
<dmm76@humboldt.edu>
01/25/2009 11:41 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Letter to help stop the widening of 101

I have attached a letter to express my feelings about not widening highway 101 through Richardson Grove State Park. If you need me to send it via u.s. postal mail I can also send it that way.
Thanks for your efforts

Dana Martin richardson grove state park.docx

To whom it may concern:

I have lived in Humboldt County for 3 years now and have absolutely fallen in love with the beauty of this area. Very few places on earth are home to such magnificent trees as the old growth redwoods found throughout this area. By allowing this road to widen would be dangerous to the overall health of the Richardson Grove State Park along the highway 101. I have traveled this road for years now, all times of the year, and have never felt that the traffic flow was too slow or that it needed to be widened by any means. These trees are home to so many living creatures that thrive in this type of ecosystem. This planet has a finite capacity for human destruction, why inflict such pain to our only home. We must take care of these beautiful giants and I am here to speak up for these living beings to help protect them. 1

Not only should we choose not to pursue this destruction to our planet for sake of the environment, but also for saving California's tax dollars in these tough economic times. California can't afford to throw money into projects like this. This money can be saved to help provide so many greater services to the state of California. Why throw our children's education money into a wider highway that kills of a species that already is suffering so greatly. Don't we want our children to enjoy the same wonders of the world as we have? 2

Please take my feelings into consideration and do not allow the highway 101 to be widened. Thank you for your time and consideration,

Sincerely,

Dana Martin

1. *See General Response #13.*
2. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.

Kathy Marshall
<kpeachy@reninet.com>
01/28/2009 10:53 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove and the 101 Corridor btw Eureka and Arcata

Dear Ms. Harmon,

I have attached an editorial written by Ken Miller. If you have not already read it, you should read it now. It eloquently and passionately expresses exactly what many Humboldt residents feel, that Highway 101 development/improvement is NOT a priority. Preserving the ecological integrity and natural beauty of our area is the key to building a sustainable future for Humboldt County and all of its residents. Slow speeds save lives. Let's make sure that everyone slows down on both sections of the highway through simple and inexpensive means, rather than spend too many millions of dollars on creating thruways for dubious benefit. 1 2

The ecological destruction and disturbance in both projects will have many negative impacts. I am particularly disturbed by Cal-Trans' proposed mitigations of environmental impacts in the Richardson Grove area. Garbage can lids does not mitigate endangered species disturbance, and weeding the redwoods does not mitigate cutting their roots. In addition a 300 foot long and 18 foot high retaining wall will totally detract from the beauty of that stretch of highway. Just make the cars slow down for that mile stretch of highway. "25, Stay alive" should be the guiding theme of that project. 3 4 5

Also, as a regular user of the 101 corridor between Eureka and Arcata I say "50 is nifty". Nobody needs to speed through those short 8 miles. As a person who would also prefer using her bicycle along that stretch of highway I also need to add that the corridor is dangerous enough for bicyclists. Any construction or building and then use of an interchange will make the journey by bicycle even more dangerous.

Please take the simplest routes in both situations...keep the speed limits LOW. Humboldt residents want to determine the course of their economic future for ourselves. We don't want to be dragged into a more congested, more polluted, more oil dependent future by a state agency that thinks we need to be just like every other area of the state.

Sincerely,

Kathy Marshall, RN
1100 Tilley Ct.
Arcata, CA 95521
(707) 502-1288

1. *See General Response #1.*
2. *See General Response #8.*
3. *See General Response #16.*
4. *See General Response #15.*
5. A design modification was developed subsequent to the circulation of the draft document. The modification of the wall included changing the location and type of wall, from the west side to the east and from an above the road wall to a below the road wall. Because the wall is constructed below the road it would not be visible to motorists except for the barrier rail. In addition, the wall modification reduces the number of tree removals from 30 to5.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:19 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: RICHARDSON GROVE

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:20 AM -----

Marilyn Martino
<mfernando@peoplepc.com>
03/10/2009 07:51 AM
Please respond to
Marilyn Martino
<mfernando@peoplepc.com>

To kim_floyd@dot.ca.gov
cc
Subject RICHARDSON GROVE

Let me say that I support keeping Highway 101 through Richardson Grove as is, with the addition of a slower speed limit. This is NOT a time to incur huge expenses that will harm the Redwoods. The trucks can pass through the grove and have been doing so. 1

Thank you. 2

Marilyn Martino
1267 Eeloa Ave.
Rio Dell, CA 95562

PeoplePC Online
A better way to Internet
http://www.peoplepc.com

1. *See General Response #2.*
2. While CA Legal trucks have had access through the park, STAA trucks cannot legally traverse this portion of Route 101 with the exception of certain licensed livestock carriers and household goods carriers.

Libertybelle Maxey
<lrm22@humboldt.edu>
03/12/2009 05:19 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject please stop richardson grove project!

To whom it may concern:
I am very upset about the idea of the Richardson Grove road widening project. I am born and raised in Humboldt county. I pride myself on living "behind the redwood curtain". This means I live in a different area than most other areas of the states. I like being different, sheltered, and in a low populated area. Cutting down prized trees for growth of the area is not what I want. I do not want Humboldt county easier to get to. Being hard to get to is one of the reasons it so special. I know many, probably most people in Humboldt agree with me. Please, please, please do not widen the road. Stop the project please.
Sincerely,
Belle

1

2

1. *See General Response #2.*
2. *See General Response #13.*

March 11, 2009

Kim Floyd
Caltrans Project Manager
Box 3700
Eureka, Ca. 95502

Dear Ms. Floyd;

Please use Stop Lights

I am writing this letter to encourage you to consider trying stop lights in the Richardson Park area. Although this method, endorsed by many, may prove to not work; if it does work, this could save trees and money. I request that stop lights be tried before resorting to any other method. 1

I understand that you have the deeper knowledge of this matter, and that also you are most likely pressured by "two sides." I just ask that you weigh each possibility carefully and use your integrity in choosing what you think is best for the area. 2

I thank you so much for reading this.

Sincerely,

Linda Maxwell

Linda Maxwell
Box 1255
Ferndale, Ca. 95536

1. *See General Response #10.*
2. Caltrans is carefully considering the public comments received and the issues raised in those comments.

Alan McCann-Sayles
<alanpol@humboldt1.com>
01/28/2009 11:09 AM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject I adamantly oppose the proposed Richardson Grove project.

I am writing in regards to the proposed Richardson Grove project.

I do not see a demonstrable need to bring the "super" trucks here.
We are not over-populated county and do not want these trucks. 1

The ancient redwoods, the few pockets that remain of these great trees and great forests should be protected, not cut down. They are the uniqueness that bring tourists to our county.

I adamantly oppose this proposed project. Please stop it now.

Alan McCann-Sayles
1696 Ocean Drive
McKinleyville, CA 95519
--

What is hateful to you, do not do to your fellow men. That is the entire law, all the rest is commentary.
--Talmud

Hurt not others with that which pains yourself.
--Udana-Varga, Buddhism

This is the sum of duty; do naught to others which if done to thee would cause thee pain.
--The Mahabarata, Hinduism

No one of you is a believer until he desires for his brother that which he desires for himself.
--Hadith

1. *See General Response #1.*

MeiLi McCann-Sayles
<meili@humboldt1.com>
01/28/2009 11:12 AM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject No on Richardson Grove project.

To whom it may concern,

1

I am adamantly opposed to the proposed Richardson Grove project.

MeiLi McCann-Sayles
1696 Ocean Drive
McKinleyville, CA 95519
--

"The country is governed for the richest, for the corporation, the bankers, the land speculators, and for the exploiters."

Helen Keller

1. *See General Response #1.*

TO. Kim Floyd
RE: These comments refer to the Humboldt 101 Widening Project, Visual Impact Assessment.
FROM: Martha Lee McCardy

I currently live in the North Bay, however I lived in Humboldt County 20+ years. I drive the route frequently. I read the comment period has been extended.

I am against this project to realign 101 to provide for the movement of larger scale truck traffic. I believe enforcing a reduced speed limit through the area best addresses the needs for this objective. 1

I have not been persuaded by the argument that the off-loading issue is a major detriment to economic development within Humboldt County. We have heard this for many years. The local economy continues to be poor, because there are so few jobs. People save money by using the internet to purchase what they need, and what their local businesses cannot supply due to lack of demand. A larger road will not change that. 2 3

I am seriously concerned with altering the scenic resources with this stretch of 101. In the summer, driving out of the hot, open sunlight into the mixed woodland and forest, these areas of dappled to deep shade are not only breathtaking, but they provide cool spots to enjoy. The assessment determines the visual character of the road will continue to be a slow, curvy road. I believe changing the dappled to shady character of the route to one of sunlit character will be a major change. I do not believe this element is significantly explored. 4

Specifically
Appendix K, Visual Impact Assessment.
I believe the VIA is insufficient.
The document does not provide realistic Photo Simulations . On a project of this sensitivity, I would like to see simulations developed specifically for each individual site locations to a degree that enables the viewer to see the effects of the project on the corridor.

The simulations of the project shown on Pages 166, 167, and 168 do not show the physical impacts of the proposed work in enough detail to determine the pre/post project visual character.

A. Pg. 166 Location of the cut south of Overpacks Grove Resort driveway 5
A line shows the cut. No photo simulation is provided.

B. Pg. 167 Location of retaining wall north of Overpacks Grove Resort Driveway
A line shows the location. No photo simulation is provided of the 300' soldier pile tieback wall as it will appear in this location. This reader is 6

unable to visualize the wall, and its likely impact on vegetation on the upper slope.

C. Pg. 168 Similar type of retaining wall located in Del Norte Redwoods State Park.

Visual impacts should be shown at this location, not similar.
No photo simulation is provided of the west location, Sta 111+00 to Sta 114+00.
Removal of 20 tan oak to create the "main feature" of a large soldier pile retaining wall for 300' should be shown in a more realistic simulation.

2. VISUAL CHARACTER I have driven this route many times. I feel the visual assessment minimizes the cumulative impacts of reducing vegetation throughout the project. Changing the visual character to "open and well sunlit" changes these areas in a very significant way- from shady retreat and dappled sunlight to open and well sunlit.

7

Thank you for the opportunity to comment on a project that could impact one of the most beautiful areas in Southern Humboldt.

1. *See General Response #8.*
2. *See General Response #11.*
3. *See General Response #13.*
4. *See General Response #2*
5. While a visual simulation was not provided, a photograph picturing what the wall would look like was provided in the document. The final document has added simulations, see Appendix K.
6. A design modification for the retaining wall was developed subsequent to the circulation of the draft document. The modification included changing the location and type of wall, from the west side to the east side and from an above the road wall to a below the road wall. Since the wall is constructed below the road it would be much less visible to motorists except for the barrier rail. It also reduces the number of tree removals from 30 to 5.
7. With the exception of the removal of Big leaf Maples at PM 1.35 to 1.36, it is not anticipated that the project would open up the canopy substantially. The width of the cut where the larger trees are located on this one cut slope is about 200 feet. Since similar sized trees surround the proposed cut, the amount of area opened up in the canopy is fairly limited. Traveling at 35mph, the altered landscape would be in view for just several seconds.

Bob McCombs
<bobmcc@humboldt1.com>
01/27/2009 10:24 PM

To Deborah_Harmon@dot.ca.gov, Kim_Floyd@dot.ca.gov
cc
bcc
Subject Stop the Richardson Grove widening

I am writing concerning the proposed Richardson Grove widening project. This project should never have progressed this far and should be stopped now. If there is such a great need to bring the large trucks up here then a bypass that doesn't destroy redwood should be built. This is not the best use of tax-payer dollars. 1

I do not see a demonstrable need to bring the "super" trucks here. This is a sparsely populated county and we have done admirably so far without these trucks. 2

Humboldt County is a very special place and will only remain so if access is somewhat limited and if we don't put speed and greed over the preservation of this very special place. 3

The reduction in traffic and the lack of large vehicles spewing noxious emissions has enhanced the health of the county. Visitors and locals don't need to breath the unhealthy fumes from giant trucks and don't have to deal with the noise and dangers posed by large vehicles. At Richardson Grove there are campgrounds close to where the trucks would be passing. 4

We who live here have watched the decimation of the ancient redwoods. What few pockets remain of these great trees and great forests should be protected, not invaded and cut down for "super" trucks. People from all over the world come to see these treasures; leave them be. 5

I staunchly oppose this proposed project and it should be stopped immediately.

Thank you for your consideration,
Robert McCombs

1. *See General Response #9.*
2. *See General Response #11.*
3. *See General Response #12.*
4. *See General Response #14.*
5. *See General Response #2.*

dave@radfreenm.org (David McCoy)
01/28/2009 03:36 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. As a property owner in Eureka, I use Richardson Grove for recreational purposes of hiking and camping. Desecration of the grove for a roadway is not justifiable. I am concerned that this report is inadequate and insufficient in several ways. I also question the necessity of the project, and cannot find information within the report that explains how this project allows the restrictions for the longer trucks to be lifted by Caltrans. 1 2

Adequate mitigation for the project is not considered. How do you replace a 250 ft tree that is 2000 years old? 3

No plans for the further acquisition of additional land suitable for planting of redwoods has been made by CalTrans as a form of remediation. 4

No plan or explanation has been made regarding plans for the sale and recovery of the economic value of each of the trees to be destroyed. No statement of the economic value for each tree has been made that sets forth the value based on such factors as the lumber, the esthetic and tourism value, the ecologic relationship to adjacent trees in the forest. The biota in each of the trees has not been evaluated and no information is presented related to the replacement, mitigation or value of that biota. 5

The further loss of additional redwoods after the initial destruction has not been considered. 6

The additional hydrocarbons that will result in the long-term deterioration of the esthetic qualities, noise and air quality from the construction and the additional increase in huge truck traffic and other vehicles has not been considered for park users and future generations. 7

The impact over time of the increased pollution on the forest from additional diesel and other large motor vehicles has not been considered.

The impact of the one mile stretch of construction has not been considered for wildlife that will suffer from the effects of barriers, higher traffic flow aand at greater speeds. 8

The stretch of Highway 101 that would be impacted by this project provides motorists, bicyclists, and pedestrians with access to old growth redwood forest, and provides a gateway into the North Coast that defines the character of the region. This construction project would cause harm to this atmosphere and to the health of this prized redwood grove. These issues are not adequately addressed in the document. 9

I do not believe that cutting the roots of 30 redwood trees, some of which are 15 feet in diameter, could not possibly entail some significant impact, as the document concludes. The impacts cannot be adequately predicted, however, because there is no information in the document showing how cutting roots of 10

the old trees would not adversely affect, or even kill, these ancient trees.

Any industrial development in this sensitive grove is cause for alarm. Noise, air pollution, soil compaction, and many other effects from large industrial construction equipment will disrupt the serene environment, drive away wildlife, and discourage the public's use of the state park. The economic costs of those impacts and the mitigation of hose impacts has not been adequately considered. An entire year of this could cause extreme impacts on the local forest ecosystem, and deteriorate the quality of the environment. 11

It is my understanding that Caltrans has a policy that whenever a highway improvement project is planned, bicycle access is considered and prioritized. This stretch of Highway 101 provides inadequate access for bicyclists. The narrow shoulders already ensure conflicts between bikes and vehicles. The narrow shoulders provide no room for bicyclists to ride along side vehicles already. This proposed project does not seem to comply with Caltrans' own policy. 12

I have grave concerns, as well, that a few businesses will benefit from this publicly funded project while businesses dependent on tourism may suffer. Local businesses located directly impacted by this project and not adequately acknowledged in the document, will suffer harm, especially during the construction phase. In a time of economic crisis, I fear that these shops and services may not survive the impacts. 13 14

Sincerely

David B. McCoy

Sincerely,
David McCoy
dave@radfreenm.org
2815 Hillside Drive, Eureka, CA

1. *See General Response #2.*
2. *See General Response #1.*
3. No redwood trees larger than nineteen inches in diameter will be removed for the project. Within the park, the only two redwoods to be removed are six and seven inches in diameter.
4. The proposed project does include transferring 0.56 acre of land currently in the Caltrans easement to State Parks and replanting the area in appropriate vegetation. The replanting plan has been developed in association with staff from State Parks.
5. The majority of trees proposed for removal are twelve inches in diameter or less and half are tan oaks which have a lower value both aesthetically and as food or shelter for wildlife. It is proposed to chip the trees and use this for mulch as part of the revegetation efforts.
6. It is not expected with the protection measures incorporated into the design that the project would result in the loss of additional redwoods.

7. *See General Response #14.*
8. As stated above, the capacity of the highway is not being increased, nor is a substantial volume of traffic expected to be diverted from I-5 or Route 99. Thus, the project should not result in large increase in traffic flow. Nor would traffic speeds be expected to increase since the highway would remain a two lane curvilinear roadway with little to no shoulders with a posted speed limit of 35mph. No barriers are being proposed as part of the project with the exception of the location of the retaining wall outside the park which is adjacent to other residential and business structures. Wildlife is already affected and have adapted to activities from the park such as campground programs, generators from the RVs, and general maintenance activities conducted by the park staff to upkeep the park facilities and roads as well as traffic and maintenance activities associated with Route 101.
9. *See General Response #2.*
10. *See General Response #3.*
11. *See General Response #4.*
12. *See General Response #5.*
13. *See General Response #6.*
14. *See General Response #7.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:09 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: richardson grove+ hwy 101

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:10 PM -----

Jason McKinney
<doobie420@hotmail.com>
01/30/2009 10:04 AM

To <kim_floyd@dot.ca.gov>
cc
Subject richardson grove+ hwy 101

So I'm writing in response to the proposed widening of hwy 101 through richardson grove. PLEASE DON'T DO IT!!!!!
My family has been going to richardson grove since the 1950's. That place is sacred not only to my family but to many many other people in the world. With only 3% of the worlds old growth forests left, we have a right to our kids and grandkids and their kids and so on to protect these cathedrials. Tearing down one tree disrupts the root systems of other trees, weaking them and potentially destroying the whole forests. Please, Please don't tear down any trees...
thank you, Jason Mckinney

1

Windows Live™: E-mail. Chat. Share. Get more ways to connect. Check it out.

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:45 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:45 AM -----

"Erin Roseberry" <msroseberry@hughes.net>
02/19/2009 03:56 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

Dear Ms. Floyd,
I have been a self-supporting taxpayer in Humboldt County since 1989. Please spare the trees at Richardson Grove! That stretch of beautiful highway is our gateway. Please don't try to turn Humboldt into a convenient, easy-access, just-like-everybody else world that we find North, East, and South of here. I am happy to pay more for shipped goods and/or slow down during those miles under the ancient trees. If people or businesses don't like what makes Humboldt special, let them leave. No one is required to make their home in this special landscape. Why distroy what so many of us cherish? 1
Please don't take away what makes this area so special. 2
Sincerely,
Erin Roseberry McNeill
83 Clough Rd.
Loleta, CA 95551
707-733-5523

1. *See General Response #2.*
2. *See General Response #11.*

Mirage

30 January, 2009

Caltrans
1656 Union
Eureka, CA 95501

To whom it may concern:

Please, please, please, please, don't cut down any redwood trees! Those redwoods that stand at Richardson Grove State Park through which U.S. 101 trails are the real deal, not, as on this letterhead, a fake planting made to attract people. Yet why did the Mirage hotel pick palm trees as their symbol? It may be because people equate trees with shelter, inspiration and sustenance.

My family camped every summer for decades either at Hartsook Inn or the state park amid the singular beauty of those ancients that grace the banks

1

of the Eel. We kept going back again and again because we loved the sheer beauty and grandeur of the grove and felt revitalized and rewarded for being able to camp so close to nature's awesomeness.

As a 40-year resident of Humboldt County, we have never minded slowing down to negociate the twists and turns on the narrow stretch of road through the state park. Instead, we take the time for a breather on the otherwise 70-mile per hour road and enjoy motoring as it was originally conceived to see the sights that here, only an ancient stand can bestow.

There are too few places like this left. Keep this one intact for posterity and do a by-pass if you must. But please don't cut the redwood trees!

Your truly,
Susan McPherson
(707) 822-1463

2

1. *See General Response #2.*
2. *See General Response #9.*

Kim
Floyd/D01/Caltrans/CAGov
03/12/2009 02:42 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:40 PM -----

Jill Mefford
<jillomefford@yahoo.com>
03/12/2009 07:30 AM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Sirs,

Please preserve the integrity of the Richardson Grove, the integrity of our State Park. Passing by a 300' retaining wall and watching seriously damaged trees decline (die?) is not what we want for ourselves and future generations. Passing through Richardson Grove is a spiritual experience, a passage. Slow the traffic to 25mph. Without the danger of driving that stretch too fast, the travelers--and even the truckers--can savor the beauty, the peace.

I thank you, my children and grandchildren thank you.
Jill Mefford, Trinidad CA

1
2
3

1. The retaining wall would not be located in the park. A design modification for the retaining wall was developed subsequent to the draft being circulated. The modification included changing the location and type of wall, from the west side to the east and from an above the road wall to a below the road wall. Since the wall is constructed below the road, it is less visible to motorists except for the barrier rail. It is also 100 feet shorter and requires less tree removals, five as opposed to the original design which took thirty..
2. *See General Response #2.*
3. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 03:02 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:02 PM -----

"John and Marsha Mello" <mjmello@saber.net>
03/11/2009 10:03 AM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove project

March 11, 2009

Kim Floyd
Project Manager
Caltrans, Eureka

Dear Ms. Floyd,

We are long-time residents of Eureka, and are writing in opposition to the proposed Caltrans proposal to cut a wider corridor through Richardson Grove. While we realize that there is pressure from some businesses here to make an easier, faster thoroughfare for larger trucks, we believe that your agency should first try the more ecological, less-expensive approach of reducing the speed limit to 25 mph, and perhaps putting in metering lights. We believe that most drivers using this part of Hwy. 101 would have no problem waiting a short while for trucks to pass through, especially if it meant keeping the beauty of Richardson Grove intact. 1 2 3 4

We'd like to urge Caltrans to think outside their usual "build it large" box and come up with a more balanced approach. The State Park area of Richardson Grove is more than just a route for trucks… it's an attraction for tourists and a breathtaking corridor that should be enjoyed by all. Please rethink this proposal. 5

Thank you very much for your time.

Sincerely,

Marsha and John Mello
2371 Ridgewood Drive
Eureka, CA 95503
(707) 441-9287

1. *See General Response #13.*
2. *See General Response #13.*
3. *See General Response #8.*
4. *See General Response #10.*
5. *See General Response #2.*

Prophet Mark Messenger
<prophetmark@earthlink.net>

01/28/2009 04:03 PM

Please respond to
Prophet Mark Messenger
<prophetmark@earthlink.net>

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove, no need for tree removal with new technology

Deborah Harmon, Cal Trans

With our current technology of driving atop paved roads under serious changes, and the foreseen upcoming mode of travel being above the ground, (without need for tires anymore), to remove those trees now may look foolish to have done when we look back in several years. 1

Please consider this at your meetings pertaining this matter. Thank You!

Have A GREAT Day Every Day! As Our Father God Is Also Doing!

humbly, Prophet Mark

1. Other modes of goods movement such as railroad, short sea shipping or maglev vehicles are not currently viable. Both the railroad and the port at Humboldt Bay require infrastructure improvements and funding to be procured to implement these improvements. Funding for these improvements have not been identified.

jmeyer.family@verizon.net
(Maureen Meyer)
02/13/2009 11:41 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove

Dear Ms. Harmon,
After reading about the Richardson Grove Operational Improvement Project I feel compelled to ask you to vote against it. This Grove of Redwoods is so beautiful. It is outrageous that Caltrans would be allowed to remove 89 of them harm an unknown numbers of trees during construction. It does not appear that Caltrans has even followed their own processes for considering this project. As a native Californian I urge you to please do all that you can to help us protect some of the ancient beauties of California. 1
Thank you for your consideration.

Sincerely,
Maureen Meyer
1373 Montgomery Road
Thousand Oaks, CA 91360

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:08 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson's Grove widening

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:09 PM -----

"Middlemiss, Laura" <Laura.Middlemiss@suddenlink.com>
01/30/2009 10:14 AM

To "kim_floyd@dot.ca.gov" <kim_floyd@dot.ca.gov>
cc
Subject Richardson's Grove widening

Ms Floyd,
I am writing to you to express my adamant opposition to the widening of the road through Richardson's Grove. As a born and raised local, I have seen what short sighted development can do to our environment and economy. How can you possibly even think that cutting down ancient trees to make way for large trucks is feasible, let alone moral???!!!! 1

What is needed is a well thought out bypass if the need for larger trucks is an absolute. I am not against access and development. I am for a logical and comprehensive plan that does not include cutting down irreplaceable trees. 2

Please note that I am not representing Suddenlink Media in any way in my opinion expressed in the above email. I am writing to you as a private citizen.

Thank you for your time. I trust you to be of knowledge and intelligence in your role in this matter.

Sincerely,
Laura Middlemiss

Laura Middlemiss
Senior Account Executive
Suddenlink Media
707/268-5344 direct line
707/443-4164 fax

1. *See General Response #2.*
2. *See General Response #9.*

Kim Floyd/D01/Caltrans/CAGov
02/02/2009 09:46 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: proposed richardson grove project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/02/2009 09:45 AM -----

"julia middlemiss " <little_Missmiddle@hotmail.com>
01/30/2009 04:19 PM

To <kim_floyd@dot.ca.gov>
cc
Subject proposed richardson grove project

It is greatly distressing to hear of the proposed highway hidening project on highway 101 in Richardson Grove. This stretch of road is a magnificent representation of the beauty offered by the northcoast, the redwood trees that line the roadway are a valuable part of the state park. The thought of cutting these trees in order to allow large trucks passage is infuriorating. In this time of global warming and over-dependence on fossil fuels, we can no longer afford to all such projects of ecological degradation to take place. I deplore those in decision making roles to stop the passage of this project, in the interest of preserving what natural beauty is left on the north coast. 1

Ross Middlemiss
Former resident, Arcata, California

1. *See General Response #2.*

Ken Miller
<tamer1@suddenlink.net>
02/17/2009 05:20 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject R Grove DEIR comments 1-4

TO: Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501
12/15/08

RE: Richardson Grove Operational Improvement Project
HUMBOLDT COUNTY, CALIFORNIA
DISTRICT 1 - HUM - 101, PM 1.1/2.2
464800
Draft Environmental Impact Report/ Environmental Assessment and Programmatic Section 4 (f) Evaluation
Ms Harmon:

Please confirm receipt of my comments submitted to the DEIR on the following dates.
12/15/08
12/22/08
1/08/09
1/22/09

I have attached the combined comment to make assurance doubly sure.

Thank You,

Ken Miller
1658 Ocean Drive

McK, CA 95519

Comments.doc

TO: Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501
12/15/08

RE: Richardson Grove Operational Improvement Project
HUMBOLDT COUNTY, CALIFORNIA
DISTRICT 1 – HUM – 101, PM 1.1/2.2
464800

Draft Environmental Impact Report/ Environmental Assessment and Programmatic Section 4 (f) Evaluation

Ms Harmon:

1. Why is the RG project not being considered as part of the larger project, which is to make all of District 1 compatible with STAA trucks? Please refer to the following article: "The report details how various industries are affected by the lack of a full-fledged truck route. Companies like Wal-Mart, Home Depot, Safeway Food and Drug and Ray's Food Place have to reload in Grants Pass. Highway 199 limitations prevent other large companies from setting up shop here." "Without necessary improvements to the 197/199 corridor, Del Norte will continue to be left out of the regional, statewide and global marketplaces, resulting in continual and irreparable harm to the county's economy and its citizens," Tamara Buchanan, executive director of the Del Norte Local Transportation Commission, wrote in a report titled the Goods Movement Action Plan. (February 15, 2008, The Daily Triplicate/Bryant Anderson, emphasis added) 1

2. What relationship do STAA trucks have to the servicing of Big Box/Big Business stores? To servicing potential Port activity (see #14)? 2

3. What evidence do you have that STAA compatibility will not induce growth of Big Box/Big Business stores? 3

4. In the "internet survey" of local businesses, did it pose the question of what impacts the induction of Big Box stores by STAA truck traffic 4

compatibility would have on their businesses? Have you evaluated this potential? If not, why not?

5. Did the "internet survey" ask any businesses or other economic interests about advantages of Humboldt's relative geographic isolation? Has CalTrans evaluated this? If not, why not? 5

6. Did the "internet survey" ask whether Big Box stores are more likely with than without unimpeded STAA traffic? Has CalTrans evaluated this? If not, why not? 6

7. If Big Box stores do not utilize STAA trucks, what do they use? Has CalTrans evaluated this? If not, why not? 7

8. If Big Box stores use smaller trucks, does not that contradict your assertion that there is a dearth of smaller trucks due to their phasing out? 8

9. Do you envision STAA trucks supplying Big Box stores throughout District 1? Has CalTrans evaluated this? If not, why not? 9

10. What are the economic and social consequences of inducing Big Box store growth and survival by enabling STAA trucks to access them via STAA trucks without inconvenience? Has CalTrans evaluated this? If not, why not? 10

11. What peer review or other accepted statistical measure was used to determine the significance under CEQA of the "internet surveys" of businesses? 11

12. If Dr Gallo relied on the internet survey results, why should his conclusions be considered significant under CEQA, if the surveys themselves cannot meet the standard for significance? 12

13. Does the predicted 12.3% decrease in truck traffic due to efficiency account for increases due to Big Box or other large business development? 13

14. CalTrans Strategic Plan allocates 15% of the $20 billion budget to infrastructure supporting ports, yet no mention of the relation of this 14

Project to the Humboldt Port development is made. STAA trucks could induce the growth of truck-compatible containers, and container ships are a central component of the Harbor District's as of yet unanalyzed plan. The presence of a widened RG could influence the feasibility of inappropriate Port development. Why is this relationship not evaluated? Has CalTrans evaluated this? If not, why not?

15. XIIa claims less than significant impact. Has the Big Box/Big Business-inducing consequences of STAA truck traffic through District 1 been evaluated in order to make this claim? Has CalTrans evaluated this? If not, why not? 15

16. XVa makes a similar less than significant claim, but without analyzing the relation to Big Box induction, can Cal Trans substantiate this claim? Has CalTrans evaluated this? If not, why not? 16

17. The traffic safety data points to an inappropriate, hazardous speed limit for the traffic and road conditions through the very short, critical sections of RG. Surely, speed limitations, including speed tables and other physical elements to constrain speeds to 25MPH in the critical zones, would be far cheaper with no adverse environmental consequences. At 25MPH, CO2 emissions conveniently flatten out. 17

18. "In addition, construction would occur within the structural root zone of several large, mature redwoods abutting the existing roadway and the root systems of these trees could be further affected." However, there is no biological evaluation of the effects of traffic on the root systems of nearby redwoods. What scientific evidence have you evaluated to assess these potential impacts? Has CalTrans evaluated this? If not, why not? 18

19. If large redwood tree root systems are adversely affected, what impact will these adverse effects have related to edge effects, or other consequences to the ecosystem, including nearby trees, if these affected redwoods suffer? Has CalTrans evaluated this? If not, why not? 19

20. Without evaluating the impacts to redwood roots, other than to acknowledge that they will be affected, how can CalTrans check the "less than significant impact" box under Section IVB? 20

21

21. It is well established that redwood trees have shallow spreading roots that interconnect with those of other redwood trees. They lack a deep tap root. Hence, it is reasonable to assume they would be particularly susceptible to ground compression forces and deranged hydrologic conditions. Widespread top die-offs along 101 testify to adverse cumulative impacts related to roadside traffic. Why have you not evaluated this biological reality, and how do you propose to evaluate and mitigate?

"Generally, sequoias and redwoods are encircled by shallow roots, which extend four to six feet down and 125 feet (!) out from the tree. Redwoods have no taproot…;"

"In another experiment, marked water put into one redwood was detected in another 500 feet away, showing that the roots were connected."

Giants: The Colossal Trees of Pacific North America, by Audrey Grescoe, with references (but not tied specifically to text). Roberts Rinehart Pub. 1997 pg 21.

""A redwood does not have a taproot.; it sends out shallow, lateral roots that usually reach no deeper than about 12 feet. The major roots are about one inch in diameter or larger, and they may spread outward more than 50 feet in every direction. The root system also consists of many small, fibrous roots that may form a dense mat *in the top three feet of soil* (italics added). Redwood roots often interlock with the roots of adjacent trees, forming extensive networks that stabilize the tree and help keep it upright during fierce winds or pounding floods."

Coast Redwood, A Natural and Cultural History, by Michael Barbour, PhD, Sandy Lyons, and Mark Borchert, PhD, Cachuma Press, 2001, pg 25

21 a. Why is there no actual analysis or evaluation of the biological impacts to the roots of the redwood trees? The reference to Park estimates of a Structural Root Zone is generic ("a tree"), not at all specific to redwood trees, which have widespread, interconnected root *systems*. You reference Arnold, but that reference states ominously that "The root system is composed of deep, widespreading lateral roots with no taproot [40,44]."

Sec 4.4 of the **Natural Environment Study**
States that:

"This work will involve the structural root zones of approximately 25 large redwood trees ranging in diameter from 3 feet to 15…"

"The Structural Root Zone of a *(italic added)* tree is the circular area with the tree trunk at the center and a radius equal to 3 times the diameter of the tree trunk measured at breast height (California Department of Parks and Recreation 2005). Additional paving and the placement of shoulder backing could cause soil compaction and disturbance within the structural root zones of large redwoods. Studies have shown that compaction of the soils within the root zone can have an adverse effect on these trees (Arnold 1975). Adverse effects to large trees may be a significant impact to this unique natural community." 22

And in **Environmental Consequences, 4.6 under Cumulative Impacts:**
"Impacts to mature redwood forest and impacts to listed species are the principal environmental effects that require a cumulative impact analysis."

21b. How is it possible to avoid or mitigate redwood root compression without an analysis of the extent and vulnerability of the root systems? 23

Your glib assurances, as in **Chapter 5. Mitigation and Minimization Measures, where you state** "No heavy equipment will be staged or parked within the dripline of mature trees in unpaved areas." are irrelevant in the face of this critical data gap. 24

Notwithstanding the well-established fact that the root zones of mature redwood trees-and some of these 15 big trees are over 9 feet DBH-extends as far as 500 feet from the tree, the *dripline* may not even be three times the DBH (see referenced quotes below).

Substantial evidence in addition to that of Arnold regarding the extensivity of the redwood root systems is to be found in the above citations.

22. Why is there no mitigation for the predictable effects of increased traffic overlying the root systems of old growth redwoods?

23. You project a 50% increase in traffic in 20 years. What will be the likely and potential impacts on the redwood ecosystem of such increased traffic on the proposed Project stretches? 25

24. Has CalTrans made any provision for improved bicycle safety in this Project? Has CalTrans evaluated this? If not, why not? 26

25. Short-sea shipping has been touted as an immediately feasible transport modality out of Humboldt Bay. Were businesses surveyed regarding this substitute for trucking their goods? Why is this alternative not mentioned, when the entire justification for enabling STAA trucks is to facilitate commerce? 27

26. Since 15% of CalTrans' budgeted priorities is targeted to port infrastructure, why is short-sea shipping not considered in this DEIR as justification for the "No Build" alternative? 28

27. If this Project is considered part of an overall, incremental effort by CalTrans to make District1 STAA truck compatible, and the overall effect of this, when considered with all the other past and planned projects relevant to this overarching goal, is to induce Big Box/Big Business stores, how can CalTrans claim that there will be less than significant impacts due to cumulatively considerable incremental effects? (XVIIb) (see #1) 29

28. Section 4(f) of the Department of Transportation Act of 1966, codified in federal law at 49 U.S. Code, Section 303, may approve a Project if "there is no prudent and feasible alternative to using that land." Please explain why reducing the speed limit to 25MPH, enforced with speed tables and appropriate signaling, would not simultaneously reduce collisions to acceptable averages, improve bicycle safety, and allow the STAA trucks currently exempt from prohibitions to safely navigate the corridor? If the percentage of trucks involved in collisions reflects the percent of traffic that is trucks (16-17%), how can CalTrans conclude that trucks are especially sensitive to the current road alignment? 30

29. Why are the cumulative effects of this Project considered apart from those of related foreseeable CalTrans Projects which would open Del Norte and Humboldt to STAA trucks, such as the 299 and 199 Projects? Since Del Norte County economics are included in the benefits touted in the Gallo Report, the RG Project clearly cannot be viewed as an isolated Project independent of these other Projects which are on the drawing board. 31

30. Please provide an independent evaluation of the methods, data, results, and conclusions of the Gallo Report and any other survey used by CalTrans to develop the economic analyses cited in the DEIR. Credible critiques reveal substantial flaws which invalidate the purported conclusions, rendering them insubstantial under CEQA (see Dave Spreen comments, for example). Clearly, these so-called surveys were designed and interpreted to support pre-determined outcomes, a fraudulent enterprise at best. Why were surveys not designed that could evaluate all of the foreseeable and probable effects of this Project, rather than the adorned, unsubstantiated, subjective (largely guesswork) perspectives of a few business owners? 32

31. "NEPA requires that an EIS be prepared when the proposed federal action (project) as a whole has the potential to "significantly affect the quality of the human environment." If unimpeded STAA truck traffic enhances Big Box/Big Business advantages over local business throughout District 1, why does this fact not trigger an EIS? (see #1)

Thank You,

Ken Miller
1658 Ocean Drive
McK, CA 95519

1. The project at Richardson Grove has independent utility and does not rely on the construction of the Del Norte improvements to be viable. In looking at the impacts from the proposed project at Richardson Grove, study areas were defined for each resource. For some resources the study area would extend beyond the project limits. The project was determined not to result in growth inducing impacts and as the Level of Service is satisfactory through this area and the project is not expected to result in substantial changes to traffic volumes overall, nor truck volumes, it was determined the study area for traffic impacts would extend from the four lane section just south of Piercy to the four lane section beginning at the bridge a couple of miles north of the project. There have been studies conducted for the Del Norte County that consider the results of implementing both the Del Norte County improvements and those proposed on US 101 in Humboldt County that concluded that Level of Service for Route 101 would not be adversely affected.
2. Since the industry standard is the STAA vehicle, big box stores would likely realize some economic benefit from lifting the restriction just as small, local, independent businesses are expected to. As stated in the draft environmental document, the lack of STAA access did not prohibit the establishment of big box stores in Eureka and elsewhere. Providing STAA access to Humboldt County would likely be beneficial for servicing potential port activity as well.
3. *See General Response #12* regarding the potential for growth inducing effects.
4. The internet survey was independently performed by the Humboldt County Office of Economic Development. Caltrans did not sponsor, develop, or oversee the survey. As part of the Del Norte County STAA project, a survey was also conducted including some representatives of big box stores. In that survey, of those big box stores that responded, they stated the STAA improvements would not really change shipping patterns or their business. This is in contrast to the many other producers of goods surveyed who indicated that high shipping rates due to the current truck size limitations is of concern. This is consistent with the information collected from businesses in Humboldt County.
5. No, the survey did not ask the businesses about the advantage of Humboldt County's relative geographic isolation. The geographic isolation would provide some protection from competition; it also means that there is finite population base for selling their product. Business owners were asked if they anticipated expanding their business as a result of lifting the STAA restrictions. Most indicated that there would be minor or no expansion in staffing or amount of shipping anticipated.
6. No, the survey did not ask big box stores already present whether hypothetically they would have been more likely to locate in the area if STAA access were available.
7. Presumably the big box stores utilize CA Legal trucks just as the independent local businesses do. CA Legal vehicles make up the majority of the 11 percent truck traffic volumes on US Route 101 in the project vicinity. This information was considered in the overall evaluation of the project's potential impacts.
8. No. The information collected indicated that the big box stores tend to have CA Legal trucks included in their fleet, while the small, independent businesses which do not have their own fleet are more affected by not being able to utilize industry standard vehicles for their shipping needs.
9. Once STAA access is available the choice will be up to the shipper what type of vehicle will suit their needs. Since the information collected indicated that truck volumes are not anticipated to substantially change.
10. It has not been established that lifting the STAA restriction at Richardson Grove would result in big box stores expanding or enhancing their survival. In fact, the survey results from the Del

Norte County survey of big box stores indicate that expanding STAA access would not substantially alter their shipping patterns or result in stores expanding.

11. The information of the internet surveys was evaluated by Dr. Gallo as well as by Alicia Boomer who prepared the growth analysis technical study.
12. The estimated impact refers to the economic benefits or detriments with the availability of STAA as identified in Dr. Gallo's report. The conclusions in Dr. Gallo's study were limited only to those sectors responding to the Internet survey, and within those sectors, the response rate was significant.
13. Internet survey responses were limited (only 14) on the question regarding the effect on annual truck traffic of allowing STAA legal trucks on US Route 101 through Richardson Grove. For those answering the question, they estimated a reduction in annual truck trips of 12.3%, reducing annual truck traffic by 758 trips.
14. While lifting the STAA restriction at Richardson Grove would be of benefit to the port once it is in operation, there are a number of improvements that have been identified by the Harbor District that are necessary for shipping to be viable. The funding for these port improvements has not been identified. Providing STAA access at Richardson Grove is an identified need regardless of whether the port is developed or not.
15. Caltrans has evaluated the growth inducing potential of the project. Providing STAA access at Richardson Grove is not expected to result in substantial incentive for big box development because it does not substantially change the factors that most influence growth in Humboldt County. *See General Responses #12* regarding market factors that influence growth in the County.
16. *See General Response #14* regarding the potential for an increase in truck traffic.
17. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
18. The existing roadway occurs on root systems of old growth redwoods within Richardson Grove. Route 101 at this location was constructed over ninety years ago and the redwoods abutting the road in the park remain viable to the present day. *Also see General Response #3* regarding impacts on trees and the minimization measures incorporated into the project.
19. It has been determined by the Caltrans certified arborist, and an independent consulting arborist contracted by Save The Redwoods League that the project would not result in substantial adverse impacts to the root systems of the old growth redwoods.
20. See Response #19 above regarding the determination by arborists of the project's impacts on the trees.
21. While the project would add additional paving near some trees and may result in some additional soil compaction, the minimization measures incorporated into the project such as use of an pneumatic excavator such as an air spade or hand tools around the redwoods and restricting parking of equipment and storage of materials in the vicinity of the trees will help ensure that no substantial adverse impacts resulting from construction would occur. It is important to note that within the park, the maximum shoulder widening that could occur is two feet for each lane.
22. It is expected that the project would result in some additional compaction where construction occurs adjacent to the trees. The effects of compaction would be minimized by using Cement Treated Permeable Base which reduces the amount of excavation and compaction that would normally be required. Caltrans arborist, Darrin Sullivan, has been involved with the development of this project and the numerous measures incorporated into the design as well as construction techniques to minimize the impacts to redwoods. He determined that the project would result in minimal impact to the root vitality of the redwoods. Dennis Yniguez, an arborist contracted by the Save the Redwoods League to evaluate the project, notes that, "the existing

root systems of old growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." He further concluded that, "… highway alterations, as proposed, will have no significant detrimental effect on root health or on the availability of water to the roots of old growth redwoods adjacent to the highway construction."

23. As stated above, arborists have evaluated the project's impacts to the trees and have concluded that the impacts would not result in a substantial adverse effect.
24. Staging for the project is restricted to paved shoulders and turnouts, thus the root zones of the trees should not be an issue.
25. The projected increase in traffic would occur with or without the project. It is not known what the potential impacts from an increase in traffic would be.
26. Shoulders are being widened to four feet outside the park to better accommodate bicyclists and pedestrians. Within the park, continuous widening on the existing roadway to create wider shoulders is not possible without removing several old growth redwoods. The project does propose to add two foot shoulders within the park where no shoulders currently exist and where trees abutting the roadway do not preclude widening. Any bike/pedestrian path beyond the highway would be on park land and would have to be done in association with State Parks since they are the agency owning the land. While the proposed project doesn't markedly improve the safety for pedestrians and bicyclists through the park, it doesn't worsen the existing situation.
27. The survey did not query the businesses about their likelihood of using short sea shipping as an alternative to trucking. The Humboldt Bay Harbor District has identified improvements that are needed in the port to establish short sea shipping. Currently there is no funding for these improvements nor is there any known funding in the immediate future. Thus, at present, short sea shipping is not a viable alternative for goods movement.
28. See Response to #27 above regarding port improvements.
29. See Response to #10 and #15 above regarding the information that the project is not expected to induce big box development.
30. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
31. Cumulative effects were considered for the project and were determined not to be significant. The cumulative impact analysis builds upon information derived from the direct and indirect impacts analysis. The cumulative impact analysis focuses on those resources currently in poor or declining health or at risk even if project impacts are relatively small. For the Richardson Grove project, three resource areas were considered: parklands; endangered species, specifically Marbled Murrelet and Northern Spotted Owl; and old growth forests. Refer to Section 2.4 in the FEIR for results of cumulative impacts analysis.
32. Dr. Gallo's study was not intended to be a comprehensive evaluation. Those businesses responding to the survey that his evaluation was based on were likely the businesses most concerned about the shipping costs. These businesses represent fifteen different industry sectors but can be lumped into three general categories: agriculture and fisheries (including ranching, nurseries and fishing); manufacturing (including such diverse firms as cheese manufacturing, sawmill/lumber/reconstituted wood products, brewery, fabricated structural metal manufacturing, jewelry, and sporting/athletic wear); and retail sales (including motor vehicle and parts). Within several export dependent sectors, a high percentage of the industry firms provided quantitative estimates of the dollar impact of trucking constraints on their transportation costs. The information generated even from the limited number of sectors considered was sufficient to enable Caltrans to determine that the benefits derived from the project would be worth the expenditure of public funds.

33. It has not been established that the lifting the STAA restriction at Richardson Grove would result large proliferation of big box stores in Humboldt County. Many factors go into the decision for a store to locate in a particular area, not the least of which is the population base that would be supporting that store. In addition, by providing STAA access, the local businesses that have been disadvantaged by the shipping costs would be able to compete more favorably with the big box stores. Caltrans has determined that while there are effects resulting from the project, they are not significant given their context and intensity. Therefore, an EIS is not required.

Kim Floyd/D01/Caltrans/CAGov
03/02/2009 10:54 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/02/2009 10:54 AM -----

Marcia <mountainmarcie@mcn.org>
02/28/2009 04:27 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Please let the road through Richardson Grove remain as it is. 1

Even though you say you would not cut any big trees, there will still be root damage to these irreplaceable beauties. Wildlife will be impacted, no matter what time of day, or what season of the year, you do the work. 2

There is a simple solution. DROP THE SPEED LIMIT to 25 to 30 miles per hour through the grove. It will slow the trucks perhaps 30 seconds. If business cannot live with this, then something is definitely wrong with these businesses. 3

We live in a unique, beautiful area, and Richardson Grove is the first look people have at the redwood forest heading north. It takes my breath away, after all these years, this enchanted place. It is perfect, as it is. 4

Five generations of my family have camped and enjoyed this unique place. PLEASE LEAVE IT ALONE!

Thank you,

Marcia Miller
P O Box 1590
Laytonville, CA 95454
Telephone: 707-984-6599

1. *See General Response #3.*
2. Wildlife inhabiting the area adjacent to the highway and campgrounds in the park is already affected and have adapted to noise, lights, and human activity associated with the campfire programs, campground activities including generator noise from the RVs, and general maintenance activities conducted by the park staff to upkeep the park facilities and roads as well as traffic and maintenance activities associated with Route 101. There might be limited night work, but as productivity is not as great during night construction, and therefore is more expensive, it would likely only be utilized sparingly.
3. *See General Response #8.*
4. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:30 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:31 AM -----

Larry Miller
<jusco@humboldt1.com>
03/10/2009 08:14 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

To: Kim Floyd, Project Manager

From: Pamela Miller

Subject: Richardson Grove Draft Environmental Impact Statement

Date: March 11, 2009

Richardson Grove is a California State Park to be held and cared for us all and future generations to come. This project is a very bad and expensive idea. I have lived here most of my life and most of us up here know exactly what happens when we we start cutting into Redwood groves, especially heritage groves. To think removing 80+ trees, cutting the roots of thousand year old Redwoods, tearing up asphalt and basically shattering the fragile soil piping and mychorizal association isn't to have dire consequences down the line is arrogant and misleading. And for what? Bigger, faster trucks...What are you thinking? There have been many creative, sensible solutions offered . Why not try some of them first ? The current proposal is a sure plan for grove to start caving in on itself and making room for a four lane freeway. Please do not do this.

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1. *See General Response #3.*
2. *See General Response #13.*
3. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.4.2 of the FEIR/EA.
4. *See General Response #9.*

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:26 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:26 AM -----

"Lorraine Miller-Wolf"
<lorraine@millerwolf.com>
02/13/2009 06:05 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

To whom it may concern,
I am writing to express my opposition to the plan to cut down/remove 87 trees on 101. I realize there are always two sides to an issue and that there are many in favor of widing 101 in order to impact commerce. I am against this plan as I feel strongly that one of the major attractions of this area is the magnificent redwoods that only grow in one other place in the world. In removing the 87 trees, the integrity of that area will be severally impacted. In our too fast paced world, we seldom get an opportunity to slow down and appreciate the beauty that surrounds us. The present layout of 101 presents such an opportunity that will be lost if the road is widen and straightened out. There is no going backwards; if the trees were to be cut, we will have lost a irreplaceable gift to humankind. 1 2

It is my sincere hope that the powers to be listen to the voice of the people; there is a strong majority of us that are against the plan to cut our precious and beloved Redwoods.

Thank you.
Sincerely,
Lorraine B. Miller-Wolf
1363 Clipper Lane
Bayside, CA 95524

1. *See General Response #13.*
2. No old growth trees would be removed as a result of this project. The majority of the 30 trees proposed to be removed in the park are four to twelve inches in diameter and half are tan oaks. The largest tree proposed to be removed from the park is a 24 inch in diameter tan oak and only two redwoods are proposed for removal in the park and they are six inches in diameter and seven inches in diameter. The current ambience of the area for the motorist would not be altered substantially as a result of this project as the roadway would remain a curvilinear two lane highway with minimal to no shoulders with large redwood trees abutting the edges of the roadway. With the design modification of the retaining wall, the number of tree removals at the wall was reduced from 30 to 5. The total number of tree removals proposed for the project is now 54.

Jeremy Mills
<jtm10@humboldt.edu>

03/12/2009 05:30 PM

Please respond to
Jeremy Mills
<jtm10@humboldt.edu>

To deborah harmon <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove EIR

Thank you for the opportunity to review the Richardson Grove Draft Environmental Impact Report/ Environmental Assessment. I am concerned that the purpose and need for the project is not fully explained and the reasonably foreseeable socioeconomic impacts are not fully analyzed. 1 2

The document fails to consider STAA truck access to Humboldt County as a system. Why is STAA access to the south necessary and the previously constructed STAA access to the north inadequate to meet the shipping needs of local industry? 3

The document fails to explain how exemptions that allow the STAA vehicles to be used without roadway improvements help protects the safety of the traveling public (page 11). 4

The document fails to consider the reasonably foreseeable growth inducing impacts of STAA access especially the replacement of existing businesses with big box stores. The document fails to consider the reasonably foreseeable urban blight that will result from the construction of big box stores and the closing of existing retail stores. 5

Jeremy Mills
(707) 476-0840

1. *See General Response #1.*
2. *See General Response #12.*
3. STAA access to Humboldt County is available from the north via Route 101. For trips originating from the south along Route 101, STAA vehicles would have to detour east to I-5 then north to Oregon then detour back west to return to Route 101. Then STAA vehicles could head south through Del Norte County before entering Humboldt County on Route 101. This represents a detour of about 300 miles which would add substantial travel times and result in greater fuel costs.
4. The proposed project would result in roadway improvements.
5. As mentioned above, there are several factors which affect rate of growth in Humboldt County which have a greater influence than STAA access availability. "Big box" stores are already present in Humboldt County in part because these businesses have access to a fleet of California Legal vehicles which are not restricted at Richardson Grove. The small businesses have expressed concern about the lack of availability of non-STAA vehicles. They report that the trucking companies they rely on generally stock the industry standard – sized vehicles (e.g., STAA trucks) in their fleet and it is becoming increasingly more difficult to access the non-STAA – sized vehicles. Thus, the proposed project is anticipated to benefit the small businesses.

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:23 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Improvement Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:23 AM -----

"T'sera..." <lady.tea@comcast.net>
02/20/2009 09:56 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Improvement Project

Ms. Floyd,

I was alarmed to receive an email that CalTrans is planning a project to adjust the width and route of US-101 through Richardson Grove State Park. My family has patronized the park regularly for decades---almost yearly for most of my 26-year lifespan---all the way back to my grandfather's boyhood in the 1920s shortly after the park was established and highway 101 was largely a dirt road north of Marin County. 1

I fully understand that highway 101 serves as central and critical trucking route in this state, but without better details on the impact of *not* allowing certain trucks to travel along this area under current law, I don't believe adequate background is being provided to tax-payers and is reason in and of itself to rally against this proposed project.

1. The materials fail to clarify which of the three STAA size classes (trailers of 48', 53' and double size) actually exceed California's current maximum length of 65' in total. 2
2. There is no indication of the percentage of trucks regularly traveling 101 which are prohibited on the Richardson Grove stretch of the highway. This obviously bears heavily on how worthwhile the project is given its environmental costs, both temporary and permanent. 3
3. No estimate has been given on the current fiscal impact of not allowing these trucks on this particular stretch. 4
4. Given these trucks are obviously already on California's roads and elsewhere on highway 101, how is it that they're currently navigating the prohibited area(s)? Is this not a tenable solution on an ongoing basis and, if so, who has deemed this to be the case? 5

The care and preservation of Richardson Grove, beyond the personal reasons stated above, is a particularly sensitive subject for my entire family just now as both my grandparents passed away within the last two months and made a request that their ashes be scattered in the main grove of this park. They hoped to be laid to rest after 61 years of marriage in the place where they vacationed with their six children during

summers, where some of their daughter's ashes were scattered after she died of cancer, and *precisely* where CalTrans would be digging things up, cutting down trees and wreaking havoc on the peaceful, beautiful grove that sits at the heart of this park if this project goes through.

Finally, at the risk of stating the obvious, Richardson Grove was established for the express purpose of preserving *those* trees in *that* grove, not just the big ones, from the destruction typically wrought by the ever expanding demands of commerce. Beyond that, the trucking CalTrans seeks to accommodate, as opposed to promoting cargo trains and/or buying local, happens to be one of the more polluting forms of moving commercial goods in this state. 6

I hope to receive a response from either you or your office on the points above at your soonest possible convenience. I have various contacts within the Bay Area's film industry, which has used California's redwoods as a backdrop for some rather iconic films, and have no problem reaching out to every one of them to help halt this project if I'm not convinced that the benefits outweigh the disturbance and potential destruction.

Thank you very much for your consideration.

Sincerely,

T'sera Mingst-Belcher
510.225.5106
lady.tea@comcast.net

1. Within the park, the project proposes only to adjust the width of Route 101 to provide two foot shoulders where possible where there are currently no large trees abutting the roadway. Outside of the park four foot shoulders will be provided. Slight realignments are proposed to eliminate off-tracking.
2. The project will provide access for STAA trucks with up to a 53 foot trailer and 25 foot truck. Refer to Figure 3 of the document for truck lengths.
3. The 2008 average daily traffic for Route 101 at Richardson Grove was 5,520 vehicles with 11 percent of that amount composed of trucks (Section 1.2 of the document). It is impossible to tell what percentage may be STAA trucks that are illegally using the highway. Collision data collected does not differentiate between STAA and non STAA trucks.
4. The STAA truck restrictions at Richardson Grove are estimated to be responsible for a reduction in annual income for businesses and residents of Humboldt and Del Norte Counties of $8.0 million (in 2004 dollars). For the 20 year period of the analysis, and allowing for annual nominal growth of 3 percent, the income losses total $228 million. The income losses for just one year exceed the $5.5 million estimated cost of the realignment project at Richardson Grove.

5. STAA trucks cannot legally traverse Richardson Grove and restricted vehicles can be ticketed by the California Highway Patrol. STAA vehicles can access Humboldt County on US Route 101 from the north. The primary purpose of the project is to lift the restriction on STAA vehicles. The current roadway geometrics are such that STAA vehicles off-track over the center line into the opposing lane. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. If a collision were to occur involving a STAA vehicle that was given a permit to traverse the park and off-tracking was found to be the reason for the collision occurring, Caltrans would be liable because 1) Caltrans knew there was a geometric problem associated with STAA trucks traveling through the area and 2) Caltrans did nothing to correct the known issue.
6. The proposed project would necessitate the removal of two small redwoods in the park. They are six inches and seven inches in diameter respectively. With the special conditions and minimization measures in place during construction, the project is not expected to result in a substantial adverse effect to the larger redwood trees.

3-12-09

To Caltrans

Re: Richardson Grove Expansion

Please Register my personal comment against cutting of ANY OLD Growth trees at Richardson's Grove.

This Project is unnecessary and is a ~~waist~~ waste of taxpayer money.

It is always nice to see the narrow grove surrounding the Road and slows traffic to our special Home.

J.D. Miskell

Dr. Box 2055 Trinidad CA

1

1. *See General Response #2.*

fiddle@asis.com (Jessie Modic)
01/29/2009 10:08 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove

Dear Ms Harmon,
Please do not go forward with the proposed tearing up of Richardson Grove. Large trucks can already get an exemption to go through there. Another idea is to have traffic lights for when a large truck goes through. Tearing up Richardson Grove is not the only way to get large trucks through there. And who wants large trucks, anyway? Big box stores, that threaten our local businesses., that's who. And how wuold it make it safer, with trucks barrelling through at a higher speed limit? It wouldn't be safer. Please leave Richardson Grove as it is, and consider putting in traffic lights instead - a much less expensive proposition, when California doesn't have enough money to pay teachers, and needs all the money it can save. Thanks for your consideration.

I have grave concerns, as well, that a few businesses will benefit from this publicly funded project while businesses dependent on tourism may suffer. Local businesses located directly impacted by this project and not adequately acknowledged in the document, will suffer harm, especially during the construction phase. In a time of economic crisis, I fear that these shops and services may not survive the impacts.

Sincerely, Jessie Modic

[YOUR NAME HERE]

Sincerely,
Jessie Modic
2899 ChemiseWhitethorn, Ca 95589

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5

1. The primary purpose of the project is to lift the restriction on STAA vehicles. The current roadway geometrics are such that STAA vehicles off-track over the center line into the opposing lane. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. If a collision were to occur involving a STAA vehicle that was given a permit to traverse the park and off-tracking was found to be the reason for the collision occurring, Caltrans would be liable because 1) Caltrans knew there was a geometric problem associated with STAA trucks traveling through the area and 2) Caltrans did nothing to correct the known issue. The proposed project would correct the known geometric condition and lift the restriction for STAA trucks with no special permits being required.
2. *See General Response #10.*
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
4. *See General Response #13.*
5. *See General Response #7.*

Submitted by [illegible]
PoBox 545 Monterey, Ca 93942
Environmental television Producer
www.ampmedia.org

P.1.

Jan. 26, 09

Deborah Harmon, Senior Environmental Planner
California Dept. of Transportation
1545 Union ST
Eureka, Ca 95501.

Re: comments on Draft EIR/Environmental Assessment and Programmatic Section 4 (F) Evaluation in regards to "Richardson Grove operational Improvement Project" Humbolt County, Ca District 1-Hum-101, PM 1.1/2.2. 464800

Dear Deborah,

I am calling for a full EIS for two reasons

1). It is a more thorough document, and since you are calling for federal monies to fund the project the federal government needs to know the full extent of what costs may incur. Our government is broke now and projected cost are always smaller than the real final costs. 1

2) Richardson grove is no place for wider, bigger highways. It was preserved for its beauty, wildlife habitate and a last hold out for some of the largest rarest trees on earth. no one can predict accurately how these trees and the MAMU will truely be affected, science is too often bias towards its own interest. 2

Bringing in a constant stream of heavier traffic to this grove is exactly opposite of the groves orgenial intent, and goes against everything its suppose 3

100% recycled office paper

to inspire and protect. Please answer the following in FEIR!

1). What impacts will the road building and excavation and removal of trees have on the South Eel River? Address erosion factor 4

2) What long term effects of noise, and pollution from trucks and traffic have on the MAMU and die back of trees due to this traffic, already seen throughout the Avenue of Giants? 5

3). Compare value of the habitate to the value of adding this road? which is the greater loss to us all? (See addendum 1) P.3 6

4). What will be the impact and cost of having to add widening to smaller roads to accomodate the larger trucks - include costs of ramps 7

5). Since scoping comments were not adequately studied we need a new draft EIR (this time with an EIS) 8

6) What science do you have that states "The project will not adversely modify MAMU Critical Habitate... How can it not? This is bias bogus science. What studies do you have that can possibly address this statement? 9

Remember, not addressing these concerns in your final EIR can be grounds for a lawsuit.

Thankyou.
Sincerely, Lorna Moffat
PO Box 545, Garberville, Ca 95542

Addendum 1) from P. 2. question 3)

Compare value of the existing habitate to the loss of value due to the roads widening-

Example! The constant noise, traffic and pollution will have an extroadinary impact on tourism as well as the local nesting MAMU. There can be no doubt about this. I know, I go to these areas to seek beauty, quiet, peace. areas that are heavily trafficed I avoid as do most nature lovers. What effect will it have on small towns depending on Richardsons grove tourist draw?

Lorna Moffat
POBx 545
Monterey, Ca 93942

1. The level of impact determines the appropriate level of document under NEPA. The project as proposed with the special design features and special conditions in place is not anticipated to result in significant impacts.
2. Within the park, the only widening proposed to provide up to two foot shoulders where possible where currently no shoulders exists. North of the park, widening is proposed to provide four foot shoulders to better accommodate non-motorized traffic. No old growth redwoods will be removed. The US Fish and Wildlife Service has determined that the project would not result in take of the Marbled Murrelet, and that the construction activity represents a relatively short term disturbance that is not expected to have a long term effect on the breeding performance of the Marbled Murrelet as stated in the Biological Opinion for this project.
3. The truck traffic volume is not expected to substantially change. By lifting the STAA restriction the type of trucks is expected to change, not the number of trucks. As the weight restrictions are the same for STAA trucks as non-STAA trucks, the STAA trucks are not expected to weigh substantially different.
4. No work is proposed in the South Fork of the Eel River. Culvert work on drainages that empty into the River is proposed and appropriate best management practices will be in place. For more information refer to chapter on water quality, Section 2.2.1 in the environmental document.
5. The project is not expected to result in increase in noise, vehicle emissions, or truck traffic. The US Fish and Wildlife Service have determined that the project would not result in a take of listed species, including the Marbled Murrelet. The Service further concluded that the construction activity represents a relatively short term disturbance that is not expected to have a long term effect on the breeding performance of the Marbled Murrelet as stated in the Biological Opinion for this project. The project impacts to the redwoods have been minimized with special design features and special conditions during construction. With these measures in place, the project is not expected to result in die back of the redwoods.
6. The habitat abutting the existing roadway has less value to the Marbled Murrelet than that found further from the roadway since the highway itself results in “edge habitat” that provides less protection from predators. For the most part, the impacts from the project are limited to the area adjacent to the existing roadway.
7. STAA trucks are currently allowed on US Route 101 (via access from the north) with the exception of the one mile segment that is included within the project limits of this project. STAA truck route designations on local streets are determined by local governments. Any improvements needed to interchange on-ramps or off-ramps or at-grade intersections with State highway legs would have to be made on a case by case basis as local governments decide to create STAA routes on their local streets.
8. The draft document did contain information reflecting the scoping comments.
9. Section 7 of the federal Endangered Species Act defines impacts to designated critical habitat. As the project would not remove any potential nest trees, it was determined that the project would not adversely modify critical habitat. The US Fish and Wildlife Service concurred with this determination per the Biological Opinion that they prepared for this project.
10. As stated previously, the traffic volumes are not expected to substantially change. Trucks would be unlikely to divert from I-5 and Route 99 which are the primary north south trucking routes because they are more fuel efficient and less timely to access the major population centers in northwestern US. Nor is the project expected to result in increased noise and vehicle emissions. Caltrans has involved the California Parks and Recreation Department throughout the planning process for this project. It is not expected that tourism within the Richardson Grove State Park would suffer long term effects as a result of the project.

Susan Moloney
<susan@ancienttrees.org>
01/30/2009 04:42 PM

To deborah_harmon@dot.ca.gov
cc Kim_Floyd@dot.ca.gov, Caltrans.Director@dot.ca.gov
bcc
Subject Richardson Grove

Deborah Harmon
CA Dept of Transportation
1656 Union Street
Eureka, CA 95501

RE: Richardson Grove DEIR

Dear Ms. Harmon,

Please seriously consider the following points regarding the proposed Richardson Grove Operational Improvement Project.

First and foremost, I firmly believe that this project is completely unnecessary. There are no goods or services we do not have sufficient access to on the North Coast. 1

At the public hearing held at the River Lodge in Fortuna earlier this January, it was apparent that this project would personally benefit only a few industries and individuals, while the publicly-owned, irreplaceable trees of Richardson Grove will suffer. This is completely unacceptable. 2

Furthermore, increasing our dependence on fossil fuels, when our planet is facing irreversible damage from global warming, is destructive and short-sighted. 3

Simple and inexpensive speed control would achieve the same results that this expensive and destructive project will have. 4

Or, perhaps, like the waivers that the cattle industry recently received to pass through the grove, other STAA trucks could also be granted access. They're already going through now, with a negligible amount of serious accidents, so why not just post a lower speed limit, and enforce that speed limit and allow access? 5

There should be no further work on this project unless, and until, a complete, professional study on the full impact that roads and root compaction and cutting will mean for the trees in Richardson Grove. 6

If this project does proceed, however, a bike path MUST absolutely be included. 7

How can it be that funding for this unnecessary project is available when vital service and projects are loosing funding. I request that the funds for this project be made available for fisheries restoration and the California Conservation Corps. 8

Thank you for your consideration.

Sincerely,
Susan Moloney
--

1. *See General Response #1.*
2. *See General Response #3.*
3. STAA access to Humboldt County is available from the north via Route 101. For trips originating from the south along Route 101, STAA vehicles would have to detour east to I-5 then north to Oregon then detour back west to return to Route 101. Then STAA vehicles could head south through Del Norte County before entering Humboldt County on Route 101. This represents a detour of about 300 miles which would add substantial travel times and result in greater fuel costs.
4. *See General Response #8.*
5. The primary purpose of the project is to lift the restriction on STAA vehicles. The current roadway geometrics are such that STAA vehicles off-track over the center line into the opposing lane. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. The proposed project would correct the known geometric condition and lift the restriction for STAA trucks with no special permits being required.
6. The project plans have been reviewed by a certified arborist. In addition, an independent arborist contracted by Save the Redwoods League also reviewed the project in relation to potential impacts to the trees. The arborists both concluded that the project would not result in substantial adverse effects to the trees with the protection measures in place. See more information in *General Response #3*.
7. *See General Response #5.*
8. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.

"morrissey8@att.net"
<morrissey8@att.net>
01/27/2009 02:37 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Opposition to the DEIR on Richardson Grove

Dear Ms Harmon,

I would like to speak in opposition to the DEIR at Richardson grove because it is a much more significant change to the forest than simply removing two trees. 1

The DIER at Richardson Grove builds a 300 foot by 8 foot wall at the same time Caltrans will see an increase in speed. (whether officially posted or not) 2

This will surely be hazardous, and lead to more of the frequent 2 - 5 hour 101 closures due to traffic accidents. 3

Therefore, the truck route to Humboldt will still be "unpredictable" in terms of timing routes, which is what this boils down to.

It will be much safer and more predictable to have a 25 mph zone for the few hundred feet of the 300 mile trek most affected by this route - Humboldt to the Bay Area. 4

In addition providing a safer and more predictable route, the 25 mph no build option will save taxpayers $6 million.

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees.

Josephine Morrissey

1. The location of the proposed retaining wall is outside the park where adjacent land use includes residential and commercial development.
2. *See General Response #13.*
3. With the construction of this project, highway conditions are not expected to be any less safe than they currently are. Because there will be revisions made to non-standard highway design features such as curve radii and shoulder widths, it is expected that the roadway on this section of Route 101 will be safer for all users as a result. The presence of slightly larger STAA trucks is not expected to make the roadway any less safe as the comparative weights of the non-STAA and STAA rigs are relatively the same, with the STAA trucks having the potential to be slightly heavier due to a larger size tractor (if sleeper is included).
4. *See General Response #8.*

Roy Barnette
<roybarnette @yahoo.com>
01/28/2009 10:31 AM
Please respond to
roybarnette@yahoo.com

To deborah_harmon@dot.ca.gov
cc
bcc
Subject

1
2

Please just lower the speed limit.....This is so simple...You can't cut around the roots of trees and expect them to survive or not fall on innocent people driving into the beautiful redwood curtain. Please this is a win for all. Wildlife, Trees, the public in many ways.

Thank You
Janette P. Murphy

1. *See General Response #8.*
2. *See General Response #3.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:12 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove NO!!!!

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:12 PM -----

"Alyssa Murray" <Amurray@aliveandthrivin.com>
03/12/2009 01:53 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove NO!!!!

1

I am against the plan to widen the road through Richardson Grove. Do not do it! Please preserve this are for future generation.
Alyssa Murray
Bookkeeper
Mother
Site Council AES, SBMS
ACC member

1. *See General Response #13.*

2-19-09

Richardson Grove is wonderful.

1 25MPH is wonderful.

2 Not cutting down trees is wonderful.

3 Humboldt must be protected from urban

4 sprawl, speed & greed.

Nance Naven

1. *See General Response #8.*
2. *See General Response #2.*
3. *See General Response #12.*
4. *See General Response #13.*

JACK NEFF
1408 BROCKTON AVENUE
LOS ANGELES, CA 90025
(310) 478-2835

January 28, 2009

Deborah Harmon
Senior Environmental Planner
Caltrans
1656 Union Street
Eureka, CA 95501

Re: Richardson Grove Operational Improvement Project
EIR/Environmental Assessment and
Programmatic Section 4(f) Evaluation
Humboldt County, California District 1
HUM-101, PM 1.1/2.2 464800

Dear Ms. Harmon:

The project to "adjust the roadway alignment" is in irreconcilable conflict with the policy of the State Parks system and the geography of Richardson State Park. No amount of political horse-trading can return equal quantities to each other. Richardson Grove is the Humboldt County gateway to the "Redwood Highway," an irreplaceable crown jewel of the State of California, and a critical asset to the people of this state. The project and Caltrans EIR/Environmental Assessment and Programmatic Section 4(f) Evaluation is recipe for "death by inches" to the shrunken forest home to threatened and endangered individuals and species, plant and animal. 1 2

Richardson Grove State Park includes a critical 1.1 mile portion of the Redwood Highway through where Highway 101 has just one traffic lane in each direction. Large redwood trees grown near the roadway on both sides. Figures 6A and 6B, pp. 48-48 EIR/Environmental Assessment, etc.

Caltrans' December 2008 EIR/Environmental Assessment and Programmatic Section 4(f) Evaluation (the "EIR/Environmental Assessment, etc.") is deceptive in assuring readers that avoidance, minimization and mitigation will permeate the project, but on the ground, where lines are drawn and Humboldt County men go to work with heavy equipment and fat government contracts, environmental safeguards are "FOR DESIGN STUDY ONLY." Appendix L, Layout Maps. 3

This letter is a call to Caltrans to abandon the above-referenced project, or in the alternative, a request for further environmental studies. Based on Caltrans own appendices to the "EIR/Environmental Assessment, etc.," political pressure in favor of the project is driving the data. The EIR/Environmental Assessment, etc. is deceptive in assuring readers that avoidance, minimization and mitigation are sufficient to protect California's Redwood Forest. Opposition to approval to all of the design and construction of above-referenced project is in the best interest of the habitat, species, land, water, air and the people of the State of California. The project and Caltrans' EIR/Environmental Assessment, etc. will undermine and subvert the intentions of laws protecting the largest living organisms on earth, *Sequoia Sempervirens*, among other life forms, which call California their home. 4

The EIR/Environmental Assessment, etc. fills in the gaps exposed at the February 20, 2008 "Informational Meeting" held by Caltrans in Eureka. Caltrans's current EIR/Environmental Assessment, etc. only includes information which supports Caltrans' original "Detailed Survey" and "Biological Resources" study. Caltrans now has a calculation and knows of many trees, what type of trees, and the size of the trees will be destroyed by the project. Appendix L, Layout Maps.

On page 111 of the EIR/Environmental Assessment, etc." Caltrans submits to the political pressure in favor of the project and rejects the necessity of maintaining the interconnecting web of forest parks along the Redwood Highway. "Significant Environmental Effects of the Proposed Project. None." "Unavoidable Significant Environmental Effects. None." 5

For decades California and federal agencies including the California Departments of Forestry, Resources, Fish & Game and the U.S. Fish & Wildlife Service have approved in large numbers Timber Harvest Plans, Conditional Take Permits and other administrative permissions which allowed loggers to clearcut Southern Humboldt County. The web of state, local and national parks along the Redwood Highway has been the largest classroom for people to learn about the oldest living trees in the world, *sequoia sempervirens*, or coastal redwood. The project area along Highway 101 is the single area along the Redwood Highway where the redwood forest canopy extends over the highway in most of the 1.1 mile length of the project. Beyond the mountain ridgelines surrounding the Richardson Grove and all along the Redwood Highway lies the clearcuts whose death and destruction were "legal" in the eyes of the Department of Resources. Each year rain floods slash and debris from the clearcuts into the South Fork Eel River, continuing to ruin the riverbank habitat critical to the web of life in the forest.

Political pressure has shown that California's North Coast is an ecological disaster area, and Caltrans plan to "adjust roadway alignment" does not and cannot Avoid, Minimize or Mitigate all of the damage this project creates. In the current political environment in Humboldt County, Caltrans' contractors for this project will not limit their damage to staging areas, exposure to noise will absolutely exceed Caltrans' estimates, exposure to Night Lighting will interfere with procreation in Richardson State park, Habitat Impact will reduce the size and viability of the habitat for the plants and animals, exposure to the Activity of Construction Personnel and Equipment will exceed Caltrans' estimates by a vast amount. All of these impacts will result in damage which cannot be repaired by dollar investments, making the project an irrevocable commitment of resources. Therefore in the interests of maintaining the Redwood Highway, the project should be abandoned. If, in the alternative, Caltrans performs further environmental study, Caltrans must also obtain more accurate assessments of the political climate in Humboldt County toward enforcement of the proposed limits on contractors and workers who build in the forests. 6

Caltrans is aware of political pressure to carry on business as usual in the forest is pushing this project forward. In Appendix L, Layout Maps to the EIR/Environmental Assessment, etc. each of the maps dated October 14, 2008 all have printed in conspicuous bold faced letters in <u>two separate locations</u> on the map's legend "FOR DESIGN STUDY ONLY." Caltrans' the purpose for using the disclaimer "FOR DESIGN STUDY" printed twice on the maps must be related to the subject of matter of the maps, which is the foreseen impact of the project components on the large trees adjacent to the Redwood Highway in Richardson Grove: Culvert Work. Tree and Shrub removal. Night Work. Contractor Staging Areas. Disposal of excess material. Equipment. <u>Indirect Effects</u>. Tree Root Impacts. Increased Traffic. <u>Effects from Ongoing Project Activities</u>. 7

Caltrans should also acknowledge the political pressure brought on it by the North American Free Trade Agreement ("NAFTA"). NAFTA requires the states to bear the cost of widening roadways to accommodate large trucks which are the subject of the STAA enforcement terms within NAFTA. Large trucks this size are not allowed on unreinforced roads along this stretch of highway and throughout California. Caltrans should keep in mind the policy of protecting the essential ecological fabric of the web of State, local and National Parks, and not offer any more environmental sacrifice zones in the interests of inhuman corporate business entities. Is there an individual anywhere in California who wants bankrupt big-box shopping stores in Eureka at the cost of California's unique and priceless natural heritage? Caltrans should look at the issue as a trade off of cheap access to 8

dangerous imported goods in exchange for an irreplaceable crown jewel in the web of life within the California State Park system.

Political pressure is on Caltrans from Big timber to accept the idea that murrelet decline is due only to degradation of its ocean-based food source, and not because of demolished nesting habitat. This statement is based on junk science. Caltrans' Biological Assessment does acknowledge the project includes Marbled Murrelet habitat. The Biological Assessment of this project does not make an effort to study the impact of the project on chances for recovery of the Marbled Murrelet (forest and sea bird). Chapter 2.2 and Chapter 2.3 of the Biological Assessment do not state results from any current Marbled Murrelet studies of their numbers or acres of habitat available. Chapter 2.2 only repeats the scope of murrelet habitat, 35 miles within the coastal shoreline, but does not say how much of habitat is there presently, or how many Murrelets there are. In light of how project work will be performed on the ground, if Caltrans abandons the project Marbled Murrelets will have a chance to live and breed in Richardson Grove. 9

Caltrans and the people of California have an assurance from the Biological Assessment that "tan-oak dominated woodlands" includes sequoia sempervirens, Douglas fir or Port Orford Cedar or other "big-money" trees. In Chapter 4.A "Habitat Impacts" of the Biological Assessment of the Project, Caltrans says in "approximately ¼ acre of tan-oak dominated woodlands will be cleared for cut-and-fill." Experience with Humboldt County contractors using heavy machinery shows that a quarter acre of "tan-oak dominated woodlands" on paper can become a wasteland and an opportunity to poach valuable timber on the public purse. 10

Caltrans should abandon this project because the goals of the project are opposed to themselves. Caltrans and the people of California have an assurance from the Biological Assessment that the project will not substantially increase traffic. Chapter 4.B "Traffic Impacts" states that "it is not anticipated that there will be a substantial increase in traffic levels" on the Redwood Highway. On the one hand the project is designed to increase freight traffic through Richardson Grove to accommodate heavy trucks, in a habitat where the trees are so thick that "Since 1915 a number of large redwoods of Richardson Grove have had pavement right up to the base of their trunks." Chapter 4B "Tree Root Impacts." On the other hand Caltrans assures the people of California the character of the traffic through Richardson Grove will change so that the addition of freight truck will not substantially increase traffic levels. What is it? 11

Caltrans should abandon this project because Caltrans's reliance on References in Chapter 6 of the Biological Assessment show the hand of political pressure on the EIR/Environmental Assessment, etc. process. Caltrans chooses to cite only two (2) references as sources for the entire 23-page Biological Assessment: A 2002 study to support Caltrans' use of well-designed trash cans to prevent larger birds likes jays, crows and ravens from preying on the Marbled Murrelet (Liebezeit, J.R. and T.L. George. 2002. A summary of Predation by Corvids, etc. Calif. Dept. Fish and Game, Species Conversation and Recovery Program, Rpt. 2002-02, Sacramento, CA. 103 pp.) and a List of Species posted on a website hosted by the U.S. Fish and Wildlife Service. There are dozens of threatened and endangered species of plant and animal who survive in and around Richardson Grove and Caltrans can only include citations to study about trash can design and list of forest inhabitants? This is evidence that truthful scientific study has been filtered out by politics, and the strong hand of politics is again grasping for the public purse. 12

Caltrans should abandon this project. The nearby South Fork Eel River is listed as a National Wild and Scenic River due to its "outstandingly remarkable values" of "scenery" and "fish". Caltrans has not thoroughly studied, using the best science available, the impacts of the Project on scenery and on fish such as Coho salmon in the South Fork Eel River (the latter of which could be impacted by sediment generated by the project which could elevate temperature in the river). The demise of salmon fishing in California is past crisis and has gone into history. Habitat restoration, and a concomitant commitment by Caltrans to support habitat restoration could one day reverse this situation. 13

The instances of "die-back" are growing along the Avenue of the Giants because of closeness of the Highway to the narrow stands of Sequoia trees, which affects the primary constituent elements necessary for medium-term and long-term Marbled Murrelet habitat. Caltrans has also avoided an explanation of how the reduction in tree canopy over Highway 101 in the Richardson Grove State Park area could increase "blow-down" and "wind throw" of large trees in the area. Caltrans cannot wave its hand and remove the blur between lobbyist-driven junk science statements designed arising from the road-widening demand of big business. 14

Caltrans should abandon this project. Caltrans did not examine how larger trucks sometimes driven by foreign nationals would effect wages of Caltrans workers and California trucker drivers and other workers. The economic analysis in the EIR/Environmental Assessment, etc. of the small businesses in Humboldt County, only lists a few of tourist shops along a very short stretch of the Redwood Highway. (Page 36, Chapter 2.1.3 "Affected Environment"). The absence of high-density housing for low-income or minority residents cited in this section highlights 15

16

the unique forest character which Caltrans has a duty to preserve through a transparent EIR/Environmental Assessment, etc. process. Caltrans must include an estimate of how many other Richardson Grove adjacent streets and highway ramps would need to be widened to accommodate the larger trucks, a subject again omitted by Caltrans because of the silhouette of politics shadowing the EIR/Environmental Assessment, etc.

Caltrans should abandon this project.

Very truly yours,

Jack Neff

cc: California Attorney General Edmund G. Brown, Jr.

1. The establishment of the highway predates the establishment of the park. Typically, changes to both the highway and park facilities have been made by the two agencies working together.
2. The trees proposed for removal do not constitute nesting habitat for either Marbled Murrelet or Northern Spotted Owl. The area affected by the proposed project is adjacent to human activity areas such as the highway itself, campgrounds, visitor center, and park roads and as such, is less desirable habitat.
3. Final design plans are not prepared until after the environmental document is finalized so that commitments made during the environmental process can be incorporated into the final plans. The use of "For Design Study Only" terminology is to differentiate between preliminary and final design plans.
4. Political pressure, either positive or negative does not drive the data. The proposed measures to avoid or minimize impacts to the redwoods were recommended by a certified arborist.
5. Construction of the proposed project would not destroy the "interconnecting web of forest parks along the Redwood Highway" since the proposed project would only affect that area immediately adjacent to existing highway. The majority of 2,000 acres that comprise the park would remain unaffected by the project.
6. Caltrans has committed to providing monitors during construction to ensure protection measures identified in the plans and specifications are utilized properly. Regardless of the political climate, the contractor selected to construct the project will have to adhere to the conditions stated in the plans and specifications as well as any conditions contained in the permits that will be obtained. . The US Fish and Wildlife Service concurs that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled Murrelets or Northern Spotted Owls in and near the project area.
7. See Response #3 above.
8. "Big box" developments are present in Eureka already. These stores have fleets which included the CA Legal - sized trucks. It is the small businesses which have experienced the most challenge in accessing the CA Legal – sized trucks. The small businesses desire access to STAA – sized vehicles for importing and exporting more economically.
9. The Biological Opinion prepared by US Fish and Wildlife Service (USFWS) acknowledges habitat loss due to timber harvest as the primary reason for listing the Marbled Murrelet and Caltrans accepts this statement. US FWS concurs that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. In addition, the USFWS concurs that the project may modify, but is not likely to adversely modify designated Critical Habitat for Marbled Murrelet. Richardson Grove State Park contains many acres of suitable nesting habitat higher in value than the forest area within the project area due to being a distance from the existing human activity areas of the campground, park maintenance yard, and roads.
10. Table 8 in the FEIR/EA includes a listing of the trees and Appendix L shows the locations of the trees proposed for removal. Approximately sixty five percent of the trees to be removed range from four to twelve inches in diameter. Areas to be cut or filled are identified and staked prior to construction so the limits of the cut and fill activity are clearly delineated. The trees to be removed are not particularly valuable as merchantable timber and there is little incentive for the contractor to not adhere to the plans and specifications. In addition, there is oversight

performed by Caltrans inspectors, archaeological monitors, and biological monitors to ensure compliance with the plans.

11. The project is not designed to increase freight traffic but the purpose is to change the types of vehicles that traverse this portion of Route 101. It is not anticipated that truck traffic would increase on Route 101 as a result of the proposed project. The project will not be increasing the capacity of highway as no additional travel lanes will be constructed. The potential for increased truck traffic would be due to diverted truck traffic that currently uses other north/south routes such as I-5 and Route 99. Diversions from these other routes would depend upon it being economically feasible for the trucking companies to change their existing routes based upon fuel consumption and travel times. Since all the major coastal cities from southern California to northern Washington have readily available access to the I-5 and Route 99 corridors which have straighter alignments and faster travel times, the opening of STAA access to Route 101 through Richardson Grove is not expected to generate a substantial amount of diverted truck traffic. If the project is constructed, some of the truck traffic that currently use Route 101 through Richardson Grove would likely switch form non-STAA trucks to STAA trucks which has the potential to reduce the number of truck trips.
12. The species covered in the Biological Assessment (BA) was determined after consulting with the species list provided by the US Fish and Wildlife Service (USFWS). Much of the life history information provided in the BA is provided in every BA prepared for that species. USFWS is familiar with the references that provide the information on the species' life histories. Since the BA is a document prepared for the USFWS, it wasn't deemed necessary to provide all the citations for info provided in every BA. The corvid-proof trash receptacles are being proposed by Caltrans as part of the proposed project as an enhancement to the Marbled Murrelet and Northern Spotted Owl. Thus, it was determined to be appropriate to include references for proposed enhancement measure.
13. Impacts on scenery of the South Fork of the Eel River would be minimal. The existing trees on the western banks of the River screen views of the highway from the River. The proposed project would not substantially alter drainage patterns or result in an appreciable increase in runoff. Erosion control and storm water Best Management Practices implemented during construction would protect water quality. The proposed project was determined to have No Effect to listed salmonids.
14. It is not anticipated that there would be a reduction in the tree canopy over the highway. As mentioned above, 65 percent of the trees to be removed are twelve inches in diameter or less. The larger trees which comprise the majority of the canopy would remain. As can be seen in Appendices K and L, and photos 6B and 7B in Section 2.1.6 of the FEIR/EA, the areas where the vast majority of tree removal is proposed do not contain large trees, thus, the tree removal is not expected to increase blow-down or wind throw of large trees.
15. The proposed project would not affect the wages of Caltrans staff. It is not anticipated that the project would substantially affect the wages of California truck drivers. Some small business owners have reported that the expected cost savings that could result from this project would enable them to increase wages and/or benefits of their employees.
16. No on/off ramp improvements are anticipated.

cniesen@humboldt1.com
01/26/2009 11:17 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove Modification

History: This message has been forwarded.

1
2
3

I would like to let you know of my objections to the proposed " road re-alignment " for Richardson Grove. Cutting down of redwood trees is something that should be done only as a last resort--when no other alternative is available, like lowering the speed limit so trucks can safely navigate the one mile section in question. A retaining wall that is at times over 10 plus feet tall and 300 feet long is not a natural part of the forest and would be very intrusive to the natural surroundings that now exist in Richardson Grove. In reviewing the information that CalTrans has put forth it would appear that CalTrans is being very selective/secrative in what they publish and what they appear reluctant to publish. Although the realighment is put forth as being for the benefit of Northern California it would be of greater benefit if CalTrans was as transparent with all the information concerning the realignment so an informed decision could be made and the comment period not pass without the citizens of Northern California being able to have their collective input heard. Thank you for taking these concerns forward for inclusion in the public feedback time frame.

Jim Niesen

1. No old growth redwoods are proposed for removal as part of this project. The largest redwood proposed to be removed is nineteen inches in diameter, however, within the park boundaries, the only two redwoods proposed for removal are six and seven inches in diameter.
2. *See General Response #8.*
3. The location of the proposed retaining wall is outside the boundaries of the park in an environment that has been altered with numerous buildings, private access roads, utility poles, and other associated development.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:30 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove Comments

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:30 AM -----

Josh Nikolauson
<fly6410@yahoo.com>
03/10/2009 07:22 PM
Please respond to fly6410@yahoo.com

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove Comments

Hello. I am writing to express my opinion about the proposed Richardson Grove highway expansion. I am completely opposed to the cutting into, removing, or otherwise harming of these trees (old growth included) in the Richardson Grove area. I feel that the current plans will do more harm than good, in both the short and the long term. I am surprised that the plans do not include bike and pedestrian lanes. I feel that this course of action will only benefit a few for a short time (relative to the age of the old growth trees). I do not feel that the proposed project plans are the best for the environment or the community. I believe there to be other options that can satisfy the needs of all parties involved. This is a state park and we have the responsibility to look after it (it being the park). I appreciate the opportunity to be heard and I hope that my opinion matters. 1

The 30 old growth trees, the cutting of roots of living trees, and the 89 other trees slated for removal is not an acceptable cost. 2

Sincerely,
Josh Nikolauson 3

Primary Teacher
Laurel Tree Learning Center
4555 Valley West Blvd.
Arcata, Ca. 95521
(707) 822-5626

1. Redwood trees can adapt to the impacts associated with roads as noted from existing highways such as Route 101 at this location as well as along Route 254 – "The Avenue of the Giants." Several measures have been incorporated into the plans that would minimize the impacts of construction as well as long term impacts on the trees. The measures include hand work in the vicinity of the trees, using permeable structural section for the roadway that will allow more water to get to the tree roots, using air spades to minimize cutting the roots, and incorporating roots in the fill rather than cutting them. For more information see Appendix B of the FEIR/EA.
2. *See General Response #5.*
3. *See General Response #3.*

Kim Floyd/D01/Caltrans/CAGov
12/16/2008 09:26 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT, Mitch Higa/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: public imput on proposed projects

public comment
----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 12/16/2008 09:25 AM -----

glenda nikolauson
<gnikolauson@att.net>
12/15/2008 02:44 PM
Please respond to gnikolauson@att.net

To Kim_Floyd@dot.ca.gov
cc
Subject public imput on proposed projects

I am writing to advise you that I **oppose** the highway improvements by Caltrans for projects in Richardson Grove and Highway 101 between Arcata and Eureka. I could go into detail my reasons but they probably would differ very little from those you have already heard. I live in McKinleyville and have traveled the areas proposed for improvement many many times. Keep the trees, save the money and focus on highway improvements that are a higher priority. 1

Thank you,
Glenda Nikolauson

1. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:31 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove DEIS comments

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:31 AM -----

Susan Nolan
<snolan@humboldt1.com>
03/12/2009 03:46 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove DEIS comments

Dear Kim,
Here are my comments on the Richardson Grove DEIR. I previously submitted comments to Deborah Harmon (via email, 1/25/09). I would like to replace that submission with the following, which clarifies and expands on my earlier comments.

Planning for this project shows an unusual degree of environmental sensitivity. I'm impressed with the detailed care for soil preservation and revegetation, erosion control, spill control, etc. The mitigations of rehabilitating the old roadbed and corvid-proof trashcans are excellent. Thanks to CalTrans for preparing a full EIS. I believe the result has been a big improvement. 1

Reducing the speed limit in the Grove is an excellent idea. Dedicated funding for enforcement would be helpful. In the summers I worked and lived in the Grove, speeding accidents usually occurred between the maintenance yard entrance and the visitor center. This proposal makes no significant changes in that strip. The proposed modifications could encourage drivers to maintain highway speed deeper into the Grove, leading to more speeding accidents where the road becomes narrow and winding in the middle of the park. Speed bumps or speed tables might be appropriate too. 2 3 4

Damage to roots of old-growth redwoods, through compaction and cutting, are among the most serious consequences of the project in my mind. After looking at the Big Lagoon project, I have to wonder how big the construction footprint will actually be. How much ground beyond the old and new roadbeds and roadcuts will be compacted or disturbed? The DEIR specifies "Equipment staging/storage areas will be on the paved roadway or on existing unvegetated gravel/paved pullouts. There will be no staging in sensitive natural communities. No heavy equipment will be staged or parked within the dripline of mature trees in unpaved areas." (page 24) It's not clear if land adjacent to the project will be used for turning equipment around, driving to another location, parking employee vehicles, or similar temporary uses, which would also cause compaction. 5

Also, the dripline is a less useful metric with redwoods than with many other trees, as redwoods have a huge spread of roots. A large tree's root system may cover a couple acres. Parking outside the dripline will not prevent compaction in the root zone. In fact it may concentrate damage on the more fragile feeder roots. 6

Equipment weighing several tons can cause serious compaction. The new

roadbed itself will inevitably require compaction, but how much compaction will be caused beyond the existing and proposed roadbeds is not clear. I don't think this has been adequately addressed in the DEIR.

Information on the cutting of large tree roots was difficult to find. The page for Appendix L offered nothing besides the title, so the maps of affected trees were unavailable. The large-scale maps do not distinguish between cut and fill. Table 9 on pages 84/94-85/95 is labeled "Potential Tree Root Effects" but it's not clear what effects it addresses. Perhaps an explanation of the R/L column would help. I do not feel that the project can be properly assessed without a thorough examination of damage to tree roots, one of the most serious environmental consequences of the project. 7

The DEIR on page 57 notes: "The type of retaining wall is designed to blend in aesthetically as possible as well as to be compatible with other walls constructed within the State Parks along Route 101." The retaining walls in Del Norte Redwood State Park, far from blending in, create a stark and unpleasant visual effect and a claustrophobic, unsafe feeling. 8

The table of contents was so inaccurate as to be nearly useless, resulting in much wasted time.

There seems to be no place in the planning process for community sentiment, so it has to find indirect outlets. However I would like to address it directly: many, many people in Humboldt County don't want improved access. We want to be separate from the metropolitan agglomerations further south. If it's harder to do business here, we consider that a good. I watched Santa Rosa grow from a town like Eureka to just another sprawling suburb in the Bay Area metroplex. Those who want a go-go economy would do well to live where it's already a established priority. 9

Surely Richardson Grove is the heart of the redwood curtain, the point where you know you've crossed into another way of life. Many of us would like that impediment to remain undisturbed. 10

Thank you for accepting my comments, and for all the work all of you at CalTrans have done to ensure that this project does the least harm to Richardson Grove. Susan Nolan.

1. *See General Response #8.*
2. Dedicated funding to CHP enforcement is outside the authorization of Caltrans.
3. The proposed project introduces more curves into the alignment, thus it is estimated that the proposed modifications would tend to discourage motorists from speeding. In addition, in fall 2008, the posted speed in this portion of Route 101 was reduced from 40mph to 35mph.
4. Installing speed bumps would not correct the geometric deficiency of roadway that results in the off-tracking.
5. Non mechanized and pneumatic excavators such as an air spade work around redwood trees in the park limit the amount of disturbed soil that occurs during construction. Equipment is limited to shoulders and pullouts in the park except for those areas that would be under fill as part of the project.
6. Within the park heavy equipment would be precluded from going off the roadway within the structural root zone (three times the diameter of the tree trunk) of redwoods thirty inches in diameter or greater with the exception of the culvert improvement work.
7. Additional information has been provided regarding impacts to old growth redwoods. See Section 2.3.1 in the final document.
8. A design modification for the retaining wall was developed subsequent to the circulation of the draft document. The modification included changing the location and type of wall from the west side to the east side and from an above the road wall to a below the road wall. Since the wall is built below the roadway it is less visible to motorists except for the barrier rail. In addition the modification reduces the number of trees to be removed .
9. *See General Response #12.*
10. *See General Response #2.*

Dear Deborah Harmon, 3-9-09

I could write pages and pages covering my feelings on the "Richardson Grove Improvement Project" and someday I probably will. For now however I will keep my concerns short and sweet.

I have read paragraph upon paragraph of support of this project proposal and I, although a biased tree hugger, have run valid points from both sides through a self imposed neutral viewpoint in my mind. And after much deliberation one thing echoes an unquestionable truth as to the reason not to commence the "Richardson Grove Improvement Project" and that is within the Caltrans generated proposal flyer itself titled, 'Richardson Grove Need and Purpose' The statement located at the last sentence of the second paragraph reads,

> "This location is one of the few remaining areas of the state in which these trucks are not permitted."

To me this is not a selling point but is inadvertently a plea, a warning and message to heed.

Then again this telltale message is repeated in a similar way on page ii of 'Draft Environmental Impact Report, Environmental Assessment and programmatic Section 4 (f) Evaluation of the Richardson Grove Operational Improvement Project - Approval Signature Date December 3, 2008." It reads,

> "Northwestern California is one of the few remaining areas of the State that STAA trucks are not permitted."

Shouldn't this be seen as a positive thing? Maybe I am missing something still but I am not buy into the Caltrans

1

selling point.

"Aldo Leopold of the U.S. Forest Service warned that for too long, "A stump was our symbol of progress." from the textbook, 'Enduring Vision' Boyer page 492.

Sincerely,
Ellen Norden
without prejudice
UCC-31-360

1. *See General Response #1.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:19 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:19 AM -----

Family Hands <familyhands@mcn.org>
03/09/2009 09:37 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Please don't cut old growth trees so bigger trucks can drive to Eureka. I drive thru that grove at least once a month and it is always looked forward to. Nature shouldn't always be the looser when she comes up against man. Sometimes it should be us that bends and meanders. The big stores in Eureka have faired quite well for the past 30 years with their wares going around those trees. 1

2

Thank You, Kirk Norton

1. *See General Response #2.*
2. *See General Response #6.*

Caltrans Project
Manager Kim Floyd
P.O. Box 3700
Eureka, Calif. 95502

Dec. 24, 08'

Re: Richardson Grove

Dear Kim Floyd

One of my first outings upon moving to Humboldt was a trip to the Mattole through Richardson Grove, a remarkable experience not just for the magnificence of it, but rather my own heightened awareness…feeling, as a child, in awe, we slowly making our way through,…not wanting it to end….seeming to me, as if being in some kind of ancient domain on an that ever weaving path like road,… timeless for those moments.

I thought to myself how I'd never experienced anything so unique and feeling so fortunate for those thoughtful people who had once worked hard to preserve this special place, so very close to exactly how they had found it, that rareness of vision, imagination and devotion of those who can adopt to nature, as it is, adapt in such a way as to preserve it for folks of all ages….and even more generously, saving it for posterity.

Certainly a few businessmen who would change all this, may be able to understand what is spoken of here. Possibly to find a moment to stop and consider how such a place will always be vulnerable to the newest wave of peoples intentions, so at variance wtih those who helped to create it … and how such personal objectives, over time, have resulted in removing far too many of such treasures already . This amazing avenue is arguably a; "one of a kind" for it's ingenuity in allowing those who have never been within an ancient forest, including all the kids and older folks who cannot make the trek by foot into such places… this rare moment for experiencing an extraordinary part of our world. 1

Granted, if Richardson Grove is left intact, it will continue to mean more work and less profit for a certain group of businessmen. In my own mind this seems a fair exchange for being part of our greater community, many of us taking less for the privilege of living here and able to relate to their loss. If we all do what we can to understand this land we've discovered and come to settle upon, and to acknowledge the responsibilities of sustaining its benefits and heritages as best we can, it may well go on enchanting all our children's lives and those of many generations to come.

It is up to all of us……..

Thank you for your deepest considerations

Jack Nounnan

1. The proposed project would not substantially alter the current aesthetics of the roadway and its setting. The road would remain a two lane curvilinear road with minimal to no shoulders with large trees abutting the edge of pavement. The two redwoods proposed to be removed in the park are six and seven inches in diameter.

Jack Nounnan
<jnoun@sbcglobal.net>
01/29/2009 01:35 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

History: This message has been forwarded.

I'm told you only must take on questions. Is it really that way, that formal with your job? Your name, with its roots there in 'harmony'. you could very well be one of those young folks who have come through my life regularly and we sharing in our concerns and them going on to other practices beyond environmental issues, like forest defense, to a whole long list of things that MUST be attended to, if there is to be much left....of the kind of nature i experienced when i was young...some 75+ years ago As an activist here, i don't dare get into what all it was like when i first saw this country. Not among wonderful and caring young folks who have come to save our forest, etc. They would be so disillusioned by what little they are trying to do and how little such work come to mean. But longer experience and the trials of losses, have not changed what i believe and see as worthy to work for.

I wont be breezy here, but rather down to the 'business' among much of it (this time around) what Caltrans wants. In my work, the confrontations are usually from another direction, but regardless of which way i face, it always brings 'business' as the driving force. And as a teacher, i know that almost any method can be supported and have relative success, within the limited terms of it's own parameters. But not among that of the whole picture and 'time infinitum'.

It's just too much to ask that nature not be tampered with to the greatest degree? And not assuming us humans know what we're doing, have our agenda and all.... figured out to be superior to what and where we find ourselves on the face of this globe? We proceed as if we know...and through time, the destructiveness of our methods have certainly served our immediate personal/business needs more exclusively, while slowly to much faster , in many cases (with all it's long term effects) shredding where we live.

And we have just so much time to figure this out now, in our particular arrival and stay on earth. It's the makings of comedy, but the downside of the seriousness of what we face so tragic that one wonders why we must bother arguing our points. But here we are.

It would be extraordinary to have actually gone through the basics of how best to live anywhere on this planet, but that training is only marginal, at best, even with all of what we have discovered about how it's got to be done, or else.

It is so strange on one level, to read this, as if it were really a vital and well thought out statement.

Caltrans says it needs to change the grove to make it easier for big trucks to pass through the Redwood Curtain. The highway project would remove 39 trees from a one mile stretch of Highway 101, construct a 17 foot high, 300 foot long retaining wall along the road, and cut into the sensitive root systems of up to thirty ancient redwoods. The proposed changes to the winding road through the giants will likely take more than a year to complete, with disruptive sounds, lights and construction equipment within and around the prized grove.

Caltrans says these impacts will not harm the natural environment or take away from the *gateway feeling* travelers' experience when they cross into Humboldt County. 2

And further... the need for a "take" permit from the U.S. Department of Fish and Wildlife, which means that the endangered species that are listed will be allowed to be disrupted, harassed, or even killed, 3

Only glimpses of what we could talk about....and of course,.....that it's a State Park, which ought to be off limits, or what so many folks think and feel should be ithe truth.

Is there real consideration being given to the simplest of these measures to provide access of big trucks....like the 3rd Alternative or is that just being ignored altogether? It would seem so, as Caltrans seems bent on doing otherwise. Why is that? 4

Can you not be more in harmony with the long term objectives of other than business here and be our true representative,'on the job' and even being paid,Which is fair, to stand your ground for the most viable procedure, even against those who have positions above you and acting on behalf of other kinds of interests than merely understanding their position as the most incredible kind of responsibility for preserving while maintaining the ecological wonder placed in their hands.

Respectfully and thank you for anything you can do to help us here

jack nounnan, Eureka

1. Additional information is provided in the final document in Section 2.3.1 regarding proposed impacts to redwoods.
2. The current ambience of the area for the motorist would not be altered substantially as a result of this project as the roadway would remain a curvilinear two lane highway with minimal to no shoulders and large redwood trees abutting the edges of the roadway.
3. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable, thus, no incidental take permit is required.
4. *See General Response #8.*

February 13, 2009

Deborah Harmon
Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka CA 95501

RE: Proposed Richardson Grove Operational Improvement Project

Dear Ms. Harmon:

Please reevaluate the current CalTrans plan for Operational Improvements to Richardson Grove.

CalTrans circulated inadequate notice of the initial Draft Environmental Impact Report. As of January 31, 2009, there is no record on the CEQAnet website of CalTrans having submitted the Richardson Grove DEIS to the State Clearinghouse. For CalTrans to remain within the boundaries of lawful action, such submittal is necessary to allow an appropriate period for public comment. 1

Furthermore, the DEIS considered only this project and no other alternative. A consideration of viable alternatives is essential and is one primary purpose of modern environmental analysis. 2

Finally, this project will dramatically impact the root structure of the redwood grove. Redwood science is clear that the redwood root systems are shallow, lateral roots, which graft to other redwood roots to develop an interconnected root system for several trees at once. The proposed construction project will harm this type of root system, and jeopardize the integrity of the forest ecosystem. Please reconsider the current plans for Richardson Grove. 3

Thank you for this opportunity to comment. I appreciate your willingness to consider the thoughts and concerns from the public.

Very truly yours,

Katina Nystrom
2127 Wisteria Way
Arcata, CA 95521

1. The public review and comment period of the DEIR/EA began December 5, 2008 and was extended to March 12, 2009.
2. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.4.2 of the FEIR/EA.
3. *See General Response #3.*

pobox581@hotmail.com
(Pete OConnor)
01/28/2009 06:24 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Plans at Richardson Grove!

Dear Ms. Harmon,

Please reconsider any changes to be planned on the Richardson Grove widdening project. There are many alternatives to the widdening plans for 101 through the park. Please keep the big trucks out of our area , we have done fine without all of them making their way thorugh. There are viable altertanitaves such as a mini container barge operation in Humboldt Bay that make a great deal more sense in so many ways! 1

The area in question is quite atractive and functional as it is and hopefully as it always will be. The impact on the environment in such an area us not worth the cost let alone the lack of reasoning to begin with. 2

The dammage to the existing trees would be substaintail and result in the old growht trees falling in the near future due to the severity of the operation. There is no proof that permanant dammage will not occur with the widdening plans? 3

Where will there be alowances for bicycles in Cal.Trans. plans- it seems like an ill concieved plan. The impact on the imediate environment short and long term could be significant? 4

I am concerned, that few will benifit from the widdening . To the contrary , it is likely that locally people and buisnesses will suffer in these difficult times. Please do not consider such an upsurd plan that will end in disaster. 5

Sincerely

Pete OConnor
PO Box 581 Bayside Ca 95524
707 822 4103

1. Several alternatives were considered but were determined to either not meet the purpose and need for the project or were considered not feasible. These alternatives included spot widening at the STAA restriction points, double decking the highway through the park, bypassing Richardson Grove State Park, and several variations of signalization alternatives. More information is provided in Section 1.4.2 of the FEIR/EA.
2. Currently, infrastructure improvements are necessary to develop short sea shipping in Humboldt Bay, and funding for these improvements have not yet been identifed. And, while short sea shipping may be an option in the future, it will not be practical for all shipping needs such as time sensitive goods or animals. In addition, Humboldt Bay has a couple of major disadvantages that must be overcome before short sea shipping would be perceived as viable. As stated in the Port of Humboldt Bay Harbor Revitalization Plan, the Bay's limited inland access by both rail and trucks is a key disadvantage since Interstate 5 is a major route for goods movement due to its access to major population centers from California to Washington. This lack of inland access combined with Humboldt County's small population and limited economic base makes Humboldt Bay less desirable than other competing ports.
3. *See General Response #3.*
4. Shoulders are being widened outside the park to better accommodate bicyclists and pedestrians. Within the park, widening on existing roadways to create wider shoulders for bicyclists is not possible without removal of several old growth redwoods. Any path beyond the highway would have to be done by or in association with State Parks since they are the agency owning the land.
5. *See General Response #7.*

12/24/02 Mele Kalikimaka + HAUOLI MAKAHIKI to
ATTN; MANAGER KIM FLOYD.. AS A MEMBER of the Humboldt
County community... since 1970... I have travelled thru Richardson's
Grove... many times... I'm currently housed here @ H.C.C.F. since
Oct 12, 2002... my reaction is... to the chopping down of
87 trees... is hell NO!!... Look what they did to the Wiyot
tribe... massacred them + then moved them to Indian
reservations... stripped them of their dignity and rights...
In the 1860's... there was a huge wave of bills to remove
the Chinese out of America... after the Chinese paid 40%
of CA state tax... and had no alien/citizen rights...
In the 1941... after Pearl Harbor... they removed my
relatives to American Concentration Camps... AKA Internment
Camps... same reason they did the Chinese, Native American
etc... for economical reasons...

1

Now Caltrans is working w/ business community to remove 87 healthy trees... because a floral bulb farm... who's been busted 2XS by Immigration... a beer distributor... some Dairy People... all say the lanes aren't wide enough to accomodate their business needs + wants... Whoa them horses big Daddy... why should I or anyone else desire to support Corporate business in America... like bailing out those worthless Car Companies in Detroit... if the Dairy/Beer/Bulb farm go under... due to the fact they need bigger trucks...

I say screw em... those 87 trees provide more than oxygen... It's important we not knock out something that helps our ecosystem... There's small business's that are struggling to survive... like the salmon returning to spawn... the small business owner is forever messed over by big business... Are the trees in a blight... are they healthy... who gets the trees when you cut them down?... surely there's other viable ways + solutions: ① Why not block traffic between 12AM - 6:00 AM + route it so these massive trucks can use both lanes coming + going?... Why demolish an asset to the tourism industry of Humboldt County... Why isn't this grove of Redwoods better protected?... Did they not survive the Great Flood of 1964?... How old are these trees?... what is the EIR if 87 Redwood

2

3

4

trees comes down?... What happens in the next few years if some of these companies were to go bankrupt?... we are in tough economical times... who care about daffodils - milk + beer products?... we can still get these products... why aren't these companies using SR 299?... or working on getting rail service + boat shipping service re-established in this area?...

I'm no rocket scientist... but cutting down 87 trees... seems a bit much... Where's the tree sitter's when we need em?... Oh well... you'll probably buzz those poor trees down... maybe you ought to make a DVD documentary about it... because you will massacre the small businesses... and affect our tourism It's... ALL in the name of Progress...

CIAO Bruce Toshio OGATA #8467
AKA Bruce Almighty Lilee

5 6 7

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how STAA restriction at Richardson Grove has adversely impacted their business. The STAA restriction affects a cross section of businesses.
2. Subsequent to the circulation of the DEIR/EA, a design modification for the retaining wall was developed. The modification for the retaining wall would be built on the east side of US Route 101 and below the northbound lane. The modified wall would require much less tree removal (5 trees as compared to approximately 30 trees of the original wall proposal). Thus the tree removal for the overall project was reduced from 87 to 54. Sixty-five percent of the trees proposed to be removed are twelve inches in diameter or less and 85 percent of the 54 trees are tan oaks. Once cut, the trees will be chipped and used as mulch as part of the revegetation efforts.
3. *See General Response #10*.
4. Of the 54 trees proposed for removal, only six are redwoods. The largest redwood to be removed is nineteen inches in diameter.
5. The STAA restriction affects more than just the bulb farm businesses. Many local businesses and individuals have expressed their concerns about how the STAA restriction affects their business including such diverse interests as local manufacturing firms, cheese producer, seafood exporter, local brewery, construction industry representatives, lumber product representatives, dairy owners, clothing manufacturer, ranching business, creamery, performing arts representatives who rely on the STAA vehicles to transport their sets for local performances, and racing recreationists who use the STAA vehicles to transport their cars. In addition, Caltrans heard from many other business owners who support those businesses who are affected by the STAA restriction and so, they themselves are also affected.
6. Due to deficient geometrics in several curves on State Route 299 which would result in larger vehicles off-tracking, STAA trucks are restricted from this highway.
7. Currently, infrastructure improvements are necessary to develop short sea shipping in Humboldt Bay, and funding for these improvements have not yet been procured. And, while short sea shipping may be an option in the future, it will not be practical for all shipping needs such as time sensitive goods or animals. In addition, Humboldt Bay has a couple of major disadvantages that must be overcome before short sea shipping would be perceived as viable. As stated in the Port of Humboldt Bay Harbor Revitalization Plan, the Bay's limited inland access by both rail and trucks is a key disadvantage since Interstate 5 is a major route for goods movement due to its access to major population centers from California to Washington. This lack of inland access combined with Humboldt County's small population and limited economic base makes Humboldt Bay less desirable than other competing ports.

LaurenJ Oliver
<laurenjoliver@gmail.com>
03/12/2009 05:02 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Comments on Richardson Grove DEIR

Deborah Harmon

Senior Environmental Planner

CA Department of Transportation

1656 Union Street

Eureka, Ca. 95501

March 12, 2009

Subject: Richardson Grove Promotes Healing

Dear Ms. Harmon,

As a Clinical Psychologist and Organization Development Consultant, the environment for change and healing is key. When I bring clients up to Humboldt County for retreats (change management; board development, etc), I ask them to note the landmarks as they enter our county. Recently one said, "You live in a foreign country!" and went on to say how healthy and invigorating he found the people and business leaders of Humboldt.

When he entered our county, via the cathedral that is Richardson Grove, he opened himself to be someplace special – as indeed he was. The QUALITY I can offer through my business begins with Richardson Grove, and would be sorely damaged by the taming and obscuring of this Gateway to healing and to the Possible Future. When my clients observe this embracing scene, the healing magic begins. This is irreplaceable. 1

I moved here a little over 5 years ago, after falling in love with this beautiful county and her redwoods as a child. Then my father would drive up the Redwood Highway, and he would breathtakingly point out another gorgeous grove or a view of the river as we drove for miles through the cool, fragrant forest. I still thrill every time I drive through the Grove – this symbol of the precious unique treasures we have to enjoy and to offer.

Research in Consumer Behavior shows that the challenge of the retailer is FIRST to get a consumer to enter the store. The drawing card must be visible. Then the space must create a pathway to guide the consumer onward, past various highlighted areas, toward the back of the store. This is the key strategy for assuring the potential consumer becomes and actual consumer. We need this entry to draw in those we wish to visit, and to send them on down the path through our gorgeous county for the tourist spots, the hotels and recusants, the wines and cheeses, the organic beef. All these products gain a much higher return for their producers when they are bought right here.

With regard to the Possible Future, have you noticed that everything around us now spells "change"? At new present, the pressure s of climate change, the tumbling of Wall Street's capitalism, to name a few. Are you aware that US is no longer the leader in world standards? Try to sell to Europe these large trucks we are proposing to spend $6million to make room for. No, they are not allowed. Europe requires "Over-Cab" trucks, which are shorter and more fuel-efficient. How long a life cycle do these trucks have? We know the US auto industry is on the verge of bankruptcy. In short, this is a plan that might have made economic sense 10 years ago. But these trucks will be designed out of existence within a few years, if our new policy makers do the job we elected them to do. We must truck less, become more locally sustainable, and create far less CO2. Are you aware of Europe's standards for trucks? Let us look to the leaders in today's world for our benchmarks. Please add this data to your report.

2

The highway now dominates this corridor, and we all see the trees next to the highway browning and losing their health. Their roots are driven over and restricted. The heat from the asphalt radiates and dries. The break in connection by distance from other trees of the grove divides and conquers. What symbol of our uniqueness can you offer to replace this treasured gateway?

3

Richardson Gove is the ONLY passageway before Eureka that actually does – as your report states – grab the attention of drivers, such that their safety is endangered unless they slow down to allow reign to their awe. What kind of Possible Future are you envisioning for Humboldt County – known throughout the land as the place of ancient redwoods and many rivers? How shall we signal our unique and wondrous wealth to visitors and tourists when we obscure this eye of the needle that draws us in?

4

I need Richardson Grove to stay as it is. Let's set a speed rate of 25 miles an hour, slow enough for safety and wonder. Save Humboldt's future by saving our treasures of the past.

5

Dr. Lauren J Oliver

Redway

707-923-0152

1. The proposed improvements would occur on the existing highway which passes through and provides access to Richardson Grove State Park. No old growth trees would be removed as a result of this project. The majority of the 30 trees proposed to be removed in the park are four to twelve inches in diameter and half are tan oaks. The largest tree proposed to be removed from the park is a 24 inch in diameter tan oak and only two redwoods are proposed for removal in the park and they are six inches in diameter and seven inches in diameter. The current ambience of the area for the motorist would not be altered substantially as a result of this project as the roadway would remain a two lane highway with minimal to no shoulders and large redwood trees abutting the edges of the roadway.
2. The issue is that the size of vehicle in use commonly throughout the nation, including California has changed to the STAA. While California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with the industry standard - sized vehicles. Thus, the non- STAA vehicles tend to be older vehicles as the newer vehicles are the industry standard – sized trucks. Smaller businesses, which depend upon trucking companies for importing and exporting their products, are finding it difficult to reliably access these non-standard sized vehicles.
3. Neither the Caltrans certified arborist nor park ecologist have noted a loss of vigor in the trees adjacent to the highway in Richardson Grove. While not ideal, redwood trees can adapt to the impacts associated with roads. Several measures have been incorporated into the plans and specifications that would minimize the impacts of construction as well as long term impacts. Measures such as hand work in the vicinity of the trees, using permeable structural section for the roadway, using air spades to minimize cutting the roots, and incorporating roots in the structural section rather than cutting them are among some of the measures.
4. The characteristics of the road and the setting in the park would not be substantially modified as a result of the project.
5. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/17/2009 01:51 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove project - Public Comment

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/17/2009 01:51 PM -----

Alan Olmstead
<alan@sirius-studios.com>
03/10/2009 10:31 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove project - Public Comment

I would like to add my voice of dissent to the current CalTrans plan for widening / realigning Richardson Grove. Surely there are less damaging alternatives. A keypad and access code (or bar code reader) that would allow only those over length trucks to activate a traffic light for example. Reduce the speed limit for starters to 25mph! Please do not ruin the ambiance of this gateway to the Northcoast when other (much less expensive!) solutions ARE feasible.

1
2

Alan Olmstead
3805 H Street
Eureka, CA 95503
707-443-9836

1. *See General Response #10.*
2. *See General Response #8.*

davido@fredericprinting .com
(David Olds)
01/27/2009 04:15 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

I was hoping to someday visit this beautiful forest, but once again it's money over people and by the time I can afford to get there it will be spoiled. I am 57 years old. When I was a child the world was so much more pristine and unspoiled. I have watched it go from pristine to ruin in my short lifetime. In my opinion beauty of this kind is an expression of Gods beauty. He revealed Himself in the bible AND in his creation. You are literally tearing a page out of Gods nature bible, crumpling it up and wiping your butt with it. I saw it happen in the southern Utah desert as I grew up. I watched toads, desert turtles and horny toads disappear and pristine areas misted with pollution. All so a few assholes can have a bigger mansion and feel important. They and we will all answer to God for our decisions and I will be there to see justice. You have been forewarned. 1

Sincerely,
David Olds
David Olds
9123 E. Mississippi Ave.
Denver, CO 80247

1. *See General Response #2.*

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:24 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Save Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:23 AM -----

Deb Olcott
<dolcott@wusd.org>
02/20/2009 04:16 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Save Richardson's Grove

Dear Ms. Floyd,
My family, friends, and I have been regular visitors to Richardson's Grove for more than 25 years. We are now camping there every summer with kids and grandkids. It is the family vacation we most look forward to each summer. It is unconscionable to think that Caltrans would consider cutting any redwood trees in this unbelievably beautiful area. 1
I cannot see nor understand a need to widen or straighten the road in the park area--a large part of it's charm is the fact that you can slow down and really "drink in" the majesty of the redwoods. What can possibly make it worthwhile to sacrifice any of the trees/environment? 2
Please reconsider ANY alteration to the roadway through Richardson's Grove.
Thank you,
Deb Olcott and family

1. In the park only two redwoods would be removed. They are six and seven inches in diameter.
2. *See General Response #13.*

<rwolofson@sbcglobal.net>
01/29/2009 03:47 PM
Please respond to
<rwolofson@sbcglobal.net>

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove Proposal

Deborah Harmon
Senior Environmental Planner
CA Dept of Transportation (Cal-Trans)
1656 Union Street
Eureka, CA 95501
deborah_harmon@dot.ca.gov

Dear Ms. Harmon,

I am very concerned about the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. I believe that this report is inadequate and insufficient in several ways. I also question the necessity of the project itself, and cannot find information within the report that explains how this project allows the restrictions for the longer trucks to be lifted by Caltrans. 1

I do not believe that cutting the roots of 30 redwood trees, some of which are 15 feet in diameter, could not possibly entail some significant impact, as the document concludes. Whatever impact(s) it would have cannot be adequately assessed, however, because there is no information in the document showing how cutting roots of the old trees would not adversely affect, or even kill, these ancient trees. 2

My personal assessment is that a few businesses will benefit from this publicly funded project, while an irreplaceable resource will almost certainly be damaged or destroyed, and local businesses dependent on tourism will suffer. Local businesses located directly impacted by this project and not adequately acknowledged in the document, will likely be harmed, especially during the construction phase. 3 4

I do not see that the citizens of California or Humboldt County will benefit from this project, but will certainly pay the price!

Sincerely,

Bob Olofson
212 Fourteenth Street
Eureka, CA 95501
707-444-8764
rwolofson@sbcglobal.net

1. *See General Response #1.*
2. *See General Response #3.*
3. *See General Response #6.*
4. *See General Response #7.*

meaganomalley@yahoo.com
(Meagan O'Malley)
01/27/2009 02:28 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Richardson Grove Project

Dear Ms. Harmon,

As a frequent visitor of Richardson Grove and surrounding areas, I am very concerned about the Richardson Grove Operational Improvement Project.

This construction project would cause harm to old growth forested area that is unique to our beautiful state. It is difficult to believe that cutting the roots of 30 redwood trees will have no significant impact on the ancient trees surrounding them, as the Caltrans Report suggests. Furthermore, the industrial development involving motorized equipment could cause significant impacts on the local forest ecosystem, and deteriorate the ecology for both native species and human visitors. 1 2

Thank you for your ongoing consideration for our beautiful, ancient, majestic California.

Sincerely

Meagan O'Malley

Sincerely,
Meagan O'Malley
6520 El Colegio Rd #2216
Santa Barbara, CA. 93106

1. *See General Response #3.*
2. As noted above, construction in the park within the structural root zone of redwoods thirty inches in diameter and larger would be performed by hand work or pneumatic excavators such as an air spade.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:49 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Highway 101 Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:49 PM -----

julie olsen <jsangels2002@yahoo.com>
03/11/2009 04:08 PM
Please respond to jsangels2002@yahoo.com

To Kim_Floyd@dot.ca.gov
cc
Subject Fw: Highway 101 Project

--- On **Wed, 3/11/09, julie olsen** ***<jsangels2002@yahoo.com>*** wrote:
From: julie olsen <jsangels2002@yahoo.com>
Subject: Highway 101 Project
To: "Dennis Steinmetz" <dennis@roofmanage.com>
Date: Wednesday, March 11, 2009, 3:48 PM

Dear Ms. Floyd,

I have been driving Highway 101 for 45 years. My father, who owned O.F. Olsen Moving and Storage, had trucks that traveled the entire state and beyond, from 1948 until he retired in the late 1970's. Never once did he mention to me, as a concerned parent, to beware the dangers through Richardson's Grove, nor was this small segment of highway an issue for his drivers. In fact, during all his years in business the only accident that occurred was on the <u>four lane section</u> of freeway near Legget that, thank heaven, did not involve any other vehicles.

The arguments made to widen this section of 101 are spurious at best and decidedly self-serving. This two minute drive through the redwoods is the JEWEL IN THE CROWN of State Highway 101. It is what every tourist from around the world can actually see and viscerally experience without taking a detour of unknown duration. 1

I once gave a foreign exchange student a ride from the bay area. He was, he proudly claimed, "a Persian". He was so overwhelmed by the sight of sun rays slanting through the canopy and hitting the lime green

ferns on the forest floor that he begged me to stop so he could walk back and take a picture. I took his photo standing with his hand on the trunk of a old growth tree and we continued the journey to my father's house. My dad gave him dinner and money for a bus ticket to Portland. Ten years later, I received a note from him thanking us for the hospitality and telling me that the picture I took that day still sits on his desk. He proudly tells his Iranian friends that ,"this was the day that I became a tree hugger!!"

I cannot fathom any reason to pluck the jewel from this crown now, or any time in the future! Progress will NOT be facilitated by destroying the most eloquent and powerful public relations tool in the kit. 2

Thank you for your consideration of my opinion.

Sincerely,
Julie Ann Olsen
Eureka, CA 95501

1. *See General Response #13.*
2. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:59 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove project comments

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:59 PM -----

cr-email@humboldt1.com
03/11/2009 11:11 AM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove project comments

Rodney and Constance Osburn
P.O. Box 880
Fortuna, CA 95540
(707) 725-4559

Kim Floyd
Caltrans Project Manager
Deborah Harmon
Senior Environmental Planner
CA Dept. of Transportation
1656 Union St.
Eureka, CA 95501

Dear Ms. Floyd and Ms. Harmon:

This letter comes from two life long residents of Humboldt County with Constance being a third generation "Humboldtian". We love our pristine beaches and rivers and the cathedral- like beauty of our virgin redwood forests. We, like most residents, realize that we live in a place unlike no other on earth. Our county's southern gateway, Richardson Grove, is unsurpassed in its majesty. Even the great manmade cathedrals of Europe cannot compare to nature's creation as one drives through the grove. Now, Caltrans, in order "to improve safety", has proposed plans to permanently change the only gateway of virgin redwoods in the world so that larger trucks of box companies can more easily stock our local big box stores (and other big box stores are encouraged to build here). 1

There ARE simple, low-tech solutions, that would save our gateway grove, allow trucks to pass safely, and also save California taxpayers $6,000,000, money that could be better spent on schools, healthcare, or a myriad of other needs in these horrific economic times. 2 We do not need another unnecessary project like the K-rail wall eyesore that stretches from south of Fortuna past College of the Redwoods and serves as a backstop for trash and weeds and the greatly increased numbers of dead deer and other roadkill. 3 (Frightened animals on a busy highway with nowhere to go are huge safety hazards.) Why not slow traffic through Richardson Grove to 25 mph or establish a traffic light at each end of the grove? 4 This would save the trees and integrity of Richardson Grove and allow the often speeding trucks that we now see, to pass.

5

Richardson Grove's trees are unique treasures that serve as a stunningly beautiful gateway to Humboldt County. They are also heritage trees that belong to all Californians as well as future generations. With a bit of cooperation, deliberation, and simple common sense, everyone can be happy. Please. Preserve our gateway with low tech safety solutions. Allow a project for the greater good to prevail, not special interests.

Sincerely,

Constance and Rodney Osburn

cc: Senator Wesley Chesbro
Assemblywoman Patricia Higgins

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
2. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.
3. *See General Response #8.*
4. *See General Response #10.*
5. *See General Response #2.*

To: Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka CA 95501

From: Marie & Kindrick Ownby

Re: Richardson Grove Project

Date: January 28, 2009

We believe strongly that, whenever we can preserve our natural environment, especially the likes of the beautiful redwood trees in Richardson Grove, that we should do so without hesitation.

We urge you to seriously consider what we understand to be alternative #3, to lower the speed limit through the grove to 25 miles/hour, and save a few million dollars. 1

We are often too quick to alter mother earth in the name of progress and for expediency. The increase in the amount of time it will take to pass through the grove under the new speed limit pales in significance in relation to the potential destruction of more that the two trees that are slated to be cut down, and in relation to the negative affect on the wildlife during the construction phase. 2 3

Please do consider alternative #3.

Respectfully submitted,

Marie Ownby

Marie Ownby

Kindrick Ownby

2940 Williams St.
Eureka CA 95501

1. *See General Response #8.*
2. The two redwoods proposed to be removed from within the park are six inches and seven inches in diameter.
3. Wildlife is already affected and have adapted to activities from the park such as campground programs, generators from RVs, and general maintenance activities conducted by park staff to upkeep the park facilities and roads as well as traffic and maintenance activities associated with Route 101.

Deborah Harmon/D01/Caltrans/CAGov

01/27/2009 09:55 AM

To Kim Floyd/D01/Caltrans/CAGov
cc
bcc
Subject Fw: My comments on the DEIR on Richardson Grove

----- Forwarded by Deborah Harmon/D01/Caltrans/CAGov on 01/27/2009 09:53 AM -----

Buzz Parker
<buzz@cosmicdebris .com>
01/27/2009 09:51 AM

To deborah_harmon@dot.ca.gov
cc
Subject My comments on the DEIR on Richardson Grove

Hello Deborah,

I live in Arcata, CA and respect the simple 50mph speed limit in the 'corridor' between Arcata and Eureka. From what I understand, it was proposed and passed due to only one deadly accident that by lowering the speed limit lives can be saved. The corridor has brought a long lasting awareness to safe driving to me and friends. Please look at this very simple solution as a positive and healthy example to what is being proposed in Richardson Grove. As we all know, our state is financially hurting and there can be other important CalTrans projects we can use our state money on. Richardson Grove is truly is a gateway to the grand nature of Northern California and has a very long lasting impression for visitors and the important economy of tourism.

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 1

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 2

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on 3

the part of the nutritiously shy Murrelet and Owl.

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees.

Thank you,

Buzz Parker

1. *See General Response #8.*
2. *See General Response #15.*
3. *See General Response #16.*

blkdog6562@yahoo.com
(Wendy Parker)
03/04/2009 07:23 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. I do not see the need to bring bigger trucks through this sensitive area. For the amount spent on a years worth of work to benefit so few and possibly disrupt the growth of the ancient tree's that line this area is just not feasible. I'd rather see this area in tact than looking like a transformed garden. the last thing i want to see is a huge wall off rock. Please don't destroy this beautiful part of Humboldt county, the tourists need to see the old growth as they make their way North without having to take any alternate routes. Thank you for your time.

Sincerely,
Wendy Parker
2575 Alliance Rd. apt 3f
Arcata, Ca

1
2
3

1. *See General Response #11.*
2. *See General Response #2.*
3. The location of the proposed retaining wall is outside the park.

linda.parks@ventura.org
(Linda Parks)
01/28/2009 04:21 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Please do all you can to protect the redwoods and not cut trees/roots to make way for truck traffic in Richardson Grove. 1

Sincerely

Linda Parks

Sincerely,
Linda Parks
2967 Thousand Oaks Blvd
Thousand Oaks, CA 91362

1. *See General Response #3.*

Kenneth Patmore
528 Garland Avenue
Fortuna, CA 95540
(707) 725-5813

January 18, 2009

Kim Floyd
Caltrans Project Manager
P.O. Box 3700
Eureka, CA 95502

Dear Sir:

I have held a Class A license for 50 years and have driven the section of road that is in question many times.

From the pictures in the Times Standard it is obvious where the bottleneck lies. The simplest way to solve this problem would be to cut the one big redwood that is on and causes the "S" turn. This would allow for a clean sweeping turn for both lanes of traffic.

You have, no doubt, heard from radical environmentalists who claim that the cutting of any tree will spoil the appearance of the park.. During my years of driving this highway, several trees were removed. I would challenge anyone today to be able to find where that took place.

To take out one large tree to correct the problem would make a lot more sense than removing a lot of little trees and building a retaining wall etc. It would be a lot cheaper and a much more expedient way to handling the problem. The highway would be a safer travel for truckers, tourists and all of us. 1

Sincerely,

Kenneth Patmore

Kenneth Patmore

1. There is more than one curve which results in the STAA restriction on this segment of Route 101. The proposed project would make adjustments to the current alignment that would modify the deficient geometrics of the highway and allow STAA vehicles to traverse this portion of Route 101 without off-tracking.

"Jean Paulson"
<flyin-lion@humboldt1.com>
01/30/2009 01:48 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove

I wish to protest Caltrans proposal for the removal of trees in the state park at Richardson Grove. I feel that the proposed "mitigation" measures are absurd and completely insufficient; that there should be no "take" permit allowable (our endangered species are having a hard enough time as it is), that, as ever, cumulative effects on the entire area have been insufficiently studied, and that all this craziness is really going to benefit only a few, and irreparably harm this beautiful area and the creatures whose home it is. I support Alternative 3, which would save the taxpayer(in these financially parlous times) $6 million and change, restore transparency and sanity to the "discovery" process , slow traffic down (how's about some devices such as on Hwy. 101 between Eureka and Arcata?) save both human and wildlife and preserve this beautiful and irreplaceable area for all. Sincerely, Jean Paulson (Eureka)

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1. *See General Response #15.*
2. *See General Response #16.*
3. *See General Response #2.*
4. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:29 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:30 AM -----

Peeblesblick@aol.com
03/10/2009 06:27 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Ms. Floyd,

I just want to say, as a lifelong California resident, I don't want my State Park carved up to save a few bucks. Personally, I'd be willing to pay more for products if it means preservation of Humboldt Redwoods State Park. When a park is put aside for people's enjoyment it should not suffer reduction of that enjoyability because of a change in freight transportation technology. Not only would the enjoyment of those driving through but also the enjoyment of those visiting the park and camping there be affected. If it's not possible to route the freeway around the park then measures to reduce speed through it need to be put in place. I have driven on that section of Hwy. 101 many times and would be happy to see the speed limit reduced to 25 mph and I even wouldn't mind waiting at a light. It is not, after all, that long of a section, nor is the traffic burden very heavy. A 15 minute wait for the trucks would not be the end of all commerce in Humboldt County. If they shut off their engines and roll down their windows they may even enjoy it too. Please don't allow that beautiful grove to be cut into any more than it already has.

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Sincerely,
Joelle Peebles
McKinleyville, CA

Need a job? Find employment help in your area.

1. The project proposes some modifications to the existing alignment. The road predates the establishment of Richardson Grove State Park, thus the park has developed in association with the highway.
2. *See General Response #2.*
3. Once construction is complete, it is not anticipated that campers or other park visitors would experience any adverse long term effects since the scenic setting would not be substantially altered.
4. *See General Response #9.*
5. *See General Response #8.*
6. *See General Response #10.*

Kim Floyd/D01/Caltrans/CAGov
01/29/2009 02:14 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/29/2009 02:14 PM -----

Barbara <beep@saber.net>
01/28/2009 01:42 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Please do all that you can to stop this project of widening the road through Richardson Grove. This forest is one of not that many special Redwood forests around our area. It is part of what makes our community what it is and offers campers and hikers and swimmers and visitors a chance to touch in with the natural history of this country in a unique way. It is part of our legacy, and not something to be destroyed by the need to have more and bigger vehicles drive into and through this community. The current carbon emissions are plenty and the noise is already a lot to be tolerated by these growing giants and the creatures that inhabit the woods. Please protect them from further encroachment and protect this landscape for the future of our children, grandchildren and on into seven generations.

Thank you.

Sincerely,
Barbara Penny
3800 Blue Slide Creek Rd
Redway, CA 95560

1

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1. *See General Response #13.*
2. *See General Response #2.*
3. The long term effects on air quality and noise are not expected to be substantially different from existing condition. The proposed project is not increasing the capacity of Route 101, nor will travel times be reduced as a result of the project. The alignment shifts would not result in any appreciable differences in noise to sensitive receptors like campers or park residences. It is possible that the project would result in fewer emissions since there could be fewer trips.

Barbara <beep@saber.net>
01/28/2009 01:36 PM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

As a 30 year resident of Southern Humboldt, I strongly oppose the widening of Richardson Grove. I think that trucks bigger than those that can currently navigate the roads there are not essential to the well being of our community. Please do all you can to keep this from happening. The trees there are so special to our place here and the campgrounds nearby would be very adversely affected by huge trucks driving fast nearby. Create another route if such traffic is really necessary. 1 2

Thank you, Barbara Penny
3800 Blue Slide Creek Rd
Redway, Ca. 95560

1. *See General Response #11.*
2. *See General Response #13.*

ceperr@sbcglobal.net (Claire Perricelli)
01/27/2009 01:56 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

I am concerned about the plans for the stretch of 101 through Richardson Grove on several levels. 1

I am concerned that the proposed project, by cutting and disturbing roots of ancient trees, may do severe (and irreversible) damage. 2

I am concerned that during the project the park and local businesses will be severely (and irreversibly) impacted. 3

I am concerned that the needs of cyclists and pedestrians are not taken into account.

If we could have some sort of variance for cattle trucks what is the issue with others? 4

I hope these issues can be better addressed.

Sincerely,
Claire Perricelli
2259 16th St.
Eureka 95501

1. *See General Response #3.*
2. Caltrans is working with the local businesses and the park to minimize construction impacts. For example, flaggers will be present at the park entrance when traffic queues are expected to ensure for minimal delays for ingress and egress. At businesses south of the park where sight distance is better, business access will be protected and maintained so traffic queues don't block entrances. A communication plan to inform local businesses and motorists as to construction impacts will be used throughout construction.
3. *See General Response #5.*
4. The primary purpose of the project is to lift the restriction on STAA vehicles. The current roadway geometrics are such that STAA vehicles off-track over the center line into the opposing lane. Issuing a permit to allow STAA vehicles through the park does not resolve the issue of off-tracking. The proposed project would correct the known geometric condition and lift the restriction for STAA trucks with no special permits being required.

Laurens Perry
<laurens@assetconversions .info>
01/30/2009 10:55 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Project at Richardson Grove

Deborah Harmon
CA Dept of Transportation
1656 Union Street
Eureka, CA 95501
deborah_harmon@dot.ca.gov

Dear Ms. Harmon,
I am so sorry that you young folks value only that which is new, large, fast, and expensive. Richardson Grove is old, quiet, slow, and majestic. I drove a bus through the Grove twice a day several years ago, and frequently reflected upon the inevitable slaughter. I know the grove well, and will sorely miss it when you and Caltrans finish your project. It is more valuable as it is than all the stuff that will be trucked to and from points south from and to points north. You do know that not everything is owned by you and me. We don't own Richardson Grove. It belongs to the plants and animals that live there. They should be left alone. 1

Laurens Perry
PO Box 34
Myers Flat, CA 95554

1. *See General Response #1.*

fhyre@asis.com
01/29/2009 02:00 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

Deborah Harmon
Caltrans

I am writing to speak against the widening of Richardson Grove. 1

As Caltrans knows so well, widening roads invites more traffic. More traffic brings further air pollution, increasing the already large percentage of children and adults who now suffer with asthma. 2

Increased traffic brings increased traffic accidents, injuring and killing people and straining our already fragile medical care system.

Because the safety of bicyclists has not been taken into account in this project, a wider road, but with no additional room for bicyclists, will mean faster traffic and larger vehicles, both increasing the danger to bicyclists. The Richardson Grove area is part of a well-advertised, INTERNATIONAL, bicycle route. (I know this because I live along this route and meet many people bicycling from Canada to Mexico and countries in Central and South America.) Putting foreign nationals in increased mortal danger could certainly sour international relations. 3 4

My understanding is that the roots of old growth redwood trees will be cut in order to accommodate the widening of this road. What are you thinking? I foresee lawsuits aplenty. 5

Please delay your plans indefinitely, until such time as you can well-mitigate each of these issues... or scrap your plans for this project altogether.

Fhyre Phoenix
1658 Mad River Road
Arcata, CA 95521
707-826-7367

1. *See General Response #13.*
2. *See General Response #14.*
3. Widening the roadway to provide four foot shoulders outside the park would provide a much improved condition for bicyclists and pedestrians as compared to existing. Within the park, the proposed modifications to the roadway would add two foot shoulders where the presence of trees does not preclude it. It is not expected that speed rate would increase within the park as the proposed project would not be removing the curves from the highway, but rather would be introducing more curves into the alignment and modifying the existing curves. While the proposed project would not be markedly improving the safety for bicyclists within the park, it wouldn't worsen the existing condition. Caltrans has committed to installing additional signs alerting motorists to the presence of bicyclists in this segment of Route 101 as part of the project.
4. *See General Response #5.*
5. *See General Response #3.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:46 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:43 PM -----

Dale Pifer
<dpiferx23@att.net>
03/11/2009 11:04 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

March12. 2009

Richardson Grove

Please do not destroy the Richardson Grove Redwood Park, Humboldt County, California. The loss of one of those glorious Redwood tree is a loss we should not and can not accept. Redwood Forest National Parks, were preserved (set aside for the people of the USA) for future generations and cutting even a few of those now left (That should be protected) is a tragedy and a loss to all who live now and those that will come in the future. 1

There are several ways to solve this dilemma beside CUTING DOWN the beautiful old growth trees. There is no reason to cut down the tress with the exception that SOMEONE sees a large profit in doing so.

DO NOT DO THIS.

Citizens of Humboldt County

Darrell and Dale Pifer

1. *See General Response #2.*

"Jennifer Poole"
<jtpoole@saber.net>
01/28/2009 12:45 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove: the wrong project at the wrong time

Deborah Harmon
CA Dept of Transportation
1656 Union Street
Eureka, CA 95501
deborah_harmon@dot.ca.gov

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project.

First, I agree with all the points in EPIC's letter, pasted in below; I especially agree that Caltrans has so far not met its responsibilities to the public, as far as this planning process goes.

Here in Willits, in Mendocino County, we have a lot at stake in Richardson Grove State Park: Willits is "Gateway to the Redwoods," less than 50 miles away (closer than Eureka). Tourists heading up to see Richardson Grove stop here for supplies, to eat a meal, or to spend the night. I believe those tourists, as well as many local residents, would be adversely affected by a realignment that would allow larger trucks to drive faster through Richardson Grove. 1

I read the local newspapers here, and I've seen nothing in recent months regarding the Richardson Grove project. I don't remember seeing any notice about the December 15 meeting in Fortuna. This morning, I searched archives of The Willits News, the Ukiah Daily Journal, and the Santa Rosa Press Democrat, covering the last 6 months or so, and I don't see any public notice of an opportunity for the public to comment on this realignment plan by Caltrans. I think Caltrans should have made a greater effort to get public comments from residents of Mendocino County. 2

p.s.: I know this isn't Caltrans staff's business to consider, but in the midst of this economic crisis, shouldn't the California Transportation Commission act with some common sense to prioritize road projects that are of more immediate need to a larger number of people/taxpayers than the realignment of Richardson Grove?

Sincerely,

Jennifer Poole
P.O. Box 1698
Willits, CA 95490
jtpoole@saber.net

1. The proposed project is not expected to result in trucks traveling faster since the project introduces more curves to the alignment. In addition, the highway would remain a two lane curvilinear road with minimal to no shoulders through the park. Large trees would continue to abut the edge of pavement. These characteristics would tend to discourage motorists from speeding. In addition, the posted speed limit was reduced from 40 mph to 35 mph in the fall of 2008. The scenic qualities of the highway setting would not be substantially altered and no old growth trees would be removed. Thus, tourists stopping in Willits and local residents of Willits should not be affected by the proposed project except during construction.
2. There have been four public meetings about the project and numerous articles and editorials in several newspapers informing residents about the project. Each of the public meetings was advertised in advance in the newspapers.

"Karen Potts"
<karen7777@asis.com>
01/27/2009 09:58 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Cal Trans proposed widening of Richardson Grove

Do not want to see the proposed widening of Richardson Grove.
I vote for the alternative-

Alternative 3 would involve simply lowering the speed limit
through the one-mile section of the Grove to 25 mph, would save tax payers $6 million in needless costs, and prevent harmful construction impacts. 1

Karen Potts
PO Box 307
Leggett, CA 95585

karen7777@asis.com

1. *See General Response #8.*

February 20, 2009

Kim Floyd
P. O. Box 3700
Eureka,
California 95502

Dear Ms. Floyd,

Yesterday I read the excellent arguments re Richardson Grove written by Doug Tickner which appeared in the My Word section of the Times-Standard, and that is what is prompting me to write this letter. I agree whole-heartedly with his arguments, and would like to add this:

No commercial interests should be allowed to change a designated park in any harmful way, since the trees belong to the people of California. I am a 92-year old native of Humboldt County and it has meant a lot to me to be able to visit Richardson Grove over the years. 1

Sincerely yours,

Carla Petersen Powell

Carla Petersen Powell
Box 114
Trinidad,
California 95570

1. *See General Response #2.*

<peggy@worldfamilyyoga .com>
01/27/2009 04:18 PM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Cal Trans proposal

Dear Deborah,

I am hearing word about some plans of Cal Trans that would cause environmental havoc to the redwood ecosystem around the highway 101 corridor. I am strongly opposed to this proposal and encourage you not to let this go through. That is a beloved area for all of us residents as a gateway to Humboldt county, as well as tourist who come through here. 1

Sincerely,

Peggy Profant

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:35 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:35 PM -----

phil purcell
<ppurcell7@yahoo.com>
01/30/2009 11:02 AM
Please respond to ppurcell7@yahoo.com

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Sir:

I want to express my **opposition** to you realignment project as currently proposed. Richardson Grove is a State Park and a national treasure, and if anything there should be **less traffic** moving **more slowly** through there. You're a professional transportation planner! **This project is short-sighted and misguided!** To do nothing would be much better. Better yet, create more access for pedestrians and bikes through the park. and slow down the traffic. The health of old growth trees should be prioritized. What's the rush, anyway? **Take your time, and do the analysis. Let's get it right!**

1
2
3
4

Sincerely,

Phil Purcell
3784 Spear Ave.
Arcata, CA 95521

1. The posted speed limit was reduced for this segment of Route 101 from 40 mph to 35 mph in fall 2008.
2. Shoulders are being widened to four feet outside the park to better accommodate bicyclists and pedestrians. Within the park, widening on the existing roadway to create wider shoulders is not possible without removing several old growth redwoods. The project does propose to add two foot shoulders within the park where no shoulders currently exist and where trees abutting the roadway do not preclude widening. Any bike/pedestrian path beyond the highway would be on park land and would have to be done in association with State Parks since they are the agency owning the land. While the proposed project doesn't markedly improve the safety for pedestrians and bicyclists through the park, it doesn't worsen the existing situation.
3. *See General Response #8.*
4. *See General Response #3.*

Deborah Harmon/D01/Caltrans/CAGov

01/26/2009 02:14 PM

To Kim Floyd/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove Improvement Project

----- Forwarded by Deborah Harmon/D01/Caltrans/CAGov on 01/26/2009 02:13 PM -----

Philip Ratcliff
<skazz999w@hotmail.com>

01/05/2009 12:32 PM

To <deborah_harmon@dot.ca.gov>
cc
Subject Richardson Grove Improvement Project

Deborah Harmon, Sr. Environmental Planner
CA Department of Transportation
1656 Union St.
Eureka, CA 95501

Dear Ms. Harmon:

I'm writing regarding the Richardson Grove Improvement Project. I drive from Cloverdale to Eureka/Arcata a few times a year, and am familiar with Richardson Grove. Upon entering the grove, drivers are advised by road signs to reduce speed to 40 mph.
I feel that by simply reducing the speed further to 30 or 35 mph, Highway 101 as it now exists, can handle any manner of truck traffic. The area of reduced speed is quite short, and would not be more than a minor inconvenience. 1
The Caltrans Improvement Project plans to remove redwood and fir trees, and to perform road construction work that affects root systems of redwood trees. This would be destructive and ill-advised. 2
Save taxpayer money and the trees by merely reducing the speed limit in the grove for the mile or two in question. Thank you.

Philip Ratcliff
15 Foster Ct.
Cloverdale CA 95425

1. *See General Response #8.*
2. *See General Response #3.*

Kim
Floyd/D01/Caltrans/CAGov
03/18/2009 10:19 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Caltrans Richardson Grove Planned Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:20 AM -----

Paula Rhude
<isrhude@gmail.com>
03/10/2009 09:00 AM

To kim_floyd@dot.ca.gov
cc
Subject Caltrans Richardson Grove Planned Project

Dear Mr. Floyd,

As a Eureka resident who travels the 101 corridor to the Bay Area frequently, I want to weigh in on the proposed widening of Highway 101 thru Richardson Grove. I am opposed to the project! Trucks have to stop many times in Willets and again in Eureka. Stop Lights and lower speed limits could control traffic and improve safety thru the ancient trees of Richardson Grove. 1

Please do not spend our tax money on this very damaging project. We can use the six million dollars on better things and save the State Park trees for future generations. 2

Thank you.

Sincerely,
Paula Rhude
P.O.Box 38
Eureka, CA 95502

1. *See General Response #10.*
2. *See General Response #8.*

March 11, 2009

Kim Floyd -

I strongly oppose the Richardson Grove "Improvement" Project. Our State Park needs to be left intact! No alterations! I say leave our trees, animals and birds in peace, undisturbed. I'm guessing all Project supporters are under the false belief that our human needs and desires are more important than our environments. That in fact is not true.

So - does my comment really have any influence on whether or not the Project proceeds as planned? I would appreciate your answer to this question, Kim.

1

Sincerely,

Jan Riber
P.O. Box 302
Miranda, Ca.
95553

P.S. - I am including a stamped, addressed envelope for your convenience. Looking forward to your reply.
- Jan Riber

P.P.S.

I am also aware that Singing Trees Recovery Center will be negatively impacted to a critical degree if the Project proceeds. 2

Why endanger our most precious redwoods and other trees by cutting or damaging their roots? 3

→ The $6 million estimated cost of the Project is also outrageous. Please be reasonable. 4

Lower the speed limit!

Isn't there a way to halt the planned Project??

— Jan Riber

1. Caltrans considers all comments before making a final decision.
2. The Singing Trees Recovery Center would be impacted during construction, experiencing increased noise and traffic delays. If night work occurs near the business it would be disruptive. Long term impacts would primarily include the right of way that would need to be acquired in order to construct the retaining wall, impacts to aesthetics resulting from vegetation removal for the cut from postmile 2.05 to 2.10 and the retaining wall. The proposed cut bank is currently vegetated primarily with shrubs and low growing vegetation and would be revegetated as part of the project. The proposed retaining wall would be constructed below the road and would be visible from some of the structures (both a residence as well as one of the buildings associated with the business) as well as being visible from various spots on the property.
3. *See General Response #3*.
4. *See General Response #8*.

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:36 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:36 PM -----

"Barbara & Howie" <flotsam11@suddenlink.net>
01/30/2009 10:28 AM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove

Leave the Beauty alone. Having lived in Humboldt County for over 32 years, I am saddened and angry about the increasing push towards development, and moves to tear down the "Redwood Curtain". Let's be different. Let's say No. Leave Highway 101 as it is and urge people to slow down in their driving instead. As a Humboldt County taxpayer I am requesting that we leave the Richardson Grove area as it is. 1 2

Thank you,
Barbara Rich
flotsam11@suddenlink.net

1. *See General Response #2.*
2. *See General Response #8.*

Heatherlee Richerson von Tchudi <heatherli@me.com>
01/27/2009 12:39 PM

To deborah_harmon@dot.ca.gov
cc Heatherlee Richerson von Tchudi <heatherli@me.com>
bcc
Subject Comments on the DEIR On Richardson Grove

History: This message has been forwarded.

Dear Deborah Harmon,

The DEIR is insufficient in its mitigation measures for the proposed project. Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. Please do not place road development, when there are alternative routes or delivery options, of higher importance than preserving these ancient forests. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

Thank you,
Heather S Richerson
220 Harmony Lane
Garberville, CA 95542

1. *See General Response #15.*
2. *See General Response #16.*
3. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:25 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:25 AM -----

Sharon Britt
<sbritt44@hotmail.com>
03/12/2009 07:01 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove project

I love that stretch of road by Richardson Grove and the calming effect it has as I drive thru. I've been going there for 60 years and I do not want any of it tampered with!!!! This is a STATE PARK, which means it belongs to every citizen living in California! It is not the property of a few to do with as they want.

As others have suggested, there are alternatives! There needs to be a balanced approach that will please everyone. The suggestions already voiced are very do-able, such as putting in stop lights at each end so that big trucks can pass safely and/or slowing the speed limit to 25 mph. These are just 2 of the suggestions out of many more possibilities. Another huge plus of these suggestions is that it can save the state about $6 million, an important factor in todays economy. 1 2

Please think creatively, use common sense and some cooperation. Save these beautiful trees that belong to ALL of us in California and to our future generations so they can enjoy the wonder of these trees as we are doing now. 3

Sharon Richmond
Fortuna, CA

Most folks are about as happy as they make up their minds to be.
-Abraham Lincoln

1. *See General Response #10.*
2. *See General Response #8.*
3. *See General Response #2.*

February 16, 2009

Kim Floyd
Project Manager
State of California, Department of Transportation
PO Box 3700
Eureka, CA 95502

RE: Richardson Grove project

I recommend that the "no build" alternative be approved.

I am a 16-year Humboldt county resident. Before relocating to southern Humboldt, I vacationed in the area several times over the past 3 decades. I know that people come here for the Trees – the Trees must remain our number one priority.

1

This project runs right through the middle of a State Park – land that was purchased for the permanent protection of the Trees and forest. Taxpayers paid the money to protect these Trees. Faster speeds (no matter the speed limit, a straighter road will bring faster travel) and larger trucks will only detract from the 'wilderness-type' experience that visitors come to the Park for.

2

I take issue with several items written in the draft EIR.

The project will "improve the safety and operation of Route 101 while also improving goods movement." Not true: A straighter highway will encourage faster speeds. Large trucks are a hazard in themselves because of their size, and inability to stop and maneuver quickly. Larger trucks=greater hazard.

3

The draft EIS claims that no old growth trees will be removed, however "construction would occur within the structural root zone of several large, mature redwoods abutting the existing roadway and the root systems of these trees could be further affected."

4

I have personally witnessed a road-damaged old-growth Redwood tree fall without warning across highway 101. In that incident, luckily, no one was harmed although two vehicles suffered extensive damage. For the State to intentionally damage the integrity of the old-growth trees at Richardson Grove knowing that the damage inflicted could cause them to fall in the future – in a State Park – is unforgivable.

"Construction of a cut slope and a retaining wall north of Richardson Grove State Park would affect the visual setting for residents and visitors to the Singing Trees Recovery Center."

5

It will also affect the visual setting for visitors to the State Park, and for all travelers on that section of highway.

"This improvement in goods movement will help area businesses stay competitive in the marketplace. Several businesses, including lumber, floral, food and other manufacturing, as well as the local newspaper, have noted higher costs and have considered relocating out of the County."

This is stretching the truth, to say the least. The local newspaper will not relocate to save money – it wouldn't be a local newspaper. The lumber businesses cannot relocate away from the lumber, now can they? Local business has always dealt with the roads throughout Humboldt in just the way they are. They were established and built up with no promise or indication that the roads would ever be any different. If the Leggett slide had not made fixing that part of the highway necessary, no one would be talking about realigning Richardson Grove now. 6

The draft EIR is lacking in considering the effect on the majority of local businesses who are not concerned with truck size. How much money will most local businesses lose with a decrease in tourism? Local business are southern Humboldt business. I can't think of one that wants Richardson Grove touched. 7

I urge the Department of Transportation to abandon this ill-advised project.

Thank you,

Barbara Ristow
PO Box 308
Miranda, CA 95553
ristowb@gmail.com

1. No old growth trees would be removed as a result of the project. Both the Caltrans arborist and an arborist contracted by the Save the Redwoods League have determined that the proposed project would have no substantial detrimental effect on root health of old growth redwoods adjacent to the highway.
2. *See General Response #13.*
3. With the construction of this project, highway conditions are not expected to be any less safe than they currently are. Because there will be revisions made to non-standard highway design features such as curve radii and shoulder widths, it is expected that the roadway on this section of Route 101 will be safer for all users as a result. The presence of slightly larger STAA trucks is not expected to make the roadway any less safe as the comparative weights of the non-STAA and STAA rigs are relatively the same, with the STAA trucks having the potential to be slightly heavier due to a larger size tractor (if sleeper is included).
4. *See General Response #3.*
5. The land use both north and south of the park includes residential and commercial use and both uses have altered the natural landscape. The proposed cut slope at postmile 2.05 to 2.10 is a previous cut bank and is vegetated primarily with shrubs and low growing vegetation and would be revegetated so the visual impacts would not be long term. A design modification for the retaining wall was developed subsequent to the circulation of the draft document. The modified design includes changing the type of the wall from an above the road wall to a below the road wall. Since the wall is below the roadway motorists would only see would be the concrete barrier adjacent to the northbound lane. The barrier is required due to the height of the wall (12 feet) should a vehicle leave the roadway.
6. *See General Response #11.*
7. *See General Response #7.*

1/26/09

Dear Kim Floyd

I'm writing to oppose the proposed 101 expansion through Richardson Grove for the following reasons:

1. Traffic in Eureka
2. Infrastructure overload
3. Loss of agricultural land

1. Pedestrians get killed by motorists in Eureka. Widening 101 means more cars and trucks will pass through. 101 cuts through Eureka commercial and residential districts where pets and pedestrians are threatened. You can't walk to the store without crossing 101. 1

2. Widening 101 will increase immigration from southern California, increase the demand for housing, land for subdivisions, water. The municipal infrastructures, the courts and law enforcement are not prepared for this kind of influx of people. 2

3. Humboldt County residents are united in our desire to maintain a bioregional economy. Charles Hurwitz taught us how corporate investment in our county can harm our agricultural land. Our land is excellent for growing food. If the global economy collapses, we could feed ourselves, just not at Winco. We do not need to invigorate our economy by attracting corporate investors. We need to protect our agricultural land from logging, subdivisions and malls. All three ~~these~~ would increase with the widening of Highway 101.

3

Sincerely

1/26/09

Geoffrey Robinson
B.S. Environmental Resources Engineering
HSU. 2001
2016 DARIN DRIVE
MANILA CA 95521
(707) 441 1696

1. The majority of roadway widening in the project occurs in the northerly portion outside the park where shoulders would be widened to four feet to better accommodate pedestrians and bicyclists. The project would not increase the capacity of the highway, thus it is not anticipated that traffic volumes would substantially change over existing volumes.
2. *See General Response #12*.
3. The adjacent land use within the project limits is residential, commercial, and public recreation. The project does not impact any land zoned for agriculture. In addition, as stated above, the project is not expected to be growth inducing, thus impacts to agricultural land beyond the project limits are not anticipated.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:29 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:30 AM -----

Donette Rogers
<rogersds@suddenlink.net>
03/10/2009 06:12 PM

To kim_floyd@dot.ca.gov
cc Jim Rogers <jimr9@suddenlink.net>
Subject Richardson Grove

Dear Ms. Floyd,

My husband and I think Richardson Grove is the most beautiful area between Santa Rosa and Eureka. We urge Caltrans to do everything possible to leave this beautiful area as it is. If traffic conditions require a stoplight or reduced speeds, PLEASE choose these less costly and more environmentally sensitive alternatives. It took over two thousand years to grow this forest, and removing any of them cannot be an option. We must act as responsible caretakers for future generations of trees and children. 1 2 3

Jim & Donette Rogers

rogersds@suddenlink.net
jimr9@suddenlink.net

1. *See General Response #2.*
2. *See General Response #10.*
3. *See General Response #8.*

January 27, 2009

Mr. Kim Floyd
Caltrans Project Manager
P.O. Box 3700
Eureka, CA 95502

Re: Richardson Grove Improvement Project

Dear Sir:

First as a tourist and now as a resident of Eureka, driving through Richardson Grove is awesome after driving through all the urban and increasingly rural sprawl that has overtaken Northern California. The sheer size of the trees and overall beauty of the grove is something to be preserved and protected for future generations. This place is unique and should be left alone. Taking out a "few" redwood trees and disturbing the fragile root systems that remain, and thereby possibly kill the trees, while widening and straightening the road makes little economic sense in this age of economic free fall, global warming and climate change. 1 2 3

Widening Route 101 through Richardson Grove is simply an opening for bringing larger loads of goods into the area on bigger and bigger trucks which are dangerous on roads shared with passenger vehicles, bicyclists and pedestrians. Diesel usage and fumes are harmful and sure to be much more restricted very soon given the need to seriously address climate change. Shipping goods long distances and basing local economies on more and more imported goods is questionable based on current economic and environmental trends. 4 5

Please do not proceed with this project. Calling it an "improvement" is a public relations ploy. You can never bring that beautiful grove and roadway back.

Sincerely yours,

Nola Roiz

Nola Roiz
P. O. Box 6309
Eureka, CA 95502

1. *See General Response #2.*
2. *See General Response #3.*
3. *See General Response #13.*
4. With the construction of this project, highway conditions are not expected to be any less safe than they currently are. Because there will be revisions made to non-standard highway design features such as curve radii and shoulder widths, it is expected that the roadway on this section of Route 101 will be safer for all users as a result. The presence of slightly larger STAA trucks is not expected to make the roadway any less safe as the comparative weights of the non-STAA and STAA rigs are relatively the same, with the STAA trucks having the potential to be slightly heavier due to a larger size tractor (if sleeper is included).
5. The only viable option for goods movement into Humboldt County from the south currently is by truck. Since Humboldt County isn't self sufficient, goods movement would likely continue to occur. While California Legal-sized trucks are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with the industry standard-sized vehicles. Thus, the non STAA trucks tend to be older vehicles as the newer vehicles are the industry standard- sized trucks. Smaller businesses which depend upon trucking companies for importing and exporting their products are finding it difficult to reliably access these non STAA trucks.

Kim
Floyd/D01/Caltrans/CAGov
03/18/2009 10:31 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:32 AM -----

Barbara Root
<jambamom@gmail.com>
03/10/2009 09:18 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove project

Dear Kim - my husband and I are adamantly opposed to ANY disturbance of ANY trees in or near the Richardson Grove. The northern California economy has muddled along 'lo these many years and will continue to do so without wrecking what Mother Nature has spent years to produce. The proposed project's possible, not even probable, positive financial impact does not justify the destruction of a forested area unequaled anywhere in the western United States. It would be a heinous crime to touch this spot which truly belongs to everyone, certainly not to Cal Trans or other organization. Please remember that this is a State Park, owned by the people, and can not be reproduced! 1

The difference between removing 40 or 87 trees is zero; the impact is devastating either way. The added cutting of root systems of 30 (or any) of the largest (or any) trees is an abomination. The increase in square yards of asphalt will likely asphyxiate more trees; the building of a retaining wall is likely equally detrimental to trees and other greenery. 2

To value the bottom line on a financial accounting sheet above this majestic show of Mother Nature's power is a crime that should not even be under discussion. Please scrap the whole project. By doing so you will show the people of California that you recognize and respect this awe inspiring phenomenon we are privileged to enjoy and will guard its presence for future generations. 3

Thank you,
Wesley and Barbara Root
2575 Knox Cove Drive
McKinleyville CA 95519
707 839 5293

1. *See General Response #11.*
2. *See General Response #2.*
3. *See General Response #1.*

Deborah Harmon, Senior Environmental Planner
Calif Dept of Transportation
1545 Union St.
Eureka, CA 95501

Dear Ms. Harmon,

I am submitting comments regarding the Draft EIR/ Environmental Assessment and Programmatic Section 4(f) evaluation in regards to "Richardson Grove Operational Improvement Project.

First, there needs to be a full EIS, the federal document. The skimpier state EIA isn't enough for a number of reasons. First, 101 is a federal highway, and the plan calls for the federal government to fund the project. Also, the project is within ¼ mile of the South Fork Eel River, which is a federally designated Wild and Scenic River. And very important is that the U.S. Fish and Wildlife Service has listed Richardson Grove State Park as "critical habitat" for the Marbled Murrelet (which is a species in great danger, considered "endangered" by the state, threatened by the feds. The impact on this species needs to be studied in much more depth. (1) (2)

An adequate EIR/EIS will have much discussion about the cumulative impacts of building this project on various aspects of the ecology and the likelihood of the survival of the murrelet in the various parts of the range (for example, how will the species be affected south of the Humboldt County line.

There are serious inconsistencies and flaws. For example, on page 103 it says "Noise, lights, and activity disturbance generated by the construction of this project may disturb breeding and migration patterns in the project area." On the same page, it says "However due to sensitivity of the species, it was determined that the project may affect, and is likely to adversely affect Marbled Murrelet." (3) Page 15 of the Natural Environmental Study says "The temporary noise ... with project construction is likely to disturb murrelets that are nesting in the area yet strangely the next sentence concludes "The project will not adversely modify MAMU critical habitat." (4)

Also, there's a significant impact to the wide shallow root systems of the ancient redwood forest of the highway construction / realignment. (5) A more extensive study needs to be done as there is considerable "die back" along the Ave. of the Giants due to the road's impact. Taking out the other trees will also greatly impact the ancient redwoods. (6) Due to weakening of the root structure, there could be more wind throw and blowdown of ancient redwood trees, which would really open up the canopy and impact murrelet nesting, migration, and social activity. Taking out the canopy in the area will increase wind flow, and have impacts in quite a few ways of this fragile ecosystem and species.

The draft EIR didn't include the comments submitted. And since the scoping comments weren't addressed, we need a new draft EIR 7
(This time with an EIS).

I'd like to suggest that allowing the bigger trucks will actually hurt our economy. Humboldt County has many small businesses which will be hurt by the STAA trucks that benefit the 8
big box stores. (big box stores mean lower wages).
Also, big trucks may not be accomodated by on and off ramps, and how many ramps would need to be altered or widened at public cost, not to mention how would adjacent streets need to be widened. A lot of people go to Humboldt for tourism; it needs to be addressed how bigger trucks and more noise would affect tourism. I 9
personally avoid areas with big, noisy trucks, and love Humboldt for the fact that corporate generica hasn't yet taken over (There are no Wal Marts in Humboldt!) Big box stores will be facilitated by this project, and they have been proven to cause 10
urban blight, and drain the local economy (smaller stores keep more money in the economy).
What's more important, this ecosystem or bigger trucks coming to Humboldt. This county's getting along just fine without widening the highway there, and I believe there are far more important 11

more

priorities with our tax money, esp. in
The current economy (ie. mass transit, rail,
education, health care, etc.

Thank You,

Bryan Rosen
PO Box 1052
Trinidad CA 95570

1. The NEPA Environmental Assessment does take into consideration that South Fork Eel River is a federally designated Wild and Scenic River and that portions of the project area have been designated as Critical Habitat for the Marbled Murrelet. What determines the level of NEPA document is whether a significant impact is anticipated to occur as a result of the project, not the presence of federally protected resources alone. The project is not expected to have substantial adverse impacts on the values that resulted in South Fork Eel River being designated. The US Fish and Wildlife Service determined that the project would not result in "take" of any listed species and that the construction activity represents a relatively short term disturbance that is not expected to have a long term effect on the breeding performance of the Marbled Murrelet as stated in the Biological Opinion for this project.
2. Impacts to federally listed species is analyzed through the Section 7 process of the Federal Endangered Species Act process then summarized in the NEPA document. Preparing an EIS does not result in a more detailed analysis per se.
3. The examples cited in your letter are not inconsistencies. Both the NEPA/CEQA document and the Biological Assessment, prepared for compliance with the federal endangered species act process, acknowledge that the project activities may affect the Marbled Murrelet. The terminology, "may affect and likely to adversely affect" is the Section 7 language that is part of the federal Act. In the Biological Opinion prepared by US Fish and Wildlife Service, the Service concurs that the project may affect and is likely to adversely affect Marbled Murrelets, but goes on to determine that there would be no take of species.
4. Section 7 of the federal Endangered Species Act defines the level of impacts to designated Critical Habitat. As the project does not take any potential nest trees, it was determined that the project would not adversely modify designated Critical Habitat for Marbled Murrelet. The US Fish and Wildlife Service concurred with this determination.
5. Both the Caltrans arborist and Dennis Yniguez, an independent arborist contracted by Save the Redwoods League, have determined that with the special conditions in

place as described in the document, there would be no significant detrimental effect on root health or the availability of water to the roots of old growth redwoods adjacent to the highway construction. Mr. Yniguez also noted that "the existing root systems of old-growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height." Mr. Yniguez concluded that with the special conditions incorporated into the design and construction, the project "…as proposed will have no significant detrimental effect on root health or on the availability of water to the roots of old-growth redwoods adjacent to the highway construction."

6. In the majority of areas where tree removal is to occur within the park, the trees to be removed are not immediately adjacent to redwoods as can be seen in Appendix L, the layout maps. The reason for this is that most of the areas where tree removal would occur are on previous cut banks, so there are no large redwoods present in these areas. Thus, it is not expected that tree removal would result in more wind throw and blow down of the redwoods, nor is a major opening in the canopy expected.
7. The comments are not generated until the draft environmental document is circulated to the public. The draft document did contain information reflecting the scoping comments.
8. Many small businesses have requested the County and Caltrans to pursue the project and have expressed concern of how the STAA restriction at Richardson Grove has adversely impacted their business. STAA trucks are currently allowed on Route 101 (via access from the north) with the exception of the one mile segment that is included within the project limits of this project. STAA truck route designations on local streets are determined by local governments. Any improvements needed to interchange on-ramps or off-ramps or at-grade intersections with State highway legs would have to be made on a case by case basis as local governments decide to create STAA routes on their local streets.
9. It is not anticipated that lifting the STAA restriction would adversely affect tourism. It is not anticipated that truck traffic would substantially change, nor is noise expected to substantially increase.
10. *See General Response #12.*
11. The widening that is proposed within the park is to provide up to two foot shoulders where possible in areas where currently no shoulders exist.
12. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.

Sonja Roseth
<sonjaroseth@gmail.com>
01/30/2009 09:30 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove

Hi Deborah, I strongly disapprove the current plan to cut Redwoods in the Richardson Grove--reducing the speed makes a lot more sense. There are more ramifications than are immediately apparent. Let's protect what little we have left of giant redwoods for our children and grandchildren. Thank you Sonja Roseth

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1. *See General Response #2.*
2. *See General Response #8.*
3. *See General Response #3.*

Kim
Floyd/D01/Caltrans/CAGov
03/18/2009 10:28 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:28 AM -----

Elaine Rossiter
<raceylady68@yahoo.com>
03/10/2009 04:54 PM
Please respond to
raceylady68@yahoo.com

To "Kim_Floyd@dot.ca.gov" <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

I just wanted to leave on opinion about the project at Richardson Grove. I believe that the approach of doing the minimum is best for all. Don't cut down trees or cut roots,install lights and control speed seems a better approach and much less costly.Tourism is becoming more important all the time. Thanks for your consideration Elaine

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1. *See General Response #10.*
2. *See General Response #8.*
3. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:55 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove EIR

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:55 PM -----

jkr49@asis.com
03/11/2009 11:17 AM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove EIR

Dear Kim,

I've written several times over the past year concerning this ill-advised project.

As the reality of the oncoming Depression deepens, it is ever more foolish to be spending millions of tax-payers' dollars on something that benefits economically only a few. This money could be helping our local infrastructure in ways that would make the economic rebuilding better for all of us. 1

As the actual environmental costs on-site are revealed, it is clear that irreparable harm will be caused to a unique State Park "owned" by all Californians: ancient redwood root systems that support trees dating from the birth of Christ. Nowhere else can travelers see these wonders of nature so up close as they pass into our community. This corridor is a priceless asset, just as it currently exists! 2

It is now obvious that a few dollars spent on traffic control can easily suffice to limit any dangerous driving conditions, while at the same time permitting even larger trucks -- "needed" by only a few further north -- to pass through the Grove, taking barely a minute longer. 3

I've yet to hear any reasonable response to questions about how this project would negatively impact those "mom and pop" businesses near the Park and throughout Humboldt which have managed to survive the Mall and big box encroachment so far. Nor have you addressed the quality of life issues that the vast majority of local residents want to make sure do not "Santa Rosa-ize" this rare rural community. 4 5

I'm not sure if you want to consider this as a formal "impact" of your proposal: but you should know in advance that feelings locally are fierce on the matter of protecting Richardson Grove and this wonderful, slower-paced access to our area. If you insist on pursuing this bone-headed project, you will most certainly face people sitting on the road in front of your bull-dozers, and using civil disobedience to block any destruction of this treasure. The responsibility is on your shoulders; I don't envy the pressure you must be under to let "progress" once again sweep away reason (Look what it's got us to thus far...) But I truly hope you will do the right thing this time!

Cheers, Jared Rossman

Box 786
Redway, CA. 95560
923-2879

1. *See General Response #8.*
2. *See General Response #12.*
3. *See General Response #11.*
4. "Big Box" stores are already present in Eureka, and STAA access to Eureka is available from the north via Route 101.
5. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
6. Currently, infrastructure improvements are necessary to develop short sea shipping in Humboldt Bay, and funding for these improvements have not yet been identified. And, while short sea shipping may be an option in the future, it will not be practical for all shipping needs such as time sensitive goods or animals. In addition, Humboldt Bay has a couple of major disadvantages that must be overcome before short sea shipping would be perceived as viable. As stated in the Port of Humboldt Bay Harbor Revitalization Plan, the Bay's limited inland access by both rail and trucks is a key disadvantage since Interstate 5 is a major route for goods movement due to its access to major population centers from California to Washington. This lack of inland access combined with Humboldt County's small population and limited economic base makes Humboldt Bay less desirable than other competing ports.

Kim
Floyd/D01/Caltrans/CAGov
03/18/2009 10:31 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardsons Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:32 AM -----

<dryerson2@suddenlink.net>
03/10/2009 08:55 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardsons Grove Project

Kim Floyd, Project Manager
Caltrans

Dear Ms. Floyd,

I strongly support the 25 mph alternative which will avoid cutting the roots of about 30 old growth redwoods in our State Park so future generations can experience them. 1

The $6 million saved can be applied to the massive funding needed to circumvent future flooding that will occur along several sections of Highway 101 in Humboldt County. The sections through Orick, Big Lagoon, around Humboldt Bay south to Loleta, to name a few, will need to be rerouted or have bridges or causeways built within the next 50 years to be ahead of storm surge damage. Please read the article below and spend the district's money to benefit all current and future residents, not just a few businesses that exist today. Sea level is not actually level over the surface of the planet, and unfortunately, our portion of the coast will get more than its fair share of the rise. 2 3

Scientists to Issue Stark Warning Over Dramatic New Sea Level Figures
http://www.truthout.org/030909EA
Robin McKie, The Observer UK: "Scientists will warn this week that rising sea levels, triggered by global warming, pose a far greater danger to the planet than previously estimated. There is now a major risk that many coastal areas around the world will be inundated by the end of the century because Antarctic and Greenland ice sheets are melting faster than previously estimated."

Thank you.

Sincerely,

Diane Ryerson
1659 I Street
Arcata, CA 95521

1. *See General Response #8.*
2. *See General Response #12.*
3. *See General Response #7.*

Jim Floyd
Project Manager
PO Box 3700
Eureka CA 95502

January 26, 2009

Dear Project Manager ~

I am writing to express my complete opposition to the proposed widening of Highway 101 at Richardson Grove. There are numerous reasons why such an undertaking would not be in the best interest of Humboldt County and the surrounding area.

1 Firstly, there is the immediate issue of cutting trees. We currently have so little of our native forest left that each tree, plant & creature is helping to hold on to what are at best tenuous - if not outright degraded - ecosystems. It would be irresponsible of us, as stewards of what is left of our natural heritage, to continue to erode a forest ecosystem. Widening 101 at Richardson Grove would do just that, and it is unacceptable.

2 There is then the issue of what increased motor traffic ~ especially large trucks, which are the principal reason that the expansion has been proposed ~ will do to the area at large. I moved to this area because it is one of the most beautiful, unique, & <u>remote</u> areas of the continental U.S. The very inaccessibility of our area has served to save us from the strip malls & housing developments that plague the rest of our nation.

3

The citizenry of Humboldt has chosen to live here because of the small communities and emphasis on local business & unspoiled nature. Large-scale corporations & big-box stores have already crept into communities like Eureka, pushing out local small business and offering shoddy merchandise, low-paying, dead-end jobs, and shady environmental practices. When this happens, money moves out of this local economy that we work to build, & into the pockets of international corporations. There is a lesson to be learned from the legacy of Maxxam, which took off with our resources, & immense profit, leaving us with decimated lands and waterways, few jobs, & a deflated economy. We can do better.

Don't degrade the integrity of Humboldt's ecosystem and community. Leave Richardson Grove alone.

Thankyou for your time & attention to this matter.

Sincerely

Kimberly Reiman
PO Box 4272
Arcata CA 95518

1. *See General Response #2.*
2. *See General Response #14.*
3. As you note, some big box stores are already present in Eureka. The economic costs of not providing access for STAA trucks would fall on businesses currently located in Humboldt County. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Economic activity and subsequent growth in Humboldt County faces a challenge in the form of distance to major markets with or without the proposed project. The inaccessibility of the County to larger trucks is not the most important constraint on business development in this portion of northern California. A study prepared for the Humboldt County Association of Governments identified distance from major population centers, lack of direct access to the Interstate road system, lack of a completed four lane north-south or east-west highway, limited air service, unreliable and inadequate rail service, lack of industrial land zoned in Eureka, shortage of labor in some occupations, lack of diversity of tourist attractions and visitor activities and perception of the area by outsiders as remote as being the major constraints to economic activity and subsequent growth in Humboldt County (Cambridge Systematics, Inc., 1989).

1/20/09

Dear Kim Floyd,

The purpose of this letter is to express my concern regarding the realignment project that Caltrans has proposed through Richardson's Grove. As a Humboldt County resident I am quite frankly disgusted by the current proposal. Just when we believe our community is wizening up to the indisputable significance of our old growth forests, yet another near sited construction plan is drafted in the name of "progress."

Presently, less than 3% of the original old growth redwood forests remain. While Richardson's Grove may be but a tiny piece of that 3%, the role that this old grove plays in our community is enormous. The park is not only a recreational and educational facility for local youth, but is a breath taking rest for people all over the world. There is no doubt that further road construction would dampen the aesthetic luster of that particular section of highway, as well as weaken the longevity of the old growth trees. One need only a basic understanding of redwood forests to know that the health of one tree lies in the relationship between its roots and the roots of neighboring trees. 1 2

Why Caltrans hasn't proposed a more creative solution to the so-called "problem" demonstrates both ignorance and a lack of foresight. It seems to me a more appropriate solution to reroute the highway over the river and around the park. This plan would accomplish the goal of creating a wider road while preserving the integrity of Richardson's Grove for future generations. 3

It is my hope that you rethink and renegotiate the proposed plan. Whether or not you sympathize with the logistical and economic aim of the project, please acknowledge the devastation and disappointment the proposed plan would bring to the members of this community.

Sincerely concerned,

Erin J. Ryon

1. *See General Response #2.*
2. *See General Response #3.*
3. *See General Response #9.*

Dear Deborah

Comments on the DEIR
On Richardson Grove

The DEIR is insufficient in its mitigation measure for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be weakening and eventually the death of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a flush response on the part of the nutritiously shy Murrelet and Owl. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

Sincerely Cristy Sabo

1. *See General Response #15.*
2. *See General Response #16.*
3. *See General Response #8.*

Richard Salzman
<richard.w.salzman@gmail.com>
01/22/2009 03:29 PM

To deborah_harmon@dot.ca.gov, Kim_Floyd@dot.ca.gov, Caltrans.Director@dot.ca.g
cc
bcc
Subject richardson grove

1

I'm with Ken Miller on this one. We do NOT need more large trucks on the road here in Humboldt County.
Please spend this money elsewhere.
Thank you,
Richard Salzman

--
Richard W. Salzman
1751 Charles Ave
Arcata CA 95521

Richard.W.Salzman@gmail.com

707.822.5500
707.825.6600 (fax)
707.845.3700 (cell)

--

http://www.times-standard.com/othervoices/ci_11525716

Imagine Humboldt

Ken Miller/For the Times-Standard
Posted: 01/22/2009 01:30:43 AM PST

We should all carefully consider whether we really want, or need, the Richardson Grove widening project. Our geography is our greatest asset, which we should exploit, not overcome.

Scientists have long recognized that geographic separation fosters diverse, beneficial adaptations and attributes. It is no different with communities. Our most valuable socio-economic asset may well be the relatively minor inconveniences attributable to our geography and weather.

Buffered from global forces, Humboldt's unique bio-regional economy, formerly fueled by over-exploitation of timber and fishing, could rise again in a sustainable form.

New energy, transport and other technologies and modalities on the horizon, including short-sea shipping and electric vehicles, will soon preclude the need for this project. Reliance on the information/technical highway instead of the asphalt highway is the way to go if we want to enhance what we love here.

Imagine if we restored our wild salmonid fisheries; if we generated our own power with local renewable sources, and plugged in our vehicles; if we developed novel transport capacity using non-fossil fuel; if we expanded local food production, local manufacturing, and high-value specialty agricultural and timber products; if we developed innovative architectural solutions to our diverse housing needs. Imagine attracting the industries that we want, rather than relying on impersonal, erratic global economic entities.

The RG project is part of an overall effort to make 101 an express thoroughfare to Oregon and beyond. Mega-port with diesel-rail development is another ingredient in that outmoded agenda to increase our dependence on, and subservience to, an increasingly obsolete, and destructively extractive, business model.

Highway thoroughfare connectivity brings with it overpowering financial capital, cutthroat savvy, and population pressures that overwhelm precious local resources, uniqueness, and localization efforts.

There are good reasons to believe that widening RG and enabling STAA trucks will not improve our economy, and will not avoid biological damage to the precious grove. It will, however, boost harmful vehicular emissions in the long run as traffic increases dramatically.

We can create an economy with satisfying, liveable-wage jobs that enhances, rather than degrades, our quality of life, and that builds on the beauty, quiet, open space, small-town communities, and diversity we cherish. But first, we must prevent a development juggernaut from destroying the resources that would enable us to capture the high-value and new niche markets that could make all this possible.

Simple and inexpensive speed control, an added bike path, and judicious waivers for some STAA trucks, would make travel through RG safe and more enjoyable, and benefit local park businesses, with no ugly concrete retaining wall detracting from the spectacular scenery, or root compression killing old-growth redwoods. And the Eureka-Arcata corridor needs a safe bike/hike path, not an expensive high-speed freeway.

The RG and Eureka-Arcata Caltrans corridor projects should be vigorously opposed. Our plentiful resources and sparse population are especially vulnerable in times of economic crisis to predatory practices that transform entire regional economies into faceless, dependent cogs in worldwide mass-marketing machines.

Widening roads is as irreversible as the consequences are inevitable: a highway dotted

with big boxes (from "our" Home Depot to Crescent City's and Redding's?) and cookie-cutter shopping centers and developments, coursing through traffic-choked cities along a megalopolis that has already swallowed formerly small communities like Santa Rosa.

We can commit ourselves to the creative self-reliance that has defined our heritage; or we can surrender to the frenzied sameness that has wreaked havoc elsewhere.

The keys are faith in our own resourcefulness, the wisdom to see the change that is in the making, the prudence and patience to be a vital part of bringing the new model of economic growth into reality, and the courageous vigilance necessary to resist the enormous pressures to conform.

This is our only chance to stop the highway widening projects. Once widened, there's no going back. What's the rush, if we still need STAA trucks in a few years, there's always road monies! Meanwhile, let's take advantage of the economic stimulus money aimed at emerging technologies. With government help, we can install rooftop solar panels, plug in vehicles, sell electricity, and share neighborhood victory gardens! Spend time with self, family and friends, and money on local goods and services, rather than spending money buying imported junk.

Economic localization is the best hedge, and security, against global market unreliability.

Please do not underestimate the consequences of this project, or the speed of urbanization.

Let's not ruin our peaceful rural lifestyles, economy and park with blunderbuss technology when we can recreate paradise with 21st century know-how.

---

1. *See General Response #14.*

Richard Salzman
<richard.w.salzman@gmail.com>
01/27/2009 09:25 PM

To Deborah_Harmon@dot.ca.gov, Kim_Floyd@dot.ca.gov
cc
bcc
Subject It's a Park

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3

Richardson Grove is a State Park. This is one of the teeny tiny areas that have been set aside to save as is. There is the entire rest of the state that can be paved over. But not the parks.
Put 101 around the park. Drop the speed limit, or just keep it like it is, but no way, no how, should you be taking out even a single tree to make room for bigger trucks!
Stop this project now and save your souls.

Richard W. Salzman
1751 Charles Ave
Arcata CA 95521

Richard.W.Salzman@gmail.com

707.822.5500
707.825.6600 (fax)
707.845.3700 (cell)

--

1. *See General Response #9.*
2. *See General Response #8.*
3. *See General Response #1.*

Karin Salzmann
<karinfire@suddenlink.net>
01/29/2009 12:43 AM

To Deborah_Harmon@dot.ca.gov
cc Kim_Floyd@dot.ca.gov
bcc
Subject Richardson Grove project

1
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3

Please do not widen hwy 101 at Richardson Grove. That narrow winding passageway is magical and inviting to those of us who live here, and to tourists who come from all over the world to experience our beautiful, secluded forest. Few of us in this county want to see old growth redwoods brought down to accommodate polluting, gas-guzzling trucks. We don't want to be a stretch of shopping centers and traffic jams like Santa Rosa. What a waste that would be!

Karin Salzmann
Trinidad CA 95570-677

1. *See General Response #13.*
2. *See General Response #2.*
3. *See General Response #1.*

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:44 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:44 AM -----

"casaharrison@att.net"
<casaharrison@att.net>
02/19/2009 10:22 AM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

Dear Miss Floyd,

Richardson Grove is an irreplaceable gateway to the splendor that is Humboldt County. To
cut down these magnificent ambassadors of the coastal redwoods, specimens that would
take two or three of our lifetimes to regrow, would be a travesty. When the old guard wealth
of the area suddenly realizes in the near future that the only future we have is in eco-tourisum,
it will be to late. Reduce the speed limit instead of removing these glorious specimens that
stand on both sides reminding people that they are now entering the only place on earth
where these gentle giants still reside. They are one of the reasons that I moved here, and are
a constant reminder to me whenever I return from a trip that I am finally home.

Sincerely yours,

Peter Alexander Samuels
3275 Harrison Avenue
Eureka, CA 95503

1

2

1. *See General Response #2..*
2. *See General Response #4.*

1-27-09

Dear Kim Floyd,

I am against widening Hwy 101 at Richardson's Grove for the following reasons: 1

1. We are experiencing severe economic recession with stores closing - we will most likely have less trucks on the highway. 2
2. The natural beauty of the grove could be destroyed - people come to see these trees from all over the world. 3
3. $6 million would be better spent on fixing our roads that need help. 4

Thank you

Sincerely,

Mary Sanborn

1. *See General Response #13.*
2. *See General Response #11.*
3. *See General Response #2.*
4. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Ruth Sander
508 W. Mill St.
Ukiah, CA 95482

February 25, 2009

Caltrans
Kim Floyd, Project Manager
P.). Box 3700
Eureka, CA 95502-3700

Re: Richardson Grove

Dear Mr. Floyd,

I am writing you to share my feelings regarding the proposed widening of Highway 101 in the Richardson Grove corridor. 1

As a child, my family camped at Richardson Grove each summer. This was in the 1940's and the camp sites were on the East side of the grove under the wonderful old redwood trees. The peace and quiet which was a part of the grove is precious to anyone that has experienced it. Even though huge logging trucks drove past the camp, the necessity for slowing down, in order to navigate the narrow turns, prevented the degree of noise which one might expect. It was a magical place for both children and adults.

Much of the beauty of the world is being sacrificed in the name of progress. I can't help but wonder if we don't have our priorities confused. Is it progress to destroy beauty for speed? Is it progress to sacrifice the few ancient areas which are left on our planet for the convenience of corporations? 2

The trip into the redwoods used to take a long slow drive. Because of the narrow highway from the Bay Area, one would finally slow down within to prepare oneself for the beauty ahead. Most of that has been lost with the enlarged freeway. Let us not sacrifice this little remnant of the past for a questionable future. 3

Thank you,

Ruth Sander

1. *See General Response #13.*
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
3. *See General Response #2.*

Deborah Harmon
Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, Ca. 95501

January 18, 2009

Dear Ms. Harmon,

After reading and reviewing the DEIR for Richardson Grove I am presenting questions due to discrepancies and concerns. This land is public land for all of the state of California and for each Californian to benefit from. The gains of a few businesses in Humboldt County do not outweigh what might be lost for the rest of the citizens of California for eternity.

Please find and answer questions that I have.

Sincerely,

Becky Sandman

Becky Sandman
2072 Cooper Dr.
Santa Rosa, CA 95404

QUESTIONS ON THE DEIR FOR RICHARDSON GROVE

Chapter 2.3 Biological Environment

SEC. 2.3.1. NATURAL COMMUNITIES (P. 79 DEIR)

Question: What justifies disturbing Richardson Grove State Park, a state park, preserved and protected for all Californians, that clearly shows benefits beyond those of certain northern California businesses? 1

Question: What justifies the possible weakening and eventual death of 1,000 year old Redwood trees that isn't only a gain for commercial business? 2

Question: In this "natural community" how can making it accommodate private businesses in northern California, with more and bigger trucks, preserve the true natural community in a public trusted land? 3

SEC.2.3.1. AFFECTED ENVIRONMENTS (P. 79 DEIR)

Major discrepancy: Stating the number of Douglas Firs to be removed;
i.e. P. ii, Summary, "*Several*,"
i.e. P. 80, *30 %*,
i.e. P. 81, *27*,
i.e. P. 19, Chapter 4, Project Impact, "*abundant*."

Question: How many actual Douglas Firs are proposed to be removed? 4

Question: How can there not be the question regarding uncertainty around how many precious Redwood trees will be removed, considering the discrepancies stated in the DEIR about the number of Douglas Firs to be removed? 5

Question: If there is such uncertainty and discrepancies in the DEIR, will there also be discrepancies while the project is being constructed? 6

"Soil disturbance, exaction, compaction, cutting roots, an d exposure to fuel and oils from leaking equipment," (P. 83, DEIR) are activities that damage trees.

Question: Being that there may be serious impacts to the ancient Redwood trees, who is designated to monitor them closely, making certain that the promised mitigations are done and monitored? Who are the experts who will do the monitoring? 7

Question: Will there be arborist specialists or other biological tree specialists to monitor adverse impacts moment to moment on the Redwood trees? What is used as a quality control? 8

Question: What will prevent a violation and/or what is the fine for violating (such as severing tree roots)? These trees, some of which are 15' in diameter, are irreplaceable, unless you wait 1,000 years for them to grow. 9

Question: What studies are being used in support of cutting shallow-rooted tree systems such as large Redwood trees? What evidence or data shows that cutting or damages root systems won't weaken or kill a Redwood? 10

Question: What are the studies for using impervious materials to cover root systems of ancient Redwood trees? What are the real mitigations that work with what data to back it up? 11

Question: Is there really a plan to protect the root systems of the Redwood trees (impacting the life of each tree) considering that P.86 DEIR states that some roots will be cut? 12

Question: Re: Water Quality
Where is it written into the DEIR, specifically that one option would be to not build the proposed project, meaning that leaving the area undisturbed would preserve the quality of water that now exists? 13

Question: Why is it therefore stated in the DEIR that water quality would be improved with the addition of culvert liners and extensions? These are only needed if the construction occurs; the water quality would change with construction. 14

Question: Why is it not clearly stated that the need to improve water quality is a result of the proposed project, that there would be no need otherwise? 15

Question: Re; the Avoidance, Minimization, and/or Mitigation Measure of the DEIR regarding Wetlands and Other Waters, Environmental Consequences, how will this be monitored effectively? 16

Question: Who is responsible to create this, according to what standards? Will it be done by biological experts? 17

SEC. 2.3.3. PLANT AND ANIMAL SPECIES

Question: There are two statements in the DEIR on P. 103 and on P. 104, that there will be adverse affects to threatened species, the Marbled Murrelet and 18

the Northern Spotted Owl. How then, can it clearly be stated that the proposed project at Richardson Grove won't be harmful?

Question: Based on what study with what data, does the resulting assumption exist that noise from construction trucks, saws, backhoes, jackhammers, etc., and extreme project lights will not significantly increase disturbance of species in the project area? 19

Question: If the DEIR states on P. 103 that "noise, lights, and activity disturbance generated by the construction on this project may disturb breeding and migration patterns in the project area," how can proposing to use 13 new predator-proof garbage can lids mitigate the disturbance of breeding patterns? What positive result will it create to have the garbage can lids to protect eggs and young if there are none there? Noise and lights can also prevent birds from nesting. 20

Question: According to the DEIR roots will be cut on mature, large trees. Typically used as nesting trees, these trees may eventually die due to the cutting of their root systems. 21

What then would be the impact as nesting trees die?

Question: How can the noise level of jackhammers, construction trucks, backhoes, saws, etc., used for the project possibly be no louder than that of campground noise and that of normal traffic? 22

Question: Where is the study that shows that the noise levels are the same? 23

Question: "Female Pond Turtles could build nests in this are." The Western Pond Turtle will most likely be disturbed. 24

On what statistics was it determined that there would only be "minor and temporary" impact to said turtles?

Question: Where is the data? 25

Question: Based on what study will the Pacific Fisher, not be adversely impacted by the project (P. 102)? 26

Question: Where's the data? 27

Question: If there is going to be a two year study to document the presence of the Marbled Murrelet in the project area conducted in association with the State Parks, when will that begin? P. 103 DEIR 28

Question: How can mitigations be addressed for the Marbled Murrelet without that study? 29

2.4. CUMULATIVE IMPACTS

Question: What is the cumulative effect of all the projects in the assessment area to the Marbled Murrelet and to the Spotted Owl which covers three counties? 30

Safety:

Question: Lack of safety on Highway 101 in the project area is stated as due to humans being distracted and fixed objects (trees). What will prevent humans from being distracted with the project changes (human beings get distracted)? How will the project change the fact that there are fixed objects (trees)? 31

Question: Instead of the project, considering the issue of safety, why not reduce the speed limit to 25 mph through that stretch by Richardson Grove? Even large trucks can maneuver safely at that speed. 32

1. *See General Response #1*.
2. The certified arborist for the project has evaluated the impacts from these construction activities and has determined the project would not result in a substantial adverse effect on the viability and root health of the old growth redwoods adjacent to the highway. This conclusion is based upon the protection measures that would be in effect for work within the structural root zone of redwoods thirty inches in diameter and greater. These measures include hand work instead of heavy equipment, using pneumatic excavator such as the air spade for excavation, incorporating the roots into the structural section rather than cutting, using permeable base material, incorporating the thinner structural sections minimizing excavations, and the fact that the impervious surface is increasing less than five percent. Dennis Yniguez, an independent certified arborist contracted by the Save Redwood League, concurred that the project would not have a substantial detrimental effect on the root health of the old growth trees.
3. Very little change is being proposed for the vegetative community. No old growth trees would be removed as a result of this project. The majority of the 30 trees proposed to be removed in the park are four to twelve inches in diameter and half are tan oaks. The largest tree proposed to be removed from the park is a 24 inch in diameter tan oak and only two redwoods are proposed for removal in the park and they are six inches in diameter and seven inches in diameter. The current ambience of the area for the motorist would not be altered substantially as a result of this project as the roadway would remain a curvilinear two lane highway with minimal to no shoulders with large redwood trees abutting the edges of the roadway.
4. Twenty Douglas fir trees are proposed to be removed.
5. There is not discrepancy in the tree removal, it is just different ways to describe the information. Table 8 identifies the tree species to be removed. Trees proposed for removal as well as the limits for proposed cut and fill are shown on the project maps in Appendix L in the document.
6. A certified arborist will be present to monitor ground disturbing activities adjacent to redwood trees during construction. This person will report to the Resident Engineer overseeing construction, not the contractor.
7. A certified arborist will be present during construction in the park.
8. As previously mentioned above, a certified arborist will monitor construction activities that involve redwood tree roots in the park. It has been demonstrated by a certified arborist that an air spade tool can be used to excavate material successfully without severing roots. Caltrans has committed to not cut roots larger than 2 inches in diameter.
9. See Response #8 above.
10. To the extent practicable, tree roots won't be severed but incorporated into the structural section. Numerous measures have been incorporated into the project design and construction to minimize the impacts to the roots. Dennis Yniquez notes that the proposed grade changes are minimized and "will favor moderately increasing road height rather than severing roots beneath existing grades." He further concludes that, "the existing root systems of old-growth trees will be almost entirely undisturbed by strategic additions to shoulder width and by minimal changes to road height."
11. A certified arborist evaluated the potential impacts to the trees. Only a minor amount of asphalt (0.3 acres) would be added to the existing asphalt. If the new asphalt was laid in a continuous width along the existing highway within the project limits it would be approximately one foot wide on each side of the highway. Roots affected with the new asphalt areas are likely already adapted to the existing roadway.

12. There are numerous measures incorporated into both the design to limit the depth of excavation and fill, as well as measures incorporated into the construction contract to protect the trees as identified in the document.
13. Section 1.4 in the document addresses the no build alternative. In addition, each of the environmental consequences sections in Chapter 2 discusses the no build alternative.
14. It is not correct to state that culvert work is only needed if the project is constructed. There are existing erosion issues that are being addressed by some of the culvert improvements. In addition, some of the culverts are deteriorated and would have to be replaced in the near future or they would eventually fail independent of the proposed project.
15. Refer to the response above.
16. There will be environmental monitors during construction ensuring all commitments, permit conditions, and special conditions are adhered to.
17. Regulatory agencies prepare permit conditions. Caltrans prepares the language for the special conditions that are incorporated into the construction contract.
18. The Biological Opinion for the proposed project has been received from the US Fish and Wildlife Service. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled Murrelet based on the following factors: 1) The removal of second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available within half mile and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) The trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current Marbled Murrelet nesting habitat; and 3) the project includes measures to avoid and minimize impacts to old growth redwood tree roots during construction.
19. The Noise Study Report and Biological Assessment that were prepared for this project.
20. The recommendation for corvid-proof trash cans has been used on past projects and has been accepted by US Fish and Wildlife Service as an enhancement measure for Northern Spotted Owls and Marbled Murrelets by discouraging the presence of their predators. Even if the species are not currently occupying habitat at Richardson Grove State Park, by discouraging predators, this measure would enhance the existing habitat over what exists presently. The US Fish and Wildlife Service determined that the construction impacts would be a relatively short term impact and would not affect long term breeding patterns of the listed birds.
21. The trees adjacent to the roadway are not likely to be used as nest trees because the birds prefer nest trees that are not exposed. Meaning, that due to the roadway, the trees are more open and thus, more vulnerable to corvids. The road and the redwood trees abutting it, have co-existed since 1915. It is not expected that the proposed project, with the protection measures in place, would result in the demise of the trees. The US Fish and Wildlife Service concurred that the project would not result in the loss of potential nest trees.
22. Noise impacts from construction activities are temporary. As part of the noise study conducted for this project, a sound meter was set up in Richardson Grove State Park approximately 100 feet from the roadway to measure day and evening decibel levels (see Section 2.25 in the DEIR/EA). Typical maximum temporary noise levels generated form construction activities are shown in Table 7 of the FEIR/EA. Existing noise levels are about 64 dBA Leq. Typical

construction equipment used for this project would average about 67 to 78 dBA. This would not be a substantial increase over existing.

23. The Noise Study Report prepared for this project.
24. The area that could have a pond turtle nest that is within the project limits is very small and the duration of construction at this area would be of short duration, about a day.
25. This determination is based on the area that is suitable for nests and the area anticipated to be disturbed by the project.
26. This determination is based on the professional biologist's opinion and consulting with appropriate agencies.
27. See above response.
28. The survey for presence of Marbled Murrelet will likely begin in the late spring, 2010.
29. Appropriate mitigation for the Marbled Murrelet is identified by the US Fish and Wildlife Service and contained in the Biological Opinion this agency prepares. The Biological Opinion for this project identified the corvid proof equipment enhancements and the Marbled Murrelet survey in their Biological Opinion. The survey is meant to provide information as to the breeding numbers in this inland site which would better assist the US Fish and Wildlife Service and the State Parks in developing land use management practices that would accommodate this species.
30. The cumulative effects of this project are discussed in Section 2.4 in the final document.
31. The project modifies the relationship of the fixed object to the curve. By modifying the geometrics of the curve, motorists should more easily traverse the curves. The project will not be removing the fixed objects, e.g., trees.
32. *See General Response #8*.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:43 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:43 PM -----

Polly Savoie
<pollysavoie@sbcglobal.net>
03/11/2009 10:43 PM
Please respond to pollysavoie@sbcglobal.net

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Ms. Floyd

I am submitting my plea to please reconsider the removal of any trees in Richardson Grove.

The utterly simple, yet magnificent suggestion that traffic lights could control the passage of large trucks through there (how many go through there in one day after all), just like it is done on any number of narrow bridges, and other situations which don't allow enough room for the interaction. At this time in the dire fiscal crisis, that money would be so much better used to keep the park running for more months of the year, bringing stimulating spending to one of the hardest hit areas of the state. 1 2

The size of the trees scheduled for removal is not the point. The size of the monumental testaments to the longevity of redwoods, the giants in that grove, is. These precious, irreplaceable icons belong to all people and future generations of California, and will bring visitors in perpetuity.

With no tap roots, these trees depend on the intertwining of all their root systems for stability, and removal of any compromises the stability of many,. Removal of the protective "smaller", more flexible and resiliant trees, subjects the larger trees to more wind force, and less anchoring when roots are removed, There is no controlling which direction they will fall. 3

This in turn presents the question of liability should trees start to fall because they are destabilized. All for the benefit of a few, by comparison, truckers who don't want to slow down to take the curves safely. 4

I, for one, have never, in all the hundreds of biweekly commutes I did for several years, never once saw any truck unloading or reloading on either end of the grove. Where to they execute this procedure? There is no place to do that within view of the highway. How many trucks actually do this? 5

This is not something that will benefit the greatest number of people, it is to benefit the least

number--truckers. Our area north of Richardson Grove does not need the high speed transport of goods that some would try to convince others that is necessary for our survival. This is nonsense. 6

Let the truckers use the larger trucks, put in stop lights, which they will activate by pulling onto a sensor at a pullout at either end of the Grove as they come through. When they have the green light, and other traffic is stopped, this will allow them to go through there without the necessity of having to stay in one lane, thereby "widening" the road for the longer trucks they want to use . It will delay them very little compared to this unloading and reloading they claim to have to do--maybe 10-20 minutes compared to an hour or more. And the remainder of the two way traffic has no problem going through in the existing lanes when the light is green for them. 7

This way, the Grove will be preserved, still as unspoiled as possible and still have a highway going through it so as to bring tourist dollars to the area's businesses, and the cost of pullouts and traffic lights at each end is miniscule compared to the cost of what is proposed. Then the remainder of that money can go to providing much more important road improvements or other projects, not the least of which is keeping the park open for more months of the year to bring more tourist dollars to an area which reallly needs it. 8

We cannot continue to sacrifice our most irreplaceable heritage for expediency. They are too precious, and there is virtually always another way.

Thankyou,

Polly Savoie

1. *See General Response #10.*
2. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.
3. The majority of trees to be removed in the park are concentrated in two areas, a former cut slope that has since revegetated near the southern end of the project limits and a cut bank at the northerly park boundary. Since these two areas have been disturbed before, there are no large redwoods present in the immediate surrounding area.
4. *See General Response #8.*
5. From information provided by some small business owners, the reloading takes place in or around Oakland or San Francisco since these areas are where major easterly and north-south routes converge as well as shipping opportunities to the west.
6. *See General Response #11.*
7. *See General Response #10.*
8. The park ambience for the motorist would not be altered substantially as a result of this project. The presence of large redwoods abutting the edges of a curvilinear two lane roadway with minimum shoulders would not be changed.

SCENIC WONDER
VERSUS TRAFFIC, DRIVEN BY PARANOIA AND CAPITALISM

What THEY say about the Richardson grove project.

1. It will help business.

It may help Big business get bigger which will probably result in the smaller business's losing their competitive edge. Retail prices probably wont go down. So the project is no benefit to the common person. 1

2. It will save lives.

Straightening the road will make people drive faster. Right now you have to think. "I better slow down and pay attention". You have to use your brain. The straighter the road, the less you have to pay attention, and the faster you will go.
Richardson grove is "Site Specific". Should we build a four-lane highway in and out of Yosemite to save lives? 2

3. It will save on fuel costs and pollution

This could be true. But if the government wasn't so focused on profitS and fighting for oil maybe we would have more efficient vehicles, cleaner air and NO WAR. Saving even more lives.
Lets face it. Most of us who have moved up here and others who were born here like the rural environment we have now. A straighter faster road only brings the city many of us moved from closer to us. If we want bigger malls, with cheaper prices, then maybe we should move back to the city.
People visit the north coast because of its beauty. I can't drive through Richardson grove without being amazed by how lovely it is. Every visiting tourist from here and abroad comes to the north coast to see this natural beauty.
If The Richardson grove project is allowed, it will only help a few people. But will affect us all. 3

Scenic wonder versus traffic, driven by paranoia and capitalism. Pun intended.

Joe Schaffer
Redway

Box 174
Redway Ca.
95560

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
2. *See General Response #13.*
3. *See General Response #2.*

Sarah Scher
<sarahpol@humboldt1.com>
01/28/2009 11:16 AM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Please stop the proposed Richardson Grove project

1

Please stop the proposed Richardson Grove project.

We must protect our magnificent redwoods, not cut them down.

Thank you.

Sarah Scher, MD
770 Tenth Street
Arcata, CA 95521
--

" What would have happened if millions of American and British people, struggling with coupons and lines at the gas stations, had learned that in 1942 Standard Oil of New Jersey [part of the Rockefeller empire] managers shipped the enemy's fuel through neutral Switzerland and that the enemy was shipping Allied fuel? Suppose the public had discovered that the Chase Bank in Nazi-occupied Paris after Pearl Harbor was doing millions of dollars' worth of business with the enemy with the full knowledge of the head office in Manhattan [the Rockefeller family among others?] Or that Ford trucks were being built for the German occupation troops in France with authorization from Dearborn, Michigan? Or that Colonel Sosthenes Behn, the head of the international American telephone conglomerate ITT, flew from New York to Madrid to Berne during the war to help improve Hitler's communications systems and improve the robot bombs that devastated London? Or that ITT built the FockeWulfs that dropped bombs on British and American troops? Or that crucial ball bearings were shipped to Nazi-associated customers in Latin America with the collusion of the vice-chairman of the U.S. War Production Board in partnership with Goering's cousin in Philadelphia when American forces were desperately short of them? Or that such arrangements were known about in Washington and either sanctioned or deliberately ignored?"

Charles Higham, researcher, about U.S.-Nazi collaboration during WWII

1. *See General Response #2.*

"Linda Shapeero "
<shap@humboldt1.com>
01/27/2009 08:29 AM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove Project

History: This message has been forwarded.

Dear Deborah,

Please, I urge you today to have the Alternative # 3 considered for the Richardson Grove Project. It would simply lower the speed limit and we would be able to save all the trees and the wildlife would not be disturbed. 1

I have lived in Humboldt County since birth, which will soon be for 60 years. One of the first beauties of Humboldt County, coming from the south,is that area. Please do not have it disturbed. 2

My husband also echoes my opinion. He has lived in this area since 1970 and would be quite upset to see such devastation just so some large trucks can come through.

Thank you for your consideration,

Sincerely,

Bill & Linda Shapeero

1. *See General Response #8.*
2. *See General Response #2.*

Rita Shea
<ritabshea@gmail.com>
01/30/2009 06:31 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove modifications

Hi,
This is just a very short note to put in my 2 cent's worth.

The currently proposed Caltrans Improvements Project to widen Highway 101 through Richardson Grove is neither a viable nor an appropriate solution. For the sake of a few, 1000-year old trees are going to be disturbed. Please look at Alternative 3, a lowering of the speed limit, as a possible solution.

I realize that very big trucks will have great difficulty negotiating the curves. However, many of us live in this area so that we can leave the big rigs behind. We have no need of superstores nor do we mind paying a little more for food and other products. The trees have been here for at least a thousand years and the many animals, birds and other wild things deserve to keep their space intact.

This is one voter who declines the project as it currently stands.

Sincerely,
Rita Bouman Shea

1
2
3

1. *See General Response #13.*
2. *See General Response #8.*
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.

1-16-09

Richardson Grove State Park cannot be replaced. The plan to realign the road to allow larger STAA trucks the right of way will cause extensive damage to the grove. These ancient trees cannot be replaced. Cutting these trees will endanger the intricate root systems of other trees that have thrived next to the highway for almost 90 years. 1

First of all, trucks that large should not be permitted on roads with passenger cars. I would be very fearful driving anywhere near them. Bicyclists would be in grave danger. 2

Secondly, there are other ways that can be utilized to deliver goods to the North Coast. There have been discussions of developing a light rail system that operates a very fuel efficient and pollution-reducing locomotive including hybrids. Another possibility that has been discussed is the concept of short-shipping by barge in and out of our area to the Port of Oakland. Finding other ways to transport goods is highly important. 3 4

The only people that would benefit from the STAA trucks would be the Big Box Stores. The small merchants would not be included. The small businesses by the Richardson Grove would be driven out of business. Just what we need in this time of unemployment. 5

How much will this un-environmental plan cost us? This state is already near bankruptcy. How can our Legislators and Governor even consider this plan while citizens are losing their jobs and homes? Schools are closing. People are hungry. This proposal is scandalous. 6

Let us all slow down, take a deep breath, enjoy the beauty and be thankful for the few minutes that it takes to drive through the Richardson Grove. Let nature have it's way and not change the Grove. Instead realize that the Richardson Grove should be on the list of Natural Wonders of the World. 7

Gale Shepline

1. *See General Response #3.*
2. The Surface Transportation Act of 1982 (STAA) is a federal regulation allowing STAA trucks on the National Network, Terminal Access routes, and Service Access routes (collectively known as the STAA network). The National Network (federal highways) are primarily comprised of the National System of Interstate and Defense Highways, for example I-5 and I-80. Federal law requires that States allow STAA trucks reasonable access to terminals. In the 1980's, California evaluated all State Routes and allowed STAA vehicles on those routes that could accommodate them. These are called Terminal Access (STAA) routes. US Route 101 has been designated a Terminal Access Route. Most major highways already accommodate STAA trucks, which are the industry standard for hauling goods.
3. Currently, infrastructure improvements are necessary to develop short sea shipping in Humboldt Bay, and funding for these improvements have not yet been identified. And, while short sea shipping may be an option in the future, it will not be practical for all shipping needs such as time sensitive goods or animals. In addition, Humboldt Bay has a couple of major disadvantages that must be overcome before short sea shipping would be perceived as viable. As stated in the Port of Humboldt Bay Harbor

Revitalization Plan, the Bay's limited inland access by both rail and trucks is a key disadvantage since Interstate 5 is a major route for goods movement due to its access to major population centers from California to Washington. This lack of inland access combined with Humboldt County's small population and limited economic base makes Humboldt Bay less desirable than other competing ports.

4. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
5. *See General Response #7.*
6. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.
7. *See General Response #8.*

yshelton@austin.rr.com
(Yvette Shelton)
01/28/2009 06:05 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Please accept these comments on the Draft Environmental Impact Report for the proposed Richardson Grove Operational Improvement Project. I am concerned that the damage posed by roadways in this most precious part of our heritage is simply too risky. Would you want your children and grandchildren to be denied the ability to enjoy the majesty of the amazing ANCIENT trees in Richardson grove? Simply for the sake of another road? Which is more important in the long run? Please review your thinking. These trees deserve our respect, admiration, and care. It is not sound thinking to consider any project which may harm their environment, including their root system. Please think about the future generations and the world we leave to them. WE are the stewards of our earth.

1

2

Sincerely,
Yvette Shelton
2111 Fuzz Fairway
Austin, TX

1. *See General Response #2.*
2. *See General Response #3.*

"scott sherman"
<scottlsherman @lycos.com>
01/27/2009 09:13 PM

To <Deborah_Harmon@dot.ca.gov>
cc
bcc
Subject big is not necessarily better: Richardson Grove

Hello,

As a student of society (Sociologist) and practitioner of healing arts (Marriage and Family Therapist) and as a resident of Humboldt County my strong vote is to move in the direction of smaller and more local self-reliance.

The bigger we get the more we extract goods from further away.

The Richardson Grove proposed changes would bring bigger vehicles into this area. Aside from uglifying a beautiful and serene winding rode through the giant Redwoods the changes would also bring about faster driving speeds; and with them . . . more accidents? 1

At a time in history when it is clear that we must all cut back on our carbon footprints, exploitation of natural resources and consumerism of all kinds why would we want to proceed with widening that stretch of Highway 101.
Granted that it might make a few bigger businesses more efficient and bring them more income. That is not to say that it would be the best thing for the majority of the life forms in Northern California. 2

Let it be!

thanks and gratitude

1. *See General Response #2.*
2. *See General Response #13.*

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:24 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove/Highway 101 Decrement Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:24 AM -----

Rick Siegfried
<humboldtrick@yahoo.com>
03/12/2009 09:08 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove/Highway 101 Decrement Project

12 March 2009

Re: Richardson Grove/Highway 101 Decrement Project

Highway 101 through Richardson Grove does NOT need "improving." Business owners (I am also a business owner in Eureka) argue that their shipping costs are too high because of the limitations of the road. Too bad. These people started their businesses in Humboldt County knowing full well what the limitations were. If they want to reduce their costs, then let them move to Santa Rosa (or anywhere else for that matter). Don't destroy the County for the enrichment of a few greedy idiots. 1

Most of us moved here for the natural environment and the low population density. Driving into the County from the south and entering Richardson Grove, you are reminded of the wonderful, beautiful scenery awaiting you further down the road. "Improving" the road will uglify this beautiful entrance to the County and bring more people into the area, destroying the natural, relatively unspoiled area. All for the greed of a very few. This is very, very sick. 2 3

Please do not destroy our wonderful County by widening 101 and forever altering Richardson Grove. As with most "improvements," this will have huge negative effects on the quality of life here in Humboldt County. Please leave well enough alone. DON'T DESTROY OUR COUNTY. Find something else to "improve." (No, wait! Don't "improve" anything!)

Sincerely,
Rick Siegfried
2125 18th Street
Eureka, CA 95501

707-442-0108
humboldtrick@yahoo.com

1. *See General Response #11.*
2. *See General Response #2.*
3. *See General Response #12.*

Steve Sillett
<prof.sillett@gmail.com>
01/27/2009 12:36 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Sillett comments on Richardson Grove DEIR for CalTrans road widening

History: This message has been forwarded.

Deborah,

I understand that CalTrans is planning to cut the roots of up to 30 large redwoods as part of the effort to widen Highway 101 through Richardson Grove State Park.

Cutting woody roots of redwoods leads to decline and often die-back of the treetop and other portions of the crown, depending on the number of large roots cut and the proportion of the rooting zone impacted by construction. I have studied redwoods for many years, and my repeated observations of large redwoods near construction sites have convinced me that cutting large roots is a BAD IDEA if maintaining tree health and vigor is a goal. Surely one of the primary goals in Richardson Grove State Park, as in all other redwood forests protected within our region, is maintenance of redwood tree health and vigor. Thus, I urge CalTrans to abandon plans to widen Highway 101 in a way that necessitates cutting woody roots, because this will greatly compromise Richardson Grove State Park's goal of protecting the giant roadside trees in this magnificent forest. 1

I am also concerned by the fact that CalTrans has applied for a Take Permit from the USFW. If granted, I presume this would allow CalTrans to perform the road-widening during the nesting season of the endangered Marbled Murrelet. Again, this is a BAD IDEA if maintaining the Marbled Murrelet is a goal of Richardson Grove State Park, which it surely is. Please refrain from construction during the Marbled Murrelet nesting season (mid-March through mid-September) as this will disrupt the biology of this endangered bird. 2

Sincerely,
Stephen C. Sillett
Professor and Kenneth L. Fisher Chair of Redwood Forest Ecology
Department of Forestry and Wildland Resources
Humboldt State University
Arcata, California 95521

1. Caltrans does not intend to cut any roots two inches or larger. Refer to *General Response #3*.
2. The US Fish and Wildlife Service concurred that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term effect on the breeding performance of the Marbled Murrelet as stated in the Biological Opinion for this project.

Robert Slayton
<onelove@humboldt.net>
01/25/2009 04:28 PM
Please respond to
onelove@humboldt.net

To deborah_harmon@dot.ca.gov
cc
bcc
Subject RICHARDSON GROVE/ HWY 101 WIDENING PROJECT

As a resident of Redway for many years, I am concerned by the upcoming vote on the Richardson Grove & Hwy 101 widening project Deborah. tho there may be a benefit in transportation costs allowing larger trucks to pass thru, I seriously doubt that the long term effects of altering Richardson Grove are minimal. There are already many chain stores in Humboldt county that receive their goods via smaller trucks, ie; Target, Costco, K Mart, Safeway etc... & the benefit of larger trucks transporting goods to these stores for re-sale will have virtually no effect on the prices we as consumers will receive. Also, as far as other business not locating here due to cost of goods & delivery... I do not believe this is a reasonable consideration. If the afore mentioned business's can operate & make a profit, then so can others. 1

Please do not vote to widen 101 in the Richardson Grove Park. There are alternatives & the one I believe to be best, is to slow down the speed limit. Richardson Grove is the gateway to Humboldt County & as the Redwoods have now been logged to near extinction, the few we have left need to be kept safe. Tourism in Humboldt County's is our future... this is what brings people here with money to spend. From all around the world people come here to see the tress...Please, let's leave a few of them here for future generations. Let us act responsibly, let us think of the future & future generations instead of immediate gratification, or a savings of a couple cents here & there.. 2 3 4

We who live here know it costs more to live here & we accept this fact, transportation costs are higher here, we know this... we also know, there is no other place in the world we'd rather be... and there is no other place in the world where there are trees of such magnificence & splendor as the Redwoods here in N CA. Let the trucks slow down, use smaller trucks to deliver goods, let us pay a couple extra cents for the inconvenience of shipping & to off set the costs... but please... do not cut down one more tree, do not allow big business & the all mighty dollar to destroy such a fragile environment as what we now live in... we do not need more business in N CA, we do not need bigger trucks to deliver more goods... we are not losing anything by not widening 101 in Richardson Grove, what we are doing is preserving, or saving a way of life, a better time... where people could slow down and enjoy life.. the scenery, a slower pace... stop & smell the flowers, the trees, the river, (whats left of it) 5

The world is changing, there are few places left where we have the opportunity to save & enjoy what remains of the Pacific Northwest Rain Forest. Let us not destroy what little remains for immediate gratification & the possibility of a few jobs, or lower costs for what is all ready available here. Think of the future... not of the all mighty dollar. Bigger isn 't always better.. What is lost now, will be gone forever... even tho the plans call for no old growth redwoods to be removed... it is only a matter of time... there are only a few places left north of San Francisco where the highway needs to confirm to the beauty of the area... & Richardson Grove is one... it is the gateway to Humboldt County & what is left of the Redwoods... please do not destroy this fragile area... cut the speed limit... no larger trucks... we are used to paying a couple extra cents per item & it is worth it... no one is forcing anyone to live here... we live here because of the area & the beauty & want it to remain as is...

Please do not widen Hwy 101..
Thank You
Bob Slayton
PO Box 1066
Redway CA 95560

1. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business and negatively affected their cost of doing business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. The difference between the larger chain stores and the local businesses is that the stores you mentioned have their own truck fleet and the smaller businesses rely on trucking companies to provide their shipping needs. What has been reported is that while the smaller California Legal sized vehicles are still in use, they are becoming increasingly harder to find as trucking companies replace their fleet with industry standard-sized vehicles (STAA trucks).
2. *See General Response #13* regarding information that the highway is not being appreciably widened.
3. *See General Response #8* regarding information that slowing traffic down does not meet the project purpose and need.
4. *See General Response #2* regarding how the project would not substantially alter the gateway character of the roadway.
5. *See General Response #11* regarding the issue with non-STAA vehicles.

Richardson Grove Improvement Project
c/o Kim Floyd
Project Manager
P.O. Box 3700
Eureka, CA 95502

Dear Decision Makers,

My wife and I are amazed that the Richardson Grove Improvement Project is slated to move forward. It is the worst solution to a problem that has been ignored for decades. We can not believe that responsible people in decision making positions are so short sighted! What ever happened to the idea of completing a 4 lane highway. Highway 101 is a major north-south artery and should be improved to the same standards found just north and south of Richardson Grovel. The original plan called for relocating the freeway across the Eel River and this idea should not be abandoned. 1

Our History with this area is extensive. My father (E. J. Smart) was Cal Trans Maintenance Superintendent for this stretch of road back in the '50's and early '60's. I have worked at Richardson Grove as a Park Employee. My wife and I met at Richardson Grove and when we frequently drive the Highway 101 corridor we marvel at the beauty of this portion of the drive. Please do not take the Ronald Reagan view that "if you've seen one redwood tree you've seen 'em all".

It is time to make plans to finish the freeway the way it was originally designed. State Funding may be a problem given the current budget crisis, but Federal money should be sought. With all the bail out money being thrown around, why isn't Humboldt County pushing for appropriate funding? Richardson Grove must be preserved as part of the Avenue of Giants!!! 2

Arguments for building the originally intended freeway are many:
1.) Preserve the original park setting
2.) Create jobs in construction
3.) Improve tourism
4.) Don't argue for half-measures as a solution to a problem that has existed for decades.
5.) Extend the scenic Avenue of Giants project.
6.) Bring genuine notoriety to Humboldt County as a national leader on

environment issues.

In conclusion, the short sighted quick-fix solution is no solution at all. It is a time for the Improvement Project leaders to think about the best way to create jobs, help local businesses, preserve the environment and demonstrate some real leadership.

3

Sincerely,

Dennis Smart + Peggy

Dennis and Peggy Smart
7451 Robinson Creek Road
Ukiah, CA 95482

Phone # (707) 462-7259
e-mail: u2bsmart@yahoo.com

1. *See General Response #9* regarding information on the status of the park bypass.
2. The bypass alternative that was evaluated in the past had an estimated cost of $600 million. There has been no indication that this amount of funding would be available for this project under the American Recovery and Reinvestment Act.
3. Because of the challenges to obtain the necessary funding for a bypass and the substantial environmental impacts that would result from such a bypass, the current Route Concept Report for this stretch of US Route 101 for the foreseeable future is that the highway remain a two lane conventional highway.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:16 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: public comment

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:17 AM -----

James Smith
<edwebnetjds@yahoo.com>
03/07/2009 05:49 PM

To Kim_Floyd@dot.ca.gov
cc
Subject public comment

Hi,

I have a letter of comment, for you to file. It is attached. Please, send me more information about the DOTs plan to remove these Old Growth Trees, in Richardson Grove. Perhaps, you could attach a document or two to an email and send it to me, at my address, above.

This is an issue which thousands of concerned citizens really care a great deal about. For this reason, our environmental group, The Old Growth Organization, is asking that you postpone the scheduled date for these trees removal. This will allow time for additional research and public comment.

Thank you,

James D. Smith

letterkim.doc

To: Program Manager Kim Floyd

From: James D. Smith

I am the founder of an environmental group, The Old Growth Organization. We are a group with thousands of members and friends, throughout California, and the Unites States.

We are only learning of your plans to cut down some of the Old Growth in Richardson Grove, at this late date. Thousands of concerned citizens are attempting to preserve Old Growth, especially the California Coastal Redwood, and the other four species that associate with it, including the Douglas Fir, Grande Fir, Western Hemlock and Giant Big Leaf Maple. 1

After conducting some initial research on the subject, our group would like to offer a counter-proposal. A study could be conducted on improving the safety of traffic through these trees, at a lower cost to the taxpayer, by installing lights of varying types, to both light the trees and flash a yellow warning light. The speed limit through these curves could then be announced as 20 MPH, with more authority, using newly installed lighted signs. Therefore, this research could conclude that it would save the taxpayers money, and preserve their valuable resources, to light that area dynamically, and post signs to increase drivers awareness of the nearness of the trees and the danger this represents. 2 3

Additionally, our group's viewpoint is that Highway 101 dissects an important environmental region, known as the native habitat area of the California Coastal Redwoods. This Old Growth species is very important to protect, and we do not want to see these trees cut down, to widen this highway. Richardson Grove and Humboldt Redwoods State Park were established to protect these magnificent living creatures, and the almost magical habitat they create beneath their canopy. 4

For this reason, we are asking you to postpone the date for their scheduled removal, to allow further time for public comment, and to allow time to research additional alternatives, such as improving the lighting with a special system of lights designed to flood the dangerous area after dark, while yellow flashing warning lights needing to be installed before the curves and on the closest trees, to warn drivers, visually, of the impending danger. Additional signs could be posted, lowering the speed limit for next 0.6 miles, or whatever, to 20 MPH. This system of lights and signs will significantly increase the ability of truck drivers, and other drivers, to negotiate the tight curves, once their speed has been lowered by the new, flashing yellow lights and signs. 5

These trees should be protected, and for generations, millions of Californians who care, have thought they were. We felt good about establishing protections for these Old Growth trees, and we expected these protections to last over the long-term, for hundreds of years. We would like these protections to withstand the needs of modern trucking, their special interests and their new piggy-back trailers. Please, postpone your plan to cut down these trees, to allow more time for public comment and additional research. Millions of concerned citizens would rather protect these trees, if there were a viable option available to improve traffic safety, at night, through this region. 6

Sincerely,

James D. Smith
Founder, Old Growth Organization

1. The proposed project would not remove any old growth trees. The largest trees to be removed are a 24 inches in diameter tan oak and 23 inches in diameter Douglas fir tree. The largest redwood to be removed is 19 inches in diameter. There are only two redwoods to be removed from within the park and they are 6 and 7 inches in diameter.
2. *See General Response #10* regarding signalization alternative that were considered.
3. *See General Response #8* regarding information on how reducing the speed limit does not meet the project purpose and need.
4. The park was established after the road was constructed. The project as designed, will not cut down any old growth trees. The largest tree to be removed is 24 inches in diameter. With the minimization measures in place, arborists have determined that the project would not result in substantial adverse impacts to the old growth trees.
5. Substantially increasing the lighting, especially flashing lights along Route 101 adjacent to campground areas in the park, would likely not be acceptable to the California Department of Parks and Recreation, the agency that manages Richardson Grove State Park. The STAA restriction is in place because of the existing geometrics of the roadway are insufficient to allow STAA vehicles to traverse without off-tracking. Increasing visibility and reducing speed will not be sufficient to correct the issue of off-tracking related to the existing highway alignment.
6. There have been several opportunities for public comment for this project including four public meetings. The public comment period for the DEIR/EA began December 5, 2008 and concluded March 12, 2009 giving the public ample opportunity to comment.

susanna
<lasusanna@asis.com>
01/29/2009 03:51 AM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson grove trees/trucks

To Whom this may concern,
This is a plea to support "Alternate # 3" the no build option on the Richardson Grove for big truck access project. It is known that Redwood trees are interconnected through their root systems and the taking of any Redwood tree will adversely impact its community of neighboring trees and the larger supportive ecosystem including animal species. 1 2

I also plea on behave of the aesthetic value of this beauty and its inspiring passage. This natural gateway into our county is our fortune to generously share with all those who pass through. I support simply lowering the speed limit to save trees, money and to increase traffic safety .

Sincerely,
Susanna Snodgrass

1. *See General Response #8* regarding information of how reducing the speed limit does not meet the project purpose and need.
2. *See General Response #2* regarding information of how the project would not affect the existing gateway character of this section of highway.

Dave Spreen Enterprises, Inc.
PO Box 113, Kneeland, CA 95549
707.445.2244, fax 707.445.1024

26 January 2009

Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501

RE: Richardson Grove Operational Improvement Project
HUMBOLDT COUNTY, CALIFORNIA
DISTRICT 1 – HUM – 101, PM 1.1/2.2
464800
Draft Environmental Impact Report/Environmental Assessment and Programmatic Section 4 (f) Evaluation

Dear Ms Harmon:

I have reviewed the above-referenced Project DEIR, giving special attention to the information provided concerning the proposed project's economic justification and economic impacts.

Those are my areas of special interest and expertise.

The information concerning Caltrans' proposed project's economic justification and economic impacts appears to be drawn exclusively from the March, 2008 report "Realigning Highway 101 at Richardson Grove: The Economic Impact on Humboldt and Del Norte Counties" prepared by Dr David Gallo of Chico State University's Center for Economic Development under a contract with your department in support of the proposed project.

Dr Gallo's analysis is not based upon statistically significant sampling

In order for Dr Gallo to arrive at the conclusions that he presents in his report, the data that he has applied to his analysis would have to be drawn from statistically significant sampling. The data upon which Dr Gallo's conclusions are based were not drawn from statistically significant sampling. Dr Gallo's conclusions are not valid. They do not represent a valid rationale for the department's proposed realignment of Highway 101 through Richardson Grove State Park. 1

By way of background concerning my qualifications for critiquing Dr Gallo's Humboldt and Del Norte work for your department, I hold a degree in mathematics from Humboldt State University and I spent more than a decade negotiating rates and scheduling shipping for a major Eureka-area wholesale building and floor coverings materials distributor. Since 2001 I have operated my own consulting business specializing in the shipping of flooring materials in the North Coast region, nationally, and internationally.

Caltrans' DEIR asserts ("Purpose and Need", Section 1.2, page 2) that "As these STAA vehicles have become the "national standard," areas that do not have access for these trucks are at an economic disadvantage because truck cargos must be unloaded and transferred to shorter trucks coming into and out of the county, which results in making goods movement more expensive and less timely."

Both of these premises – that 1- STAA-limited areas such as ours are at an economic disadvantage and that 2- moving goods in and out of our area on STAA trucks would be less

expensive and more timely than our current trucking services – need to be examined in relation to Humboldt and Del Norte counties' business demographics and particular logistics situation. The Gallo Report attempted to do this, but its assessment is based almost entirely on the Humboldt County Economic Development Division's online survey (Gallo Report, page 1) which was inadequately designed and poorly implemented by any acceptable standards of sampling.

For example, on page 3, you will find that conclusions concerning the "Effect on Annual Truck Traffic" are based on only 14 responses. 2

The "Categories of Costs" (Gallo Report page 4) is a one-sided list of unsupported economic arguments and green-washing claims. The public has been misled to believe that large trucks must somehow stop south of Richardson Grove to reload onto smaller trucks in order to continue on up Highway 101. 3

95 percent of Humboldt County businesses ship or receive LTL

How many trucking firms, local or non-local, actually ship more than one 53-foot truckload in general now? In my experience 95 percent of the businesses in Humboldt County ship or receive their freight LTL (less than truckload). 4

We could put eight traffic lanes through Richardson Grove State Park and we will be no closer to major hubs and markets. Freight rates are based primarily on weight, distance shipped, class (type of product or merchandise shipped), volume, and frequency.

Shipping delays could actually increase as carriers seek to fill larger trucks. Competition could decrease as weaker carriers are pushed out of the market.

Private carriers do not combine freight. The reductions in traffic projected in the report and DEIR are, therefore, over-estimated. Freight movements in and out of Humboldt County can be re-aggregated on paper, for the purpose of the Gallo report, or justifying Caltrans', but it cannot be re-aggregated in practice, in real life. 5

There is nothing terribly "green" about larger trucks with under-utilized capacity, but they certainly would be a possibility with the fleet conversion contemplated in the Gallo report – and their effect on the environment needs to be factored into the Richardson Grove project as well.

Larger businesses will have greater access to fully-loaded STAA trucks, putting the area's small and medium businesses at further competitive disadvantage. 6

We see nowhere in the DEIR nor Gallo report where increased road maintenance costs attributable to damage caused by full STAA truckloads is included among the economic impacts of Caltrans' proposed project. There is an abundant literature on the subject. We don't understand why it has been omitted here. 7

The "Quantifying Impacts" (Gallo report, page 6) attempt to justify the survey results, but acknowledge that they are limited to only a few sectors. Footnote 1 on page 1 states that the survey was confidential and that "none of the responses can be released to the public", thereby making further scrutiny of the data impossible. Related to exporters' ability to pass along higher freight costs, however, footnote 3 on page 5 singles out the Easter lilies operations at Smith River. 8

The report's reasoning is hard to follow from that point, but the footnote then goes on to say that the report thus assumes 100% of higher freight costs are "absorbed by local firms, workers, and input suppliers". Is this really a valid assumption? Is this statement equally true for both locally owned businesses *and* the local branches of businesses based outside of the two counties? 9

On page 5, Gallo asserts that it is "impossible" to identify any particulars, but that "economic theory does tell us that all of the increase in the cost of truck transportation is borne by the local economy".

Really? And even if that were so, will the proposed project through Richardson Grove State Park have more than a very marginal effect on freight rates? 10

At least 95 percent of the cost of shipping in/out of our area is distance. Period.

When it comes to increased truck freight costs in and out of our area, the biggest factor (at least 95 percent) is distance. The Gallo Report claims on page 2 that the "survey results indicate that RG STAA restrictions" increase costs for the "affected sectors" by 16.9 percent. 11

So what is the effect when spread across all of the sectors? 12

I question any direct relation between freight cost and local area wages as implied in "Local vs. Non-Local" truck services (Gallo report, page 7). Unless I missed it, there is no calculation on what the expected reduction in common carrier rates would be after the project is completed. 13

Where is the survey of common carriers asking what this will mean to them; if they will need to buy new trucks; *if they will be forced to lay off drivers, but increase wages; and by what percentage will their overall freight rates be reduced, if any?* 14

Page 9 "Annual Impacts" admits to being weighted. Lost sales potential is not included. The last paragraph states that costs are based on only 19 online responses. Then, on page 10, there is an attempt to quantify lost sales within the IMPLAN model utilizing the very limited survey data.

Was the pulp mill included among the responses/Gallo report analysis?

It is likely the pulp mill was a survey respondent. If so, and if the now-closed mill is not reopened, how does its loss affect the economic impacts projected in the Gallo report?

It is within the realm of possibility that the pulp mill accounted for up to 50 percent of the total shipping represented in the HCEDD's limited survey data. Consequently, the Annual Economic Impact (Gallo report, page 9) of lost income would be cut in half. 15

What about the multiplier effect for local compared to out of area businesses? If the Richardson Grove State Park project results in greater cost savings for "big box stores" on the incoming side, then the 20 percent multiplier for dollars spent at local businesses will decrease, while the six percent community multiplier for out of area corporations will increase. However, since there are only so many retail dollars to be spent, the net result over the long term could be a significant reduction in local economic activity over the "no project" alternative.

Why isn't that range of possibility included in the "Multiplier Impacts" on page 10 of the Gallo Report? 16

The "Conclusions" Table 4 impacts (Gallo report, page 12), in addition to the wide degree of uncertainty due to the limited survey sampling and data gathering method, already need a major downward adjustment given the current recession. Also, page 12 footnote 5 is not specifically referenced, nor is the footnote's assertion that no new small, efficient freight trucks will come on the market in the future.

Please provide references for this, so far as we know, totally unsupportable statement.

Conclusions and recommendations

The Confusion Hill Bypass project is a good example of a Caltrans project that makes a lot of sense: benefits go to all users, carriers and businesses equally. In addition, significant economic and environmental gains are evident and can be tracked. There was nothing but support for that project.

Based on my analysis of the Gallo report and the DEIS sections that depend on it, I would recommend that Caltrans initiate an independent assessment of the statistical validity of the HCEDD Survey; the effect of that validity – or the lack of it – on the Gallo report's conclusions; and the implications, therefore, for the rationale of Caltrans' proposal to widen Highway 101 through Richardson Grove State Park. 17

Based upon my considerable experience with shipping costs in and out of our region, and the role that shipping costs play in business profitably in our region, I conclude that if a more accurate range of future economic impacts were calculated, the cost of the Richardson Grove Operational Improvement Project could not be justified. 18

Safety issues at Richardson Grove can be more effectively and economically addressed by other methods. 19

At this point in time I would recommend that Caltrans adhere to the "No Project" alternative.

Sincerely,

David M. Spreen

David M. Spreen, President
Dave Spreen Enterprises, Inc.

1. While the findings in Dr. Gallo's study are based on information from a limited portion of businesses present in Humboldt County, for the industry sectors it covers, the response rate was statistically valid. It is assumed that those businesses choosing to participate in the survey were concerned about shipping costs. The conclusions in Dr. Gallo's study did not provide the rationale for the project.
2. See Response #1 above regarding the survey results.
3. STAA vehicles cannot legally traverse Richardson Grove. Therefore, to legally traverse the grove, STAA vehicles traveling north on Route 101 must offload onto CA-Legal vehicles south of Richardson Grove before continuing north of the grove.
4. It is not known how many truck loads are shipped in or out of the county.
5. It is not anticipated that the project would result in substantial reduction in truck traffic. Nor is a substantial increase anticipated.
6. Caltrans has heard from several small businesses that lifting the STAA restriction at Richardson Grove would be beneficial for them.
7. Total Gross Weight cannot exceed 80,000 lbs with restrictions on individual axle loads, and this restriction applies to both STAA and CA-Legal vehicles. The exception is permitted loads that will exceed the legal weight due to non-reducible loads (i.e., the load cannot be reasonably broken down any smaller). More information is available at http://www.dot.ca.gov/hq/trafficops/trucks/trucksize/weight.ht. As the weight restrictions are not increased for STAA vehicles over that of CA-Legal vehicles, road maintenance costs should not be substantially affected.
8. The County conducted the survey and has not released the raw data to Caltrans.
9. Dr. Gallo stands by the findings in his report. In addition, the findings in Dr. Gallo's study are used to provide an indication as to the potential results of implementing the project. The conclusions, in of themselves, do not provide the justification for the project.
10. It is not solely the perceived effects on freight rates that small businesses have mentioned regarding their concerns about lack of STAA access. Businesses have mentioned the difficulty and uncertainty in the delivery of imported goods and the costs of having loads wait until a non-STAA vehicle can be found. They have also mentioned lost time and the cost of reloading goods from non-STAA vehicles to STAA vehicles or vice versa. In addition, for some, it is simply the availability of access that is of concern, not the cost per se. For example, racing enthusiasts transporting their racing cars have been affected by the STAA restriction at Richardson Grove. Center Arts has reported that some theater productions have been affected because the sets are transported in STAA vehicles.
11. Dr. Gallo stands by his findings.
12. The effect of lifting the STAA restrictions at Richardson Grove was not calculated for all sectors.
13. Dr. Gallo stands by his findings. The findings from this study were used to gain a broad brush look to see if there would be economic benefits to implementing the project, not provide the justification for the project.
14. There are no indication that shipping needs will markedly change in the near future. It is not expected that lifting STAA restrictions would substantially affect the local carriers. A survey performed by Fehr & Peers for shipping companies from the Eureka vicinity and Del Norte County was performed for the STAA access project in Del Norte County. Over half stated that they would be unaffected by opening up STAA access. Some of the shippers indicated if Richardson Grove was opened to STAA, they might increase their shipping. For those indicating that they might increase shipping, some are only currently shipping two to three

loads a month. Given this, even if they doubled their shipping it would be an insignificant increase in truck traffic.

15. The pulp mill owner did not respond to the survey so that sector was not included in the findings in Dr. Gallo's study.
16. Several small businesses have reported that lifting the STAA restrictions at Richardson Grove would be economically beneficial to them and none have reported to Caltrans that implementing the project would result in adverse impacts to their businesses.
17. The findings from this study were used to gain a broad brush look to see if there would be an economic benefit to implementing the project. The specific conclusions are not used to justify the project.
18. The project to make operational improvements at Richardson Grove has been advocated by the County of Humboldt and has been identified in the current and past Regional Transportation Plans for the County. The specific conclusions provided in Dr. Gallo's study are not used to justify the project.
19. The safety improvements that would result from constructing the project are an added benefit of the operational improvements. The proposed project is not a safety project per se, but the improvements made should help improve safety at this location for all motorists. The wider shoulders north of the park should also provide some additional improvements for non-motorized users as well.

Dave Spreen Enterprises, Inc.
PO Box 113, Kneeland, CA 95549
707.445.2244, fax 707.445.1024

10 March 2009

Deborah Harmon, Senior Environmental Planner
CA Department of Transportation
1656 Union Street
Eureka, CA 95501

RE: Richardson Grove Operational Improvement Project
HUMBOLDT COUNTY, CALIFORNIA
DISTRICT 1 – HUM – 101, PM 1.1/2.2
464800
Draft Environmental Impact Report/Environmental Assessment and Programmatic Section 4 (f) Evaluation

Dear Ms Harmon:

I have reviewed the above-referenced Project DEIR, giving special attention to the information provided concerning the proposed project's economic justification and economic impacts, which I detailed in my letter dated January 26, 2009.

I would like to submit the attached 5-page letter for the official record. I received the letter anonymously and the writer is unknown. I can only speculate, but this could be because the writer wishes to avoid any potential retaliation for a variety of possible reasons. What is important is that upon examination, the writer's experience, knowledge, and analysis of the trucking industry in Humboldt County is accurate. It is important for decision makers to have this kind of testimony to make a fully informed decision. 1

I also want to bring to your attention something I find quite disturbing. The Eureka Reporter Editorial page in today's (3/11/09) Times-Standard urges support for the Richardson Grove widening project based on what appears to be a set of self-serving distortions and misconceptions. I'll get to the self-serving part in a minute – in the meantime, please note the Eureka Reporter is owned by businessman Rob Arkley's Security National firm.

A barrage of media ads stating the same misconceptions have been placed by "Sunshine for Humboldt", which is identified in the ads as "a non-profit civic group". KINS radio has been running the ads incessantly – approximately every 20 minutes. So, who is Sunshine for Humboldt and what is their motivation to conduct such an expensive and relentless campaign?

The SUNSHINEFORHUMBOLDT.ORG website is not yet up, but a search of the public WHOIS database reveals that the registered owner of the domain name is SN Servicing Corp., 323 Fifth St., Eureka, CA. Again, that would be Mr. Arkley's firm.

Now consider that Security National is in the process of getting permits to construct the Marina Center project in Eureka. The anchor store for the proposed project is Home Depot. It appears to me that Security National and Mr. Arkley have substantial personal gain at stake in the final outcome of the Richardson Grove project. 2

In addition, it is no secret that Mr. Arkley has contributed heavily to local, state and national politicians. This leads to the public perception that some sort of political cronyism is at work

here. At a time when so many of us are being asked or forced to sacrifice, this kind of "business as usual" process, some might call "earmark", is no longer acceptable.

Conclusions and recommendations

The Confusion Hill Bypass is a good example of a Caltrans project that makes a lot of sense for the logistics and demographic realities of Humboldt County: benefits go to all users, carriers and businesses equally. In addition, significant economic and environmental gains are evident and can be tracked. Everyone supported that project.

Based on my analysis of the Gallo report and the DEIS sections that depend on it, I would recommend that Caltrans initiate an independent assessment of the statistical validity of the HCBDD Survey; the effect of that validity – or the lack of it – on the Gallo report's conclusions; and the implications, therefore, for the rationale of Caltrans' proposal to widen Highway 101 through Richardson Grove State Park. 3

Based upon my considerable experience with shipping costs in and out of our region, and the role that shipping costs play in business profitably in our region, I conclude that if a more accurate range of future economic impacts were calculated, the cost of the Richardson Grove Operational Improvement Project could not be justified.

In summation, I highly recommend that Caltrans adhere to the "No Project" alternative and consider additional alternatives for safety improvements that conform with the 2002 Caltrans 101 Route Concept Report, including special attention to non-motorized facilities support.

Sincerely,

David M. Spreen, President
Dave Spreen Enterprises, Inc.

1. The letter attachment from "Concerned Traveler" has been added as a separate letter.
2. A number of businesses have a stake in the final outcome of providing STAA access at Richardson Grove. The Marina Center is an independent project and was initiated prior to the initiation of the Richardson Grove Operational Improvement project.
3. The findings from this study were used to gain a broad brush look to see if there would be an economic benefit to implementing the project. The specific conclusions are not used to justify the project.

Project Manager

I attended your presentation at the River Lodge in Fortuna. I drive that stretch of road regularly as I am familier with the conditions.

I suggest that the speed limit be lowered to 25 mph. This would allow two large trucks to slow or stop to pass safely without disrupting an already slow stream of traffic. The one lane alternative is not going to work, and the proposed re-alignment is too expensive, and disruptive to the park, for the small gain. In this time of fiscal crisis, I suggest leaving the money in your budget for something that will actually make a difference. 1

Glen Squire

464 Senestraro
Fortuna, CA
95540

1. *See General Response #8* regarding information about how reducing the speed limit does not meet project purpose and need.

G. SQUIRE
464 Senestraro
Fortuna, CA
95540

EUREKA CA 955
26 DEC 2008 PM 5 L

Caltrans Project Manager

12-26-2008

Melba Squire attention: Kim Floyd - Manager

[redacted]

My husband & I moved our family to Fortuna 12/29/78 & have traveled the 101 stretch of road at Richardson Grove many times. I think if the speed limit was lowered, it could solve the problem - I wouldn't mind going slower to accomodate "slower driving trucks" - I drive slow through the area anyway to enjoy the beauty & majesty of these gorgeous & magnificent trees. 1

We were totally in "awe" the first time we saw the trees at Richardson Grove - We have camped there -- We have had Thanksgiving dinner there, & wouldn't want to see the beauty of the drive diminished in any way, 2

Sincere wishes for a good solution

Melba Squire

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #2* regarding information that the gateway character of the highway would not be substantially altered by the project.

P.O. Box 3700
Eureka, Calif.
DEC 29 '08 AM8:16
95502
OPER
TY & PS&E
RDINATOR
TR
ANCE
DORD
MGMT
NG

Today

Greetings

Please, Consider Leaving "well enough Alone in regards to The Redwood Coridor Through Richerdson's Grove. It Seems The Best & Simplest Solution would be to Reduce speed to A SAFE Flow. And to enjoy it The WAY it is. Best wishes!

Ron Squire

1

1. *See General Response #8* regarding how reducing the speed limit would not meet project purpose and need.

DIST DIR
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BUS MGMT
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HYDRAULICS
OFFICE ENGR
MAT & LAB
DOD-PROJ COORD
PROJ PROG MGMT
ADVANCE PLNG
SURVEYS
DOD-MAINT & OPER
MAINT ENGR
MAINT MGR
PERM TS
SHOP
TRAFFIC SAFETY & PS&E
TRAFFIC OPS
DIST R/W AGENT
R/W ENGR
R/W APPR COORDINATOR
DOD-PLNG
TRANS PL/PUB TR
LOCAL ASSISTANCE
EGR
ENV MGMT
ENV ENGR
GEN FILES

Project Manager
Kim Floyd
P.O. Box 3700
Eureka CA
95502

"stargarnett@netzero.com"
<stargarnett@netzero.com>
01/29/2009 08:21 AM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject slow down the trucks, save the trees

History: This message has been forwarded.

Comments on the DEIR
On Richardson Grove

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

1. *See General Response #15* regarding the out of kind mitigation.
2. *See General Response #16* regarding the corvid proof equipment mitigation.
3. *See General Response #8* regarding how reducing the speed limits does not meet project purpose and need.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:23 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove Proposed Widening Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:23 AM -----

"Karolyn & Dick Stein" <kardick68@suddenlink.net>
03/10/2009 10:21 AM

To <kim_floyd@dot.ca.gov>
cc <senator.wiggins@senate.ca.gov>, <cclendenen@co.humboldt.ca.us>, <mlovelace@co.humboldt.ca.us>, <jrsmith@co.humboldt.ca.us>, <bneely@co.humboldt.ca.us>, <jduffy@co.humboldt.ca.us>
Subject Richardson Grove Proposed Widening Project

Good morning, I have been following the conversation concerning the proposed widening of Highway 101 at Richardson Grove. As I understand it, the proposed project would require removal of 87 trees & the cutting of the roots of dozens of old growth redwood trees. It would also include covering additional permeable areas with asphalt & construction of a 300 foot long retaining wall. 1

Since redwoods have no tap root, they are supported by a shallow system of roots. Disturb that system & you imperil not only those trees whose roots have been cut & covered with asphalt, but an unknown number of neighboring trees. A good wind storm will then represent an immediate threat both to the integrity of the remnant old growth forest, but also to any vehicles happening to be traveling thru the grove at that time. 2

The economic benefit of the proposed project may be real, but seems to me to be a tenuous argument at best, requiring a rather heavy hand environmentally for a relatively small economic return. 3

Recently, I read of a proposed alternative to your project which seems worthy of serious analysis. The suggested remedy to the problem was to require large trucks to wait until oncoming traffic was halted by a traffic light system. This would enable them to cross the median when necessary to negotiate tight curves & would not require any adverse impacts to Richardson Grove trees. It would mean that large trucks & other vehicles, including passenger autos, could be forced to wait for a relatively short period of time before driving thru the grove. A small price to pay for safe transit thru the area without cutting or inflicting harm on a priceless natural treasure that belongs to all of us & generations yet unborn. 4

Please give this alternative your serious attention as you try to do the impossible & please everyone. Thank you, Dick Stein, Eureka

1. A design modification for the retaining wall was developed after the circulation of the DEIR/EA changing the location to the east side of the highway and changing the wall type to a below the road wall which results in the wall being 100 feet shorter and taking fewer trees. The total number of tree removals is now 54 trees.
2. *See General Response #3* regarding minimization measures incorporated to protect the trees.
3. *See General Response #11* regarding information on the need for the STAA vehicles.
4. *See General Response #10* regarding information on the signalization alternatives.

Kim
Floyd/D01/Caltrans/CAGov
02/23/2009 09:21 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Leave richardson's grove alone.

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:20 AM -----

Shannon stewart
<sps26@humboldt.edu>
02/21/2009 06:54 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Leave richardson's grove alone.

I am taking this oppurtunity to have my opinion acknowledged. I do not want the road to be widened for all the reasons stated in earlier comments and in the paper. Plus I livd there for 5 years and already cal trans is blocking public trails with brush and downed tress. Every time I clear the trail they are back there filling it up with tresses and roots and shrubs from the surrounding areas. State parks are for the use of people not big trucks for big businesses. shannon 1

1. *See General Response* #13 regarding information that the project does not result in appreciable widening through the park.

A balanced approach needed for Richardson Grove

MY WORD

Glenda Hesseltine

So nice to see Alan Olmstead's letter on March 3, reminding us that a balanced solution is required, and is indeed possible, in regards to Caltrans' highly controversial proposed project for Richardson Grove.

Mr. Olmstead is correct in saying that there are simple, low-tech solutions available that would save the trees, allow the trucks, and also save the taxpayer the waste of $6 million on the cost of the ill-conceived proposed project. Slowing the traffic to 25 mph or establishing a traffic light would preserve the trees, and allow the trucks. With a little deliberation, cooperation, and common sense, everyone can be happy.

A current misconception in the public mind is that only 40 trees are affected by the proposed project. This is not true. Caltrans' own document, the draft environmental impact report, shows 87 trees designated for removal. This means a significant disturbance of the canopy in the less than one mile area of the project. Perhaps even more disturbing is the information in the same Caltrans document specifying the proposed cutting of the root systems of 30 of the largest redwoods in the grove.

While it is true that the largest trees will not be removed, it is also true that their roots will be cut. With no tap root, severance of the shallow rooted network leaves the giant redwoods with a perilous future.

Some of these trees have been there since before the time of Christ. What a shame to lose them because of preoccupation with our personal profit and loss statements.

According to the same Caltrans document, in addition to severing the roots, more asphalt will be applied, and a 300-foot retaining wall will have to be placed to [illegible] the erosion of the cut ma[illegible] rough the grove.

This project, as proposed, [illegible]nificantly risks heritage trees that belong to every citizen in the state of California. We keep forgetting that Richardson Grove is a state park.

In the zeal to get the trucks through, the truth that this grove belongs to the whole [illegible]te (and therefore cannot [illegible] altered to suit the busi[illegible]ss interests of a section of Northern California) keeps getting lost.

It will be interesting to see which prevails, self-interest or social interest. Ask Caltrans for a balanced approach — put in the stop lights, slow the speed to 25 mph, allow the big trucks to pass safely, save $6 million of taxpayers' money, and save these remarkable trees which [illegible] not belong to us but to [illegible] future generations.

[illegible]end this request to Kim Floyd, Caltrans project manager, P.O. Box 3700, Eureka CA, 95502, or e-mail kim_floyd@dot.ca.gov before the March 12 deadline for comments on the environmental document.

Opinions expressed in My Word pieces do not necessarily reflect the editorial viewpoint of the Times-Standard.

Glenda Hesseltine resides in Eureka.

1

2

3

4

5

CG Stockwell
PO Box 6
Loleta, CA
95551

MAR 11 2009

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #10* regarding information on the signalization alternatives.
3. The majority of trees proposed for removal are tan oaks four to twelve inches in diameter and these trees only minimally contribute to the existing canopy.
4. *See General Response #3* regarding minimization measures incorporated into the project to protect the trees.
5. The proposed retaining wall would be located north of the park. The wall is proposed in order to gain roadway width in order to provide wider shoulders to better accommodate pedestrians and bicyclists, not stop erosion. A design modification for the retaining wall was developed after the circulation of the DEIR changing the location to the east side of the highway and from an above the road wall to a below the road wall design. The modification shortens the wall by 100 feet and reduces the number of trees to be removed from 33 to 5.

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:18 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Save Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:19 AM -----

Charlotte Stuart
<humboldtrain@sbcglobal.net>
03/09/2009 09:37 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Save Richardson Grove

My name is Charlotte Stuart. I live at 2125 18th Street, Eureka, CA 95501. I have lived in my home for 36 years.

I am so happy that they re-opened the pubic comment period for Richardson Grove. I don't think many people know of the proposed changes that are being planned to destroy an area that we will never be able to have again in our, our children's or their children's lifetimes.

We are blessed with a beautiful stretch of pristine old-growth redwoods and because of greed some people want to cut them down. Just so a highway, a paved road, can be made bigger so larger trucks can get through easier. It is almost too absurd to put down on paper. The few business people have a lot of money and it is sad and shocking that money would be worth more than trees that are irreplaceable. Or that money can rule. 1

Once they start cutting some of those magnificent trees down, it affects those further back. Look at some of the areas that have been destroyed already. And if one isn't concerned with the redwoods, then think money again. Tourists come up this way. Why would we ruin an attraction that brings our area revenue, not to mention we are a very unique area and that is what brings the people here in the first place. How many other areas in the world are like this one? How can anyone kill those beautiful trees and ruin that very special grove???????? 2

PLEASE RECONSIDER THIS!!!!!!!!

1. *See General Response #13 and* Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.
2. *See General Response #2* regarding impacts to the park character.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:46 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove alteration proposal

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:46 PM -----

"John Stuart" <john.d.stuart@sbcglobal.net>
03/11/2009 08:01 PM

To <kim_floyd@dot.ca.gov>
cc
Subject Richardson Grove alteration proposal

Dear Kim Floyd,

I have just recently been reading information about the CalTrans proposal for alterations to the Richardson Grove section of Highway 101. From what I read, I am not in favor of the current proposal. It seems that CalTrans has left out many details that are either required or necessary to fully explain and justify the proposal. I would be in favor of a more conservative option that would involve reducing speeds through the park even further and possibly the installation of a stop light that would regulate the simultaneous passage of two larger trucks. I am tired of my tax dollars being used to pay for the more expensive option when reasonable and more economically and environmentally sensitive options are available.

1
2
3

Sincerely,

Mary Stuart

1. *See General Response #1* regarding information on project purpose and need.
2. *See General Response #8* regarding how reducing the speed limit would not meet project purpose and need.
3. *See General Response #10* regarding information on signalization alternatives considered.

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 01:43 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Help Stop Caltrans Plans to Widen 101

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 01:43 PM -----

Gabrielle Sturchio
<inkblotstories @gmail.com>
01/27/2009 07:45 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Re: Help Stop Caltrans Plans to Widen 101

The widening of the roads and increase of traffic in Richardson Grove state park is utterly inappropriate for an Old Growth forest. 1

The existence of such wilderness areas is rarer and rarer in this country, *especially* on the over-developed coastal regions.

Do not desecrate this area by cutting down trees (regardless of diameter) if widening takes place. 2

Gabrielle Sturchio,
Eureka CA

1. *See General Response #13 and #14* regarding information about how the project would not result in substantial widening nor increase truck traffic.
2. *See General Response #2* regarding impacts to park character.

Sara Sunstein
<sarasun@humboldt1.com>
01/29/2009 11:45 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject 101 through Richardson Grove

Dear Ms. Harmon,

I've just learned that the project to straighten and widen Highway 101 through Richardson Grove in Humboldt County involves cutting the roots of 30 redwoods, some of them with diameters of 15 feet. This plan is unacceptable to me. Anyone who has lived in northern California more than six months knows that the root system is more important to redwoods than other trees; that their roots are very close to the surface and that trampling them all about can kill the tree; that without a tap root, redwoods depend on their roots interweaving with others' so the mesh of all keep them stable and upright. Cutting their roots threatens the trees' very lives. 1

No mitigation can bring back big, centuries-old trees you've killed or diseased by destroying their root system.

I also have problems with the proposed wall, assuming destruction of species that are already endangered (indicated by request for a take permit), and destroying the commerce of small businesses through that section for a year or so, which may mean forever. 2

Why has no attention been turned to your Option 3, that of decreasing the speed limit to 25 mph through the narrow part of the grove? It will save $5 million, by your own estimate and make the road safer. People will have to slow down, adding perhaps 5-7 minutes to their trip time, enabling them to smell the wonderful odors of a redwood forest, to see better the giants through which they pass. It will allow the trees, endangered species and businesses to continue to thrive. No where is it written the 101 highway has to be 55 mph or higher throughout its length. There are several sections where the speed limit decreases, even as low as 25 mph. 3 4 5

Please revisit the most prudent plan, Option 3--saving money, the local ecosystem, local businesses, and beauty.

Thank you for considering my request.
Sincerely,
Sara Sunstein
1800 Stromberg
Arcata

1. *See General Response #3* regarding impacts to trees.
2. The retaining wall is located outside the park in an area that has commercial and residential development. The existing vegetation in the area for the retaining wall represents marginal foraging area for Northern Spotted Owls. Subsequent to the circulation of the DEIR/EA Caltrans evaluated a design modification for the wall that reduces visual impacts to the motorists by modifying the wall design to a below the road wall type on the east side of the highway. This modification also reduces the tree removal. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable, thus no incidental take permit was required.
3. *See General Response #7* regarding construction impacts on Piercy businesses.
4. *See General Response #8* regarding how reducing speed limit does not meet project purpose and need.
5. The speed limit for this section of Route 101 is 35 mph.

Robert Sutherland
<woods@asis.com>
01/29/2009 04:50 PM

To deborah_harmon@dot.ca.gov
cc Cristina Bauss <cristinabauss@yahoo.com>, Clif Clendenen <clif@clendenensciderworks.com>, Sharon Duggan <ZeroCut@aol.com>, Cynthia Elkins <cynthia@kmud.org>,
bcc
Subject Richardson Grove Highway project

Dear Ms. Harmon,

Please enter these comments into the permanent record for the Richardson Grove Operational Improvement Project Environmental Assessment.

The Environmental Assessment (DEIR) violates California and federal law and I request the project be denied.

This project proposal has come to my attention through the media. Over time, numerous people have commented on the proposed project in both print and broadcast media, and I have read and listened to all that I had access to. The large majority of commenters have been opposed to the project, and the single most frequent theme that I noticed in the comments is that the proposed project will degrade our quality of life through changes associated with induced population growth, including among others increased traffic, commercial development including big box stores, increased population density, and the associated loss of our relatively rural values. Population growth generally also adversely impacts the natural environment. It appears to be widely understood then by the public that this project proposes significant adverse growth inducing impacts. Growth inducing impacts must be considered pursuant to CEQA, as you appear to recognize by your discussions in the draft EIR (especially at DEIR pp 31-36). That commenters persist in their objections in the face of your DEIR arguments suggests your review is incomplete or otherwise flawed. 1 2

I agree that the growth-inducing impacts are likely the most significant adverse environmental impacts of the proposed project and that your discussion of them fails to capture the magnitude of this problem. Your DEIR portrays that the traffic bottleneck that the project addresses is the one remaining significant stricture to traffic flow on the vehicle traffic routing from the Bay Area metropolitan region to Eureka, because the Confusion Hill Realignment project has also occurred. The removal of this Richardson Grove bottleneck will have an enormous impact on flow of traffic, goods, population, and culture to the areas north of the bottleneck, namely all of Humboldt and Del Norte Counties. Humboldt County, at least, is mostly populated by persons choosing and preferring a more rural, nature-oriented culture than is readily available anywhere in the Bay Area megalopolis. Universally folks in this area decry the development that has afflicted Santa Rosa, for example, as some of the commenters noted in my preceding paragraph specifically noted. We understand however that there is among us a minority who think little of sacrificing our quality of life for their own proximal gains such as personal profit. The public comment suggests that the large majority of Humboldt County citizens objects to your idea of catering to those individuals. I do not see in your document systematic and objective poling to test these views, but they bear importantly on your document: It is apparent to me that the critical 3 4

public is responding to the fact that your arguments are nothing more than a well crafted post-hoc rationalization for a decision made well in advance. This is a flagrant violation of the letter and central purpose of CEQA.

Your showing that growth inducing impacts are insignificant is disingenuous; in fact, it could not be otherwise in order for you to finesse this unwelcome and legally corrupt project. As a resident of this area for about forty years, I myself, as well as many others, have observed the many changes that have accompanied the gradual northward development of Highway 101. Clearly they have been caused by the development of the highway; other towns well away from the highway have not developed in such a catastrophic way. Surely adequate documentation of these changes exists, but you have chosen not to show it. For example, take Willits, the largest town immediately south of the proposed project. Willits has become a nightmare of overdevelopment since the upgrading of Highway 101 south of it. Why have you not closely examined the relation of development there to the increase in traffic patterns? This is the degradation of communities and environment brought about by infrastructure development, and the Richardson Grove proposed realignment is just another step - a cumulatively considerable step - in the spread of the disease of development into our communities and our natural environment. This significant adverse cumulative impact is again inadequately addressed in the document and it is a mandatory finding of significance that must be seriously considered, and not in a post-hoc manner. Withdraw the DEIR and stop the project. 5

I have these further criticisms of the project and the DEIR: The DEIR is sloppily done and replete with errors. For example, "Indian warrior" is not even in the same family as *Delphinium* and there is no species *nudcale* ; the entire discussion on DEIR 79-80 is superficial (as a botanist I also doubt that *Quercus berberidifolia* was observed). Although the DEIR discusses the Western Pond Turtle (DEIR at 95, 96-7; *Natural Environment Study* [Appendix I] at 16) it is inappropriately not listed in Appendix H. Park staff surely must know of wildlife travel routes across the highway, but for inscrutable reasons you chose not to consult them (DEIR 85). Where they exist you should provide subgrade passageways. Similarly, you should correct perched culvert lips to grade in such a way as to facilitate wildlife passage (*vide Natural Environment Study* [Appendix I] at 17). A significant misinformation occurs in your discussions of the Spotted Owl: at DEIR 109 you say the nest is 1/4 mile from the project, but at DEIR 101 you say it is 1/2 mile away. I request a more careful evaluation of the Yuma Myotis roost. A similar roost on my own property, not very far from the project site, at times also harbors various other species, including Pallid Bats. In establishing the Purpose and Need for the project you rely very importantly upon a non-peer reviewed conclusory statement presented as fact; I refer to the quoted passages from the Regional Transportation Plan (DEIR 3), and given your use of this document it should by law be attached to the DEIR. If the project proceeds you should recirculate a new draft with the various missing documents attached. My impression also is that no biological surveys of the small area north of the Park but within the project area were conducted. If so, I believe that once again you have failed to comply with environmental law. 6 7 8 9

The DEIR is profoundly legally insufficient because it is merely a well crafted document meant to justify politically based decisions made well in advance of its preparation. Irrespective of the professionalism that the preparers may have been able to manifest, they should be ashamed to serve such a culturally bankrupt purpose. We take for granted the roads that are continually being

built, and many of these are relatively innocuous. In this case it is NOT, and the impacts are terrible. This project proposes to step past an important threshold towards destroying particular lifeways and the natural environment they depend upon. It is cumulatively significant and adverse. The DEIR masterfully conceals these facts.

10

Robert Sutherland
The man who walks in the woods
PO Box 996, Redway CA 95560
29 January 2009

1. *See General Response #12* regarding information on growth inducing impacts .
2. *See General Response #*14 regarding information on potential for increased truck traffic.
3. See the above response; it is not expected that substantial numbers of trucks would be diverted from I-5 or Route 99 due to the lesser travel times and fuel consumption these routes represent. For example, Sacramento, California to Grants Pass, Oregon is approximately 337 miles via I-5 and 487 miles via US Route 101. San Francisco, California to Grants Pass, Oregon is approximately 391 miles via I-5 with an estimated travel time of 6 hours, but is 438 miles via US Route 101 with an estimated time of 8 hours.
4. Facilitating goods movement is in the Regional Transportation Plan for Humboldt County as well as being one of the goals for Caltrans. The project is supported by the Humboldt County Board of Supervisors and the Del Norte County Board of Supervisors.
5. Many factors are involved in influencing where development occurs. While we concur that development is often tied to road networks, it is not the only factor. The proposed project is not increasing the capacity of US Route 101, nor will travel times be reduced as a result of the project; both are important factors as to whether the project would influence growth.
6. The correction for Indian Warrier is noted. A botanist performed the botanical survey and did find *Quercus berberidifolia*. Appendix H of the Natural Environment Study (NES) will be corrected. Numerous studies have proved that just providing wildlife crossings will not result in wildlife utilizing the crossing. To make crossings effective, a barrier along the highway would have to be installed to direct wildlife to the crossing. Such a barrier would result in affecting the aesthetics of the park. Since the project does not result in changes that would substantially affect wildlife crossing the roadway and no locations were identified by CA Fish and Game, State Parks, or the Caltrans Maintenance as high incident locations, it was determined not to pursue any wildlife cro
7. The culvert improvement at PM 1.18 only involves the inlet. The outlet extends out from the bank but no work is being proposed at the outlet, so it will continue to be barrier for the salamander There would be no barrier for wildlife with the culvert improvements at PM 1.28 and 1.35. The culvert improvement at PM 1.34 would not correct the existing barrier. There is no habitat for Southern torrent salamander at the culvert at PM 2.10. To correct for the barriers for the culverts at PM 1.18 and 1.34 would likely involve disturbing trees adjacent to the culvert. Information on the Northern spotted owl has been corrected.
8. CEQA allows for documents to be incorporated by reference, such as is done with the Regional Transportation Plan.
9. The biological surveys included the areas within the project limits including areas both within the park and north of the park.
10. Caltrans does not concur that the project results in significant cumulative impacts.

Robert Sutherland
<woods@asis.com>
03/12/2009 12:56 PM

To deborah_harmon@dot.ca.gov, kim_floyd@dot.ca.gov
cc Sharon Duggan <ZeroCut@aol.com>, Scott Greacen <scott@wildcalifornia.org>
bcc
Subject Richardson Grove DEIR/EA

Deborah Harmon, Kim Floyd, Caltrans

12 March 2009

Please consider these comments on the DEIR/EA for the Richardson Grove Operational Improvement Project. These comments are for the permanent record. This is my second set of comments for consideration - my first letter was dated 29 January. The DEIR/EA is inadequate and I request the project be denied. Please immediately inform me of your decision. 1

The DEIR/EA states that the roots of thirty large redwoods will be cut. Nowhere does the document present an informed discussion of the significance of this root damage. Redwoods are shallow rooted trees that depend upon the wide spread of their roots to support the enormous mass of the tree. Redwoods characteristically topple over when their roots are undermined by water, for example. The cutting of the roots places the trees at great risk of falling, especially given wind loads that may be applied there, with then the irreplaceable loss of the tree and the habitat, as well as potential serious damage to the roadway, its users, and nearby structures and their occupants. Caltrans should be mindful of this threat from its previous experience. There is a long history of old growth redwood die-back along roads that Caltrans has not mentioned. The treatment in the document is cursory and it appears the potential for catastrophic damage has not been authoritatively assessed and reported. This is inadequate. 2 3

In addition, since my previous comments I have seen two separate sets of well informed comments in local media (one of which is appended below) regarding the significance of the STAA truck size increase upon local shipper needs. These give a very different picture than is in the DEIR/EA, and suggest the reasoning presented therein is highly flawed or at least inadequate for a reasoned analysis. The document clearly needs major revision of this discussion of the need for the project. Pursuant to this feature I request then that a supplemental DEIR be circulated, or that the project be denied. 4

Media accounts strongly suggest this DEIR/EA is a post-hoc rationalization of a decision previously made. It lacks careful and reasoned discussion of various serious problems. These are major violations of CEQA that render the document inadequate. In addition, the federal involvement in this project mandates also issuance of an EIS. Please revise your effort so as to comply with the law, or deny the project.

Sincerely,
Robert Sutherland
PO Box 996, Redway CA 95560

1. You will be notified that the final EIR has been certified and is available for public review.
2. *See General Response #3* regarding tree impacts and the professional opinion from certified arborist that project with the minimization measures in place would not result in substantial adverse impacts to the tree roots.
3. Numerous highways abut old growth redwoods including Routes 36, 101, 128, 197, 199, 254, and 271. No formal studies of dieback have occurred, but it has been speculated that the dieback that is evident along a small stretch between Routes 101 and 254 occurs due to drainage patterns that may have been altered as a result of the freeway construction. The project area is relatively flat and the project would not substantially affect existing drainage patterns.
4. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove. Numerous response letters submitted during the circulation of the DEIR/EA stated that the STAA restriction affected their cost of doing business.

1-23-2009

DEBORAH HARMON, SENIOR ENVIRONMENTAL PLANNER
CA DEPARTMENT OF TRANSPORTATION
1656 UNION STREET
EUREKA, CA 95501

DEAR MS. HARMON,

WITH MORE INFORMATION ABOUT THE PROPOSED RICHARDSON GROVE IMPROVEMENT PLAN, I FIND I HAVE SERIOUS CONCERNS ABOUT THE COSTLY PROJECT.

MANY YEARS AGO, I WORKED IN RICHARDSON GROVE AND WAS WELL ACQUAINTED WITH THE AREA. I THINK IT IS IMPORTANT FOR THE GROVE TO REMAIN AS IT HAS BEEN AND NOT BE MODIFIED TO ACCOMODATE A TEEN MONSTER TRUCKS. PERHAPS, THIS WOULD SET A PRECEDENT TO CUT MORE TREES IN MORE PARKS IN THE FUTURE.

I'M CONCERNED ABOUT THE CUTTING OF REDWOOD TREES. I LIVE IN AN OLD GROWTH FOREST AND HAVE SEEN HOW TAKING DOWN REDWOOD TREES CAN ADVERSELY EFFECT THE HEALTH OF ADJACENT TREES. BECAUSE REDWOODS HAVE SHALLOW ROOT STRUCTURES THAT EXTEND THREE TO SIX FEET BELOW GROUND LEVEL AND THEN RADIATE OUT SEVERAL HUNDRED FEET, INTERLOCKING WITH ROOTS OF NEAR-BY TREES, IT IS IMPERATIVE TO CONSIDER ANY TREE CUTTING VERY CAREFULLY AND ONLY AS AN ABSOLUTE NECESSITY.

I'M CONCERNED ABOUT THE COST OF THIS PROJECT AND DO NOT UNDERSTAND HOW IT CAN BE JUSTIFIED WITH THE CURRENT FINANCIAL CRISIS IN CALIFORNIA

MOST OF ALL, DRIVERS NEED TO SLOW DOWN. PROVIDING MORE OPPORTUNITIES TO SPEED THROUGH THIS PRISTINE PARK, IS NOT A SOLUTION.

THANK YOU FOR YOUR TIME AND ATTENTION.

SINCERELY,

Linda Sutton

LINDA SUTTON
PO BOX 631
REDWAY, CA 95560
707 923-2574

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1. *See General Response #2* regarding impacts on park character.
2. *See General Response #3* regarding information on tree impacts.
3. Transportation projects are not funded through the General Fund.
4. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.

1304 G St.
Eureka, CA 95501
March 11, 2009

Caltrans
PO Box 3700.
Eureka, CA 95502

Dear Kim Floyd,

Please do not destroy Richardson's Grove by cutting trees and building a retaining wall. This is where most people enjoy the redwoods. Consider instead lower speed limits and/or stop lights instead. As taxpayers, we certainly would prefer these solutions to the problem and they would make the park more enjoyable for all citizens.

1
2

Sincerely,
Elisabeth Swingdler
Elisabeth Swingdler
Merry Coor
Christina Swingdler
Violet Denning
Lani C Jackson

1. *See General Response #8* regarding how reducing the speed limit does not meet project purpose and need.
2. *See General Response #10* regarding information on signalization alternatives considered.

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:32 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Stop the Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:32 PM -----

Ajay Tallam
<atallam@googlemail.com>
01/29/2009 01:42 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Stop the Richardson Grove Project

Dear Kim Floyd and associates,

I am writing in regards to the proposed project for Highway 101 in
the Richardson Grove area in Humboldt County.
It remains clear to me that an EIR/EIS needs to be conducted in this
project, and without that there is no merit upon which this project can
proceed. More notably, the amount of opposition to this project is amazing. 1
Even with no redwoods proposed to be cut, it has engendered massive amounts
of public outcry. This is not something to be taken lightly by any means,
and I think that a rethinking of this project would not be helpful, it is
crucial. In fact, there seems to be a lack of research into why this
project needs to be done at all, maybe it is not something that should be 2
pursued after all.

Please don't attempt to proceed against the will of so many individuals/
groups and more from such myriad walks of life.
Thank you for your time and patience.
Sincerely,
Ajay Tallam

--
Ajta Milpitas, CA +1(408) 262-0959
resume-ing
http://atothet.org/
"If you don't turn on to politics, politics will turn on you" - Ralph Nader

1. Caltrans has not taken lightly the public comments received and has given consideration to all the public comments generated by this project. Caltrans has carefully considered the impacts that could result from the project and alternatives to the proposed project. Caltrans does not concur that an EIS is required for the project.
2. *See General Response #1.*

J Taylor
<jftaylor@suddenlink.net>
01/30/2009 06:38 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Comment on Richardson Grover Project

Dear Ms. Harmon,

I hope I'm not too late to have my comment included.

I've been reviewing this information for some time now, including attending a public forum last year, at the Public Marina building.

It's a difficult situation, I think. I appreciate the business owner's concerns for transportation of goods in & out of the county. Certainly they deserve to earn a living, and made a commendable plea. 1
At the same time, it appears to me they *are* earning a living; so they want a better living.

I was very impressed with the Cal Trans effort to protect the trees in Richardson Grove. It is clear there has been much effort to sculpt a good plan, with detailed presentation.
The detail engendered community questions that were not answered-- that were *unable* to be answered because of the lack of ability to forecast outcomes.

It seems to me, until the question of how much environmental impact would result from the proposed highway change, I can not support it, across many aspects.

In sum, I have decided AGAINST the Highway Project. I would rather protect the redwoods, the 101 "watershed", as it is. While some Humboldt County businesses, and therefore some residents, will not be able to expand, it maintains the environment we currently enjoy (notwithstanding other environmental challenges).
I think that if people really want to import goods and tourists, they will under current roadway conditions, they already have been.

Thank you for including my perspective,

Jennifer Taylor

"Be the change you wish to see in others" Mohandas K. Gandhi (1869-1948)

****
Jennifer F. Taylor, Ph. D.
Licensed Psychologist (PSY18047), Arcata Counseling Services
Adjunct Faculty, Psychology Department, Humboldt State University
707-826-9601

1. *See General Response #11.*

January 2, 2009

Kim Floyd
Project Manager
Caltrans
P.O. Box 3700
Eureka, CA 95502

Re: Richard Grove Road Project

Dear Ms. Floyd:

My name is Kimberly Tays. My husband and I have been volunteers with Caltrans' Adopt-a-Highway program for the past 2+ years. I have enjoyed getting to know some of Caltrans' employees and, for the most part, believe Caltrans does an excellent job of keeping our roads safe and clean.

However, I am very troubled by the proposal to remove **87 trees** and widen Richardson Grove to allow "longer trucks to safely travel through the area" (12-5-08 Times-Standard article). I believe the removal of so many trees would devastate this remarkable piece of landscape. I do not want to see this magical place turned into a fast-paced highway like we see in the rest of our state; we have too much of that already. When you get to this part of California, you actually want to slow down and take in the breathtaking scenery, including the big, beautiful redwoods and other trees that grace our natural environment. 1

As a society, we continue to value business and transportation needs over everything else—at the expense of our environment, at the expense of open space, at the expense of aesthetics, at the expense of biodiversity. Richardson Grove is one of those places that stood out in my mind the first time I visited Humboldt County—I just knew I had to come back and explore the area more because it was such an amazing place. In fact, I was so impressed with the natural beauty of Humboldt County, I moved here in 2003 and completed my degree at Humboldt State University. Richardson Grove is not just some annoying obstacle on the map to somewhere else; it is a destination for people from all over the world who come to visit our State Park lands to camp, hike and sightsee. This is what makes the Richardson Grove project all the more dreadful and incompatible in my mind. The fact that we would desecrate a national and international treasure for business and transportation interests is, in my eyes, a crime against nature. And what is even more ironic is that in your attempt to improve some business interests, you may actually destroy those businesses that cater to travelers who visit this area for its remarkable scenery and pace of life. And, you will destroy an amazing scenic roadway that is awe-inspiring.

I understand that some Humboldt businesses feel they are at an economic disadvantage because cargo from larger trucks must be offloaded onto smaller trucks to travel through this area. But we cannot ruin such a remarkable place for the interests of a few business owners; the stakes are too great and the worldwide public stands to lose an irreplaceable natural gem in our already built-built, over-desecrated and over-burdened planet. 2

For the public record, as a resident of Trinidad and Humboldt County, I ABSOLUTELY OPPOSE the Richardson Grove Road Project.

Sincerely,

Kimberly Tays
P.O. Box 75
Trinidad, CA 95570
ktays@suddenlink.net

1. The majority of trees proposed for removal are at the northern limits of the project at the cut bank that starts at the northern boundary of the park and extends to the Singing Trees facility. About half of the trees proposed for removal are tan oaks and the majority of the trees to be removed are twelve inches in diameter or smaller. Since the DEIR circulation, a design modification for the retaining wall was developed. The modification included moving the retaining wall to the east side of US Route 101, and constructing it as a below the road wall. Thus resulted in reducing the number of trees to be removed (30 trees reduced to 5 trees). The wall is below the roadway and would not be visible to motorists except for the barrier rail. The proposed project would not change the primary characteristics of the highway setting through the park—the road would continue to be a curvilinear, two lane road with little to no shoulders and old growth redwoods abutting the edge of pavement.
2. *See General Response #11.*

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:20 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson's Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:17 AM -----

Ken Terrill <kterrill@rcaa.org>
02/23/2009 07:47 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson's Grove

Kim: I would like to voice my opposition to the reconstruction of the 101 route through Richardson's Grove. This plan should be completely shelved until after the ongoing collapse of the world economy has been rectified. At the rate of decline currently being experienced, and the diminishing traffic that will result, this project is a complete waste of money and effort. This is almost as bad an idea as the cloverleafs between Eureka and Arcata. CalTrans needs to take a look at the economic reality of the next 10 years or so--stop planning for greater traffic when it is so obvious that, between the economy,declining oil production, and environmental concerns, traffic will and must decline. When we have invented a new fuel for cars and a new way to keep the corporados from destroying us all, these ideas are absurd. 1

Ken Terrill, Blue Lake

1. The project was proposed to facilitate goods movement by allowing STAA vehicles, not to accommodate increased traffic. No additional travel lanes are being proposed.

"David Terry"
<david@seguinwoodworks.com>
03/10/2009 11:26 AM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Richardson Grove Expansion project

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I am writing to voice my opinion on the Richardson Grove project. I am STRONGLY OPPOSED to this expansion project. I enjoy the fact that Humboldt County is so limited in its access as do many people who live here. By bringing in more goods (and box stores) from down south you are simply opening up this beautiful area to go the way of San Luis Obispo County. Destroying all of those beautiful trees for the sake of commodities that we simply do not want is a tragedy to nature and a tragedy for Humboldt County. Please leave the grove as it is. If truckers need to drive up here then they can do so the way they always have, slowly. If safety is such a concern for you why not add some speed bumps!!! This will truly slow traffic and make this narrow stretch of road more safe.
Thank you.

Sincerely,

David Terry
Owner Seguin Woodworks

1611 Fern St
Eureka, CA
95503

1. *See General Response #13.*
2. *See General Response #12.*
3. *See General Response #2..*
4. *See General Response #8.*

bear@wildcalifornia .org
01/30/2009 04:31 PM

To deborah_harmon@dot.ca.gov
cc
bcc
Subject Comment Richardson Grove Project EIR

Dear Ms. Deborah Harmon,

I am submitting comments on the Draft Environmental Impact Report for the Richardson Improvement Project.

I am concerned that this report is inadequate and I question the necessity of the project. 1

The impacts on this scenic stretch of hwy 101 would cause harm to the experience of the old growth redwoods to campers, motorists, cyclists, and pedestrians. This construction project would cause harm to this atmosphere and to the health of these redwoods. These issues are not adequately addressed in the document. 2

I have a degree in horticulture and understand the roots and stability of the giant trees that depends on them. I do not believe that cutting the roots of trees, some of which are 15 feet in diameter, will not have an impact. this is what your document concludes. The impacts cannot be adequately predicted with all the factors involved. Redwood trees that live in parks already have increased pressures placed on their roots by nearby trails and roadways. There must be no increased impacts on these ancient treasures. 3

I have concerns that a few businesses will benefit from this publicly funded project while businesses dependent on tourism may suffer. Local businesses located directly impacted by this project and not adequately acknowledged in the document, will suffer harm, especially during the construction phase. In a time of economic crisis, I fear that these shops and services may not survive the impacts. 4 5

Lastly, I am truly concerned about the impacts to me personally with increased traffic and the noise that it involves, since I live very close to the hwy 101 and have to endure its current traffic noises. What will the impacts be to me? Any impacts to me are unacceptable. 6

Sincerely

Traci L Thiele
640 Fir Lane
Garberville, CA

1. *See General Response #1.*
2. *See General Response #2.*
3. *See General Response #3.*
4. *See General Response #6.*
5. *See General Response #7.*
6. *See General Response #14.*

Kim
Floyd/D01/Caltrans/CAGov
03/18/2009 10:31 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:31 AM -----

Robert
<halfway3361@yahoo.com>
03/10/2009 08:39 PM
Please respond to
halfway3361@yahoo.com

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

Dear Kim,
I would very much like to see Richardson Grove remain like it is. I have never minded slowing down to drive through that magnificent sight. To destroy that just so that a few could profit seems stupid. The grading and paving these root systems will kill the giants. Help us to preserve our little corner of this wonderful state. Thanks for taking the time to read this. 1 2
Robert Thoman
McKinleyville, Ca.

1. *See General Response #8*
2. *See General Response #3.*

A balanced approach needed for Richardson Grove

MY WORD

Glenda Hesseltine

So nice to see Alan Olmstead's letter on March 3, reminding us that a balanced solution is required, and is indeed possible, in regards to Caltrans' highly controversial proposed project for Richardson Grove.

Mr. Olmstead is correct in saying that there are simple, low-tech solutions available that would save the trees, allow the trucks, and also save the taxpayer the waste of $6 million on the cost of the ill-conceived proposed project. Slowing the traffic to 25 mph or establishing a traffic light would preserve the trees, and allow the trucks. With a little deliberation, cooperation, and common sense, everyone can be happy.

A current misconception in the public mind is that only 40 trees are affected by the proposed project. This is not true. Caltrans' own document, the draft environmental impact report, shows 87 trees designated for removal. This means a significant disturbance of the canopy in the less than one-mile area of the project. Perhaps even more disturbing is the information (in the same Caltrans document) specifying the proposed cutting of the root systems of 30 of the largest redwoods in the grove.

While it is true that the largest trees will not be removed, it is also true that their roots will be cut. With no tap root, severance of the shallow rooted network leaves the giant redwoods with a perilous future. Some of these trees have been there since before the time of Christ. What a shame to lose them because of preoccupation with our personal profit and loss statements.

According to the same Caltrans document, in addition to severing the roots, more asphalt will be applied, and a 300-foot retaining wall will have to be placed to stop the erosion of the cut made through the grove.

This project, as proposed, significantly risks heritage trees that belong to every citizen in the state of California. We keep forgetting that Richardson Grove is a state park.

In the zeal to get the trucks through, the truth that this grove belongs to the whole state (and therefore cannot be altered to suit the business interests of a section of Northern California) keeps getting lost.

It will be interesting to see which prevails, self-interest or social interest. Ask Caltrans for a balanced approach — put in the stop lights, slow the speed to 25 mph, allow the big trucks to pass safely, save $6 million of taxpayers' money, and save these remarkable trees which do not belong to us but to the future generations.

Send this request to Kim Floyd, Caltrans project manager, P.O. Box 3700, Eureka CA, 95502, or e-mail kim_floyd@dot.ca.gov before the March 12 deadline for comments on the environmental document.

Opinions expressed in My Word pieces do not necessarily reflect the editorial viewpoint of the Times-Standard.

Glenda Hesseltine resides in Eureka.

please, Don't Kill these old Souls - We need them And they need us to Care for them.

1

Bonita Thompson
3135 Desert Dr.
Eureka, Ca 95503

EUREKA CA 955
11 MAR 2009 PM 1 T

Caltrans Project Manager
P.O. Box 3700
Eureka, CA 95502-3700

DIST 1
DDD-ADMIN
RES MGMT
INFO SVCS
BUS MGMT
CONST
DESIGN
HYDRAULICS
OFFICE ENGR
MATLS LAB
DDD-PROJ RECORD
PROJ/PROG MGMT
ADVANCE PLNG
SURVEYS
DDD-MAINT & OPER
MAINT ENGR
MAINT MGR
PERMITS
SHOP
TRAFFIC SAFETY & PSAE
TRAFFIC OPS
DIST RW AGENT
RW ENGR
RW APPR COORDINATOR
DDD-PLNG
TRANS PLPUB TR
LOCAL ASSISTANCE
ICR
ENV MGMT
ENV ENGR
GEN FILES

1. *See General Response #3.*

Kim Floyd/D01/Caltrans/CAGov
03/10/2009 10:02 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Improvement Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/10/2009 10:01 AM -----

David Thorpe
<davidbthorpe@gmail.com>
03/09/2009 12:59 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Improvement Project

I just wanted to voice my strenuous objections to the proposed improvement project in the area of Richardson Grove. The lovely entrance to Humboldt County is one of the natural treasures of the Western USA, and cutting down nearly a hundred beautiful redwoods in Southern Humboldt would be not only an aesthetic and ecological tragedy but a serious blow to the local tourist trade, too. 1

From a personal perspective: as a native of Humboldt County who now lives in the Bay Area, I take frequent trips to Eureka to visit family, and that stretch of road is one that I've come to know and love over the decades. I'd be quite saddened to see it butchered to make room for massive trucks.

Thanks very much for collecting comments and considering my views. Your willingness to listen is appreciated.

Sincerely,
-David Thorpe

1. *See General Response #2..*

Kim Floyd/D01/Caltrans/CAGov
03/18/2009 10:20 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Caltrans/Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/18/2009 10:21 AM -----

"Coco Thorpe" <cocothorpe@suddenlink.net >
03/09/2009 11:05 AM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Caltrans/Richardson Grove

Please do not go through with the Richardson Grove Hwy. 101 "Improvement" project. This is not an improvement at all, but a destruction of the spectacularly beautiful parkland gateway to Humboldt County. The tourist trade is far more important here than the needs of a few trucks, which should just be made to SLOW DOWN. We do not need or want any huge retaining walls marring the beauty of the Park, and the last thing our planet needs is the removal of more trees. Even though no old growth redwoods will be removed, the roadway will be too close to them and will harm their health and eventually kill them. This would be a horribly bad project at any time, but is even worse now with the state of the California budget. The destruction of natural beauty will economically harm our tourist trade and is a heartbreaking waste. This project is another ill-advised one, like the removal of Eucalyptus trees between Eureka and Arcata on Hwy. 101. Save our taxpayer dollars and the trees, please.

Thank you.
Jacqueline Thorpe
1135 K Street
Eureka, Ca. 95501

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1. *See General Response #2.*
2. *See General Response #8.*
3. The proposed retaining wall would be located outside the park. Subsequent to circulating the draft document to the public, a design modification was developed for the retaining wall. The modification changed the type of the wall to a below the road wall so it would not be visible to motorists except for the barrier rail. It also reduced the number of tree removals needed from 30 to 5.
4. *See General Response #3.*

Jan. 28. 2009

Dear Ms. Harmon:

I am writing to oppose in the strongest way possible CALTRANS' misguided and unnecessarily expensive plans for widening 101 in Richardson Grove. The mitigation measures your office has proposed do not nearly come close enough to what would be required for such a uniquely beautiful area of Cal. STATE PARK property, and one so important to a number of species on the endangered list.

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Furthermore, there is a much less expensive option, and I am adding my voice to the chorus of citizen-taxpayers who demand that CALTRANS implement Alternative 3: Lowering the speed limit will attain all the objectives of the road-widening scheme, with no adverse risk to trees or to the environment overall.

4

Your proposal for MORE road, MORE construction, for FASTER trucks is OLD-PARADIGM thinking. We can have trucks pass through there (just a little more slowly) AND maintain this GORGEOUS & unique park space for our children's children.

5

Thank you for listening.

Sincerely,
Doug Tickner

1. *See General Response #13.*
2. *See General Response #15.*
3. *See General Response #16.*
4. *See General Response #13.*
5. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 01:14 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 01:15 PM -----

Sandy Tilles
<sandyt@gotsky.com>
01/28/2009 10:50 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove

To : Kim Floyd, Richardson Grove Improvement Project Manager

I am concerned that this project will adversely impact the health of the state park and the trees in the grove as well as the quality of life in Humboldt County. I am not convinced that we need these larger trucks. I drive this stretch of the highway and see enormous trucks already. I have heard that currently there are some exemptions for the larger trucks to drive on 101. How do they manage to traverse this road? Perhaps they just drive slower. In fact, I believe that slowing down may be the answer to this entire problem.

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The report does not take into consideration all the small businesses that may be harmed by larger trucks making it easier to establish large chain stores in the area. The concept that we will all benefit from being able to purchase cheaper goods, is greatly flawed. Perhaps we should purchase less items of greater quality, produced locally,

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We have too few of these magnificent Redwood Trees left to jeopardize even a few for "progress" One of our most significant resources in Humboldt Co. is our tourism. The entrance to the area is very important. The stretch of Highway 101 that would be impacted by this project provides motorists, bicyclists, and pedestrians with access to old growth redwood forest, and provides a gateway into the North Coast that defines the character of the region. This construction project would cause harm to this atmosphere and to the health of this prized redwood grove. These issues are not adequately addressed in the document. 5

I believe that cutting the roots of 30 redwood trees, some of which are 15 feet in diameter, will certainly have a significant impact. I have seen trees die whose roots have been cut to make roads. I have seen trees die who have had too much silt compacted by their trunks. 6

Please consider Alternate NO. 3 - save the $5 million construction costs and lower the speed limit to 25 mph, allowing the trucks and the trees to co-exist! I'm sure Cal Trans could use the funding for parts of our roads that do need improvement and maintenance.

Sincerely

Sandra Tilles
POB 271
Whitethorn, CA 95589

1. Currently there is State legislation which exempts licensed livestock carriers meeting certain length and other criteria from the STAA restrictions in place through the park. The exemption provided in the legislation for these vehicles would expire in January 2012.
2. *See General Response #8.*
3. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
4. *See General Response #11.*
5. The majority of trees proposed for removal are at the northern limits of the project at the cut bank that starts at the northern boundary of the park and extends to the Singing Trees facility. About half of the trees proposed for removal are tan oaks and the majority of the trees to be removed are twelve inches in diameter or smaller. Since the DEIR circulation, a design modification was developed for the retaining wall, changing the location to the east side of US Route 101, and changing the type of wall from an above the road wall to a below the road wall. As the wall is below the roadway it would not be visible to motorists except for the barrier rail. The design modification also reduces the number of tree removals from 30 to 5. The proposed project would not change the primary characteristics of the highway setting through the park—the road would continue to be a curvilinear, two lane road with little to no shoulders and old growth redwoods abutting the edge of pavement.
6. *See General Response #3.*

David Tonn
<dtonn@hotmail.com>
01/30/2009 01:49 PM

To <deborah_harmon@dot.ca.gov>, <kim_floyd@dot.ca.gov>
cc
bcc
Subject Grove concerns

As a Humboldt resident I am concerned that the Richardson grove is being threatened at all.

Humboldt's economy is dependent on beautiful, pristine settings to attract tourism and maintain the presence of wealthy citizens whose property taxes support the county. Developing such a beautiful area is a shot in the foot for the county. Providing access to outside vehicles is a secondary concern to maintaining the unspoiled beauty and happiness of Humboldt and its resident. Providing access to such vehicles has historically degraded the quality of life for the individuals who live where the access is being provided.

1

2

There is no benefit to highway development in Humboldt. It undercuts the local economy and the natural beauty that we live in. Leave the highway alone.

David Tonn

Windows Live™: E-mail. Chat. Share. Get more ways to connect. See how it works.

1. *See General Response #2.*
2. *See General Response #12.*

March 2, 2009

Kim Floyd

Hello. I wanted to share my views about the Richardson Grove Project Caltrans proposes. Flat out, I have to say I am thoroughly opposed.

I understand that the mission of Caltrans is singularly focused but that has to change. There is a big picture, a much, much larger picture that everyone needs to pay attention to.

Six enclosed copies of previously written items that express for me my views... they did it so well....

I sure hope you leave Richardson Grove alone !!!!!!!

Very Sincerely

Kathryn Travers
1726 Sunny Ave
Eureka 95501

For the record:
I'm not keen on your Eucalyptus endeavor either.

1

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/13/2009 10:29 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove letter

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:29 AM -----

diana trichilo
<dtrichilo@yahoo.com>
03/12/2009 04:14 PM

To kim_floyd@dot.ca.gov
cc
Subject Richardson Grove letter

March 12, 2009

Kim Floyd, Caltrans Project Director
P.O. Box 3700
Eureka CA 95502

Dear Kim Floyd:

I am writing, because my family and I strongly object to the proposed widening of Richardson Grove. I am a native of Humboldt County. My parents and brother are also natives and residents. I have driven the 101 Hyway from Fortuna to San Francisco at least once a month for 30 years. I have never found the Richardson Grove area to put a stint in my travel plans. It is a special place with a fragile ecology which would be destroyed by the proposed widening.

Please consider these factors:
1- slowing the traffic to 25 mph or establishing a traffic light might inconvenience the companies wanting to run the largest trucks through RG without downshifting, but this "low tech" solution which would save me and other taxpayers $6 million-the estimated cost of this proposed project. And there is no guarantee that there would not be additional over-runs! 1
2-A more accurate estimation of the trees affected is 87 not 40, stated by Caltran's own documen , the draft environmental impact report showing that 87 trees are designated for removal. This requires a significant disruption of the canopy in under a one mile area of the project. 2
3-Even more important in my mind is the information, from Caltran's document, stating the proposed cutting of the root systems of 30 of the largest redwoods in the grove. 3

4

Any local who is familiar with redwood and redwood forests can tell you that disrupting the root system of the magnificent tall trees creates a "slippery slope" leading to fall of the "giants." They will certain be falling over in the winter storms from the effects of wind, rain and erosion.

I have read that a "retaining wall" is proposed to stop erosion from the cut made through the grove.

Geology may not my field of expertise, but even I know, from watching programs about the erosion of sand from beaches in souther CA that "retaining walls" do not keep the sand from washing away and in fact, only makes it worse! It does not take much imagination or serious consideration of possible consequences to see that the retaining wall will not be able to save the remaining trees in the area in the long run. 5

To change RG in the proposed way for the proposed commercial reasons may be in the interests of those seeking greater commercial profits. But to me, it is very shortsighted and favoring an particular interest group. Why do we need to make Humboldt County more accessible to big trucks and the southern California way of life? We have already experienced a huge upswing in crime since the trip to SF on H-101 was shortened some years ago. 6

My family and I strongly favor a choice for the more sensible and less costly "low tech" solutions that have been suggested by many other people, as well as myself. Maintaining these amazing and unique trees and their one- of- a- kind habitate is what I consider showing respect for the most important interest group of all: Ordinary Californians who flock to the parks every year looking for places to camp and relax, especially at Richardson's Grove (not to mention future generations of Californians).

Respectfully,
Diana Trichilo, Ph.D.
(707) 825-0881

1. *See General Response #8.*
2. *See General Response #10.*
3. The number of trees to be removed has been reduced resulting from a design modification for the retaining wall from 30 to 5. This is possible as the design modification included changing the location of the wall from the west side to the east of the road, and changing the wall type from an above the road wall to a below the road wall. The total number of tree removals proposed is 54. About half of the trees proposed for removal are tan oaks four to twelve inches in diameter and these trees only minimally contribute to the existing canopy.
4. *See General Response #3.*
5. The proposed retaining wall would be located north of the park. It is proposed in order to gain roadway width so wider shoulders can be constructed. The wider shoulders would better accommodate pedestrians and bicyclists. The wall is not being proposed to stop erosion. With the design modification of changing the wall to a below the road wall, the wall is much less visible to motorists. In addition, the modified design for the wall reduced the number of tree removals from 30 to 5.
6. *See General Response #11.*

To: Kim Floyd, Cal-Trans, those considering planning to widen the road through Richardson Grove

Regarding the "straightening" of Richardson Grove.
Please leave Richardson Grove alone.
Those redwoods are symbolic to many.
They are symbols of hope, peace, longevity...
If even a single old growth tree dies as a result of increased construction, it would be a travesty to our children and grandchildren. 1
If it is imperative for the "big box" trucks to come through, it would be better to make the road one way with a stoplight and vehicles would have to wait a few minutes. I also think the speed limit should be lowered - so visitors take more time to enjoy the beauty and much needed solace these wonderful trees impart. 2 3
We need to conserve money for projects which are more urgent, such as the pot holes and slides, etc. which are a regular part of living in Humboldt County. Conservation of the Eel River, drainage, flood control and many other priorities. 4

Thank You For Your Time and Consideration,

Sincerely,

[illegible] Truedell
P.O. Box 75
Redway, 95560

1. *See General Response #3.*
2. *See General Response #10.*
3. *See General Response #8.*
4. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

JOHN ULLOTH / ULLOTH GRAPHICS
10609 COLUMBUS AVENUE
MISSION HILLS, CALIFORNIA 91345

1-30-2009

DEBORAH HARMON, SENIOR ENVIRONMENTAL PLANNER FOR CALTRANS
RICHARDSON GROVE OPERATIONAL IMPROVEMENT PROJECT EIR/EA &
PROGRAMMATIC SECTION 4(f) EVALUATION
HUMBOLDT COUNTY, CALIFORNIA DISTRICT 1
HUM-101, PM 1.1/2.2 464800
1656 UNION STREET
EUREKA, CALIFORNIA 95501

DEAR MS. HARMON,

I URGE YOU TO DENY THE PROPOSED BUILD ALTERNATIVE (1.3.1. DESCRIBED ON PAGES 13-19), & CHOOSE THE "NO BUILD (NO ACTION) ALTERNATIVE" DESCRIBED ON PAGES 19-20:

1.) THE PURPOSE & NEED IS NOT COMPELLING OR LOGICAL 1
2.) THE JUSTIFICATION OF RESTRICTION OF COMMERCE IS NOT PROVEN & THE BENEFICIARIES NOT NAMED/MAY NOT EXIST 2
3.) CONSTRUCTING THE BUILD ALTERNATIVE UNDERMINES THE BROADEST PUBLIC GOOD IN AN ENDEMIC CALIFORNIA LANDSCAPE SET ASIDE FOR THE OPPOSITE PURPOSE 3
4.) THE BUILD ALTERNATIVE WOULD MOVE IN THE OPPOSITE DIRECTION OF LONG-TERM TRENDS (MONEY WASTED) 4
5.) THE PROJECT'S $5.5 MILLION 1SE COST IS UNWARRANTED GIVEN CALIFORNIA'S EXTREME INDEBTEDNESS, AND A POTENTIAL WIN-WIN-WIN SOLUTION WASN'T STUDIED. 5

THE CENTERPIECE of THE PURPOSE & NEED IS THE PASSAGE OF 2 "STAA" TRUCKS. BUT WHO NEEDS THEM? STATE PARKS & REDWOOD FORESTS - THAT CAN HAVE THE HIGHEST BIOMASS PER ACRE THAN EVERY OTHER FOREST TYPE ON EARTH - IS NO PLACE FOR STAA TRUCKS! EVEN IF THE PROJECT WERE BUILT, THERE'D BE NO LIKELY SUBSTANTIAL INCREASE OF TRUCK TRAFFIC (P. 35), TOTAL NUMBER of TRUCKS' TRIPS NOT LIKELY TO CHANGE (P. 34) REGARDLESS of VOLUME OR WEIGHT, NO INCREASE OR DECREASE IN PREVAILING SPEEDS IN THE PROJECT LIMITS, NO INCREASE IN HIGHWAY CAPACITY, PERCENTAGE of TRUCKS, OR TRAVEL TIMES (P. 78) IN CONCLUSION, LOCAL TRUCKS WILL GO THROUGH EITHER WAY, WHATEVER THEIR SIZE, STAA OR NOT; THIS ROAD IS NOT FOR THEM.

THAT THERE COULD BE ECONOMIC BENEFITS TO HUMBOLDT COUNTY IS OFF-TOPIC & NOT IN THE SCOPE of THIS E.I.R.! THE LACK OF STAA TRUCK PENETRATION DOWN EVERY COUNTY ROAD & ALLEYWAY HAS HARDLY BROUGHT THIS COUNTY TO ITS KNEES UP'TIL THIS POINT! AN "INTERNET SURVEY" BY THE HUMBOLDT COUNTY WORKFORCE INVESTMENT BOARD CITED "APPROXIMATELY"(?) 39 BUSINESSES IDENTIFYING STAA RESTRICTIONS CONTRIBUTING TO HIGH OPERATING COSTS - IT WAS "VOLUNTARY & ANONYMOUS", BUT A MAN WHOSE 1ST NAME IS "DR" (GALLO) APPARENTLY WAS ABLE TO BASE A SCIENTIFIC ECONOMIC STUDY ON WHAT MOST WOULD REJECT AS AN INADEQUATE STATISTICAL SAMPLE, & ARRIVE AT AN ANNUAL IMPACT DOLLAR VALUE(?) (PAGE 35) THIS ARGUMENT SHOULD BE COMPLETELY REJECTED AS HEARSAY RATHER THAN BEING PUBLISHED IN THIS EIR/EA! A REAL COST: BENEFIT ANALYSIS CONSIDERING ALL IMPACTS WOULD'VE BEEN A BETTER IDEA THAN AN ANONYMOUS (UNNAMED) SELF-SELECTED NON-EXPERT

6

7

"COUNTY GROWTH HAS FALLEN WELL WITHIN PLANNED ESTIMATES" - ONLY 350 BUILDING PERMITS IN 2007... (PAGE 35).. THE OPPOSITE OF RUNAWAY GROWTH IS STABILITY - CITIES LIKE LOS ANGELES WOULD LOVE TO HAVE THIS "PROBLEM" of STABILITY, INSTEAD of MUSHROOMING DEMANDS ON ITS INFRASTRUCTURE!

SO WHO IS IT THAT NEEDS STAA TRUCKS? THE ONLY ALTERNATIVE LEFT IS THESE ARE NORTH AMERICAN FREE (SIC) TRADE AGREEMENT (NAFTA) TRUCKERS GOING BETWEEN MEXICO, THE US, & CANADA... TO SAY IT ANOTHER WAY, FUGITIVE TRUCKERS - JUST PASSING THROUGH - VAGRANTS. THEY DON'T LEAVE MUCH MONEY IN HUMBOLDT, JUST PAVING DAMAGE, AS THEY'RE NOT BASED IN THE REGION. BUT WHY ARE THEY RUMBLING THROUGH OUR STATE PARKS? NAFTA HAS EXPORTED AMERICAN JOBS; MAKING THE 101 FRIENDLIER FOR NAFTA FUGITIVE TRUCKS HARMS THE LOCAL ECONOMY ON THEIR WAY TO..? (WALMART?)

8

RICHARDSON GROVE STATE PARK, WILD & SCENIC EEL RIVER, & TRAVEL DOWN THE 101 IN THE PROJECT AREA & BEYOND ARE AMONG CALIFORNIA'S MOST INCREDIBLE TREASURES. THE FIRST TWO HAVE BEEN SET ASIDE FOR THE PUBLIC - NOT COMMERCE - FOR ALL TIME IN RECOGNITION of THEIR IRREPLACEABLE BEAUTY & VALUE AS NATURAL HABITAT, FOR RECREATION & ENJOYMENT FOR LOCALS, RESIDENTS of CALIFORNIA, & PEOPLE FROM ALL OVER THE WORLD. ALTERING THIS PLACE & THE EXPERIENCE of CYCLING

9

3

ALONG THE 101 (AKA PACIFIC COAST BIKE ROUTE) OR IN A CONVERTIBLE (AS I HAVE) SHOULD ALSO BE A PROTECTED PART of THAT EXPERIENCE. TO BUILD THIS PROJECT TO ENABLE STAA TRUCKS TO PASS EACH OTHER TO EXPAND COMMERCE & AID THE LOSS OF AMERICAN JOBS, TO HELP NAFTA TRUCKS IS WHAT'S WRONG & NEEDS TO STOP. FURTHER WIDENINGS of THE ROAD & TREE TAKINGS OPENS THE CANOPY TO "EDGE EFFECTS", UNDERMINES ROOTS of SURROUNDING TREES, ADDS SILT TO RIVERS, & COULD CUT THE "TREE TUNNEL" EFFECT OPEN. THE VISUAL SIGHT OF LARGER TRUCKS RUNNING THROUGH THE PARK, THE ROAR of "JAKE BRAKES" (COMPRESSION BRAKING) CONTROLLING LARGER LOADS, THE GREATER RISK OF ACCIDENTAL COLLISIONS WITH TREES IN BAD WEATHER, ETC. RUN COUNTER TO THE VISITOR & HABITAT IMPROVEMENTS NEEDED, & A GOOD NIGHT'S SLEEP IN PARK CAMPGROUNDS! MOST PEOPLE COME INTO NATURE & NATURAL PARKS TO ESCAPE COMMERCE & NOISE; BUT THIS PROJECT SENDS IT AFTER THEM! THOUGH THE REPORTED DESTRUCTION of FOREST APPEARS SMALL (PAGE 80), THE "DEATH of A THOUSAND CUTS" (DESCRIBED AT BOTTOM of PAGE 54-55) HAVE MADE THE PROJECT AREA LESS THAN WHAT IT COULD BE. THE RETAINING WALLS (PAGE 46) & (PAGE 87) IN THE BUILD SCHEME WOULD NOT BE ALLOWED IN A NUMBER of CALIFORNIA MUNICIPALITIES, MUCH LESS PREMIER STATE PARKLAND!* THE COASTAL REDWOOD BELT IS ONLY ABOUT 12 MILES WIDE ON AVERAGE - WHY MUST WE RAM TRUCKS THROUGH THAT, WHEN THE WHOLE REST of THE STATE IS AVAILABLE FOR RAMMING TRUCKS THROUGH? REDWOODS DON'T EXIST ANYWHERE ELSE ON EARTH, & THEY'VE BEEN DECIMATED THROUGHOUT MOST of THEIR RANGE(S); THEY CLEAN THE AIR, MAKE WATER & OXYGEN; TRUCKS DO JUST THE OPPOSITE.

THE BUILD PROJECT RUNS COUNTER TO SHORT & LONG-TERM TRENDS: TRUCK TRANSPORT DECLINING NATIONWIDE (PAGE 34-5). THE INTERSTATE SYSTEM HAS BEEN FINISHED OFFICIALLY FOR SEVERAL YEARS. SAWMILLS HAVE SHUTDOWN ON THE NORTH COAST, HAVING UNSUSTAINABLY OVERHARVESTED THEIR RESOURCES (MEANING LESS & LESS LOGS TO HAUL BY TRUCK). HUMBOLDT COUNTY WILL BECOME MORE DEPENDENT ON NATURAL TOURISM IN THE FUTURE AS MORE of THE STATE BECOMES OVERDEVELOPED & NEEDING TO ESCAPE ON WEEKENDS & FOR VACATIONS; INVESTING IN TOURISM OVER FUGITIVE NAFTA TRUCKS IS THE BEST USE of REVENUE! CHRONICALLY-DEFERRED HIGHWAY MAINTENANCE SPENDING IS DESPERATELY NEEDED FOR PAVING & BRIDGES ALL OVER THE STATE TO STAVE OFF EXPONENTIALLY-HIGHER EXPENDITURES TO RETURN OUR HIGHWAYS TO "A STATE of GOOD REPAIR" IN THE FUTURE. ∴ WE CANNOT AFFORD

10

11

12

13

* WHERE WILL THE 1/4 ACRE FOR CUT & FILL (EXCAVATION STAGING) GO? WHO WILL DETERMINE THE LOCATION, & WHEN? I DID NOT SEE THIS IN THE EIR/EA

TO WASTE $5.5 MILLION HERE UNTIL OUR MAINTENANCE BACKLOG ON EXISTING FACILITIES IS ELIMINATED. WORSENING AIR QUALITY, FOSSIL FUEL BURNING (CARBON RELEASED TO THE AIR) & ATTENDANT GLOBAL WARMING MUST BE ADDRESSED BY ALL MEANS POSSIBLE, & "YESTERDAY" – EVEN SMALL PROJECTS CAUSING FOREST FRAGMENTATION MUST BE STOPPED & REVERSED; RICHARDSON GROVE COULD & SHOULD BE EXPANDED FOR OUR HEALTH & NATURAL SUSTAINABILITY... INTACT FORESTS' ABILITY TO IMPROVE OUR ENVIRONMENT IS HARD TO MEASURE IN MONEY, ~~BECAUSE~~ BUT ITS BENEFITS TO HUMANS ARE MANY & ESSENTIAL... UNFORTUNATELY, THERE IS NO PLACE FOR THIS IN THE EIR/EA PROCESS, AND NO BOTTOM LINE of "FOREST SERVICES RENDERED"... 14

IT IS CLEAR FROM ACCIDENT STATISTICS, TO THE LITTLE PILES of BROKEN MIRRORS & CHUNKS of FIBERGLASS I HAVE SEEN AT THE BASE of REDWOODS ON 101'S CURVES, WE ASK THE 101 TO DO TOO MANY THINGS; ADDING STAA TRUCKS WILL NOT HELP. PRIORITIZING THEM WITH THIS PROJECT PUTS THE 101 HIGHWAY ON A "COLLISION COURSE" WITH THE NEED FOR ENVIRONMENTAL PROGRESS, HABITAT, & PARKLAND EXPANSION FOR A GROWING CALIFORNIA POPULATION. NOT ONLY DOES THE PROPOSED PROJECT NOT TRULY SATISFY THE BOTTLENECK THRU RICHARDSON GROVE TODAY, THE STAA FUGITIVE NAFTA TRUCKS' WIDTH, HEIGHT, WEIGHT, & WEIGHT of THEIR PAYLOADS, NUMBER & LENGTH of TRAILERS IS A MOVING TARGET, BOUND TO INCREASE IN THE FUTURE (I REMEMBER CLEARLY WHEN THE LONGEST TRAILER WAS 40' MAXIMUM, FOR EXAMPLE, NOW IT'S > 30% MORE) THIS PROJECT ASKS US TO REDUCE NATURAL VALUES, REDUCE THE VISITOR EXPERIENCE AT ONE of OUR MOST PREMIER STATE PARKS TO SPECULATE ON REDUCING COSTS FOR A MINORITY of COUNTY BUSINESSES WHO REMAIN ANONYMOUS, AND TO EMPOWER AMERICAN JOB-REDUCING NAFTA-GOODS LADEN TRUCKS TO MOVE IN A STRAIGHTER LINE THROUGH ANCIENT FORESTS... WITHOUT ANY REAL GAINS IN HIGHWAY PRODUCTIVITY. THIS IS WRONG, & "THERE'S NO RIGHT WAY TO DO A WRONG THING." THERE IS, HOWEVER, A POTENTIAL WIN-WIN-WIN OUTCOME YOU DID NOT CONSIDER: A COMBINATION of "NO BUILD" & "~~BUILD~~ (SUBSTITUTE: "USE") AN IMPROVED FACILITY WITHOUT USING PUBLIC PARK, RECREATION LAND, WILDLIFE OR WATERFOWL REFUGE"; 15 16

A.) REDESIGNATE THE PROJECT AREA (& AS MUCH MORE AS NECCESARY) AS "HISTORIC** 101" OR "SCENIC 101" – AS A SCENIC/RECREATIONAL, & LOCALLY-SERVING ROAD. THAT PRIORITIZES THE HIGHEST & BEST USE of THIS ROAD IN CONSIDERATION OF ITS REDWOOD HABITAT. IT WOULD ELIMINATE FUGITIVE, NON-LOCAL TRUCKS, IMPROVE SAFETY FOR BICYCLES & CARS, QUIET THE VISITOR EXPERIENCE IN THE PARK, REDUCE MAINTENANCE COSTS. IN FACT YOUR OWN TEXT SUGGESTS THIS IS THE IDEA YOU FEAR MOST: "... ALTHO. THE ROADWAY IS NARROWER THAN ADJACENT SEGMENTS of ROUTE 101 TO THE NORTH & SOUTH, IT HAS 17

** THE ROUTE ITSELF IS HISTORIC – & YOU CAN'T ASK FOR TREES MUCH OLDER! – THE PAVING NOT-SO-MUCH...

EMPHASIS MINE - APPEARANCE, BUT NOT REALITY!

THE APPEARANCE of A MODERN STATE HIGHWAY... THE HIGHWAY ITSELF DOES NOT HAVE THE HISTORIC QUALITIES THAT WOULD WARRANT ITS EVALUATION AS A POTENTIAL HISTORIC ROAD." ← WELL, THAT DOES NOT LOGICALLY FOLLOW, ANY MORE THAN PROVIDE ANY JUSTIFICATION FOR THE PROPOSED PROJECT — TO STEP TOWARD "A MODERN 4-LANE HIGHWAY"! ALSO (ON PAGE 54 & 55), "THE PRESENT HIGHWAY DOES NOT HAVE THE SAME CHARACTERISTICS AS THE ORIGINAL HIGHWAY — THE ORIGINAL PLANS... DATED 1914... SHOW THE HIGHWAY... WIDTH of 18 FEET. MOST RECENT PLANS, DATED 1996, SHOW A PAVEMENT WIDTH of 21 TO 36 FEET IN ADDITION TO SHOULDERS IN SOME AREAS of UP TO 5 FEET." IN FACT THIS DOES SUGGEST THAT REDUCING THE WIDTH of PAVING TO 24 FEET ((2) 12 FOOT WIDE LANES (ON AVERAGE) WOULD REVERT A "HISTORIC" OR "SCENIC" HIGHWAY TO A SAFE YET HABITAT-ENHANCING ASSET WITH MINIMAL GRAVEL-STABILIZED OR "GRASS-CRETE" (MOWABLE PERF. BLOCK) SHOULDERS — FOR SAFETY

18

B) AS FUGITIVE STAA TRUCKS WON'T MOVE ANY FASTER THROUGH THE FOREST'S OBSTACLE-COURSE OF TREE TRUNKS, MOVE TRUCKS TO THE I-5 CORRIDOR (WITH ADDED DESIGNATION of "101 TRUCK ROUTE" OR NEW "101" SIGNAGE), WHERE THEY CAN GO FAST, THE INFRASTRUCTURE IS STRONGER FOR THEIR HEAVIER PAYLOADS, & CURVES ARE NOT SLOW & LABORIOUS. ALSO, TRUCK-RELATED INFRASTRUCTURE (FUEL & SERVICE) IS MUCH MORE PLENTIFUL THERE, & THEIR NAFTA DESTINATIONS (MEXICO, CANADA) MUCH MORE EASILY REACHED. LIKEWISE, EAST-WEST CONNECTIONS-ROADS BETWEEN THE I-5 & THE NORTHWEST COAST / CALIFORNIA, WILL MINIMIZE TIME LOST IN THE REDWOODS, WINDING ALONG THE EEL RIVER, THROUGH SMALL TOWNS, ETC.

19

C) THIS CAN BE ACCOMPLISHED MOSTLY BY SIGNAGE & CHANGES TO STATE MAPS, SAVE MOST of THE $5.5 MILLION (FOR THE PROPOSED PROJECT) FOR CALTRANS' MORE PRESSING DEFERRED MAINTENANCE PROJECTS... "FIX IT FIRST!"

THANK YOU FOR THE OPPORTUNITY TO COMMENT ON THIS EIR/EA.

John Jay Ulloth

(JOHN JAY ULLOTH / ULLOTH GRAPHICS)

P.S. PERHAPS YOUR DESCRIPTION of THE NORTHWEST PACIFIC RAILROAD (NWP) SHOULD/COULD INCLUDE INFORMATION THAT THE LINE WAS CONSTRUCTED (AROUND THE TURN of THE CENTURY), BUT WAS BUILT ON UNSTABLE BANKS OF THE EEL RIVER PRONE TO CONTINUAL ROCK FALLS, BUILT TOO LOW TO AVOID HIGH WATER FLOODING of ITS TRACKS & TUNNELS, HAD AN EXTREMELY POOR ACCIDENT/SAFETY RECORD, VERY LOW SPEED RESTRICTIONS BEFORE ITS LONG-OVERDUE F.R.A. SHUTDOWN (PER YOUR PAGE 41) & THAT IT NEVER REOPENED BECAUSE ESTIMATES FOR ANNUAL MAINTENANCE WERE ON THE ORDER of $1 MILLION PER DAY TO KEEP THE LINE OPEN. UNFORTUNATELY THIS LINE IS COMPLETELY UNSUITABLE AS A MODERN RAILROAD, & PROBABLY EVEN TOO UNSAFE AS A BIKE PATH, IN THE VICINITY of THE PROJECT AREA.

1. *See General Response #1.*
2. Caltrans has worked closely with State Parks throughout the project development process to minimize impacts to the park resources. The majority of the project can be constructed within the existing transportation easement.
3. Goods movement into Humboldt County will continue to occur via trucks for the foreseeable future. To use short sea shipping or the railroad requires infrastructure improvements. Funding for these improvements have not been identified.
4. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
5. *See General Response #11.*
6. The Regional Transportation Plan for the County identifies an objective of providing STAA access at Richardson Grove. This project would satisfy this stated objective.
7. The finding and conclusions in Dr. Gallo's study were not used to justify the project but to provide a broad brush look at the potential economic effects of the project.
8. *See General Response #11.*
9. It should be noted that US Route 101 predates the establishment of Richardson Grove State Park. The project would not substantially alter the characteristics of the existing highway. It will remain a two lane, narrow, conventional highway with trees abutting the roadway.
10. The widening that is proposed in the park is to provide one to two foot shoulders where it can be done without removing large trees. The majority of the tree removal in the park occurs in two previous cut slopes, which is why there are no old growth redwoods present. The majority of the thirty trees to be removed in the park are twelve inches in diameter or less. These trees are not the main component of the canopy.
11. The curve corrections that would occur as a result of the project would make the road easier to traverse by all motorists. The roadway would not be moving the travel lanes closer to the primary campgrounds, nor would it result in a substantial increase in truck traffic so it is not expected that noise would increase post construction.
12. The retaining wall is located outside the park. Subsequent to the circulation of the draft document a design modification for the wall was developed. The modified wall would be located below the road so it would not be visible to motorists except for the barrier rail and the location changed from the west side of the road to the east side. The design modification reduces the number of tree removals from 30 to 5. The staging areas for the wall as well as the rest of construction would occur in paved turnouts and the one unpaved turnout at PM 1.79.
13. *See General Response #6.*
14. The project would not have any substantial effect on global warming or air quality.
15. Transportation needs will continue to evolve over time. As stated previously, this project is in compliance with the County Regional Transportation Plan which identifies STAA improvement at Richardson Grove. The project does not increase the roadway capacity. It will remain a two lane conventional highway.
16. A bypass alternative was considered. See Appendix B.

17. It is unclear how designating US Route 101 as a historic or scenic highway would improve safety, reduce maintenance costs, and reduce the highway noise. Designating a highway as scenic or historic does not eliminate trucks from the traffic flow.
18. It is the geometrics of the alignment including roadway width that results in the restriction of STAA vehicles. Highway standards have evolved as the automobile itself has changed. Highway geometrics less than the standard increase the potential for liability in the event of collisions occurring.
19. This project would not affect I-5 being the primary north-south trucking route. Trucking routes are determined by fuel costs and time. I-5 and route 99 are more fuel efficient and have higher speeds than US Route 101. Since major coastal cities from southern California to northern Washington have readily available access to I-5 and Route 99 corridors which have straighter alignments and faster travel times, it is not expected that trucks would divert to US Route 101, especially since east-west routes connecting US Route 101 and I-5 such as 299, 36, and 20 are also restricted for STAA vehicles.

woodsky@humboldt.net
(Gayna Uransky)
01/28/2009 09:10 AM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove

Dear Ms. Harmon,

This is a bad idea. We need these trees as a gateway to a beautiful area. What we DO NOT need is these huge trucks coming up 101. There is a perfectly good way for them to enter our area ALREADY AVAILABLE: up Rte. 5 and over on a direct route to the Arcata/Eureka area on an already available road. 1

Old growth redwood forest provides a gateway into the North Coast that defines the character of the region. Their roots are very shallow.Any cutting of the roots would likely cause instability, and foster a dangerous likelihhood of trees falling on motorists. 2

The impacts cannot be adequately predicted, however, because there is no information in the document showing how cutting roots of the old trees would not adversely affect, or even kill, these ancient trees. 3

The public's use of the state park must be considered a priority. 4
And what about bicycle access? Where is that considered and prioritized? This proposed project does not seem to comply with Caltrans' own policy about bicycle access. 5

Local businesses will be directly impacted by this project as well during any construction. And this is just not a good time to be doing that to our businesses. 6

[YOUR NAME HERE]

Sincerely,
Gayna Uransky
1653 Kimtu Rd.
Garberville CA 95542

1. From the south, there is no direct access for STAA vehicles into Humboldt County. The only access would be from the north on Route 101 from Oregon.
2. *See General Response #2.*
3. *See General Response #3.*
4. The public's use of the State Park should not be affected once construction has been completed.
5. *See General Response #5.*
6. *See General Response #7.*

Kim
Floyd/D01/Caltrans/CAGov
03/13/2009 10:23 AM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/13/2009 10:23 AM -----

"Stacey and Tony"
<urhammer@quik.com>
03/12/2009 11:11 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

Hello Ms. Floyd,
I oppose the caltrans project that will reroute highway 101 at Richardson grove. Enough trucks can get in here already! Don't spend any of my money to cut down the trees! I am a local business and property owner! This is a waste of our tax money. Leave the trees in our state parks alone.
Thank you for your time,
Anthony Urhammer

1

1. The proposed project would lift the restriction on STAA vehicles. Currently, the only STAA vehicles that are exempted from the restriction are household goods carriers and certain licensed livestock carriers.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:52 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:52 PM -----

"Stacey and Tony" <urhammer@quik.com>
03/11/2009 12:38 PM

To <Kim_Floyd@dot.ca.gov>
cc
Subject Richardson Grove

Hello Ms. Floyd,
I am writing in opposition to the widening of Highway 101 through Richardson Grove. I live in Eureka and do not want to see the roots of many ancient redwood trees destroyed so that large trucks can come through and destroy our local economy up here. We do not want *big box* stores to ruin what our local businesses are providing perfectly fine. We do not want the health and ambience of an important aesthetic tourism draw to be jeopardized. Please support the locals of Humboldt County in our outrage over what is being planned.

Thank you for your time,
Stacey Urhammer

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1. *See General Response #3.*
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
3. *See General Response #12.*
4. *See General Response #2.*

Kim
Floyd/D01/Caltrans/CAGov
03/12/2009 03:02 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Proposed widening at Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:02 PM -----

"Aiko Uyeki"
<aikoh@sbcglobal.net>
03/11/2009 09:58 AM
Please respond to
"Aiko Uyeki"
<aikoh@sbcglobal.net>

To <kim_floyd@dot.ca.gov>
cc
Subject Proposed widening at Richardson Grove

1
2
3

Please do not waste taxpayer dollars in widening 101 at the expense of losing our beautiful redwoods at this location. Consider putting in stop lights there and make speed limit 25 mph so big trucks can get through safely.

Thanks for your attention.

Aiko Uyeki
McKinleyville CA

1. *See General Response #2.*
2. *See General Response #10.*
3. *See General Response #8.*

Susic Van Kirk
P.O. Box 568
Bayside, CA 95524
svkirk@humboldt1.com

January 26, 2009

Deborah Harmon, Senior Environmental Planner
California Department of Transportation
1656 Union Street
Eureka, CA 95501

Re: Richardson Grove Operational Improvement Project
Draft EIR/EA and Programmatic Section 4 (f) Evaluation

Dear Ms. Harmon:

These comments are provided after reviewing the document listed above; Dr. David Gallo's Study, "Realigning Highway 101 at Richardson Grove, the Economic Impact on Humboldt and Del Norte Counties," April 2008; and the 2003 report prepared by Cambridge Systematics, Inc., "Transportation for Economic Development." The other economic report by Cambridge Systematics, Inc., dated Nov. 1989, and referenced in the Draft EIR/EA, was not available for review. In addition, Jacqueline Debets, Humboldt County's Business and Workforce Programs Manager, responded to questions.

The proposed project would adjust roadway alignment in a one-mile stretch of Highway 101 through Richardson Grove State Park in southern Humboldt County to allow Surface Transportation Assistance Act (STAA) trucks to pass through the area. Currently the roadway does not meet STAA standards, limiting the size of the trucks allowed to pass through this stretch. Although mention is made that the project would improve safety (p.2), this assertion appears questionable. The corridor will remain narrow and the curvilinear alignment marginal even after completion of the project, but with the lifting of STAA restrictions, the California Highway Patrol will allow the larger, STAA trucks to pass through the formerly restricted area. Caltrans recognizes that even with the project the corridor will remain hazardous and is considering reducing the speed limit through Richardson Grove to 35 mph as an independent action from the proposed project (p.10).

1

2

The stated purpose of the project is to adjust the roadway alignment so that two STAA trucks going in opposite directions can pass one another (p.2). Although non-STAA trucks currently pass each other in this section, Caltrans is concerned with more than transportation as indicated by the California Transportation Plan's Vision:

> California has a safe, sustainable, world-class transportation system that provides for the mobility and accessibility of people, goods, services and information through an integrated, multimodal network that is developed through collaboration and achieves a prosperous economy, a quality environment, and social equity. (Caltrans web page)

Caltrans is concerned with a prosperous economy, so much so that it commissioned a report to look at methods to "direct some of Caltrans' transportation investments to the state's worst pockets of poverty and joblessness" so that Caltrans can "play a role in each poverty-stricken area's own efforts to create jobs and relieve economic hardships" (Cambridge Systematics, Inc. June 2003, section 1.1). The report evaluated ten areas in the State, including Eureka, where it identified five constraints to economic development, among which is the "lack of easy access to the area due to trailer length restrictions on U.S. 101 and SR 299" (6.1.1). Other constraints listed: higher costs because of long distances to markets and suppliers; relative isolation that creates marketing challenges; lack of venture capital, and traffic congestion on U.S. 101 through Eureka.

In February and March 2008, Caltrans funded a study, conducted by Dr. David Gallo of the Center for Economic Development at Chico State University, "to determine the economic impact of the project on Humboldt and Del Norte counties of realigning Highway 101 at Richardson Grove" (p.1, Gallo Study). Dr. Gallo determined that the "STAA truck restrictions at Richardson Grove are responsible for a reduction in annual income for businesses and residents of Humboldt and Del Norte counties of $8.0 million (2004$)" (p.1). He noted that the losses for just one year exceed the $5.5 million estimated cost of the Richardson Grove project and concluded that the balance between economic benefits and project costs was good enough that the "project should move ahead" (p.1).

Jacqueline Debets gave three examples of impacts to local businesses because of the STAA restrictions. All are exporters. One lost a shipment because the refrigeration unit on one of the older local trucks was inadequate. Another experienced problems with having to transfer its food product from the smaller local trucks to STAA trucks south of the Richardson Grove bottleneck. The third, an equipment manufacturer, almost lost a contract because the customer, although initially agreeing to pay the shipping costs, reneged when it couldn't figure out the STAA limitation (personal communication 14 Jan. 2009). She believes the $8 million annual loss to local businesses from the STAA limitation is conservative.

Dr. Gallo based his study on a confidential, online survey conducted by the Humboldt County Economic Development Division, the purpose of which was to determine the extent of the impact of the STAA restrictions at Richardson Grove on business activity in Humboldt and Del Norte counties (p.1). He also stated that "none of the survey responses can be released to the public."

1. The Draft EIR/EA states that northwestern California is one of the few remaining areas of the State that STAA trucks are not permitted (p.3), although non-STAA livestock carriers and moving vans are permitted by the California Highway Patrol to pass through the Richardson Grove STAA-restricted area (p.11). In addition to Richardson Grove, STAA restrictions are also in place on Highway 199 and at Buckhorn Summit on Highway 299. The restriction at Big Lagoon on Highway 101 has been corrected by a recent Caltrans project. The Gallo Study addressed only the Richardson Grove STAA restriction.

a. Is Dr. Gallo's analysis just as applicable to the STAA restrictions on Highway 199 and at Buckhorn Summit?

3

b. Is the $8 million annual income loss solely connected with Richardson Grove? 4

c. Does Caltrans intend to undertake projects on Highway 199 and at Buckhorn Summit in order to allow use by STAA trucks? CEQA prohibits against segmentation of a project into individual parts when those parts are, in fact, a single project. Caltrans should assess its STAA proposals for Richardson Grove, Highway 199, and Buckhorn Summit as a single project. 5

d. What are the cumulative impacts of opening all three restrictions on truck traffic into and out of Humboldt and Del Norte counties; on opening up hundreds of miles of roadway and many communities to non-local business and corporations which might have a competitive advantage over locally-owned businesses; and on the cost of maintaining bridges and roadways subjected to larger and heavier trucks? 6

2. The Gallo Study relies on the online survey conducted by the Humboldt County Economic Development Division, but the information generated from the survey is confidential. No information was provided regarding the protocol, method of survey distribution, or survey questions.

a. How were businesses recruited for the online survey? 7

b. What were the survey questions? 8

c. Why is the information used by the Gallo Study confidential? If businesses are not identified, what is the problem in revealing the information? Dr. Gallo identifies fifteen specific industry sectors in Table 3 associated with the list in Appendix A. Local people pretty much know the businesses associated with these specific industry sectors, including cheese manufacturing, breweries, greenhouse and nursery production, so what is the reason for withholding the information if it is not linked to any specific business? 9

d. Were the questions specific to Richardson Grove or did they also include Highway 199 and Buckhorn Summit? 10

e. What fraction do the 45 responding businesses represent of the total businesses in Humboldt and Del Norte counties? 11

f. The Gallo Study limits its analysis to industries incurring only 15% of total area truck transportation costs and 25.9% of the amount paid to non-local trucking firms and these industries are responsible for only a small percentage of local economic activity: 18.6% local sales, 9.3% employment and 12.3% total income. Do these data indicate significant effects from STAA restrictions at Richardson Grove? 12

3. Appendix A of the Gallo Study lists 509 Industry Sectors. Of that number 198 include dollar amounts for output and income and numbers for employment, apparently indicating only those sectors which operate in Humboldt and Del Norte counties. The Appendix indicates that these 198 sectors employ 74,332 individuals and generate an annual income of $4,070,340,000.

a. What is the source of these data?

b Is the $8 million loss in income due to the Richardson Grove STAA restrictions significant in light of the fact that it represents only two-tenths of one percent of the total $4 billion generated by business activity in Humboldt and Del Norte counties? If the Gallo Study added the $500 million annual marijuana contribution to the economy, that two-tenths of one percent slides even further to one-tenth of one percent. Apparently growers are not experiencing 13

income losses due to transportation problems at Richardson Grove or at least they aren't complaining.

4. Local trucking firms currently transport goods into and out of Humboldt and Del Norte counties, using trailers that are not prohibited by STAA restrictions.

a. How will lifting the Richardson Grove STAA restrictions affect local trucking firms in Humboldt and Del Norte counties? Will it increase their business or will it make them less competitive with out-of-the area trucking firms? If it decreases their business, what is the dollar figure associated with this decrease? 14

b. What will be the economic impact to local trucking firms if they must invest in STAA trucks to remain competitive? How much will it cost them?

c. If firms can't afford to invest in the larger trucks, will this put them out of business? How would that affect the local economy?

d. If local trucking firms transport on all three highways out of Humboldt and Del Norte counties (Highways 101, 199, 299), and the restrictions are not lifted on Highways 199 and 299, they would have to maintain their smaller fleet regardless of Richardson Grove. How does this affect their competitiveness with out-of-the-area trucking firms? 15

5. People live in Humboldt and Del Norte counties behind the Redwood Curtain for many reasons, including the isolation, the removal from the sprawl and traffic of areas south of Richardson Grove and east of Buckhorn, and the association with a still-livable environment of open space and beauty. For these residents, the benefits are worth the sacrifices of lower wages and a higher cost of living. Quality of life weighs heavily in the equation of why people live here and why people move here.

a. How will opening previously STAA-restricted sites affect the quality of life value that seems more important to many local residents than high wages and low costs? 16

b. Should businesses accept these trade-offs as individuals do? Why do businesses locate here knowing that transportation costs, irrespective of STAA restrictions, are higher because of distance to markets and suppliers and a single mode (highways) of transportation? Is quality of life a factor?

c. Will the investment capital and incomes from retiring and fleeing urbanites be lost at some point because the north coast becomes just like every other place? What could that mean to the area's economic activity? 17

The results of Humboldt County Economic Development Division's online survey were used by Dr. Gallo to provide the economic justification for the Richardson Grove project. Because of the significance of this survey and the Gallo Study in the development of this project, Caltrans should show that the project's justification is based on non-biased, objective collection and analysis of data. Thank you for a response to these questions. 18

Sincerely yours,

Susie Van Kirk

Susie Van Kirk

1. The curve corrections and added shoulders would be expected to make the roadway safer to traverse for all users.
2. In late 2008 the speed limit on this segment of US Route 101 through the park was reduced to 35 mph.
3. A separate economic study is being prepared for the projects on Routes 197 and 199 in Del Norte County.
4. The income loss is connected to the lack of STAA access into Humboldt County from the south.
5. Yes, there are currently STAA access improvement projects under study on Routes 197, 199, and 299. The projects on Routes 197 and 199 have incorporated Richardson Grove into their analysis. There are several projects ongoing on Route 299 to improve STAA access.
6. The Del Norte study did consider potential traffic increase on Route 101 as a result of the STAA restriction at Richardson Grove and Routes 197 and 199 being removed. It was determined that the level of service on Route 101 would not deteriorate even with the three routes open to STAA vehicles.
7. The internet survey was voluntary. The internet survey was independently performed by the Humboldt County Office of Economic Development. Caltrans did not sponsor, develop, or oversee the survey.
8. The survey questions focused on the effect of the lack of STAA access on the cost of importing and exporting goods, materials, and equipment. In addition, in February 2008 supplementary survey questions were added to the online questionnaire in order to obtain more detailed information on cost impacts. Humboldt County has not released the raw data to Caltrans.
9. Humboldt County has not released the raw data to Caltrans.
10. The questions pertained to Richardson Grove.
11. It is not known what fraction of total businesses are represented in the survey respondents. The businesses that responded only represent a few industry sectors. Since it was a voluntary survey, it is likely that those businesses most concerned about shipping costs are the ones who participated in the survey.
12. The County considers the effects of the STAA restriction to be significant.
13. It is not known for certain what the source for these figures are. The findings and conclusions in Dr. Gallo's study were not used to justify the project but rather to gain a broad brush look at the potential economic effects of implementing the project.
14. In the economic evaluation for the Del Norte STAA improvement project, 60% of the local trucking firms stated that they were unaffected by the STAA improvements. Opposition from trucking firms was not received. It is expected that as companies replace equipment, they would like consider replacing vehicles with the industry standard STAA vehicles.
15. STAA improvements needed to lift all the restrictions on Route 299 would take several years to implement. It is expected that the competitiveness with out of the area companies would remain fairly similar to the present condition.
16. It is not expected that the quality of life for the majority of Humboldt County citizens would appreciably change. The highway improvements would not result in substantial traffic increase, divert substantial numbers of trucks from the primary trucking routes, or result in substantial growth in Humboldt County.
17. The primary guide for development in Humboldt County is the City and County General Plans.

18. The project fulfills an objective identified in the County's Regional Transportation Plan. The information from Dr. Gallo's study were used to provide a broad brush look at the potential for economic impacts.

March 5, 2009

1403 H Street

Eureka, CA 95501-2333

Caltrans Project Manager

Kim Floyd

P. O. Box 3700

Eureka, CA 95502

In Re: Richardson Grove Proposals

We are dubious about the true need for the Richardson Grove Project, concerned for the trees due to the impact on roots which would be caused by the changes, and would be greatly saddened to lose that lovely spot in the drive. 1 2

Could you, at least, not install an ugly blank wall through there? 3

Sincerely,

Patricia A. Vance

Patricia A. Vance

Forrest W. Vance

Forrest W. Vance

(Mr. and Mrs. F. W. Vance)

P. S. Is there, perhaps, any feasible solution in Mr. Olmstead's MY WORD in the Times-Standard? 4

1. *See General Response #1.*
2. *See General Response #3.*
3. The retaining wall would not be constructed within Richardson Grove State Park. The wall had been proposed to be placed in an existing cut slope on the west side of the highway north of the Overpacks Resort and Singing Trees Recovery Center. Subsequent to the circulation of the draft document, a design modification was developed. The design modification included changing the location to the east side of US Route 101, and changing the wall type to below the roadway so the wall would not be visible to motorists except for the barrier rail. The design modification also reduces the number of trees to be removed from 30 to 5..
4. *See General Response #8.*

kv2@gotsky.com (Kristin Vogel & Kurt Volckmar)
01/28/2009 02:11 PM

To deborah_harmon@dot.ca.gov (Deborah Harmon, Senior Environmental Planner)
cc
bcc
Subject Comments for Richardson Grove Operational Improvement Project

Dear Ms. Harmon,

Slowing the speed through Richardson Grove is the frugal and responsible choice for Caltrans and the healthy way to protect our irreplaceable redwood trees which thousands come to visit each year. This straightening project claims to not remove old growth Redwoods but it will cause root disturbance and the cutting of roots which will destabilize the big trees and cause them to topple. This will endanger locals, visitors and truckers and destroy our tourist industry. We support Alternative No. 3. 1 2

Please lower the speed limit, save millions of dollars for our strapped State, and allow slower trucks, cars and magnificent redwoods to coexist. Please work on more important road projects in this time when California is deep in debt. You have a duty to spend the public's money in a way that benefits more of us citizens than the few business owners and corporations that lobbied for this stupid, wasteful and destructive plan that is blind to beauty and common sense. 3

Sincerely,
Kristin Vogel & Kurt Volckmar
P.O. Box 453
Garberville, CA 95542

1. *See General Response #8.*
2. *See General Response #3.*
3. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Emily Walter
<emily.lynn.w@gmail.com>
01/27/2009 07:18 PM

To Deborah_Harmon@dot.ca.gov
cc
bcc
Subject Richardson Grove project

I appose the Richardson Grove project. I do not believe it is in the best interest to Humboldt County and will only cause harm. It's like opening the curtains permanently and we like living behind the redwood curtain. 1

--
Emily Walter
1650 H Street
Arcata, CA 95521

1. *See General Response #2.*

P. O. Box 631
Trinidad, CA 95570
March 10, 2009

Kim Floyd, Project Manager
Caltrans District 1
P. O. Box 3700
Eureka, CA 95502

Dear Mgr. Floyd:

We would like to be counted among those opposed to widening Highway 101 through Richardson's Grove, for three principal reasons – ecological, commercial, and historical.

First, it is intrinsically or morally wrong to kill living organisms, which have been living there for centuries before Euro-American contact, so that some businesses in Humboldt County can earn more profits. Any living organism has a right to life and has an intrinsic value because it exists, not to mention its value as food or shelter or living place for other organisms. It is now well known that a complex ecosystem lives in the crown of old complex redwoods. 1

People treat the features of the natural world, living or inanimate, as if they were merely commodities for our use or hindrances to what we want to do, and should therefore be eliminated. Only a very small remnant of old-grown redwoods still exists -- it is simply wrong to remove any more of them just so some businesses can make more money.

Second, a sizable proportion of those of us living here in Humboldt County do not want large industry-sized trucks to travel in and out of the county, because we want to encourage smaller, local businesses. We don't want large, big-box businesses here, because they out-compete smaller ones, and our towns become just like any other miscellaneous American town lacking in local character or unique features. Furthermore, the money made by local people in locally owned businesses stays in the county, while profits earned by large corporations leave the area. 2

Third, this section of road is the last vestige of the old and historic Redwood Highway, which was narrow and wound around the large trees. It seems like an oasis when one enters it after traveling through the open country to the south. It is beautiful and restful and feels like the old days. It should by saved as an historic monument, if for no other reason. Humboldt County attracts visitors because it is still relatively rural in character and has large parks with old-grown redwood forests. Richardson's Grove makes an excellent gateway to Humboldt County. Please don't destroy the emotional and esthetic impact of that short section of highway. 3

Thank you for your attention.

Virginia J. Waters James F. Waters

Virginia and James Waters

1. No old growth redwoods would be removed for this project.
2. Many small businesses throughout Eureka and the surrounding area have expressed their concern of how the STAA restriction has impacted their business. Staff from Humboldt County urged Caltrans to explore options for providing STAA access into the County. The Humboldt County Regional Transportation Plan (RTP) recognizes the importance of this access and one of the goals in the RTP is to eliminate the STAA restriction at Richardson Grove.
3. *See General Response #2.*

Deborah Harmon
Cal Trans Environmental Planner

January 24,2009

Richardson Grove Widening Project

Dear Deborah,

It is my hope you hear my plea in dissuading Cal Trans from pursuing the Richardson Grove widening project. How can private business for their own profit get the say in disturbing what is our treasured Old Growth Redwood Forest? They say it will save money with larger trucks BUT I believe these supposed savings will not be passed on to the consumer. It's just more profit in their pocket. 1

What happened to the legislation that protects our forests and lands? Why is the State Park sitting back saying very little? You can't even pick up a fallen tree limb to burn in your campfire. It's illegal. And yet they're allowing Cal Trans to come through this grove to re-route, widen, disturb and cut roots on sacred and precious thousand year old trees? This is a violation to the actual purpose of Richardson Grove State Park. It's the park staff's job to protect Richardson Grove for the people. Where is their voice? Why are they so silent? 2

I spent many hours wading through and trying to decipher the 181 pages of the DEIR, finding discrepancies and inaccuracies. What was said on one page was contradicted pages later. I came away confused and mistrustful of this document.

Cal Trans must stop this insanity now! The State DOES NOT have five or six million dollars to spend on a project that is NOT necessary. You send a guy who sits for a few hours along side the highway counting trucks when you should really send him to see what goes on from midnight to 5am on any given Monday. You'd see just how many trucks are getting through. And they are getting through without incident. It can work! Drop the speed limit for a year and see if this alternative will work BEFORE there is more waste of taxpayers money. 3 4

What you think is a problem can be resolved by dropping the speed limit to 25 mph for all trucks with trailers. They CAN get through the grove without incident! I as someone who has lived and worked on this highway for over twenty years have already seen a significant difference since you dropped the speed to 35 mph a couple months ago to all vehicles. Although it should have started North of Big Foot instead of South. This is an area where trucks going too fast cause many accidents, the most recent a truck full of crab. If a 25 mph limit were imposed you would see it work. Try some alternatives before jumping into this very costly venture. 5

If speed was reduced there would be no need to cut back the banks Cal Trans is proposing to do across the street from Singing Trees Recovery Center and a hundred feet or so from my backdoor. I will not sit back without protest as they build a retaining wall of toxic poisoned wood that will seep down into my backyard. And if this project is allowed it could very well shut down Singing Trees business as we are located adjacent to the Grove. There's no way anyone who wants a quiet peaceful place to begin putting their lives and families back together will want to 6

be here. The 24/7 construction activity, backed up traffic, artificial night lighting and dump truck backup beeps could very well put us out of business. No one and I repeat no one will want to begin their recovery process in this type of atmosphere. A friend stated any truck that can make the turn from Broadway onto Fifth Street in Eureka can also drive through Richardson Grove without incident. It's all about slowing down for these couple miles. It's really so simple. 7

Again I implore you to step up to the plate and shut this project down. Try alternatives of reduced speed, higher traffic fines and substantial tax write offs for those who load and unload. Don't spend millions when there is another way.

Sincerely,

Pattie Watson
Singing Trees

1. *See General Response #1.*
2. Caltrans has been coordinating with State Parks throughout the development of the proposed project and has been taking their concerns into consideration.
3. The State General Fund does not fund transportation projects. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.
4. In late 2008 Caltrans reduced the speed limit for this segment of Route 101 to 35 mph. However, reducing the speed limit does not correct for the off-tracking that occurs because of the existing highway alignment geometry.
5. *See General Response #8.*
6. The retaining wall would use chemically treated timber lagging. It utilizes standard chemical treatment.
7. Singing Trees facility and adjacent residents would experience temporary impacts during construction. A design modification for the retaining wall was developed subsequent to the circulation of the draft document. The modified design changed te location of the wall from the west side of the highway to the east side and changed the type of the wall from an above the road wall to a below the road wall. Since the wall is constructed below the roadway, it is not visible to motorists except for the barrier rail. It would also be visible from various locations of your property, although the trees and vegetation on the slope would provide screening of the wall. The modified design reduces the number of tree removals from 30 to 5.

Kim Floyd/D01/Caltrans/CAGov
01/30/2009 12:17 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Public Comment re Richardson Grove "Improvement" project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/30/2009 12:17 PM -----

Roberta Welty
<bertijo@humboldt1.com>
01/30/2009 07:43 AM

To Kim_Floyd@dot.ca.gov
cc
Subject Public Comment re Richardson Grove "Improvement" project

I am adamantly against the widening of #101 through the Richardson Grove. It is a beautiful stretch of road that reminds me, and all tourists coming into the area - 'You have entered a special place', ie Humboldt County. Leave our Redwood Curtain. The environmental and aesthetic degradations are NOT worth any potential economic gain. In this time of budget crunches, please spend the few highway improvement funds more wisely. 1 2

Roberta Welty
bertijo@humboldt1.com
654 Ole Hanson Road
Eureka CA 95503
707 476-0654

1. *See General Response #2.*
2. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim Floyd/D01/Caltrans/CAGov
03/12/2009 02:31 PM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Comments re Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 02:31 PM -----

Robin West
<lightbirdone@yahoo.com>
03/12/2009 12:34 PM
Please respond to lightbirdone@yahoo.com

To Kim_Floyd@dot.ca.gov
cc Nadananda FOER <nada@eelriver.org>
Subject Comments re Richardson Grove

Greetings Kim Floyd,

I have a question about the Richardson Grove project.

Who is liable for the property damage, medical care, and loss of life that will result in undermining redwood trees? As you would know if you studied the trees, they have very shallow root systems and depend on each other, in groves, to hold themselves upright. And they do very well at holding themselves upright when not messed with. 1

Once you chop off a few roots, they will start dropping their big, heavy limbs. On cars, on STAA trucks, and on all other traffic that passes by. 2

Big trucks create a phenomenon called "apparent wind" as they move down the road. This created, 'apparent', wind multiplies the wind's effects on trees and their parts. It won't be long before branches and limbs are dropping on the roadway, and what or whoever is on the road at the time. The trees will also start falling over. 3

The question is, who is liable? Who pays for the damage to life and limb, property, and families that lose people, if it could have been prevented by some science and knowledge of physics?

Please, someone needs to really study the effects of the apparent wind big trucks create at 40 miles per hour plus driving in a redwood grove. 4

I wish for this comment to be a formal part of the E.I.R.

Peace and Fun,
Robin West,
matriot and earthling

REVIVE YOUR LIFE NOW
Creating A Life You Love
Waking Up To!
Aliveness Coaching For Women
Who've Encountered cancer
reviveyourlife@gmx.com

1. The project's impacts to the redwood trees have been evaluated by both the Caltrans arborist as well as an arborist contracted by Save the Redwoods League, Dennis Yniguez. These arborists have determined that with the special conditions in place as described in the document, there would be no significant detrimental effects on root health or the availability of water to the roots of old growth redwoods adjacent to the highway construction.
2. One of the special conditions that have been incorporated into the project is to incorporate the roots into the road structural section rather than severing the roots.
3. The "apparent wind" phenomenon currently exists with the trucks that traverse this portion of US Route 101. It is not expected that the project would result in trees being more susceptible to dropping limbs or falling over.
4. Liability would be determined on a case by case basis. It should be noted that Caltrans reduced the posted speed limit in the grove from 40 mph to 35 mph in the fall of 2008.

Will Ruin Tourism
Millions of $ spent on Tourism - People from all over the world come "To the Redwoods!"

If you want to drive fast and be bored take Interstate 5.

Last of the original Redwood Highway that feels like it used to leave this last bit of a beautiful highway alone. 1

Only a few special interests will be served - such as Sun Valley Farms.

Reduce speed limit and don't widen (ruin) Richardson Grove 2

Ann Whitis
935 B Street
Eureka, Calif. 95501
(707) 443 5023

1. *See General Response #2.*
2. *See General Response #8.*

Kim Floyd/D01/Caltrans/CAGov
01/26/2009 08:54 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 01/26/2009 08:54 AM -----

Phil Frisbie/HQ/Caltrans/CAGov
01/26/2009 08:46 AM

To Carol & John Wiebe <wiehaven@humboldt1.com>
cc Kim Floyd/D01/Caltrans/CAGov@DOT
Subject Re: Richardson Grove project

Hello Carol and John,

Thank you for taking the time to write. I am forwarding this message to Project Manager Kim Floyd. She is the central contact for public comments on this project. If you have any further comments please send them directly to Kim_Floyd@dot.ca.gov by January 30, 2009.

Sincerely,

Phil Frisbie, Jr.
Public Information Officer / Webmaster
Caltrans District 1
(707) 441-4678, fax (707) 445-5330

Carol & John Wiebe <wiehaven@humboldt1.com> wrote on 01/24/2009 09:43:08 AM:

> Dear Cal Trans officials
> Regarding the current proposed Richardson Grove project, we
> are not alone in bemoaning the suggested project that would
> undermine, and eliminate one of the wonderful Humboldt County heritage
> sites that brings folks to our area, from all around the world. 1
> This is especially short sighted in the light of recent economic
> conditions - essentially destroying one of the magnificent gateways
> to our world famous redwood region. Tourism, vital to our region's
> economic stability, and a world famous grove of ancient redwood trees 2
> , is more important than transporting a few more cows to the slaughterhouse.

> Carol and John Wiebe

1. *See General Response #2.*
2. *See General Response #6.*

Joe Louis Wildman
PO Box 1396
Ukiah, CA 95482
707 367-0910

Kim Floyd, Project Manager
Caltrans
1656 Union Street
Eureka, CA 95501

3-12-2009

Dear Project Manager,

In my job, I have contact with Caltrans staff regularly and have on occasion discussed the Richardson Grove Project 01-48460.

Staff has compared the project to the NASA Challenger Space Shuttle O-Ring Disaster. NASA staff alerted management as much as 10 years early about that flawed project. Much like the NASA example, Caltrans staff understands and knows project flaws and brings them to the attention of management. In this case, Caltrans staff noted providing for mitigation for the "Growth Inducing Impacts" of Richardson Grove STAA Project. Caltrans staff has alerted Management. Management refuses to listen. Management pushed to receive CEQA/NEPA low level approval. Citizens had to demand for a full EIR/EIS because management wouldn't listen to staff.

1

Design exceptions are also in question. Design exception are needed because the project as designed will not provide for pedestrian and bikes. With no length limit on the STAA truck, surely there will be consequences. Who's engineering license will need to be withdrawn under litigation after injuries or death in the Grove?

2

This project is like no other at Caltrans – in a fast track. There is no budget for this project, spend what it takes to get it done, as fast as possible. Lack of a budget is important. However, so many concerns are being unattended that, like the Challenger, Richardson Grove as designed will likely result in a devastating legacy.

Based on what I have heard from Caltrans staff , I call for analysis of "logical termini" and "independent utility" of all the STAA projects in District 1. The projects affecting the future of the Humboldt Bay Region are the Richardson Grove project 01-48460 in southern Humboldt and projects 01-47940, 01-45490, 01-48110, 01-47940, 01-44830, and 01-4500 in Del Norte need to be examined together.

3

Caltrans staff need to be protected.

Sincerely,

Joe Louis Wildman

1. Design exceptions are needed because many features of the existing roadway do not meet current design standards in a number of areas including curve radii, shoulder width, superelevation rates, and clearance to a fixed object. These items have to do with how vehicles interact with the highway, not pedestrians and bicyclists. Of course, both pedestrians and bicyclists benefit if the design standards are met.
2. All design plans must be reviewed and approved by a registered engineer.
3. The Richardson Grove Operational Improvement project does have independent utility and logical termini. A traffic analysis was performed that included evaluating the STAA improvement projects in Del Norte County in conjunction with Richardson Grove.

1

Redwood National & State Parks

The view is spectacular looking straight up in a grove of tall redwoods in northern California.
Photographer – Ed Cooper

12 MAR 2009 PM 1 L

Kim Floyd,
Please dont improve Richardson Grove. We have so little Redwood left, 4 percent. Please find an alternate route.
I've been a resident in Humboldt County for 40 yrs. been in business for 34 yrs. My name is Brenda J. Williams work phone number is 822-8611. call anytime
Thank you.

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Kim Floyd
PO Box 3700
Eureka.
California
95501

MAR 13 '09 PM 3:25

13308

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Impact

www.impactphotographics.com

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
03/05/2009 09:36 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/05/2009 09:36 AM -----

Kaswoof@aol.com
03/03/2009 06:59 PM

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove

Thank you for allowing input on the Richardson Grove issue.

I believe the trees should NOT be cut down to allow for roadway and/or larger truck traffic. There is nothing I need here behind the so-called "Redwood Curtain" that another truck or a larger truck can bring me. It is not necessary to cut the trees for a supposedly 'better' roadway. 1

Another reason to not cut the trees and widen the road has to do with the budget. In this time of budget cutbacks, this seems like a logical project to cut. And even if we had loads of money to spend on this project, it still is unnecessary. 2

Thank you again for taking public input.

Karen Willits
Blue Lake, CA

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!

1. *See General Response #2.*
2. The State General Fund does not fund transportation projects. This project would be funded as an operational improvement project through the State Highway Operation and Protection Program (SHOPP). Funding is competitive as there are many needs throughout the State. This project is a priority project for the Caltrans District 1 office and is supported by the Humboldt County Board of Supervisors. However, the California Transportation Commission determines the ultimate decision of project priorities and funding.

Kim
Floyd/D01/Caltrans/CAGov
03/12/2009 03:14 PM

To Deborah Harmon/D01/Caltrans/CAGov
cc
bcc
Subject Fw: Don't mess with Richardson grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 03/12/2009 03:14 PM -----

Yvonne Winter
<ywinter@saber.net>
03/11/2009 09:17 AM

To Kim_Floyd@dot.ca.gov
cc assemblymember.chesbro@assembly.ca.gov, senator.wiggins@senate.ca.gov
Subject Don't mess with Richardson grove

Ms. Floyd,
I am a 28 year resident of Mendocino County and have come to the conclusion after these nearly 30 years, that people should make way in favor of trees. There is NO way to replace the loss of the root systems of these trees, and there IS an alternative for traffic. I no longer sanction the notion of nature being sacrificed for 'our' convenience. I admit to not having a 30 ft trailer or a cattle transport business, nor do I drive my livelihood from any similar industry. However I have given up many aspects of an easier life in order to facilitate a closer respect for nature. I believe that the economic advantages of your proposed actions to 'rectify' the road thru' this incomparable grove are short term financial fixes which will have serious long term detrimental effects on our corner of this planet. 1

I live in the woods. Not anything like the age of the Richardson Grove, but I have observed first hand how much more the destruction of the surrounding trees takes place with the initial removal of [a few] trees and surrounding roots. Five years after removing some trees [in order to build a better road to my house] I am still losing large limbs and entire trees to weather-related events. The proximity of the removed trees sheltered the 'collaterally damaged' trees and there is nothing I can now do to rectify the situation. Once they're gone no one can EVER replace them.

But we CAN replace the transport route. Fairly effectively and without the massive trauma to the forest. 2
I STRONGLY oppose any messing with Richardson Grove.
Sincerely, Yvonne

1. *See General Response #3.*
2. *See General Response #9.*

"Len Wolff"
<riverwolf@sbcglobal.net>
01/30/2009 10:29 AM

To <deborah_harmon@dot.ca.gov>
cc
bcc
Subject Big Trees or big box Stores, which wil lit be?

Comments on the DEIR

On Richardson Grove

The DEIR is insufficient in its mitigation measures for the proposed project.

Offering to weed ("remove invasive materials") around the trees once a year is not proper mitigation for the severing of the roots of 30 trees, some of which are 15 feet in diameter. This "out-kind" mitigation is insufficient for the possible impact, which could be the weakening (and eventually the death) of the Giant Redwoods in this State Park. 1

Also, the offer of 13 new garbage can lids is insufficient and inappropriate for the possible impact of the one year's worth of construction noise disturbance to the endangered and threatened species that are state and federally listed and possibly trying to nest in the Grove. Thirteen new garbage can lids, to discourage corvids (ravens & crows) from accumulating and possibly raiding the eggs of Murrelets and Spotted Owls, is not a viable mitigation, in that the nests will never be built, nor the eggs laid, if the noise disturbance causes a "flush response" on the part of the nutritiously shy Murrelet and Owl. 2

Please take the no-build option on this project, and save tax payers $6 million by lowering the speed limit through the Grove to 25 mph allowing the trucks safe passage and preserving the trees. 3

Thanks, Len Wolff

1. *See General Response #15.*
2. The US Fish and Wildlife Service determined that the proposed project would not result in any Marbled Murrelet or Northern Spotted Owl nesting habitat being removed or degraded and the likelihood that the project would result in direct mortality of Marbled Murrelets or Northern Spotted Owls, particularly to young or the loss of eggs is discountable. The Service also concurred that the project may modify, but is not likely to adversely modify designated Critical Habitat of the Marbled Murrelet based on the following factors: 1) The removal of as many as 31 second-growth redwood and Douglas fir trees would amount to approximately 0.6 percent of the estimated potential old-growth habitat available to nesting Marbled Murrelets within half mile of proposed vegetation-removal activities and it is unlikely that the removal of this small percentage of vegetation would substantially alter the canopy characteristics of the forest in Richardson Grove State Park; 2) The trees proposed to be removed are not large or old enough to contain suitable nesting platforms, thus their removal would not result in the loss of any current Marbled Murrelet nesting habitat; and 3) the project includes measures to avoid and minimize impacts to old growth redwood tree roots during construction.

   While there is no known cases of Marbled Murrelets nesting in Richardson Grove State Park, it is estimated that at least one nesting pair are present within the 250 acres of suitable nesting habitat which may be subjected to noise disturbance during the breeding season. The US Fish and Wildlife Service concurs that the proposed construction activity represents a relatively short term disturbance that is not expected to have a long term influence on the breeding performance of the Marbled Murrelets or Northern Spotted Owls in and near the project area.

   Providing the corvid- proof trash receptacles is a conservation measure recommended by the US Fish and Wildlife Service during the consultation efforts for this project and Caltrans incorporated this measure into the project. Conservation measures in the context of the federal Endangered Species Act represent actions that are intended to further the recovery of and/or minimize or compensate for the project effects on the listed species. The revegetation of disturbed areas and the restoration of the half acre that would be relinquished back to State Park are also conservation measures. The restoration of the half acre would enhance foraging habitat for Northern Spotted Owls.

   Surveying potential breeding habitat to identify potential nesting areas is identified as a recovery action in the Marbled Murrelet Recovery Plan (US FWS, 1997). The two year survey for Marbled Murrelets that Caltrans has proposed to do at Richardson Grove State Park would aid in the recovery of the species by providing information to the US Fish and Wildlife Service about the population in inland nesting areas.
3. *See General Response #8.*

1-22-09

DEAR SIRS; MADAM:

LAST MONTH MY WIFE AND I RETURNED FROM THE BAY AREA. AS BEAUTIFUL AS THE TRIP NORTH TO ARCATA IS, THE ONE SPOT THAT ALWAYS INSPIRES ME IS RICHARDSON GROVE. WHAT A GORGEOUS AREA - THAT SHOULD BE MAINTAINED UNTOUCHED INTO PERPETUITY. 1

SO OF COURSE YOU WANT TO DESTROY IT. NO REALLY, WHATEVER YOU PLAN TO CHANGE YOU WILL DESTROY THE GROVE IRREPARABLY. YOU WANT TO CUT DOWN TREES AND 'HORROR OF HORRORS' - BUILD A WALL - HOW BEAUTIFUL THAT WILL BE! 2

AND FOR WHAT? SO SOME MONSTER TRUCKS CAN HAUL IS MORE 'JUNK' WE DONT NEED. HAVENT YOU HEARD - OIL WILL BE GETTING SCARCER AND MORE EXPENSIVE. WE NEED TO MAKE BETTER ENVIRONMENTAL CHOICES. 3

PLEASE ~~DONOT~~ DO NOT TOUCH THE GROVE. LEAVE IT

(OVER)

INTACT FOR US TO ENJOY, MAYBE ADD A BICYCLE PATH BUT DON'T CUT THE TREES OR YOUR NAME IS 'MUD'

PEACE

Al Wolski

AL WOLSKI
1699 I ST
ARCATA, CA
95521

1. *See General Response #2.*
2. Subsequent to circulation of the draft document, a design modification for the retaining wall was developed. The modified design changed the location of the wall from the west side of the road to the east and changed the type of wall from an above the road wall to a below the road wall. Since the wall is constructed below the road, it would not be visible to motorists except for the barrier rail. The modified wall also reduced the tree removal from 30 to 5.
3. *See General Response #8.*

Bob Wunner
<robertwunner@yahoo.com>
01/28/2009 09:45 PM
Please respond to
robertwunner@yahoo.com

To deborah_harmon@dot.ca.gov
cc
bcc
Subject

Dear Ms. Harmon

I am sure that you are being bombarded by all kinds of comments on Highway 101 going through Richardson's Grove. My comments are rooted in my families vacations at Richardson Grove in the mid 1940's and my first job--a park aide in 1957--out of high school.

HIGHWAY 101 SHOULD NOT GO THROUGH THE VALLEY BOTTOM OF RICHARDSON'S GROVE. PUT THE HIGHWAY SOMEWHERE ELSE LIKE CAL TRANS DID NEAR THE TREES OF MYSTERY. IT SEEMS REALLY DUMB THAT WE ARE EVEN DISCUSSING THIS IDEA. WE ARE SUPPOSED TO BE GETTING MORE CONSCIOUS OF OUR ENVIRONMENT 1

Sincerely Bob Wunner Arcata, CA. 300 Union Apt Q

1. *See General Response #9.*

"Carlhandup @att.net"
<carlhandup @att.net>
01/31/2009 12:10 PM

To <Deborah_Harmon@dot.ca.gov>
cc
bcc
Subject No on tree cutting

1

No worth while outcome on the issue of removing "old growth" redwoods...for little to no improvement of traffic safety...and respect of the land.

Carl Young
Fortuna, CA

Vote no on tree cutting

For the Times-Standard
Posted: 01/30/2009 01:28:06 AM PST

var requestedWidth = 0;
if(requestedWidth > 0){ document.getElementById('articleViewerGroup').style.width = requestedWidth + "px"; document.getElementById('articleViewerGroup').style.margin = "0px 0px 10px 10px"; } Along with the destructive and outrageous cuts he plans for our state budget, Governor Schwarzenegger proposes spending $5.65 million on the Richardson Grove □Improvement□ project: Cutting roots of ancient redwoods, harming, possibly destroying marbled murrelets and northern spotted owls who nest in Richardson Grove State Park, and opening our beautiful coastal redwood paradise up to more and bigger truck traffic and the rampant development that inevitably accompanies such a breach. Caltrans admits that the two major causes of collision in the grove are driver distraction and large obstacles situated on the edge of the road (the trees that were there long before the road was). These conditions will not be changed with this project. Truck accidents accounted for only 16 percent of accidents over a five-year period, with drunks and sleepers involved in a goodly amount of the other 84 percent. How will this be improved by realignment? Caltrans says it won't.

Eighty-nine trees would be cut, and a 300-foot-long retaining wall erected at the north end of the road just outside the park. Humboldt Sunshine has found it necessary to misstate the tree cuts in their recent radio ads and what does that tell you? If you had the time to review the economic report that provides the real rationale for this project, you would notice how many other □misrepresentations□ or absence of fact are being used to justify what could be irreversible damage to our ancient redwoods.

Haven't we lost enough of our natural majesty here in Humboldt at the hands of misguided □captains of industry?□ Are we so willing to relinquish this treasure that we would risk the death of these ancient trees that are part of the public trust? And what right do we, in this small county, have to threaten the integrity of a state and national treasure like Richardson Grove State Park? If you wouldn't chop down an ancient redwood, why would you cut off their nutrient supply?

They admit it's not a safety issue. It's economic. And like trickle-down, it's not necessarily good economics. Vote no. Send your comments to Caltrans today. The deadline is Friday, Jan. 30th.

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
02/23/2009 09:18 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: don't widen Highway 101 thru Richardson Grove

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/23/2009 09:18 AM -----

KCY <kcy@frontiernet.net>
02/22/2009 11:16 AM

To Kim_Floyd@dot.ca.gov
cc
Subject don't widen Highway 101 thru Richardson Grove

Dear Kim,

I can't believe anyone would even considering hacking away at Richardson Grove just to make it marginally easier for big trucks to reach their destinations in Eureka, etc. Hasn't enough damage been done to the old growth giant redwoods? Richardson Grove is a symbol of what Humboldt county is all about. It is a clear sign to big city drivers to SLOW DOWN. Life here does not go at the frenetic pace that it does in big cities and we want to keep it that way. 1

Ken Young
Petrolia

1. *See General Response #2.*

Kim Floyd/D01/Caltrans/CAGov
02/24/2009 09:35 AM

To Deborah Harmon/D01/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Richardson Grove Project

----- Forwarded by Kim Floyd/D01/Caltrans/CAGov on 02/24/2009 09:34 AM -----

Casey -Yundt
<caseyskayacat@yahoo.com>
02/24/2009 08:46 AM
Please respond to caseyskayacat@yahoo.com

To Kim_Floyd@dot.ca.gov
cc
Subject Richardson Grove Project

Dear Kim,

My husband and I are reviewing the purposed changes that are threatening the beautiful Grove of Redwoods called Richardson Grove. Wow, who would have thought that this small group of old growth redwoods would be in danger?? I am sending this to you begging that the pristine gentle giants be left alone.. They are a landmark to many.. Slowly passing the grove of trees is a breath of fresh air to many. Driving through history is how I like to think of it.. Many of those trees are thousands of years old and deserve a chance to live a few thousand more years.. Entering those trees is an amazing gateway to the Humboldt nation... This gateway should be preserved for the youth of this world and for all the generations that are yet to come.. Getting rid of few trees is just showing everyone that it is okay to cut down the earth more and more.. When is enough enough?? Oh I know, when we've cut all of our oxygen supplies down.. There is already a road through the trees, isn't that enough?? I can only prey so.. 1

Hoping you can help make the RIGHT decision, Natalee and Casey Yundt

P.S~ Tell the state they should be spending the 6 million on something that we need.. Our state is in such financial crisis somone better be ashamed that the road is all they are thinking about.. Our schools, law enforcement and medical fields I am sure could use the money to benefit many things.. Not just some silly road... 2

1. *See General Response #2.*
2. Funding for transportation projects is not funded from California's General Fund, and the funding is specifically allocated for transportation projects.

Wed. Jan. 21, 2009

Dear Kim Floyd
CALTRANS Rep.,

Having reviewed the DEIR for Richardson Grove State Park, my wife and I want to vote for alternative No. 3 which will save approx 10 million in construction costs and simply lower the speed limit to 25 mph. 1

Cutting down 87 trees is a crime and a waste of taxpayers money. We've done enough cutting. It's time to save the beauty of old growth redwoods and small, locally owned businesses. 2

The recession we are in may morph into a depression. Large malls, Mervyns included, may be a thing of the past. Along with malls or mega stores the need for oversized trucks maybe unnecessary. With unemployment rizing fast smaller stores can hire a lot more people. Now is the time to SAVE, not cut or spend. 3

Respectfully, Ben Gotaroff Kaye Gotaroff
Steve Pitts

1. *See General Response #8.*
2. *See General Response #2.*
3. *See General Response #11.*

Response Letters - support

Norma Allman
Ericka Barber
Robert C. Berry
McBride
Karen Brooks
Thomas Bruner
Kevin Caldwell
Les Charter
Bernie Christen
David Cooksey
Ken Davis
Leendert DeVries
D.E. Dorsey
Pamela Dressler
Rose Edmiston
Jerry Edwards
Robert Figas
Nicole Foley
Justin Frank
Gregg Gardiner
Michael Goodner
Walt Guilbert
Jacie Hake
Russ Harris
Don Hartmann
Kellie G. Herman
Stephen R. Horner
James A. Hunt
Bernice Huston
Susan Jansson
Michael Kasper
Evelyn King
Christine Kohrman
Lawrence Labranche
Richard Lindsay
Mark Loughmiller
Kit Mann
Len Mayer
Thomas & Nancy McLaughlin
Tim & Dorice Miranda
David Morris

Ron Angier
Ken and Linda Bareilles
Donna Berti
Megan Boos
Angela Brown
Jennifer Budwig
David Callow
Kylie M. Chase
Ken Christen
Dan Curtis
Ernie DeGraff
Linda Disiere
Carolyn Dowdy
Mike Duncan
David W. Edmonds
Barry Evans & Louisa Rogers
Mike Finley
Gregg Foster
Louise and Leo Fredrickson
Walt Giacomini
Charles F. Goodwin, Jr.
Robert Gunsalus
Arlene Hansen
Bill and Arlene Hartin
Sherry and Dennis Hazelton
James Hoff
Julie Houtby
Stephen Hunt
Marcell Iles
Dan Johnson
Mary Keehn
William E. Kleiner
Steve Kozak
Dottie Lee
William D. LeRoy
Wesley MacDonald
Rodney Maples
Rob McBeth
Christopher Metzger
Brian A. Mitchell
Gwen Morris

Dorothy Bain
Mary Grace Barrick
Jim McBeth
Wayne Bower
Ivan Brownell
Briar Bush
Steve Carmichael
Paul Christen
Frank Christensen
Lowell Daniels
Armand M. Deny
Steve Dolfini
Ray Dowdy
Erin Dunn
Jeff Emmons
John Egan
Abe Fockaert
Alan Fox
Gabriel Gardiner
Warren Hockaday
Wes Green
Haider Ajina
Rick Harris
Jerry Hartwell
Daniel Haskins,II
Vickie Horner
Dean Hubbard
Dennis G. Hunter
Gordon Inkeles
Leanne Johnson
Evan M. King
Jason Kline
Michael Kraft
Syd Lehman
Sue Long
Edgar Modero
McKay Marcelli
Marty McClelland
Phillip A. Minor
Leland Mora
Jake Morris

Sam Morris
Todd Morris
Denver Nelson
K. Jeff Nelson
Maurice Shaw, Jr.
Jack R. Noble
Eric O'Ferrall
Steve O'Meara
Doris M. Osburn
Patrick Owen
Jay Pollard
Christina Parker
Lennie Parsells
C.H. Parton, Jr.
Kristopher Payne
Rhonda Pellegrini
Mary Perkins
Lon Praytor
Elan Puno
Shane & Kristina Radelfinger
Rollin C. Richmond
Steve Ritter
Paul Rodrigues
Mark Rynearson
Ed Ryan
George & Janet Sandera
Dave & Jackie
Saunderson
Dennis A Schlotzman Sr.
Ruthann M. Schulte
Susan Seaman
Brian Senteney
Donna Shipley
Barry Smith
Jimmy R. Smith
Barbara & Jerry Stelz
MaryJo Stepp
Myran C. Scwartze
Jason Thomas
Leeya Brooke Thompson
Bill Thorington
Julie Timmons
Sergio Torres
Brett Tritten
Tia Tupper
Randy Turner
John VanderMolen
John, Kris, & Robert Vevoda
Wendy Wahlund
Lee Wakefield
Regina Wallace
Phillip G. Watson
Stephen G. Watson
Dennis Wendt
Praj White
Kathy Wildgrube
Birdena Williams
Julie Williams
Ken Wilson
Joan Woodcock
Jeremy Wright
Marc Wright
Wallace Wright
Marilyn Yelle
Norepr M. Zallen
Kenneth & Ellen Zanzi
Katherine Ziemer