

**Final
Program Environmental
Impact Report**

**1998-2000
Regional Transportation Plan
for Humboldt County**

STATE CLEARINGHOUSE NUMBER: 99032077

**Humboldt County Association of Governments
235 4th Street, Suite F
Eureka, CA 95501**

August 1999

Final Program Environmental Impact Report

1998-2000 Regional Transportation Plan for Humboldt County

STATE CLEARINGHOUSE NUMBER: 99032077

Prepared for:

**Humboldt County Association of Governments
235 4th Street, Suite F
Eureka, CA 95501**

**Contact Person: Spencer Clifton, Executive Director
Telephone: (707) 444-8208**

Prepared by:

Planwest

**Fehr & Peers Associates
Natural Resources Services
Shutt Moen Associates
Lang Railsback & Associates
Spatial Resources Integration**

**Contact Person: George Williamson AICP - Planwest
P.O. Box 4581
Arcata CA 95518
Telephone: (707) 825-8260**

August 1999

**Administrative Final EIR
1998-2000 Regional Transportation Plan for Humboldt County**

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Introduction

Under the requirements of the California Environmental Quality Act (CEQA), a Final Environmental Impact Report (FEIR) is required to contain:

- The Draft EIR;
- Copies of all comments or recommendations received by the lead agency during the Draft EIR public comment period;
- A list of persons, organizations, or individuals commenting on the Draft EIR (this requirement is met by the FEIR table of contents);
- The responses of the lead agency to "all significant environmental points" identified during the review process; and
- Anything else the lead agency determines should be added (CEQA Guidelines section 15132).

The Draft EIR (DEIR) for the 1998-2000 Regional Transportation Plan for Humboldt County is incorporated, by reference,

There were a total of five comment letters delivered to the lead agency during the DEIR public review and comment period. The responding agencies were:

- North Coast Unified Air Quality Management District (letter dated July 19, 1999)
- County of Humboldt Public Works Department (letter dated July 23, 1999)
- County of Humboldt Planning Department (letter dated July 26, 1999)
- Caltrans District 1 Planning Division (correspondence dated July 26, 1999)
- Charles Wilson (letter dated July 30, 1999)

The comment letters and agency responses are included in this FEIR. The purpose of this section is to clarify the distinction between comments raising "significant environmental points" about the EIR and comments and concerns of other types. The former are required to be addressed in the Final EIR. The latter are not CEQA issues, and are addressed by the lead agency in other contexts.

The EIR is intended to address a proposed project's effects on the physical environment, as well as to meet a number of procedural requirements. The FEIR is required to address "significant environmental points," or what are generally called "substantive" questions. These are comments or questions about descriptions and conclusions of the DEIR relating to project impacts on the physical world. This FEIR contains copies of the letters submitted to the Humboldt County Association of Governments addressing the DEIR. Each comment letter is given its own numerical designation. Within each comment letter, substantive comments about the content of the DEIR are identified with marginal lines on the left side of each page. Each separate comment is given a distinct comment number (1, 2, 3, 4, 5). These comment numbers are keyed to the responses to comments, which follow each comment letter.

Final Environmental Impact Report

1998-2000 Regional Transportation Plan for Humboldt County

Addition

This addition to the Final EIR references several revisions made to the Draft 1998-2000 Regional Transportation Plan (RTP). These revisions have been made prior to certification of the EIR and have been incorporated into the Revised Final Draft 1998-2000 Regional Transportation Plan (October 1999) being considered for adoption by the Humboldt County Association of Governments.

The Draft 1998-2000 Regional Transportation Plan included a range of regional transportation planning policies, including policies for roadways. A roadway policy (1.10 Funding Allocation Guidelines) has been added to ensure the equitable distribution of funds. This policy does not impact the amount of funding for roadways, or potentially affect the range of regional roadway improvements analyzed in the EIR. The addition of this policy does not create impacts beyond those evaluated in the EIR prepared for the 1998-2000 Regional Transportation Plan.

The Draft 1998-2000 Regional Transportation Plan included a table of mid- and long-range Capital Improvement Program (2005-2018) roadway improvements. This table identifies improvements that would become candidates for future STIP funding. These improvements may change in future regional transportation planning cycles. Should these identified improvements become designated for funding, then subsequent project planning and environmental review would be required. The purpose of the table is to identify future funding priorities. The addition of future funding priorities in the table does not change the analysis provided in the EIR prepared for the 1998-2000 Regional Transportation Plan.

This addition is to be added to the Final EIR, prior to certification by the Humboldt County Association of Governments.

Distribution List

State Agencies

State Clearinghouse, Office of Planning & Research
Caltrans District 1 Division of Transportation Planning
Resources Agency
Department of Conservation
Department of Fish & Game, Region 1
Office of Historic Preservation
Department of Parks and Recreation
Regional Water Quality Control Board, Region 1
Department of Toxic Substances Control
Native American Heritage Commission
State Lands Commission
California Highway Patrol

Local Agencies

Humboldt Co. Public Works	1106 Second St. Eureka, 95501
Arcata & Mad R. Transit System	736 F Street Arcata, 95521
City of Arcata	736 F Street Arcata, 95521
Humboldt Transit Authority	133 V Street Eureka, 95501
Eureka Dept of Public Works	531 K Street Eureka, 95501
Eureka Transit Service	531 K Street Eureka, 95501
City of Rio Dell	675 Wildwood Ave. Rio Dell, 95563
City of Fortuna	P.O. Box 545 Fortuna 95540
Spencer Engineering	1930 Central Ave., Ste C McKinleyville, CA 95519
North Coast Unified Air Quality Management District	2300 Myrtle Ave, Eureka CA 95501
Humboldt Bay Harbor District	P.O. Box 1030 Eureka CA 95502

Libraries

Humboldt County Public Library - Eureka Branch
Humboldt County Public Library - Arcata Branch

Notice of Completion

Draft Program Environmental Impact Report

Project Title: 1998-00 Regional Transportation Plan (RTP) for Humboldt County
State Clearinghouse Number: 99032077

Project Location - Specific: Humboldt County is located on the northern coast of California. It is south of Del Norte County, north of Mendocino County, and west of Siskiyou and Trinity Counties. The project is located in Townships 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 & 12 North and Townships, 1, 2, 3, 4 & 5 South; and Ranges 1, 2, & 3 West and 1, 2, 3, 4 & 5 East, of the Humboldt Base & Meridian.

Project Location - Cities: Humboldt County includes the following Cities: Eureka, Arcata, Fortuna, Rio Dell, Ferndale, Blue Lake, and Trinidad.

Project Location - County: Humboldt County.

Project Description: The 1998-00 Regional Transportation Plan (RTP) for Humboldt County, is the update of the RTP for the Humboldt County Association of Governments, California. The proposed RTP contains an assessment of existing and potential transportation needs; documents the policy direction, actions, and funding recommendations designed to meet the short-term and long-term requirements of the County's transportation system; and projects a future travel demand for regional roadways. The RTP describes travel characteristics; and addresses the following transportation modes and issues: Roadways; Transit; Aviation; Bikeways and Pedestrian Facilities; Goods Movement; Recreational Travel; Transportation System Management; Pipeline Transport and Energy Conservation; Air Quality; and Land Use/Transportation Connections.

Lead Agency: Humboldt County Association of Governments.

Addresses Where Copies of FPEIR are Available: The FPEIR is available at the Humboldt County Association of Governments, 235 4th Street, Eureka, CA 95501. Copies are also available at the Humboldt County Library - Arcata, 736 F Street, Arcata; and Humboldt County Library - Eureka, 1313 Third Street, Eureka, and the Northcoast Environmental Center Library, 879 Ninth Street, Arcata.

Review Period: Begin: June 19, 1999
End: August 2, 1999

Contact Person: Spencer Clifton, Executive Director
Humboldt County Association of Governments
235 4th Street, Suite F
Eureka, CA 95501

Area Code/Phone Number: (707) 444-8208



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse

STREET ADDRESS: 1400 TENTH STREET ROOM 222 SACRAMENTO, CALIFORNIA 95814
MAILING ADDRESS: P.O. BOX 3044 SACRAMENTO, CA 95812-3044
916-445-0613 FAX 916-323-3018 www.opr.ca.gov/clearinghouse.html



Loretta Lynch
DIRECTOR

August 3, 1999

Spencer Clifton
Humboldt County Association of Governments
235 - 4th Street
Suite F
Eureka, CA 95501

RECEIVED
AUG 05 1999

Subject: 1998-00 Regional Transportation Plan for Humboldt County
SCH#: 99032077

HUMBOLDT COUNTY
ASSOCIATION OF GOVERNMENTS

Dear Spencer Clifton:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Notice of Completion form please note that the Clearinghouse has checked the state agencies that reviewed your document. The review period closed on August 2, 1999, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's eight-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 99032077
Project Title 1998-00 Regional Transportation Plan for Humboldt County
Lead Agency Humboldt County Association of Governments

Type eir Draft EIR

Description The 1998-00 Regional Transportation Plan (RTP) for Humboldt County, is the update of the RTP for the Humboldt County Association of Governments, California. The proposed RTP contains an assessment of existing and potential transportation needs; documents the policy direction, actions, and funding recommendations designed to meet the short-term and long-term requirements of the County's transportation system; and projects a future travel demand for regional roadways. The RTP describes travel characteristics; and addresses the following transportation modes and issues: Roadways; Transit; Aviation; Bikeways and Pedestrian Facilities; Goods Movement; Recreational Travel; Transportation System Management; Pipeline Transport and Energy Conservation; Air Quality; and Land Use/Transportation Connections.

Lead Agency Contact

Name Spencer Clifton
Agency Humboldt County Association of Governments
Phone 707-444-8208 **Fax**
email
Address 235 - 4th Street
 Suite F
City Eureka **State** CA **Zip** 95501

Project Location

County Humboldt
City
Region

Cross Streets

Parcel No.

Township	Range	Section	Base
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Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Coastal Zone; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plan/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 1; Office of Historic Preservation; Department of Parks and Recreation; Caltrans, District 1; Caltrans, Division of Transportation Planning; Regional Water Quality Control Board, Region 1; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 06/18/1999 **Start of Review** 06/18/1999 **End of Review** 08/02/1999

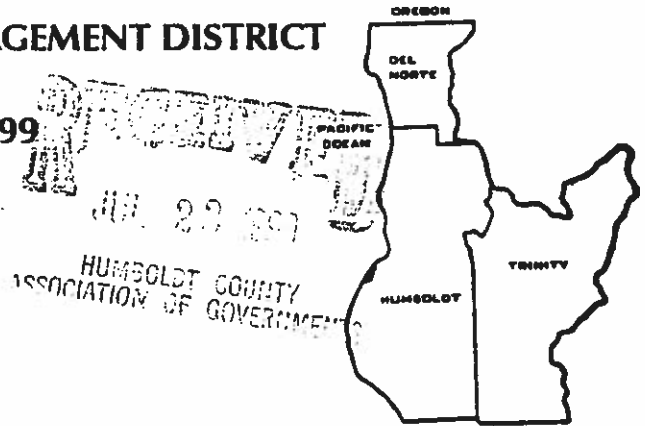
NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

2300 Myrtle Avenue, Eureka, CA 95501

Phone (707) 443-3093 Fax (707) 443-3099

July 19, 1999

Mr. Spencer Clifton, Executive Director
Humboldt County Association of Governments
235 Fourth Street, Suite F
Eureka, CA 95501



Subject: Air Quality Management District's Comments on the Draft Environmental Impact Report for the Regional Transportation Plan for Humboldt County (1998-2000)

Dear Mr. Clifton:

Thank you for the opportunity to review and comment on the above-referenced EIR. Since transportation sources create a considerable portion of the air pollution within Humboldt County, we appreciate the effort that HCAOG has made to analyze, avoid, and mitigate impacts to air quality, within the RTP's Environmental Impact Report. Following are just a few, brief comments:

- We concur with HCAOG's assessment of impacts and recommended mitigation included on page 1-10, and believe that the assumptions set forth in the document (pages 2-1 and 2-2) are reasonable in regards to air quality conditions and impacts.
- 1. • On page 3-13 (third paragraph, Air Resources), the sentence that begins with "The entirety of the North Coast Air Basin..." needs to be changed to the effect, "With the exception of the state PM10 standard, the entirety of the North Coast Unified Air Quality Management District has been..." – recommended changes underlined.
- We concur with the assessment of impacts, recommended mitigation, and other CEQA considerations included on pages 4-13 through 4-15, page 4-23, and page 6-4.

We look forward to continued cooperation and participation with HCAOG and its member jurisdictions in managing the transportation system within Humboldt County in a way that meets mobility needs while protecting quality of life and local air quality. If you have any questions regarding our comments, please call me at (707) 443-3093.

Sincerely,

Robert Torzynski

Robert Torzynski
Air Quality Planner/Specialist

1. NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

It is agreed that the assessment of impacts and recommended mitigation measures in the PEIR are reasonable.

1.1 PM10 Standard Language Clarification

Language in the third paragraph of page 3-13 will be changed to read "*With the exception of the state PM10 standard, the entirety of the North Coast Unified Air Quality Management District has been...*"



George

DEPARTMENT OF PUBLIC WORKS
COUNTY OF HUMBOLDT

MAILING ADDRESS: 1106 SECOND STREET, EUREKA, CA 95501-0579
AREA CODE 707

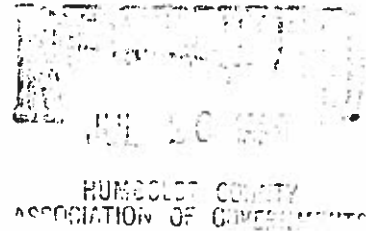
ARCATA-EUREKA AIRPORT TERMINAL
MCKINLEYVILLE
AVIATION 839-5401

PUBLIC WORKS BUILDING SECOND & L ST., EUREKA			
ADMINISTRATION	445-7491	NATURAL RESOURCES	445-7741
BUSINESS	445-7652	PARKS	445-7652
ENGINEERING	445-7493	ROADS & EQUIPMENT MAINT.	445-7421

CLARK COMPLEX
HARRIS & H ST., EUREKA
REAL PROPERTY SERVICES 445-7205

July 23, 1999

Spencer Clifton
Humboldt County Association of Governments
235 Fourth Street
Eureka, California 95501



RE: Draft Regional Transportation Plan

Dear Mr. Clifton:

Thank you for the opportunity to review the *Draft Program Environmental Impact Report for the 1998-2000 Regional Transportation Plan for Humboldt County*. The document provides a broad overview of current and proposed transportation projects in Humboldt County and associated demands on the environment. It is helpful to document the strategies that will be needed to meet our transportation needs while protecting the environment.

As noted in a June 18, 1999, letter from Allen Campbell, Director of Humboldt County Department of Public Works, there are a number of road improvements that should be added to the list of projected needs in the *Draft Plan*. The addition of these projects will not substantially change the scope of environmental impacts discussed in the *Draft PEIR*. In general, the policies presented as proposed mitigation measures in the *Draft PEIR* appear adequate to address the projected environmental impacts.

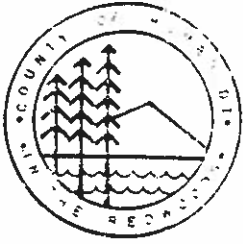
As individual projects are more fully developed, we will try to review supplemental CEQA documents and offer our comments on the assessment of environmental impacts.

Very truly yours,

Donald C. Tuttle
Deputy Director of Public Works-General Services

2. HUMBOLDT COUNTY DEPARTMENT OF PUBLIC WORKS

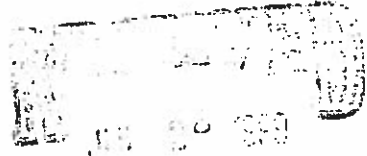
Though inclusion of priority road improvements in the RTP is not part of the PEIR, a table of County road improvements is included in the revised RTP on page 126. It is agreed that addition of these projects to the revised RTP "will not substantially change the scope of the environmental impacts assessed in the PEIR".



PLANNING DIVISION
OF THE PLANNING AND BUILDING DEPARTMENT
COUNTY OF HUMBOLDT
3015 H STREET
EUREKA, CALIF. 95501-4484 PHONE (707) 445-7541

July 26, 1999

Spencer Clifton, Executive Director
Humboldt County Association of Governments
235 4th Street, Suite F
Eureka, CA 95501



RE: The 1998-00 Regional Transportation Plan and PDEIR

HUMBOLDT COUNTY
ASSOCIATION OF GOVERNMENTS

Dear Mr. Clifton:

Thank you for the draft Regional Transportation Plan update. The document appears to be an excellent compilation and update of past plans.

One item of concern is Policy 1.2 calling for upgrade of Hwy 101 to full freeway service level. While I recognize that this policy has been a long-standing goal in past transportation plans for many years, its implementation in the segment of 101 between Eureka and Arcata may have impacts which many people may find unacceptable. Having recently attended a CalTrans meeting discussing the alternatives for upgrading this segment to full freeway, I learned that favored alternatives included extensive frontage roads on both the east and west sides of the highway. A key part of the rationale for the project was that the Regional Transportation Plan called for it.

I would like HCAOG to consider amending Policy 1.2 to reduce the impacts of the policy for the stretch between Eureka and Arcata. To the existing policy, add the following:

"... In the segment between Eureka and Arcata, options that reduce or eliminate the need for frontage roads should be given consideration, including less than full freeway options."

Such options would help in reducing impacts to visual resources, agricultural lands, wetlands, and urban sprawl.

Thank you for your consideration.

Sincerely,

Tom Hofweber
Supervising Planner

cc: Alan Campbell

3. HUMBOLDT COUNTY DEPARTMENT OF PLANNING

Though RTP policy language is not part of the PEIR, Policy 1.2 of the revised RTP has been amended to read as follows in the revised RTP:

“US 101 Upgrade. Support State efforts to upgrade US 101 ~~in order to provide continuous freeway level of service on US 101 by~~ to eliminate gap conditions, and reduce traffic congestion, and improve safety, *which includes consideration of alternatives and environmental conditions.*”

Revised policy language will not affect the mitigations, findings or conclusion proposed in the PEIR.

STATE OF CALIFORNIA-BUSINESS, TRANSPORTATION AND HOUSING AGENCY

DEPARTMENT OF TRANSPORTATION

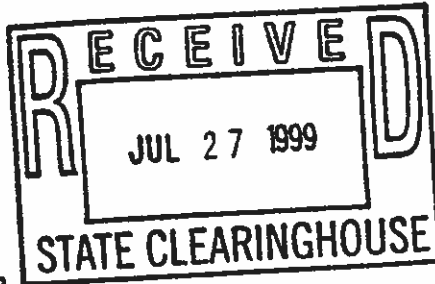
DISTRICT 1, P.O. BOX 3700
EUREKA, CA 95502-3700
TDDeaf Phone (707) 445-8463
Phone: (707) 445-6671
Fax: (707) 441-5869

GRAY DAVIS, Governor



cleared
8/2/99
E

July 26, 1999



HCAOG Regional Transportation
Plan (RTP) Program Environmental
Impact Report (PEIR)
SCH #99032077

Mr. Spencer Clifton
Executive Director
Humboldt County Association
of Governments
235 Fourth Street, Suite F
Eureka, CA 95501

Dear Mr. Clifton:

We have reviewed the Humboldt County Association of Governments (HCAOG) Draft 1998/2000 Regional Transportation Plan (RTP) and the Program Environmental Impact Report (PEIR). The following comments are provided for your consideration:

HCAOG RTP:

Page 68, Bicycle and Pedestrian, Urban Needs, reference to the need for audible signals. At this time, we do not have audible signals planned for these intersections, and the County and City of Eureka have not requested permits for these projects.

Page 74, Future ITS/ATS Needs for 36/101 and 101/299 should be referred to as interchanges as opposed to intersections.

Page 29, "State Transportation Planning Process" and "Humboldt County Mid and Long Range Capital Improvement Program", Table 25, page 97, we suggest deleting project #4, "Construct 4-lane expressway at Big Lagoon on new alignment to bypass eroding bluffs" from the "Projects awaiting PSRs" section of Table 25. We have a PSR for a 4-lane bypass of Big Lagoon. Further, the current concept for the Big Lagoon segment is "2-lane conventional highway/expressway, with intermittent passing lanes". The concept was changed primarily due to environmental concerns (primarily old growth redwood trees).

There is no project #5 shown in the table (it goes from #4 to #6).

Mr. Spencer Clifton
 July 26, 1999
 Page 2

We also suggest deleting project #6, Construct passing lanes on U. S. 101 from Mendocino County line to Eel River Bridge #4-241 (between Benbow Lake and Richardson Grove State Park) from Table 25. Passing lanes could be considered as an alternative or interim measure when the PSR for project #7 (also at Richardson Grove) is developed.

HCAOG may want to consider adding the North Rio Dell expressway conversion to freeway (Hum-101-54.3/57.0) at an estimated cost of approximately \$15 million, and the Humboldt Lagoons Expressway (Hum-101-114.0/118.2) at an estimated cost of \$21 million, to the list of projects awaiting project study reports in Table 25. These projects are included in the Caltrans "Interregional Transportation Strategic Plan" or ITSP, as longer term improvements to Focus Routes and Corridors.

HCAOG RTP PROGRAM EIR (SCH #99032077):

- 1 | Page 3, C. Regional Setting, the populations should be revised as Humboldt County does not have cities of 35,000 population.
- 2 | State Routes. Page 2-3, Caltrans is not currently planning any passing lanes on State Route 36 due to the rugged terrain and the resulting high cost of projects. Passing lane projects on Route 36 would be ver costly and would not be expected to compete well for funding with similar projects on other routes in Humboldt County.
- 3 | Page 4-4, Table 4.1, Summary of Existing and Projects Roadway LOS, we recommend that this table include the Route 101 segment between Eureka and Arcata, and Myrtle Avenue to Eureka Slough.
- 4 | Page 4-9, Mitigation Measures, this list should include the mitigation measures discussed on page 4-8, Rail Service.
- 5 | Page 4-9, Mitigation Measures, the Policy Element of the RTP should include the Policies necessary to assure the implementation of the adopted mitigation measures of the PEIR. We suggest that these policies reference the PEIR.

Mr. Spencer Clifton
July 26, 1999
Page 3

6

Page 4-24, Economic and Social Effects (not required under CEQA), this section could also identify that continued provision of accessible transit and Dial-A-Ride service in the region for persons with disabilities or elderly complies with the implementation of the Americans With Disabilities Act (ADA). Further, the provision of transit service on Route 299 also provides a greater freedom of travel for persons that are transit dependent, including the elderly, disabled; this service also opens tourism and markets in Humboldt County to transit dependent persons in Trinity and Shasta Counties.

Should you have any questions, please contact Michael G. Lucas of my staff at (707) 445-6671.

Sincerely,

for Michael G. Lucas

**RIC MORALES, Chief
Office of Regional Planning
and Public Transportation**

cc:State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

bcc:1-CSWillis
2-RMorales
3-MGLucas

MGL/scl/TP-HCAOG PEIR Let-MGL.doc

4. CALTRANS DISTRICT 1

NOTE: Only the EIR comments, which start on page 2 of the letter, are responded to in this Final PEIR. The RTP comments are addressed separately in the Final RTP.

4.1 Population Figures

Though the RTP states a high urban population of 35,000, the PEIR states that Eureka as the largest city has a population of 27,600 on page 3-29.

4.2 Clarification of State Route Planning

Sentence four under "State Routes" on page 2-3 of the RTP will be revised to read: "Passing lane opportunities are also planned in some areas ~~such as portions of SR 36~~ to continue mitigation of Federal barrier striping standards."

4.3 Addition of LOS Data for US 101

Table 4.1 on page 4-4 will be revised as follows, including LOS data for the Eureka to Arcata and Myrtle Avenue to Eureka Slough segments of US 101:

Table 4.1. Summary of existing and projected roadway LOS.

Roadway Segment	Average Daily Level of Service		
	Existing	2020	"Concept" LOS
SR 36 – Jct. US 101 to Yager Creek	C	D	D
SR 36 – Little Larabee Creek to Bridgeville	C	D	D
SR 36 – Bridgeville to Trinity County Line	C	C	D
SR 96 – SR 299/Willow Creek to County Line	C	C	D
US 101 – Mendocino Co. Line to Bridge 4-212	D	E	B
US 101 – Jct. SR 211 to Herrick Avenue	B	C	D
US 101 – Herrick Avenue to Henderson Street	B	C	D
US 101 – Henderson Street to 5 th Street	B	C	D
US 101 – 5 th Street to Myrtle Avenue	C	D	D
US 101 – Myrtle Avenue to Eureka Slough	C	D	D
US 101 – Eureka to Arcata	B	C	D
US 101 – Trinidad to Patrick's Point	A	A	B
US 101 – Patrick's Point to Del Norte Co. Line	E	E	B
SR 299 – N. Fork Mad River Br. To Redwood Creek	D	D	D
SR 299 – Redwood Creek to Titlow Hill Road	D	D	D
SR 299 – Titlow Hill Road to Berry's Summit	D	D	D
SR 299 – Berry's Summit to County Line	D	D	D

4.4 Rail Mitigation Measures

The list of Mitigation Measures on page 4-9 will read as follows:

5. Completion of a safety audit and inspection of all railroad crossings.
6. Establishment of a public awareness campaign to inform the public of rail service resumption.

4.5 Development of RTP Policies that Include Mitigation

Implementation of adopted Mitigation Measures is addressed in the Findings of Fact that accompany the final RTP and PEIR. The HCAOG Board will be considering these Findings as part of RTP adoption and PEIR certification procedures.

4.6 Economic and Social Effects of Transit Service

Economic and social effects identified in this comment are included in the Statement of Overriding Considerations for the Final PEIR.

6-30-99

Humboldt County Association of Governments
235 - 4th Street, Suite F
Eureka, CA

Dear HCAOG:

The following comments are for the Draft Program EIR 1998-00 Regional Transportation Plan for Humboldt County which is being prepared for HCAOG. These comments supplement my comments submitted in my letter dated 6-26-99 which was hand delivered to HCAOG on 6-29-99.

1 | Bicycle and Pedestrian Facilities are treated together on 2-6 and 3-4, however, bicycle vehicles and pedestrians have entirely different legal rights and funding requirements. The two modes should be separated in order to adequately provide for pedestrians since the current fad is to favor bicycle vehicles. Caltrans on the proposed Mad River Bridge construction, for instance, has indicated that bicycle vehicle safety would be funded but pedestrian safety would not be funded. Item E in the Financial Element (page 1-8) should be separated into "Bicycle Improvement Funding" and "Pedestrian Improvement Funding".

2 | The "Alternative Mode Alternative" and "Alternative Modes Alternative" are both very awkward, non-English sounding terms. Perhaps "Multi-modal Alternative" or something else would be better (page 2-7, 2-8). These terms also do not agree with the description of the four alternatives given on page 1-4: 1) proposed plan, 2) no-project, 3) transit/alternative mode, and 4) fully funded RTP alternative.

3 | The Program EIR has a particular advantage for pedestrians because it will "ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis" (page 1-1). **The EIR, however, does not address the significant negative cumulative impacts created by Caltrans' purposely severing pedestrian travel between communities.** Chapter 6 (page 6-3 Circulation) presumably would address these cumulative impacts, but nothing is mentioned. I request that this significant negative cumulative impact be discussed and evaluated. Measures should be added to Circulation (page 1-9) in order to mitigate this significant negative impact. Assumption 16 on page 2-2 is incorrect because pedestrian facilities are not becoming better connected with other modal systems.

4 | Page 1-5 correctly indicates that the County has a "Mediterranean rainfall pattern". Many people have claimed that much of the area is "temperate rainforest", without giving any definition of this vague term, in order to gain political favor.

5 | Page 1-5 incorrectly states "There is also conclusive evidence that El Nino-related weather events are becoming more frequent and severe". The weather trends are being studied more, but there is no such "conclusive evidence" one way or the other. The Program EIR is not the place for a biased political statement.

6 Assumption 2 on page 2-2 should be changed to read: "As the population increases, walking will continue to be the primary mode of travel, however, automobile vehicles will be the most used mode for longer trips in the county for both work and non-work trips".

7 Assumption 5 on page 2-2 places incorrect emphasis on the "price fluctuations" and "more expensive" propaganda about gasoline rather than reality. Higher gasoline prices might be a motivating factor to less use of automobiles, but gasoline as a commodity is historically near its lowest relative price in 50 years after adjusting for government inflation.

8 Assumption 10 on page 2-2 (also page 2-5), extending transit service on Highway 101 to Orick, was tried before and found little ridership. As I remember, the maximum number of riders was 9 in one day for the long trip, and it benefited only the RNSP employees. It is not desirable to burden all the riders in Humboldt County and all the taxpayers in Humboldt County with expensive routes which do not support themselves. The transit system should be a strong system, but it cannot serve every location and remain strong.

9 Assumption 16 on page 2-2 is not supported by the proposed plan. Page 2-6 says "The 1998-00 RTP encourages the **elimination of barriers** in the system of bicycle and pedestrian facilities", which may be true for bicycles, but it is definitely not true for pedestrians. Caltrans will continue with its defacto policy of severing historic pedestrian right of ways between communities. I will still not be able to drop off a U-Haul truck in Arcata and legally walk to the Arcata-Eureka Airport.

10 Changing the classification of Bald Hills Road to a "Major rural arterial" (Plan page 3, Figure 1, page 12, and page 15, EIR Figure 2.1 page 2-4, EIR page 3-3, Figure 4.2 page 4-18) is **a significant negative environmental impact on the \$2 Billion Redwood National and State Park**. This road should be changed instead to a "**Minor rural collector**" classification. Plan page 15 says "Its future use as a recreational route to the coast is being discussed", however, no agencies or people are mentioned. As I remember, it is not even in the "preferred alternative" in the draft RNSP General Management Plan. It is questionable whether the Yuroks would provide funds for roadway use since they pay no County property taxes. The Bald Hills Road is **NOT a "prime example"** of a road that is vital to the economy of Humboldt County. No traffic counts or projected traffic counts are even shown for this road. **Encouraging increased traffic through Redwood National Park would have a devastating, significant negative impact on the park environment.** Proposed policy 9.8 on plan page 89 touts that "HCAOG encourages control of access to environmentally unique lands", and I claim that Redwood National Park is an environmentally unique land which should not be destroyed. Plan page 28 indicates that "It has been the policy of HCAOG to notify the entities that may be impacted by the final unmet needs report prior to its adoption" "to allow for proper consideration", but I question whether the RNSP has been notified of this significant negative environmental impact on the park.

11 Figure 2-1 on page 2-4 and Figure 3.1 on page 3-2 should include Central Avenue in McKinleyville as an "Urban Principal Arterial" in accordance with Figure 4-3 of the Humboldt County Volume I General Plan. Figure 2-1 should show highway classifications which are consistent with the Humboldt County General Plan, not entirely different

classifications. Figure 4.1 on page 4-5 should show Central Avenue and include ADTs. Nothing is mentioned about the appearance of traffic congestion on Central Avenue caused by the series of many traffic signals. Perhaps a project should be proposed to synchronize the traffic signals on Central Avenue in order to increase traffic speeds from 10 miles per hour to 30 miles per hour and reduce traffic by two thirds.

12 | Page 2-8 says that "The Alternative Modes Alternative would continue to develop all projects identified in the RTIP" including "**pedestrian projects**". This Alternative will not, however, do anything for providing pedestrian use on vehicle construction projects. As Caltrans told me in regard to the Mad River Bridge, once Caltrans has "severed" the pedestrian right of way by eliminating all pedestrian safety features, and most pedestrians have been scared away, Caltrans no longer feels any obligation to use construction funds to provide pedestrian safety in conjunction with any new replacement construction. Since funds for pedestrian projects have to compete with bicycle projects, and funds are difficult to obtain anyway, **it is highly unlikely that any major "pedestrian project", such as a Highway 101 pedestrian bridge over the Mad River, will ever be constructed using HCAOG policy.** While page 4-7 says that improvements to pedestrian facilities are considered "beneficial impacts", the RTP will have few of them.

13 | Page 5-3 **incorrectly** states that that the Alternative Mode Alternative "would allow for a more developed ... pedestrian system **linking population centers of the County.**" Page 5-4 refers to improved "pedestrian facilities", but there is no improvement when pedestrian safety is not included in new Caltrans project construction, and Caltrans is the only agency construction any links between population centers.

14 | Table 3.1 on page 3-1 was prepared in 1984 and does not reflect the amount of government ownership in Humboldt County now. Numerous additions have been made to the Humboldt State Redwoods Park, and Avenue of the Giant communities are being impacted severely. Headwaters Forest and other government purchases whittle away further at privately owned land. Redwood National Park has added a few thousand more acres. Harry Merlo Park was created and recently another 130 acres at Big Lagoon was added. Government owned right of ways are not often included in the tabulations of ownership. A State legislature report about 35 years ago showed that 53.5 percent of California was government owned, and the percentage is now at least 55 percent. 80 percent of the land within 1,000 miles of Eureka is already government owned. How long will it take for government ownership in Humboldt County to reach 100 percent?

15 | Page 3-4 indicates one aeronautical use to be "combat", but no details are given. It also says "To some degree, all of these uses are accommodated by the system of airports in Humboldt County", but I question whether any "combat" is accommodated by any of the airports.

16 | Page 3-4 says that the Hammond Coastal Trail in McKinleyville provides "both transportation and recreation". HCAOG should not confuse "transportation" with "recreation". Humboldt County General Plan Volume 1 Section 4301 says "The development of transportation and recreation trails is part of the overall long range goal of achieving a coordinated and balanced transport system." It appears that this transportation goal has been confused with the recreational goal. The Coastal Trail and the Hammond

Bridge are not part of a bicycle transportation system. Speeds on the trail are not very high and are not competitive. The bikepaths are not in conformance with the Caltrans bikeway design standards and do not allow significant safe speeds. The usual mode of getting to the trail is to put your bicycle on your car and drive to the bike trail. If anything, the recreational bicycle trail encourages the use of automobiles and increases automobile emissions. With this "transportation system", bicycles will never challenge automobiles significantly.

17 | Page 3-5 states "Bike lane width standards were increased from four feet to 1.5 meters in 1997, consequently, many bike lanes constructed before that time do not meet the new state width standards". Technically, adding 11 inches to the "standard" because of numerical rounding in order to meet government S.I. laws (misnamed metric conversion) does not indicate a safety deficiency. Much more important, and not mentioned in the EIR is that the bike lanes and bike paths do not meet current or even past safety standards for grade, sight distance, stopping distance, and conflict with pedestrians. It is hard to understand why new bicycle facilities continue to be built without following anything but political design criteria.

18 | Page 3-6 uses the colloquial term, "curb cuts", which is not descriptive of the function. I suggest that "hadicapped access ramp" be substituted. Besides, most of the older "curb cuts" consist of asphalt pavement added at intersections to lower the curb face to zero instead of an actual "cut". The asphalt "ramps" do not really provide help to the blind who do not want to walk into the street without knowing they are in an automobile's way.

19 | Page 3-6 mentions "no or limited crossing facilities", but longitudinal facilities are also lacking. As you say, "pedestrians must use roadways", however, little provision is made for pedestrians including wheelchairers and baby carriages

20 | Table 3.3 illustrates the high percentage of truck traffic. Since trucks are the prime cause for breakdown of the highway structures, it would be desireable to get the heavy loads off from the highways and onto ships and railroads. One truck may do more damage than a thousand passenger cars. Nothing is mentioned in the EIR of the significant beneficial economic impact of reducing truck traffic on the massive investment in highways.

21 | Table 4-13 indicates the percentages of each source, however, nothing is shown about the actual amounts of each source. These actual amounts should be shown. If natural sea salt is a major state PM10 factor (25%), then what amount is this factor during the more critical summer period? The Federal PM10 standard is three times the state PM10 standard, so the so-called "standard" is not so standard after all. Page 4-14 says that "1998 emissions levels would have to be reduced by approximately 50% to meet PM10 standards", however, Table 4.3 shows that totally eliminating all unleaded auto sources (34%) and all Diesel auto sources (10%) would only reduce PM10 by a total of 44%, and the State PM10 standards would still not be met.

22 | Page 3-15 says "There are two main pollutants that cause health and welfare problems in California. The first is ozone smog." The EIR does not say what the second main pollutant is. "Gasses" should be "Gases".

23 | Page 3-16 says "PM10 is harmful to human health" which should be "PM10 may be harmful to human health". The list of "Major PM10 sources" omits sea salt, one of the very largest sources.

24 | Page 3-16 and 6-4 use the pompous "violations of the state PM10 standard", but the standard is really only being "exceeded". Page 2-7 uses the more accurate "exceeds standards".

25 | Page 3-18 does not indicate the present status of the "endangered tidewater goby". On page 3-18 there appears to be a few words missing at the end of the Wetlands paragraph.

26 | Recognition of the impact of overflights is good. As I remember it was not considered significant in the 1997-98 RTP.

27 | Page 3-25 mentions electric energy and natural gas, but it does not emphasize the impact that power outages have on rural residents. Many rural residents do not have access to natural gas, they only have electric power. Water is frequently pumped to the house by this electric power. When the frequent and lengthy power outages occur, the rural family has lost their oven, stove, heat, light, drinking water, toilet, bath, radio, TV, computer, and sometimes phone. Every year they unwillingly practice the Y2K disaster procedures.

28 | EIR page 3-28 mentions the esthetic effects of signage. Plan page 72 states there is "a need for improved visitor signage along roadways". One of the major distractions along our beautiful Highway 101 are the government signs. Between the north end of McKinleyville and Orick I counted about 400 large government signs, many unnecessary, and only 7 private signs. Government is the polluter of our visual environment. Trinidad has more signs than any Los Angeles freeway and should be renamed the town of "Next Right". The gaudy Cher-ae gambling sign is even more obnoxious after the Indians surreptitiously cut down the trees in the Caltrans right of way.

29 | Page 4-20 references the "forecasted 60dB CNEL contour as designated on the Airport Layout Plan for Arcata-Eureka Airport" but this information is not on the Airport Layout Plan. Airport Master Plan variously refers to the ALP as being 1, 2, 3, or 4 pages, however, it is not on any of them.

30 | Table A-1 in Appendix A shows the Western snowy plover as being "Threatened", however, there is a very large population of these birds. I understand it is only the "coastal population within the United States" (not Mexico, not inland) that has the "Threatened" classification.

Thank you for the opportunity to comment on the proposed plan. I appreciate this latest comprehensive report and the questions that it raises.

Yours truly,

Charles Wilson

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5. CHARLES WILSON

- 5.1 The combination or separation of referenced headings do not impact the environmental analysis.
- 5.2 The correct term is "Alternative Modes Alternative", intended for all references to this alternative.
- 5.3 Comment references past actions by Caltrans, not proposed future projects and are not included in the environmental analysis. Several examples that support Assumption number 16 are in the RTP Action Element, Tables 23 and 33.
- 5.4 This comment does not pertain to the environmental analysis.
- 5.5 Evidence referenced is based on historical patterns and weather trends that do indicate changes in frequency and severity of weather events that affect this area.
- 5.6 This is an assumption from the RTP and is not proposed to be changed.
- 5.7 While price fluctuation of fuel is referenced in the EIR, it is not part of the environmental analysis.
- 5.8 This is an assumption from the RTP and is not proposed to be changed.
- 5.9 This comment addresses Caltrans policy not addressed in the EIR or RTP.
- 5.10 Classification of Bald Hills Road has been revised, consistent with Caltrans Route Classification, on Figure 1 in the RTP. Reclassification of this roadway does not substantially affect the environmental analysis. The statement about importance in economy relates more to economy of rural areas. Traffic on this route is not projected to increase significantly and the RTP does not encourage an increase in traffic.
- 5.11 Central Avenue was added to the Regional Circulation Map in the revised RTP.
- 5.12 This Alternative will promote pedestrian, transit and bicycle modes of travel. There is nothing precluding a pedestrian project such as a Mad River pedestrian facility from being constructed in either the EIR or RTP.
- 5.13 This Alternative emphasizes pedestrian, transit and bicycle modes of transportation, implementation of which could be expected to result in more pedestrian facilities linking population centers of the county.
- 5.14 Table 3.1 reflects the most current information available from an adopted County Land Use Plan. Changes in acreage would not affect the environmental analysis or conclusions of the EIR or RTP.
- 5.15 This term is in reference to the RTP.
- 5.16 The Hammond Trail, as a Class I bikeway, is part of the transportation system and part of the value of this facility is that it serves both transportation and recreation needs, which are compatible uses.
- 5.17 The RTP promotes construction of new facilities that meet current standards and focuses on proposed improvements. Existing substandard facilities are not the focus of the EIR.
- 5.18 This does not constitute a comment on the EIR.
- 5.19 This does not constitute a comment on the EIR.
- 5.20 This is a financial issue addressed in the RTP, but is not part of the environmental analysis.
- 5.21 We concur that PM10 standards would not be met and this conclusion is noted in the EIR as a significant unavoidable impact.
- 5.22 The second effect discussed is PM10 and is described and analyzed on page 3-16.
- 5.23 Suggested language is not substantially different from stated language. PM10 sources, including sea salts, are included in Table 4-3.
- 5.24 The compared statements are essentially equivalent.
- 5.25 These omissions do not affect the environmental analysis or conclusions.
- 5.26 This comment requires no response.
- 5.27 Power outages and access to fuel are not part of the environmental review for the RTP.
- 5.28 This does not constitute a comment on the EIR.
- 5.29 The Airport Layout Plan for the Arcata-Eureka Airport was reviewed and analyzed as part of the EIR and is on file with the County Department of Airports.
- 5.30 The threatened status of the snowy plover is consistent with US Fish and Wildlife Service listing.