

## **The Richardson Grove Operational Project: Consequences & Alternatives**

The transformative consequences of the Richardson Grove Operational Improvement Project (RGOP)<sup>1</sup> are dismissed by Caltrans, and therefore, these concerns have been absent from community dialogue and analysis. The County's media campaign has also done nothing to promote a public discussion about very real threats posed by this project, which will enable STAA trucks to pass legally through Richardson Grove State Park.

For example, Caltrans dismisses the truck traffic consequences of opening the southern access to STAA trucks. Currently, they can only enter Humboldt legally from the north via 101, and, to stay legal, must turn around at RG. There is no legal exit for these trucks, and no legal access to 101 from the south or east. With RG open, truck traffic has to increase, and over time will increase along with development that its freight capacity facilitates. STAA access, in many cases, means simply that the truck's extra length allows for a sleeper cab, another telltale indication that the RG Project is not for Humboldt County, but for the benefit of the long haul trucking industry, and the development it serves.

Caltrans's acknowledges that 101 is a "High Emphasis Route in the Interregional Transportation Strategic Plan,"<sup>2</sup> a "principal rural artery," "a lifeline to the north coast,"<sup>3</sup> and "desirable for those large trucks to be able to drive through the County."<sup>4</sup>

I-5 is currently separated from 101 and the coast by an STAA buffer that stretches 530 miles long from the SF Bay Area to Roseburg and Coos Bay, and is 85-150 miles wide. Proposed "realignments" of 299 through the Wild and Scenic Trinity R., 199/197 through the Wild and Scenic middle Fork Smith R., and Route 20, which are in the works will breach this buffer, linking 101 with I-5. These connected roadways will make STAA truck route circuits that will increase large diesel truck traffic by orders of magnitude, and assure that our goods movement economy is dominated by the trucking industry for a long time, foreclosing the economic opportunities for a maritime highway.

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<sup>1</sup> Humboldt County District 1-HUM-101, PM 1.1/2.2 #464800

<sup>2</sup> Buckhorn Grade Improvement Project, Caltrans

<sup>3</sup> "My Word," Times-Standard, by Charlie Fielder, D-1 Director, Caltrans, 3/18/09

<sup>4</sup> Forest & River News, Spring, 2008, Trees Foundation, Kim Floyd, RGOP Project Leader

Despite these inevitable, *forseeable* interstate and intra-regional impacts, Caltrans has dismissed them in the DEIR. Instead of acknowledging this impact of increased large truck traffic congestion on our highways and urban centers, with its associated safety, economic, pollution and quality of life issues, Caltrans dismisses it with the glib assurance that bigger trucks translate into fewer trips.<sup>5</sup> Caltrans bases this outlandish assertion on 14 respondents in two counties, reported in the Gallo Report (see pg. 3), some of whom estimated an average of 12% fewer truck trips in their responses to a biased and narrowly focused advocacy survey funded by the County through the Headwaters Fund. The DEIR states: “The proposed project is not expected to result in substantial changes to the volume of truck traffic on Route 101.” (pg 35 DEIR).

Such a claim is disingenuous (see FN 18). Fewer trips would translate into higher freight costs and delays (freight costs are related to distance, weight, volume, etc., and to how busy a route is—slower routes would cost more), negating the supposed benefit to local businesses and consumers. There are many references linking interstate and intraregional transit to the RGOP, and the Highway 199/197 and Buckhorn Grade Projects in their respective DEIRs.<sup>6</sup> Unfortunately, all three treat each project independently with respect to the traffic, safety and pollution effects of the associated interstate and intra-regional impacts, with no consideration of cumulative impacts.

Caltrans, and the County, trumpet the increased efficiency of these newer STAA trucks, without acknowledging a fundamental economic principle known as the Khazzoom-Brookes postulate, which states that increasing efficiency leads inevitably, on the macro-scale, to increased usage. This is consistent with

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<sup>5</sup> “The reduction in the number of trips due to increased efficiency would likely offset any increase in number of trips due to reduced transportation costs, with a result that eliminating STAA restrictions in southern Humboldt County would not significantly change truck traffic.” p34 “The proposed project is not expected to result in substantial change to the volume of truck traffic on Rte 101.” DEIR, p35

<sup>6</sup> E.g. “The project does not include any roadway modifications or other improvements within Humboldt County. However, the project proposes improvements that would facilitate product distribution in this region. Humboldt County is included in the project area for the purposes of this study because of the potential for indirect economic impacts.” (Buckhorn)

“Caltrans has recently proposed a project on U.S. Highway 101 near Richardson Grove State Park that would allow Surface Transportation Assistance Act truck access from the south to Humboldt County. In addition, improvements are being proposed on U.S. Highways 197 and 199 in Del Norte County to allow Surface Transportation Assistance Act truck access from the northeast to Humboldt County.” (Buckhorn)

Caltrans' claim that transportation costs will decline with STAA truck access, since such a decline depends on increased STAA traffic.<sup>7</sup>

In Caltrans' modeled future, overall daily traffic through the Grove will increase about 40% over the next 20 years, but truck traffic will remain proportionally stable, allowing Caltrans to exempt this Project from Mobile Source Air Toxics (MSAT) evaluation.

According to the US DOT, increases in truck size and weight are likely to accelerate the growth of truck transportation, not impede it. In 1982, Congress passed legislation that required all states to raise the maximum allowable Interstate weight limit to 80,000 pounds. Despite the increase in truck weight, the total number of miles traveled by combination trucks increased by 63 percent from 1982 to 1993. By contrast, the miles traveled by passenger cars increased only 51.3 percent during that same period.<sup>8</sup>

Therefore, the sobering relationships between, and statistics regarding, large trucks and fatal crashes, or large trucks and local highway maintenance costs, or large trucks and noise or air pollution, or large trucks and pedestrian safety, have been conveniently ignored in the limited public discourse.<sup>9</sup> Although these large trucks represent less than 3% of vehicles, they are involved in 13-14% of fatal crashes, and 98% of the fatalities in car vs. truck accidents are the automobile passengers.<sup>10</sup>

The only safety issue that Caltrans addresses is that of vehicular traffic within the Grove itself. Caltrans summarizes the vehicular accident history in the DEIR. Caltrans is careful to position safety as a collateral benefit of road re-alignment rather than a primary purpose of the project, thereby avoiding any

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<sup>7</sup> Harry D. Saunders, "The Khazzoom-Brookes postulate and neoclassical growth." *The Energy Journal*, October 1, 1992. & *The Efficiency Paradox* by Jeff Rubin, November 27, 2007.

<sup>8</sup> Highway Statistics Summary to 1995, Federal Highway Administration, U.S. DOT, 1995, p. V-14

<sup>9</sup> "Increasing Truck Sizes and Weights Threaten Safety and US Highways and Bridges," Advocates for Highway and Auto Safety, before Congressional Subcommittee, 7/9/08.

<http://www.saferoads.org/dangers-large-trucks>

<sup>10</sup> Advocates for Highway and Auto Safety, 7/9/08, pg 3, citing Fatality Facts, 2004, Insurance Institute for Highway Safety

consideration of far cheaper and easier solutions to the vehicular accident problems in RG, such as slowing traffic. Such a solution would be consistent with Caltrans' own evidence. Of the nearly 200 accidents recorded by Caltrans in the DEIR, most were related to collisions with trees or other vehicles, many caused by speeding and/or inattention. Trucks were not over-represented in these statistics, and there were no truck vs truck accidents.

As pointed out in the Park's comments to the DEIR, the proposed road alignment brings old growth redwood trees perilously close to the roadway, where the accident statistics reveal speeding and inattention account for most vehicular collisions against other vehicles (not trucks) or trees.

Caltrans ignores the socio-economic problems of urban truck traffic in Eureka, which was identified in 2003 by their contractor as a significant "constraint on economic development":

"Traffic congestion on US 101 in Eureka's commercial and retail areas due to heavy overlapping uses for trucking, through traffic, and local traffic."<sup>11</sup>

Therefore, Eureka has been deprived of an opportunity to weigh the impacts of large diesel trucks, many of which may simply be passing through while others may ply adjunct streets ill-equipped to handle them. Opponents of STAA access through Princeton, NJ, warn of the safety, pollution, and quality of life degradation that will accompany STAA truck access to their urban thoroughfares. They, too, appear to have main routes lined with parked cars, a dangerous condition existing in Eureka that is worsened by large truck traffic.<sup>12</sup>

Humboldt County road conditions are even more degraded than the state's. Humboldt County Public Works Director Tom Mattson compared the condition of our roads to the edge of a cliff, on the precipice of irremediable failure.

In July, 2008, Advocates for Highway and Auto Safety testified before Congress that "Heavy trucks are overwhelmingly responsible for pavement damage," demonstrating that:

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<sup>11</sup> (Cambridge Systematics, on Constraints on Economic Development, 2003)

<sup>12</sup> Citizens for a Safer Route 206, rte206@yahoo.com

“...the amount of damage done to roadways is not linear to the weight of the vehicle, but exponential to the fourth power. So a truck weighing the interstate limit of 80,000 lbs exceeds 163,000 times the damage of a 2-ton car.”

([www.pavementinteractive.org/index.php?title=ESAL](http://www.pavementinteractive.org/index.php?title=ESAL))

In other words, a 20,000 pound single axle consumes 1000 times more pavement life than a 2000-pound single axle, a typical axle weight of a mid-sized passenger motor vehicle. ([www.sdot.com/docs/SDDOT\\_Truck\\_Briefing\\_2d.pdf](http://www.sdot.com/docs/SDDOT_Truck_Briefing_2d.pdf))

Similarly, despite Del Norte County’s straightforward disclosure in their STAA access plan that Home Depot and Wal-Mart are significant beneficiaries of, and lobbyists for, STAA access,<sup>13</sup> Caltrans dismisses the implications of this frank admission, claiming instead that there is no “latent need” for such businesses in our County. However, the proposed Eureka Marina Center, whose owner has been airing continuous radio ads supporting the RGOP, includes a Home Depot (or other large franchise store). Obviously, STAA access will benefit, at a minimum, the development of this Home Depot, and allow the servicing of potentially other large franchise store development all along the 101 corridor back and forth through Humboldt County, including adjunct roads, as proposed real estate developments are realized.

There has been no analysis in the RGOP DEIR (or in the Marina Center DEIR) of the cumulative impacts of STAA truck traffic added to the 16,000 additional vehicle trips, nearly 2,000 of which will occur at peak hours, anticipated in the Eureka Marina Center Plan.<sup>14</sup> Adjunct STAA roadways may include the proposed Waterfront Drive, which is a critical component of the Marina Center Plan. Traffic congestion in Eureka could fuel public demand for a bypass, a foreseeable eventuality that is never considered by Caltrans. Perhaps it is an unrevealed intention to fuel such a public demand.

Again, Caltrans has avoided public discourse on the traffic, safety, business, and quality of life implications of this consequence by simply claiming they are unlikely. There has been no discussion linking STAA access to the economic impacts in our communities if low-paying, no-benefit jobs replace good ones, as

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<sup>13</sup> “[T]he growth of retail business is similarly impeded. Home Depot opened a store in Crescent City in 2006-along with WalMart...but its trucks must re-load their cargo in Oregon from 70 to 45-foot trailers prior to traveling through Del Norte County.” Del Norte County STAA Access Plan)

<sup>14</sup> "Marina Center", Appendix P, page 3. <<http://www.ci.eureka.ca.gov>>

local businesses succumb to the lopsided competition of large franchise stores which will be facilitated by the RGOP. Similarly, Caltrans has never cited any example where bigger truck access has reduced truck traffic. In fact, the reverse is true, because dependence on truck transport breeds increased truck traffic (see FN 18).

We enjoy an increasingly rare and enviable quality of life here, in no small measure due to our geographic advantages, as recognized in a 2003 Caltrans contracted report:

“The county’s relative geographic isolation has spared it from some of the sprawl and growth pressures that have impacted many of California’s coastal communities, lending the area a quality of life cherished by residents.”<sup>15</sup>

Caltrans relied on a pair of very biased and narrowly focused on-line surveys that included only 19 complete responses in two counties to conclude that the RGOP would be economically beneficial to local businesses.<sup>16</sup> The Report itself seems to reject this use of the data: “The quantitative impact of the STAA truck restriction on Highway 101 at Richardson Grove on industry sales is particularly difficult to estimate...”<sup>17</sup> No attempt was made to evaluate the potential consequences of big box store competition, or other equally plausible detriments.

Caltrans avoided comparing potential preferable alternatives for moving goods into and out of the county by limiting the purpose of the RGOP to allowing STAA trucks to pass by one another in opposite directions legally through Richardson Grove.<sup>18</sup> With no feasible alternative to such a limited purpose, Caltrans avoids the federal statute designed to protect our treasured public parks, as pointed out by the California State Park Foundation in their comments to the RG DEIR:

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<sup>15</sup> Cambridge Systematics, 2003)

<sup>16</sup> Surveyed businesses account for only 18.6% of local sales, 9.3% of local employment, and 12.3% of total income earned by residents and businesses of Humboldt and Del Norte counties. Industries in the analysis comprise 15% of total area truck transportation costs, and 26% of non-local truck transportation costs. “Realigning Highway 101 at Richardson Grove: The Economic Impact on Humboldt and Del Norte Counties,” by Dr. David Gallo, for Caltrans, April, 2008, and DEIR p35.

<sup>17</sup> Ibid., Gallo Report, p 10

<sup>18</sup> DEIR 1.2, pg2

“Based on the environmental documentation provided, CSPF does not believe this [Richardson Grove] 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) plainly bars the use of parklands for transportation projects absent exceptional circumstances, and such circumstances have not been demonstrated for the Project...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.”

Another unfortunate casualty of Caltrans’ no alternative strategy is our port. Implementation of the RGOP would decrease the competitiveness of short-sea shipping, for example, and appropriate development of Humboldt’s nascent port.<sup>19</sup> Because of the efficiency and cost-effectiveness of a maritime highway, federal interest in, and funding of, its development has never been higher, especially if non-fossil, or non-carbon fuels are employed.<sup>20</sup>

James Oberstar, chairman of the federal House Transportation and Infrastructure Committee, emphasizes the role of maritime freight transport:

“Maritime transportation will not be overlooked in future transportation policy and strategy,... We’re going to transform the future of transportation in America, and put maritime in the front ranks. We also need to embrace short sea shipping. Congress should consider tax credits for trucking companies that shift

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<sup>19</sup> “Every time there has been a truck size and weight increase, bigger truck proponents have promised that it will mean fewer trucks, but the facts show that it simply is not true. After increases in truck size and weight, truck traffic grows disproportionately faster than car traffic. Additionally, bigger and heavier trucks create a reliance on trucks as a mode of moving freight and increase highway dependence. When trucks move more freight, it is diverted from other modes, thereby reducing the amount of money that is earmarked to develop and maintain the infrastructure of other modes. Once freight is diverted from other modes of freight they may never be an option again.” (Coalition vs. Bigger Trucks)

<sup>20</sup> The U.S. Maritime Administration is working to designate marine highway corridors. NCJ XXXX “In particular, DOT is interested in exploring the use of hydrogen for public transit buses and for certain types of waterborne vessels. This includes shuttles, ferries, and deepwater passenger and freight vessels. Long-term efforts will seek to fully integrate hydrogen power and fuel cell technology across all marine craft platforms and in stationary port power applications.” [http://hydrogen.dot.gov/publications/hydrogen\\_roadmap](http://hydrogen.dot.gov/publications/hydrogen_roadmap)

freight from the highway to water.” “... it stands to be good public policy to get thousands of trucks off the highways and even some railcars off the rails.”<sup>21</sup>

This is particularly noteworthy given the presence of the Schatz Energy Lab at HSU, “...which produced both the first street-legal hydrogen fuel cell vehicle and the first solar-powered hydrogen energy system in the United States,”<sup>22</sup> and is currently producing methane from our landfill. Such non-petroleum sources for carbon-based fuels result in no or negative GHG contributions to global climate change, a fundamental component of this commission’s mission.<sup>23</sup> One of the long-time Directors of the Humboldt Bay Harbor, Recreation & Conservation Board, Dennis Hunter, predicted, “...short-sea shipping is going to be the new wave.”<sup>24</sup>

Costs of maritime shipping are very resistant to rising petroleum fuel costs, and therefore future carbon taxes, whereas long-haul trucking costs are particularly sensitive to such increases.<sup>25</sup> By contrast, STAA truck access is not expected to improve energy conservation.<sup>26</sup>

For all these reasons, the CTC has embraced short-sea shipping and the maritime highway in a letter from Director Will Kempton to the Commissioners of the Humboldt Harbor District: “I encourage you to reach out to other west coast ports and develop a partnership in short-sea shipping, as this has been a continuing focus of the Maritime Administration. The new authorization of the federal transportation bill will give more consideration to the Marine Highway, recognizing its role in relieving congestion on major corridors, such as Interstate 5 and US Highway 101.”<sup>27</sup>

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<sup>21</sup> “Oberstar: Highway Bill to Redesign DOT,” by R.G. Edmonson 6/9/09 The Journal of Commerce Online - News Store <http://www.joc.com/node/411767>

<sup>22</sup> “Peter and the Fuel Cell,” NCJ, 8/17/96 <http://www.northcoastjournal.com/081706/cover0817.html>

<sup>23</sup> “Working to incorporate climate change emission reduction measures into the planning, programming, and implementation of transportation projects.” CTC

<sup>24</sup> Dennis Hunter, NCJ 11/2008

<sup>25</sup> TEMS, inc. “Truck line haul prices rise faster.ppt, [kmorningstar@temsinc.com](mailto:kmorningstar@temsinc.com)

<sup>26</sup> “Even the latest high-end tractor-sleeper cabs speculate being able to have only a modest (10-15%) improvement to fuel economy. ...it is anticipated that average fuel economy for tractor rigs would not change substantially.” Richardson Grove DEIR 78

“Thus it is anticipated that there would be no significant change in energy conservation as a result of the project.” Richardson Grove DEIR 78

<sup>27</sup> Letter from Will Kempton to HBHR&CD, Ca DoT, 6/8/09

None of these critical issues and impacts has been adequately aired with the public, or subjected to political debate. Instead, we have been lulled into complacency by a largely publicly funded and deceptively misleading media campaign into considering the RGOP beneficial with no downsides, or at minimum, a trivial project with much “bang for the buck.”

For example, local residents have no idea that the American Trucking Associations (ATA) is lobbying Congress to increase STAA truck weight limits from the current 80,000 lbs to 97,000 lbs,<sup>28</sup> a change that would worsen many of the above hazards associated with large diesel trucks.<sup>29</sup> Or that many local industries do not need these trucks, as acknowledged by Caltrans in the DEIR: “...There is a maximum weight restriction for loads as well as maximum length of cabs and trailers, and that for heavy loads, the economic advantage for the larger [STAA] vehicles is not there,” leading CalTrans to conclude that the “Proposed project would not result in significant increases in overall economic productivity in the region.” (DEIR 44-45).

Even the President of the local Cattlemen’s Association, Jorie Brundy, observed:

"While we respect those concerns we hope they come to realize that the road is actually wide enough to allow trucks with 48-foot trailers that have a kingpin to rear axle setting of 43 feet to pass safely through Richardson Grove, allowing Humboldt County producers to ship their product to market in a safe and timely manner.”(Brundy is the president of the Humboldt/Del Norte California Cattlemen's Association and Humboldt’s brand inspector for California Department of Food and Agriculture).

Times have changed radically since local and regional government support for the RGOP was consolidated a decade ago. Although plans for the RGOP are well advanced with the FEIR due soon, we petition this commission to delay funding until, at a minimum, public and political deliberation of these matters can be fully re-considered in light of contemporary innovation in transportation modalities, climate change considerations, and a comprehensive socio-economic perspective. Supporters of the RGOP like to say that we need both STAA

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<sup>28</sup> <http://www.logisticsmgmt.com/article/CA6652366.html>

Truckers face uphill battle over truck size and weight modernization

*John D. Schulz, Contributing Editor -- Logistics Management, 4/17/2009*

<sup>29</sup> Comprehensive Truck Size and Weight Study, US D.O.T., 2000., [www.fhwa.gov](http://www.fhwa.gov)

access *and* a maritime highway, ignoring, again, all the adverse consequences of allowing these large, and growing, diesel trucks to traverse our county.

### **The Grove**

Native Americans consider RG and its environs a spiritual sanctuary, and the RGOP an assault on that sanctuary. Please refer to the Intertribal Sinkyone Wilderness Council letter of January 29, 2009, and their website for further information.<sup>30</sup>

The trees in RG are in a long and well-tested balance with 101. There is not the die-back one sees along 101 north of the Grove, or along Avenue of the Giants. These road surfaces, along with edge effects, are killing these ancient trees. Modern road building, irrespective of how carefully engineered or laid down, compact tree roots in ways that have never been studied. Therefore, Caltrans' claims that the realignment widening will have no adverse impacts on the 28 affected ancient trees have no merit. And there is no penalty, and certainly no resurrection, when things go awry!

Caltrans conflates structural with functional root zones in justifying the cutting compacting, or otherwise manipulating the roots of 28 old growth redwood trees, with no scientific basis to conclude that such cutting is benign, other than the unsupported assertion of Save the Redwoods League's arborist. The arborist never considered any empirical evidence regarding such cutting, and never cited any scientific literature to justify his conclusion that there would be no harm.

Richardson Grove is federally designated marbled murrelet habitat, and there is no data regarding murrelet presence in the Grove. Despite the dearth of data, and the tragically inevitable extinction south of the Grove, Caltrans proposes to conduct murrelet surveys only *after* the project! Unfortunately, the wildlife agencies have signed off on this threat to recruitable habitat because it has been theoretically too difficult for the seabirds to utilize it. But murrelets have never had fewer choices, so adaptive behavior is ignored in these deliberations, despite the murrelet's perilous proximity to extinction.

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<sup>30</sup> This letter constitutes the **InterTribal Sinkyone Wilderness Council's** response to Caltrans' Draft. Environmental Impact Report (DEIR)/Environmental ... [www.wildcalifornia.org/.../1252625918\\_InterTribal\\_Sinkyone\\_Comment\\_Letter.pdf](http://www.wildcalifornia.org/.../1252625918_InterTribal_Sinkyone_Comment_Letter.pdf) -

Sincerely,