

2727 Graham Road  
Bayside, CA 95524  
September 17, 2007

Mr. Rod Parsons  
Chief, Environmental Branch E-1  
California Department of Transportation  
P.O. Box 3700  
Eureka, CA 95502-3700

Dear Mr. Parsons:

These comments are submitted in response to the Draft Environmental Impact Report/Statement (Draft EIR/S) (Draft) for the proposed Eureka – Arcata Route 101 Corridor Improvement project. I am a resident and property owner in the Bayside area, and am directly affected by the proposed project. In summary, the Draft is based upon faulty assumptions, improperly excludes feasible alternatives and does not consider the full range of impacts of the alternatives that are analyzed.

First, the Draft conjoins two independent projects that have been brought together for the purpose of environmental analysis. The project's purposes that are accomplished through Caltrans' objective to resurface restore and rehabilitate the pavement and roadway can be achieved, to the extent necessary, without regard to any of the safety project options. The analysis of the safety alternatives should not be confounded with the pavement and roadway needs that Caltrans and the Humboldt County Association of Governments (HCOAG) have identified and prioritized. These comments deal only with the safety corridor portion of the overall project.

The principal conceptual flaw that limits the analysis in the Draft is the unspoken assumption that it is necessary to have traffic move at 65 mph through the approximately four miles of Hwy. 101 between Airport Road and the Bayside cutoff. The Draft concedes, with its proposed inclusion of a traffic signal at Airport Road in Alternative 3, both that a traffic signal at that location is feasible, from a safety and an operational standpoint, and that any level of service and operational problems that may result from the traffic signal are manageable. Further, as the Draft specifically notes, Route 101 becomes a freeway north of the Bayside cutoff. In essence, this means that Caltrans and HCOAG propose to spend \$30 million in order to achieve the difference between 50 mph and 65 mph for that approximately four miles of driving. That difference amounts to about 1 minute of saved time per vehicle. Given the other analytical flaws in the analysis, the environmental and social consequences of building a freeway in that four mile stretch are not worth the more than \$30 million cost in order to save drivers about 1 minute of travel time. This is particularly true because the real bottleneck to through drivers on this highway (whether long haul truckers or vacationers, or Humboldt County residents traversing the "metropolitan" area between Fortuna and McKinleyville) is not this four-mile corridor but rather the long stretch of Route 101 through Eureka, which

presents operational and level of service difficulties far beyond any contemplated in this Draft for this road segment.

The principal flaw in the Draft analysis itself is its complete failure to consider the potential impact of the sea level rise that most Americans, and essentially all scientists, think is the inevitable consequence of the global warming that is occurring today. Route 101 is built roughly at sea level, in the middle of the Humboldt Bay that existed before European settlers diked the bay in its present location. The Draft's authors may believe that the creation of a new high seawall is as inevitable as the sea level rise, or that a revitalized railroad may take care of the problem for them by building its own seawall, or that global warming is a myth, but we'll never know because they don't discuss it. This flaw alone, the failure to consider a significant effect, requires that Caltrans either abandon the project or prepare a subsequent EIR because this is a significant impact that was not considered in the preparation of the initial draft EIR. If Caltrans does choose to prepare a new EIR, it should consider, among other things, the dubious likelihood of approvability of a seawall to protect new development under the Coastal Act and the desirability of rebuilding Route 101 as an elevated causeway to allow water to flow inland and create greater connectivity between the Bay and the wetlands inland of Route 101.

A second flaw in the draft analysis is its failure to consider adequately the effect upon traffic on Old Arcata Road between Samoa Road and Indianola Road of the alternatives that close the median crossing of Route 101 at the Bayside cutoff. Old Arcata Road in this area consists of two parts: an urbanized northern segment between Samoa Road and Jacoby Creek Road, partly within the City of Arcata, with a school zone and speed bumps, in which traffic moves at 15-25 mph, and a more rural segment from Jacoby Creek Road south to Indianola Road, on which traffic flows at 40-50 mph but does so on a narrow and winding country road on which residents sometimes feel compelled to put up handmade "Slow Down" signs to try to protect their children from impatient drivers.

The Draft states that this road may be improved when the County is able to obtain funding. Most visitors and residents of this area, particularly south of Jacoby Creek School, take access to Route 101 at the Bayside cutoff. Closing this access will inevitably cause those drivers to access 101 either at Samoa Road or at Indianola. The impacts, both temporary and permanent, upon these segments of Old Arcata Road are either not analyzed or are dismissed. But these impacts are real, and will only worsen with increased residential development in this area. The brunt of these significant impacts will fall upon the County, which will be forced to deal with the consequences, either political (of not improving Old Arcata Road), or fiscal (of widening and improving the road). It should be emphasized that these are not consequences of improving Route 101, but solely of closing the median at the Bayside cutoff.

There is a potential solution to these problems that Caltrans chose not to analyze among its alternatives, because it became fixated upon a freeway alternative in its definition of project need and purpose. This alternative would be to maintain this four mile stretch of Hwy. 101 as a safety corridor with a limited speed not to exceed 50 mph and, when

necessary, to install traffic signals at Airport Road, Indianola Road, and the Bayside cutoff. This four mile segment then would gradually evolve to become a boulevard, a divided highway that serves as a transition segment between the urban 101 of Eureka, and the freeway to the north. In effect it would be a compromise between Alternative 3 and the no-project alternative. Because Jacobs Ave. traffic could access 101 at Airport Road, the Cole Avenue access could be closed. Whether any additional traffic signals would prove necessary or desirable could be determined based upon the particular circumstances at each intersection, as traffic patterns and use change over the next twenty years, rather than as part of a grand “one size fits all” scheme.

This alternative would solve the safety and operational conflicts that form the heart of the project’s “Need and Purpose” in the Draft. It would allow Caltrans to quickly pursue its “resurface, restore and rehabilitate” objectives, to the extent necessary, in the corridor. It would substitute a minor time inconvenience for through drivers on Route 101 for the safety benefits that have been at the heart of the impetus for improvements to this corridor from the inception of this project. Even this driving-time inconvenience could be minimized through use of the sophisticated timing devices available for traffic signal control. As noted earlier, Caltrans has already conceded that the level of service problems can be handled by signalization at Airport Road. The rejection of signalization at Indianola Road was based upon the assumption that all other median crossings would be closed and the further assumption that nine lanes would be needed at that intersection. No data was presented in support of that assumption. Northbound traffic from Simpson, for example, would presumably U-turn at the Airport Road intersection, and this did not eliminate the signalization alternative there.

Further, this alternative would allow for the possible development of a dedicated bicycle/walkway alternative corridor with greater access from the Bayside community, whether as part of this project or in one of the separate configurations that have been discussed in the community. Development of a dedicated bicycle/walkway alternative corridor would significantly advance the non-automobile objectives of the Caltrans mission, allowing for safe use of this corridor for non-motorists. The Draft does not adequately discuss the corridor as a means of non-automobile transit, and forecloses access for bicycles and pedestrians from east of 101 except at Indianola. For the reasons discussed above in relation to “forcing” traffic onto Old Arcata Road, bicycling along that road, particularly south of the Bayside cutoff where the edge of the driving lane is the edge of the highway, is a very dangerous activity.

In addition, because it would reduce out of direction travel and better regulate high speed travel this alternative would also reduce energy consumption. Neither the increased energy use from the out of direction travel mandated in all of Caltrans’ alternatives, nor the increased energy use from a 65 mph freeway as compared to a 50 mph expressway are analyzed in the Draft. Finally, it would minimize the expenditure of public funds in two important ways. First, in the short run, this alternative is significantly less expensive than any of the three alternatives proposed by Caltrans, probably by a factor of \$20-30 million. Second, it will prove to be significantly less expensive in the long run, by allowing Caltrans not to commit to any particular built roadway different from what

presently exists until significantly more information about the extent of sea-level rise becomes available. Caltrans rejected signalization in part because it might have “limited longevity”, but in the context of assessing sea level rise, this saving of public funds instead could prove to be a huge advantage.

For all of these reasons, I urge Caltrans to abandon this project in its present form, and embrace this discussed alternative. I believe that this alternative would be just as safe, would be substantially cheaper, and would adequately accomplish all of the project purposes except that it would slow the transit time between the Bayside cutoff and Airport Rd. by about one minute. In addition, it would reduce energy consumption, better allow for a dedicated bicycle/pedestrian corridor, and best preserve options for adaptation to whatever the consequences of sea level rise turn out to be for Humboldt County. Last, if, as Caltrans hypothesizes, drivers begin to ignore the speed restrictions in this four-mile safety zone, a tiny fraction of the proposed cost of this project could endow a full time CHP officer to patrol the project area.

If this alternative is not acceptable to Caltrans or to HCOAG, then a number of impacts need initial analysis, or further analysis. As stated earlier, the Draft does not consider the effects of sea level rise upon any of the project alternatives, so if any of those alternatives are going to be pursued, then a new EIR should be prepared. The effect of this impact is so significant that it pervades the entire analysis. Other impacts that need analysis or additional analysis include but are not limited to:

1. The desirability of a guardrail-separated bicycle/pedestrian pathway as an integral part of any project in this corridor. It is sad, and somewhat scary, to see bicyclists commuting on the side of Hwy. 101 now. One can only speculate at the increased number of commuters who would gladly walk or bike in this beautiful corridor if a safe and dedicated path existed. Caltrans is the state transportation agency, whose mission is supposed to include more than high-speed automobile transportation. Given the carbon impacts of highway traffic, Caltrans should be including dedicated separated bicycle lanes whenever it upgrades any of its highways in an area where bicycle commuting is a possibility. In addition, if the median crossing at the Bayside cutoff is to be closed, then the project should include guardrail-separated bicycle/pedestrian corridors on both sides of Route 101 throughout the length of the corridor.
2. A further benefit of guardrail separation is that it would eliminate the need to remove the various mature trees in the corridor as part of what Caltrans calls a “clear recovery zone”. Because the terrain on the sides of the roadway is not flat, the “clear recovery zone” is not necessarily a safer alternative than the existing situation. A guardrail would seem to be a better alternative for safety, and would also eliminate the need to remove the mature Monterey cypresses, Monterey pines and eucalyptuses that presently benefit the visual landscape.
3. The public transit alternative needs additional analysis. For the same reasons as discussed above, public transit improvements should be a part of any Caltrans highway improvement project where public transit is feasible and operative. The Draft rejects public transit improvements on the basis that “expansion of public

- transit alone would cost approximately \$90 million more than the proposed Build 2 Alternative”. This means that Caltrans thinks that improving public transit would cost in excess of \$150 million. This is a classic example of making up a number to justify a conclusion. It is inconceivable that public transit authorities would think that it would take \$150 million to improve public transit in this corridor, and there is no data to support this conclusion in the Draft.
4. There is no analysis of the visual impacts of placing an interchange with a raised roadway at Indianola Road. This proposed interchange would drastically affect the viewshed from a number of locations along Old Arcata Road, Indianola Road, Route 101 itself and across the water of Humboldt Bay. Aside from its aesthetic problems, this interchange is inconsistent with the Coastal Act policy requiring the protection of views to and along the coast, an inconsistency that could doom any ultimate approval by the Coastal Commission.
  5. Finally, the growth-inducing impacts of placing an interchange at Indianola Road are dismissed without analysis. One large commercial development has recently been constructed east of the proposed interchange, and it is presently known to Caltrans planners that the City of Eureka has significant plans for additional commercial development in that area. The two most significant constraints to additional commercial development in that area are traffic congestion at the Indianola Road/101 intersection and inadequate septic capacity in the historic wetlands upon which the present commercial development exists and the proposed commercial development would be placed. The potential synergistic effect of “solving” one of those problems with a freeway interchange cannot be ignored, and should be analyzed in any future EIR.

The above discussion is not meant to be an exhaustive list but rather highlights of the deficiencies in the existing Draft. I strongly urge Caltrans to abandon the project as proposed in any of the alternatives discussed in the Draft, and instead develop a proposal along the lines suggested in this letter. At a cost of approximately one minute per vehicle, every other objective of the project can be attained, with the additional benefits of saving at least \$20-30 million, reducing energy consumption, postponing serious construction alternatives until the effect of future sea level rise is better understood, reducing or eliminating visual and growth-inducing impacts, and reducing or eliminating the impacts of diverted traffic upon Old Arcata Road and the County of Humboldt. which ultimately would be forced to deal with those impacts.

Sincerely,

Ralph Faust