



Keeping Northwest California wild since 1977

April 16, 2015

To: Gabriel Corley, CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

Sent via email transmission to ctp2040@dot.ca.gov

RE: Comments regarding March 2015 Draft of the California Transportation Plan 2040

Dear Mr. Corley:

I am writing on behalf of the Environmental Protection Information Center (“EPIC”), a nonprofit organization that advocates for science-based protection and restoration of Northwest California’s forests. On behalf of more than 20,000 supporters and members, EPIC appreciates this opportunity to provide comments and recommendations regarding the March 2015 Draft of the California Transportation Plan 2040 (CTP).

EPIC has several major concerns when it comes to long-range planning for California Transportation:

1. Connectivity
2. Prioritizing maintenance projects over new projects
3. Transparency in the planning and decision-making processes
4. Integrating community concerns into the project planning and decision-making processes

Foremost, we would like to see Caltrans integrate the California Essential Habitat Connectivity Plan into practice. The CEHC identifies 192 Essential Connectivity Areas, which serve as wildlife habitat corridors. These places “represent principle connections between the Natural Landscape Blocks within which land conservation and management actions should be prioritized to maintain and enhance ecological connectivity. Each Essential Connectivity Area connects from 2 to 15 (on average 4.3) Natural Landscape Blocks across distances averaging roughly 10 to 20 km. In addition to these Essential Connectivity Areas, there are 522 instances where Natural Landscape Blocks were separated only by a road—in which case there was no need to delineate a connecting

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polygon, because sustaining and enhancing functional connectivity across roads is the primary or only conservation action needed (Chapter 6). In addition, the map illustrates that numerous riparian corridors contribute to ecological connectivity throughout the state; and sustaining and enhancing riparian and riverine corridors should remain a high conservation priority whether they are inside or outside of Essential Connectivity Areas and Natural Landscape Blocks.”

It is imperative that Caltrans actively work to implement the goals of the California Essential Habitat Connectivity Plan into practice and establish a functional network of connected wildlands—habitat passageways that allow wildlife to move freely to search for food, find a mate, migrate, to keep genetic diversity strong and to seek refuge in response to a warming climate.

As per the recommendations of the State Smart Transportation Initiative (SSTI) it is time for Caltrans to focus on maintaining existing roadbeds and moving away from the era of Interstate building. The far north coast of California has four major project proposals slated for construction that are prime examples of “stuck in the past” project planning: Richardson Grove Improvement Project, Highway 197/199 STAA Project, Willits Bypass and Buckhorn Summit.

These are giant earth-moving projects that are designed to facilitate faster, unfettered STAA truck access to Northwest California. The Richardson Grove Project and the 197/199 Project are tied up in Court because of Caltrans’ lack of adherence to environmental laws. Both are highly controversial projects, which have been thrust on the community with little to no dialogue about the consequences that creating thoroughfare STAA truck access would have on Humboldt, Del Norte and Mendocino counties.

The Willits Bypass has been aggressively advanced despite public opposition, lawsuits and direct action. The project has seen a laundry list of environmental violations and was even shut down by the Army Corp. of Engineers for failure to adopt and fund a proper mitigation plan. There was the collapse of the viaduct construction which, fortunately, didn’t hurt anyone; however, the collapse spilled toxic chemicals into the nearby salmon-bearing creek system possibly devastating the fall run of Chinook salmon, as well as the destruction of several registered Native American cultural sites.

The Buckhorn Summit Project is currently under construction and is scheduled to open to STAA Trucks in 2017. This new trucking corridor would allow increased goods movement access to the North Coast and may dramatically reduce the need for additional STAA access for the North Coast business community—negating the need for the Richardson Grove and Highway 197/199 Projects. Caltrans should focus on maintaining existing roadbeds and de-prioritize project implementation of additional STAA access projects.

The roadbed most in need of maintenance is Highway 101 south of Crescent City, also known as “Last Chance Grade.” That section of road is on highly unstable terrain and regularly collapses in wet weather. Something needs to be done to maintain connectivity between Del Norte and Humboldt County. Caltrans is proposing a number of options, some of which cost upwards of \$1 billion to move the roadbed safely to the east. This is a project that has an actual and legitimate

need and should be prioritized over projects with limited benefit, high levels of controversy and which does not represent the needs of the North Coast community. However, this project proposes alternatives through Redwood National and State Parks, which would fragment existing protected forests. Because this area is so special, when exploring project alternatives, it is essential to find a way to avoid fragmentation of the state parks, perhaps by constructing a land bridge or other means to facilitate habitat connectivity and the movement of wildlife.

It must become a mandated Caltrans policy that all planning documents pertaining to a project with an open public comment period must be available for public review. There have been many documented instances where Caltrans has denied the public the ability to view the documents associated with an active project, which is in direct violation of the Freedom of Information Act. Laws like this are in place to provide transparency of project impacts, and must be integrated as part of the CTP.

SPECIFIC CHANGES TO BE MADE IN THE CTP:

Page 6 references the California Essential Habitat Connectivity Study (CEHCS) as a document used to develop policy for the CTP. Page xiii of the CEHCS identifies “522 instances where Natural Landscape Blocks were separated only by a road.” In these places, land bridges need to be installed whenever feasible over new roads to connect essential connectivity areas.

Page xiii of the CEHCS goes on to recognize “that riparian corridors contribute to ecological connectivity throughout the state; and sustaining and enhancing riparian and riverine corridors should remain a high conservation priority.” In order to make these areas a high priority, there must be a statewide policy that protects riparian and riverine corridors from new road-building.

Page 71 describes policies and strategies to support a vibrant economy. In the case of the North Coast, a vibrant economy would be destroyed by allowing STAA access, which would facilitate the development of multinational corporations that put small mom and pop businesses out of work and provide poverty wage jobs. STAA roads would also destroy the rural character of many of these places, which depend on eco-tourism. Giant trucks going through places like Richardson Grove and the Wild and Scenic Smith River could devastate the tourism economy in these regions, which depend on the rural character, natural beauty and peaceful setting to attract visitors from all around the world. In order to promote efforts to support a vibrant economy for these types of rural areas, a policy needs to be added to protect vibrant rural economies from unnecessary road development that would facilitate large truck transportation to serve a few multinational corporations that do not put significant money back into the economy the same way that small businesses return money to their communities.

A 2003 Caltrans’ Cambridge Systematics study summed up the benefit of not widening Highway 101 through Richardson Grove State Park, and retaining the critical buffer between Highway 101 and Interstate 5: “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.”

In Chapter 6, many of the policies and strategies are to improve outreach and education, expand collaboration and community engagement, etc., but they fail to include policies and strategies to

integrate community input into the decision-making process and planning documents. The purpose of consulting with the public is to integrate and address their concerns, not to just listen to their concerns. These policies and strategies need to be revised to ensure that community concerns are integrated into projects. One example of where these revised policies and goals would have helped protect important Native American cultural resources is in the Willits Bypass. Tribes were consulted, Caltrans was notified of the location of many cultural sites, and Caltrans paved over them. Once these sites are destroyed, there is no recourse to recover them. Caltrans must have policies that it adheres to in order to avoid these types of blunders and to protect cultural and environmental resources. Policies and strategies must be amended to integrate public comments in the planning documents.

On page 1 of the introduction, the sixth goal states to “Practice Environmental Stewardship.” Records show that Caltrans has repeatedly violated environmental standards by not complying with environmental laws. How can Caltrans guarantee that these laws are adhered to?

To summarize, Caltrans must fully integrate the California Essential Habitat Connectivity Plan into practice to establish functional wildlife corridors across the state; focus on maintaining existing roads and de-prioritize new Interstate construction; and increase transparency and inclusion of public concerns in decision-making.

Thank you for this opportunity to provide input on this matter. Feel free to contact me if you have any questions or would like further clarification of our comments. Please keep us updated on this matter, and respond by mail how you will integrate our comments into your future operations.

Respectfully,



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